



PLANNING STATEMENT ADDENDUM

18/505157/OUT: Outline application with all matters reserved apart from the means of access for residential development of up to 60 dwellings (with an illustrative layout to demonstrate adequacy of emergency and service access together with parking and indicative mix of house types, principles of landscaping ecological enhancement and surface water management) at land north of Sanderling Way, Iwade.

 Land North Of Sanderling Way Iwade Kent ME9 8TJ

Prepared by Hume Planning Consultancy Ltd

On behalf of Boat House Properties Limited

Our Reference: HPC_1542

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1. Introduction

- 1.1 This Planning Statement Addendum has been prepared on behalf of Boathouse Properties in support of the following development proposal at Land North of Sanderling Way, Iwade, Kent, ME9 8TJ:

Outline planning application with all matters reserved apart from the means of access for residential development of up to 60 dwellings (with an illustrative layout to demonstrate adequacy of emergency and service access together with parking and indicative mix of house types, principles of landscaping ecological enhancement and surface water management).

- 1.2 This Addendum has been prepared in response to the recent site visit and discussions with the appointed case officer. This document seeks to clarify the following matters:

- Demonstrate that the appropriate level of open and play space is being provided on-site and as part of the overall open space provision across the allocation.
- Explain how the proposed ecological mitigation can be delivered in conjunction with the proposed drainage strategy.
- Establish that the proposed quantum of development can be comfortably accommodated at the site, with the illustrative layout safeguarding living conditions and meeting the technical requirements.
- Provision of further information regarding sustainable construction measures and completion of the Council's Air Quality Statement Checklist.
- Confirmation on the affordable housing provision and anticipated heads of terms.

- 1.3 Together with this Statement, the following plans and documents have been amended to address the feedback on the application:

- Updated Site Layout and Unit Mix Drawings,
- Updated Design & Access Statement,
- Updated Ecological Overview and Mitigation Report,
- Swept Path Drawings.

- 1.4 The illustrative layout demonstrates how the open space, ecological, drainage and highway considerations have influenced the design process. The masterplan, although illustrative, will establish strong development framework principles to guide a future

reserved matters application. The proposal would accord with the objectives of Policy A17 and in so doing would result in sustainable form of development achieving social, economic and environmental benefits.

2. Open Space Context & Justification

- 2.1 It is relevant to this application that the Policy A17 Iwade allocation as a whole has been planned comprehensively and a collaborative approach has been taken by the Applicant with the landowner GH Dean & Co to the east and Persimmon Homes to the south, both of whom have already received planning approval on their land interests. It was established with LPA officers at an early stage of the design process that this practical approach of working in collaboration would be acceptable. The individual submissions collectively demonstrate that the whole of the allocation to which Policy A17 relates has been planned comprehensively.
- 2.2 The adopted Local Plan Policy A17 identifies the expansion of Iwade, comprising the delivery of a minimum of 572 dwellings and open space across three areas making up the totality of the overall land use allocation:
- To the north where 60 dwellings are proposed
 - To the east where 446 dwellings are proposed
 - To the south where 69 dwellings are proposed
- 2.3 Hybrid planning permission was granted at the Land East of Iwade under reference. 19/503794/HYBRID for 466 dwellings, a 40-hectare country park and new village hall. The southern portion of the allocation area is currently under construction by Persimmon Homes following detailed planning consent for 69 dwellings at Land at Pond Farm (under reference. 19/501332/FULL).
- 2.4 This application involves the remaining land to the north-west portion of the overall allocation and now includes the smaller parcel to the west of The Street (which was also covered within the Land East of Iwade approval with an illustrative capacity of 11 dwellings), where it is proposed to deliver up to 60 dwellings.
- 2.5 In regard to the allocation as a whole, Policy A17 sets out that the masterplan brief will demonstrate a strong landscape framework, include proposals for green corridors, existing and new cycle routes and provide strategic open space and planting. Relating to

the North of Iwade parcel specifically, the policy requires the open space strategy to include the following elements, which have been incorporated into the proposed site layout:

- Provision of green corridors
- Provision of substantial natural green space
- Retention of mature vegetation and hedgerows
- Safeguard and create ponds for biodiversity
- Use of low-density housing to respond to the local character and distinctiveness of the village, marshlands and the local landscape character area.

2.6 The supporting wording to Policy A17 requires the Iwade expansion to provide open space in accordance with Policy DM17 of the Local Plan (Table 1 below). Table 2 demonstrates the approximate distances from the proposed residential development to the different types of open spaces within Iwade, including existing open spaces as well as those areas which are being delivered as part of the allocation. There are a number of existing parks, playing fields and amenity areas within close proximity to the application site, as evidenced by the aerial image at Figure 1.

Types of Space	Quantity to maintain existing levels of provision	Proposed Need	Distance from new development
Parks & Gardens	1.11 ha per 1000 population	19.48 ha	2km of a destination site. 800m of a local site. 400m of a neighbourhood site.
Natural and semi-natural greenspace	4.36 ha per 1000 population	76.50 ha	2km of a destination site. 800m of a local site. 400m of a neighbourhood site.
Formal outdoor sport	1.09 ha per 1000 population	No additional facilities, but contribution to improve existing	800m
Amenity greenspace	0.45 ha per 1000 population	7.90 ha	400m
Provision for children and young people	0.24 ha per 1000 population (2-17 years)	0.50 ha	400m
Formal play facilities	Contribution either on or off site to enhance existing	N/A	N/A
Allotments	0.20 ha per 1000 population	0.35 ha	800m

Table 1: Open Space Provision – Policy DM17

Types of Open Space	Distance from North of Iwade Residential Development
Proposed amenity greenspace, including informal area of play space	100m – on-site
Natural Greenspace/ Ecological Mitigation Area	100m – on-site
Existing Allotments off Elm Tree Avenue	100m
Iwade Country Park	300m
Proposed Formal Play Space in Parcel E1	300m
Existing Woodpecker Park & Proposed Extension	400m
Existing Space Park	650m
Proposed Orchards	250m
Existing Herons Park Playing Field	750m
Proposed Formal Play & Amenity Greenspace (South of Iwade)	1km
Proposed Playing Fields within Country Park	1.5km

Table 2: Open space approximate distances to the proposed development



Figure 1: Aerial image of the wider site in Iwade village (existing open spaces annotated)

- 2.7 A more detailed open space breakdown for the three individual development areas which make up the totality of the allocation is provided below, demonstrating that the requirements of Policy DM17 are being met.

Land North of Iwade (Current Application)

- 2.8 The application site extends to approximately 4.1 hectares in area, 2.1 hectares of which would be developed for housing and the remaining 2 hectares comprising of open space. Because of the need to provide suitable habitat mitigation in line with the requirements of KCC Ecology, it is necessary for 1.5 hectares of this open space to be safeguarded as an appropriate mitigation area. The remainder of the open space on-site (0.5 hectares) would be publicly accessible comprising of an area of amenity greenspace to the western edge of the development and green corridors to the east. As demonstrated on the proposed site layout, this western area of open space shall include an area of informal play on-site.

Land East of Iwade

- 2.9 Comprising the largest area of the allocation, the East of Iwade includes a 40-hectare country park which was granted detailed planning consent in 2021. The Country Park includes designated walking routes, landscaping, new public open space, attenuation basins, playing fields and orchard planting. Additionally, 18.8 hectares of the country park will have restricted public access for ecological mitigation. The Landscape and Open Spaces Parameter Plan (drawing ref, 5598/OPA/SK004) which supported the application, demonstrates five areas of formal open space including play areas spaced throughout the development parcels to the east, as well as further green corridors/informal open space. This includes “Sanderling Green” to the north as informal open space which was based upon principles of strengthening the existing character of the northern gateway to the village, reinforcing the existing landscape structure and responding to the characteristics of the adjoining landscape. This small area of development is now contained within the red-line boundary of the North of Iwade application, and the outline framework ensures that these key landscape principles will be fulfilled.
- 2.10 A primary movement corridor connects the North of Iwade parcel with the neighbouring land to the east of The Street and the adjoining country park. The northern entry point to the park is shown opposite the application site. As indicated in the Committee Report to

the hybrid proposal (paragraph 8.29), further cohesion between the site and the country park area would be capable of being detailed through future reserved matters proposals. These factors are considered to underline the strong likelihood that residents of the development would be able to safely and conveniently navigate the short distance from the application site to the neighbouring country park, as well as the formal open space and play area to be provided in parcel E1 to the east.

Land South of Iwade

- 2.11 The southern development parcel has a similar site area to the application site, equating to roughly 4.1 hectares of which 1.9 hectares of open space is to be created overall. The open space framework consists of a natural play area along the southern edge of the development, enhancement to existing orchard planting to the north and reptile mitigation areas to the north and south of the open space. Therefore, approximately 1.1 hectares of public open space is being delivered at Pond Farm, although it is noted that this figure includes the SuDs basin which would reduce this overall amount. The Council's Greenspaces Manager raised no objection to the application, noting that the provision of open space for 69 dwellings was almost double the requirements of Policy DM17.
- 2.12 The North of Iwade application for 60 dwellings is proposing roughly half the amount of publicly accessible open space in comparison, however taking account of the Greenspaces Manager comments above, this area would be in line with the requirements of Policy DM17 and would provide an equivalent amount of open space overall (2 hectares) for a lower number of dwellings.
- 2.13 This proposal has had to strike a balance between providing a quantum of development compliant with the plan objectives (Policy A17), delivering suitable habitat mitigation in line with the requirements of KCC (Ecology), securing an appropriate level of accessible open and play space to meet the needs of residents of the development and offering a robust area of SANG to offset concerns relating to the impact of the development on the Swale SPA. In reality, the site would function within the context of the wider Iwade expansion area. In this respect, it is considered that the availability of an extensive area of country park immediately adjoining the site would provide an appropriate level of publicly accessible open space and SANG to suitably address the impacts of the development. In addition, 0.5 hectares of amenity greenspace including informal play space, is to be provided on-site to serve up to 60 dwellings.

3. Ecology & Drainage Updates

- 3.1 This amended submission is supported by an updated Ecological Overview and Mitigation Report, prepared by Corylus Ecology. The KCC Ecology comments dated 13th March 2024 confirmed that they are satisfied that sufficient ecological surveys have been carried out to inform the application, however requested that the ecology report takes into account the requirements of the drainage scheme.
- 3.2 The surface water drainage scheme is based upon the principles of providing attenuation for surface water runoff within the site with a controlled discharge to the existing ditch running along the northern site boundary, involving the creation of new drainage ponds and connecting swales. In the long term, the swales will provide foraging opportunities for species present within the site. The Ecology Report considers the impacts of site clearance and the construction phase, including works to the on-site ponds, on protected species and details proposed mitigation, therefore demonstrating that the ecological and drainage strategies can be carried out in conjunction with one another without conflict.

4. Other Matters relating to the Illustrative Layout

- 4.1 This outline application is supported by an illustrative layout in order to demonstrate that the quantum of development is achievable in line with allocation requirements, which has been influenced by the site-specific guidance set out in Policy A17, the technical considerations and achieving quality place-making. The case officer has provided feedback on the housing layout, in relation to demonstrating the Public Rights of Way (PROW) and walking routes and adequate residential amenity, which are addressed in turn below. It is highlighted that the Reserved Matters stage would agree the final site layout and detailed design, which will undergo further refinement to ensure the proposals remain in accordance with the development plan.
- 4.2 To address KCC PROW consultee comments (26th February 2024), the masterplan includes the legal route of public footpath ZR91, which will not be obstructed by the development and would be made to a minimum width of 2m. Furthermore, the masterplan now acknowledges public footpath ZR93, which will connect to ZR91 and be of the same minimum width up to the northern site boundary.
- 4.3 The case officer has queried the suitability of the walking path behind the proposed dwellings to the north because of its location adjoining the ecological mitigation area and

housing to the south. As confirmed by the ecologists, there will need to be fencing around the edges that back onto the mitigation area to prevent public access into these areas. However, as set out in the ecology report, the boundary treatment could consist of a low chestnut post and rail fence or low picket fence. Alternatively, low defensive vegetation could be used instead. This low boundary treatment will avoid the creation of an alleyway and will provide open views across the ecological area. The majority of garden boundaries will be off set from the proposed footpath, providing opportunities for landscaping to create an attractive route.

4.4 The case officer has additionally queried the separation distances and associated residential amenity impacts in some instances between the proposed dwellings on-site and between a proposed dwelling on the southern boundary and its relationship to an existing property off Sanderling Way.

4.5 The proposed illustrative layout plan demonstrates the following separation distances between the dwellings specifically highlighted by the case officer:

- Plot 25 and Plot 27: The proposed dwellings are positioned back-to-side with the gardens intervening. There is a separation distance of 11m from the rear of plot 25 to the rear corner of plot 27.
- Plot 26 and Plot 27: The proposed dwellings are positioned back-to-rear garden. Plot 26 has a garden length of 10m, with plot 27 proposed garden length of 12m, therefore providing an acceptable amount of separation to each dwelling. Additionally, the closest point of buildings will have 14m of separation.
- Plot 29 and existing dwelling No.54: Plot 29 is orientated in a north-east direction and 54 Sanderling Way is orientated towards the south-west. The general development management “rule-of-thumb” for designing new developments is to provide a separation distance of 21m between rear windows where dwellings would back onto one another. However, in this case these properties do not directly back onto one another. The separation distance between the rear elevations of the proposed dwelling and the rear corner of the existing dwelling is a minimum of 17m. This is considered to be acceptable at this stage given their angled relationship and reasonable level of separation.
- Plots 18,19 and 20: The proposed plots of 18 and 19 are positioned facing southwards with the garden boundary to the east adjoining the rear garden of plot 20. Plot 20 has a rear garden length of 11m, with a separation distance to the side elevation of plot 19 of 12m. Further separation is afforded to Plot 18 which is located further west.

- 4.6 All of these separation distances and relationships are considered to be acceptable and in accordance with general design guidance. The detailed house type plans to be submitted during the reserved matters stage would ensure appropriate window positions and separation in line with the above.
- 4.7 The case officer's concern over the close relationship between plot 38 and the flat block (units 39-44) is acknowledged. Notwithstanding the fact that this is an outline application with only access fixed and details of layout reserved for future consideration, the proposed flats have been re-positioned further eastwards and the parking area shifted to the rear on the illustrative layout, to accommodate an increased separation distance (circa 16m) to the side elevation of plot 38. To the rear of the building, there is an area measuring 2.5m by 18.5m, providing a potential communal amenity area of at least 46sqm. Furthermore, the detailed design stage could explore the use of balconies/terraces to serve the six apartments.

5. Sustainable Construction

- 5.1 In planning for climate change, plans should take a proactive approach to mitigate and adapt to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures; in line with the objectives of the Climate Change Act 2008. In order to support this, paragraph 150 of the Framework states that new development should be planned for in ways that:
- a) Avoid increased vulnerability to the range of impacts arising from climate change; and
 - b) Can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 5.2 The Design & Access Statement has been amended to incorporate a Sustainability Strategy which aims to outline the sustainability and energy credentials of the proposed development and specifically respond to Local Plan Policies DM19 and DM21 as well as to the Climate and Ecological Emergency Declaration by Swale Borough Council in June 2019.
- 5.3 The sustainable measures provided within the Design & Access Statement are described in as much detail as is possible given that the submission is in outline form. Where specifics have not been possible, the overall approach and design standards have been

described to help ensure that there will be framework in place for ensuring a high quality of sustainable construction.

- 5.4 The Council's Air Quality Statement checklist has been completed for the proposed development, thus responding to Policy DM6 of the Local Plan.

6. Housing Mix

- 6.1 In order to meet the objectives of the Local Plan allocation (Policy A17) a mixture of tenures will be provided in order to widen opportunities of home ownership and create a sustainable, inclusive and mixed community.
- 6.2 Family housing is expected to make up a large proportion of the new homes and it is likely that 80% of the new homes will have a minimum of 3 bedrooms. In addition, there is likely to be 20% of the total number of homes providing smaller units in the form of 2 bedroom houses and 1 and 2 bedroom apartments. Of the 20% of smaller units, about half will be apartments thus providing a full range of accommodation.
- 6.3 The 2015 Strategic Housing Market Assessment (SHMA) highlights the greatest future demand of accommodation is for two and three bedroom dwellings. The updated 2020 SHMA solidifies these earlier findings in relation to market housing; with a projected need of 41% 3-bedroom houses, 34.6% 2-bedroom units, followed by 17% 4 or more bedroom houses and 7% 1-bedroom units. Notwithstanding these findings, the development proposal accords with the projected mix by responding to the greatest housing need for 3-bedroom dwellings.
- 6.4 Table 3 provides a comparison of the illustrative housing mix against the details set out in Policy CP3:

No. of bedrooms	Proposed	Policy CP3
One bed	3%	7%
Two bed	17%	36%
Three bed	66%	42%
Four bed	14%	15%

Table 3: Comparison of proposed housing mix against Policy CP3

- 6.5 The main difference between the Local Plan requirement and the proposal, is a larger number of 3 bed units and a smaller number of 2 bed units by comparison. However, it is also important to turn to the requirements of specific Local Housing Market Areas

(LHMA). Iwade falls within the LHMA of “Rural parts of Sittingbourne, Iwade, Upchurch, Newington, Milstead and Teynham.” This sets out the main issues, purpose and objectives of housing proposals as follows - “Has relatively high average prices and reasonable levels of demand and as such the market is reasonably strong. Going forward, the aspiration could be to encourage the development of good quality family housing, for which the greatest local demand exists.”

- 6.6 The larger number of three bed family houses at the application site would be in line with the requirements of the LHMA. The housing mix would be reviewed and further refined at the Reserved Matters stage to ensure an appropriate mixture of housing that responds to the local market demands.
- 6.7 The provision of family housing has been considered throughout the whole Iwade allocation (Policy A17) as further evidenced by the Land East of Iwade (ref.19/503974/HYBRID) and Land at Pond Farm (ref. 19/501332/FULL) permissions. The Land at Pond Farm approval for 69 dwellings predominantly comprises of larger dwellings (74% 3-bedroom units and 22% 4-bedroom units), with a much lower proportion of 2-bedroom units (4%) and no 1-bedroom provision.
- 6.8 The Land East of Iwade approval for up to 462 dwellings indicated a slightly higher proportion of smaller dwellings as part of the overall housing mix (5% 1-bedroom and 25% 2-bedroom units), but the main focus on the delivery of 3+ bedroom homes, in line with the other parts of the allocation.

North: 60 dwellings

- 1 bed 3%
- 2 bed 17%
- 3 bed 66%
- 4 bed 14%

East: 466 dwellings

- 1 bed 5%
- 2 bed 26%
- 3 bed 52%
- 4 bed 15%
- 5 bed 2%

South: 69 dwellings

- 1 bed 0%
- 2 bed 4%
- 3 bed 74%
- 4 bed 22%

6.9 Using the above figures, the overall housing mix across the allocation is as follows:

- 1 bed 4.2%
- 2 bed 22.4%
- 3 bed 56.1%
- 4 bed 15.5%
- 5 bed 1.8%

6.10 The Local Plan specifies Iwade requires family housing; this will be delivered within the application site as well as the wider allocation area under Policy A17, therefore satisfying the adopted Local Plan.

7. Affordable Housing Statement

7.1 Policy DM8 of the adopted Local Plan makes clear that provision of housing sites of eleven or more will be required to deliver affordable housing. Iwade is sought to provide 10% affordable housing through new developments.

7.2 The proposed development will deliver a policy compliant scheme, providing for 10% on-site affordable dwellings, equating to six dwellings of the overall number of 60 dwellings this site. Generally, the mix of unit types and sizes should be governed by meeting housing need and the objective would be to meet the tenure split of 90% for rent and 10% shared ownership. Therefore, the proposal would seek to provide 5 dwellings for affordable rent and 1 dwelling for shared ownership.

7.3 Policy CP3 highlights the need for a delivery of a wide choice of high-quality homes, including private and affordable dwellings, whilst reflecting the latest SHMA figures. The annual affordable housing needs as demonstrated in the 2020 SHMA includes:

- 8.7% 1-bedrooms
- 38.2% 2-bedrooms
- 26.3% 3-bedrooms
- 26.7% 4 or more bedrooms

- 7.4 It is anticipated that the affordable housing requirement will comprise a mixture of 2 and 3 bedroom units in this case. This mixture of type and size of affordable dwellings was previously found to be acceptable by the Council's Strategic Housing Manager when commenting on the original application submission in November 2018. More detailed discussions will be undertaken at the reserved matters stage to ensure that the affordable provision matches as closely as possible local requirements with deliverability constraints highlighted by registered housing providers. The location and exact mix of the affordable provision will be confirmed at the reserved matters application stage.

8. Anticipated Heads of Terms

- 8.1 In accordance with the infrastructure requirements set out at Policy A17 of the Iwade allocation, the following contributions are anticipated for the development, which would be secured by a Section 106 (S106) Agreement.

Contribution Type	Contribution Fee
Affordable Housing	10% provided on-site
Healthcare Services	£51,840
Primary Education	TBC
Secondary Education	TBC
Community Learning	TBC
Youth Services	TBC
Library	TBC
Social Care	TBC
Air Quality Mitigation	TBC
Wheelie Bin	TBC
Formal Sports	TBC
SAMMS (SPA mitigation)	£328.27 per dwelling = £19,696.20

Table 4: Anticipated heads of terms for the application site

- 8.2 The request for developer contributions towards social infrastructure impacted by the proposal, mainly derives from KCC's updated consultation response (which is outstanding to-date) and will be fully met by the wording of the legal agreement when submitted to the Council.
- 8.3 In terms of approximate timescales for the S106 Agreement, we anticipate that a draft S106 would be provided to the Council within three weeks of confirmation of the decision

route; whether this is via delegated approval or a recommendation to grant at Planning Committee.

- 8.4 In addition to the above, the Applicant would also like to discuss the timing triggers to be conditioned for this development. The proposed roundabout providing access into the site (permission already secured under the Land East of Iwade application ref. 19/501332/FULL), is being delivered by the adjoining developer. Taking account of the timing implications relating to these off-site highway works, which is outside of the Applicant's control. Therefore, the Applicant is keen to explore an alternative trigger to delay the standard three-year time period from the approval of the reserved matters until the grampian style conditions are cleared. A similar approach was taken on the Land East of Iwade approval (see condition 2 of 19/501332/FULL).

9. Conclusion

- 9.1 This Addendum has been prepared in order to provide the Council with the confidence that the proposed number of dwellings and the open space framework is compatible with the site area and allocation policy A17.
- 9.2 It is concluded that the site layout demonstrates an appropriate level of open and play space on-site to serve the development in line with the requirements of Policy DM17, taking into account the on-site ecological constraints, the inclusion of 0.5 hectares of amenity and informal play space and the open space provision being delivered across the totality of the allocation.
- 9.3 This Addendum, together with the supporting information, demonstrates how the proposed site layout achieves appropriate living conditions, the ecological mitigation and drainage strategy work in conjunction and safeguards the existing PROW's. The proposed housing mix meets the highest market demand for 3 bed family dwellings in Iwade and contributes to the overall mix being delivered by the allocation, in accordance with Policy CP3. Further information relating to affordable housing, heads of terms, sustainable construction, air quality and highways has also been provided.
- 9.3 On the basis of the above, we would request that you determine the application at your earliest convenience.