

Planning and Transportation Policy Working Group	
Meeting Date	22 January 2026
Report Title	Housing Economic Land Availability Assessment 2025 findings, Local Plan growth strategy and sites for allocation discussion
EMT Lead	Emma Wiggins Director of Regeneration and Neighbourhoods
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Lead Officer	Stuart Watson Project Manager, Planning Policy
Classification	Open
Recommendations	• Members of PTPWG are asked to note the findings of the Housing and Economic Land Availability Assessment (HELAA) 2025. • Members of PTPWG are asked to confirm their preferred growth strategy for drafting of the Regulation 19 submission version of the Local Plan for recommendation to Policy and Resources Committee. • Members of PTPWG are asked to recommend to Policy and Resources Committee non-strategic sites for the drafting of the Regulation 19 submission version of the Local Plan including: ○ Non-strategic housing allocations. ○ Gypsy and Traveller sites. ○ Employment land allocations.

1. Introduction and Executive Summary

1.1 As part of drafting the Regulation 19 version of the Local Plan, it is now timely for members to discuss and agree their preferred growth approach for the Plan and the non-strategic sites for allocation. Agreeing these matters will enable officers to prepare the relevant parts of the Regulation 19 consultation document that is scheduled in the Council's Local Development Scheme 2025 (LDS) for the summer of this year. A link to the LDS is contained in section 8 below.

1.2 This report sets out three main issues:

- The agreed approaches to the Local Plan Review housing and employment need;
- HELAA draft findings on housing sites (including Gypsy and Travellers) and new employment sites; and,
- selection of a growth approach and non-strategic sites for allocation in the Regulation 19 consultation version of the Local Plan.

1.3 Setting out the preferred growth approach and non-strategic sites for the Regulation 19 Local Plan document for consultation will enable officers to draft non-strategic site allocation policies. Noting the findings of the HELAA draft and selection of a preferred growth approach and non-strategic site allocations will also enable complex evidence work to progress on matters like transport modelling and the Plan's Sustainability Appraisal and Habitats Regulations Assessments.

2. Background

Agreed approaches to Local Plan housing and employment land need

Housing land need

2.1 In terms of agreeing an approach to setting a Local Plan housing target and what the balance of housing need is for site allocations in a Regulation 18 draft Plan consultation Full Council at its meeting on 29 January 2025 resolved:

- (1) *That the approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the Planning and Transportation Policy Working Group report on Housing Targets, including the 5% buffer for consultation and examination resilience be considered.*
- (2) *That the proposed growth within the draft Plan Regulation 18 consultation of 7,990 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings) be considered, and that the Planning and Transportation Policy Working Group consider prior to delegation being given to the Head of Place to amend figures, with the Policy and Resources Committee Chair and Vice-Chair, solely in line with any additional planning permissions granted, new dwellings completed, annual changes in government published statistics and any evidence which concluded previously granted or allocated sites that were no longer deliverable.*

2.2 The resolutions made by the Council provided officers with a clear steer towards the balance of housing need that will require site allocations as part of the Local Plan drafting. A link to the Planning and Transportation Policy Working group (PTPWG) report that informed the Council resolutions is provided below in Section 8. In summary, that PTPWG report set out the approach to setting a Local Plan housing target, what the balance of need would be after known supplies like

existing consents had been considered, where within the Borough housing growth has occurred and where consented supply would occur.

- 2.3 Since the Full Council decision on January 2025 that dated information within it at a base date of 1 April 2024 a further year's worth of housing land supply monitoring has been completed. The monitoring updated the Council's supply of consented sites for housing and the remaining Local Plan allocations without planning consent. Following the approach agreed through the Full Council decision on 25 January 2025 the balance of housing need requiring allocation through the Regulation 19 version of the Local Plan is 8,068 (Table 1). The balance of need as previously set out includes the review of the remaining Local Plan Bearing Fruits allocations (6,365+1,703 = 8,068 dwellings). Whilst there may be slight fluctuations in this requirement as elements of the housing supply are updated after Spring of this year, the approach that was agreed by Full Council allows for a 5% buffer for any potential fluctuations.

Table 1. Local Plan Housing target and balance of need requiring allocation update 1 April 2025

A	Local Plan Housing need target 2026 to 2042 (Local housing need 1,064 x16 years +5% resilience buffer)	17,875	
B	Extant planning consents		7,167
C	Remaining LP 2017 allocations (to be reviewed		1,703
D	Neighbourhood Plan allocations		231
E	Small windfall sites allowance 78 dwellings x 13 years (monitoring 2025)		1,014
F	Large windfall sites allowance Large sites 186/50% years 8 to 10 (3 years) Large sites 186 years 11 to 16 (6 years) (monitoring 2025)		1,395
G	Known supply and allowance (B to F)	11,510	
	Dwellings requiring new land allocation (A-G)	6,365	

- 2.4 It is acknowledged that a strategic growth approach for the Local Plan Review has not yet been agreed with Full Council due to the ongoing Public Inquiry into the two planning applications for a strategic level new development commonly known as Highsted Park. There are additionally, three other strategic sites with live

planning applications that if they were consented, or not, would impact on the Council's strategic growth. The details, location and potential planning timings of the live planning applications are set out below (Table 2).

Table 2. Live strategic level planning applications

Planning reference	Address	Development potential (homes)	Planning status
21/503914 21/503906	Highsted (south) (north)	7,150 1,250	Awaiting SoS decision (Q2 2026)
23/505533	South East Faversham	2,500	Planning committee (Q2 2026)
22/503654	Land to the west of Bobbing	2,500	Planning committee (Q2 2026)
23/501071	Winterbourne Fields	1,740	Planning committee (Q3 2026)

- 2.5 Whilst the issue of live planning applications for strategic sites has yet to be determined, to inform the sites for allocation in the Regulation 19 document for consultation in the summer, members will need to set out a preferred growth approach. To enable this decision making, paragraphs 2.55 to 2.60 below sets out the previously discussed growth approaches including the known development potentials where there is a live application, and the residual balance of housing need that would need to be met on non-strategic site allocations. For the non-strategic site selection process for housing and employment land, high level summary tables of the HELAA findings are provided at appendices IV and IX. The high level summary table sets out the sites by the Borough's settlement hierarchy, HELAA site assessments, specific housing provision (for example self-build and park homes) and previous informal site selection discussion with members.
- 2.6 In terms of the historical delivery of housing across the borough and existing planning consents for housing, the report *Local Plan Review - Historic Delivery and Housing Targets* that was taken to PTPWG in August 2024 (link to report in section 8) sets out this information in detail and so is not duplicated in this report. In summary that report stated that housing delivery against the existing Local Plan targets had been positive however falls short against the Government's mandated local housing needs approach brought in since the Local Plan's adoption. In terms of growth within the borough, that report briefly summarises the historical housing performance as:

"When comparing the location of completed dwellings and those consented and not built out against the LPBF 2017 growth targets it can be identified that growth in Sittingbourne and Queenborough and Rushenden are falling considerably short of target by 16.8% and 11.2% respectively whilst growth in other non Plan target areas has been considerable, in excess of 21.7%. This means that whilst lower tier settlements' targets have been broadly met, targets for two of the Borough's highest settlements have been considerably missed."

Gypsy and Traveller pitch need

- 2.7 Gypsy and Traveller (G&T) need is considered as part of the wider housing need for overall housing supply purposes, but also has its own specific National Planning Policy requirements including assessment of the specific need for pitches for the G&T community and supply of pitches. Planning Policy for Traveller Sites (PPTS 2024) at paragraphs 9 and 10 sets out that:

9. Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

10. Local planning authorities should, in producing their Local Plan:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;*
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;*
- c) consider production of joint development plans that set targets on a cross authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);*
- d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and*
- e) protect local amenity and environment.*

- 2.8 The Council's evidence on Gypsy and Traveller pitch need is set out in the Gypsy and Traveller Accommodation Assessment (GTAA 2023). A link to this document is provided in section 8 below. This evidence has determined that at a base date of the monitoring year 2022/23 for a plan period the need for pitches is 114 and that for the purposes of PPTS 2024 paragraph 10a that there is an immediate 5 year need for 80 pitches. Whilst the supply of pitches to meet need from years 6 of a plan period should be identified where possible, the immediate 5 year need should be identified within a Local Plan. An immediate 5 year need works differently to a 5 year supply in that it is the need for pitches within in the community in the 5 years from the base date of the evidence. Whilst a 5 year supply assessment determines whether there is 5 years worth of supply throughout the Plan period.

- 2.9 The GTAA 2023 sets out that much of the immediate 5 year need (72 to 78 of the 80 pitches) could be met through authorising intensification and expansion of

existing sites identified in the evidence. Further to this evidence, 1 additional site for G&T was submitted through the Council's last call for sites (CFS) exercise in the autumn of 2024.

- 2.10 In addition, some of the identified immediate 5 year need will have already been met through windfall permissions since the base date of the GTAA 2023 evidence. The Council's monitoring between 1 April 2022 (base date of GTAA evidence) and 31 December 2025 has identified 23 pitches have been consented (Appendix X). This means for the purposes of meeting the immediate 5 year need the balance is 57 pitches and there is a residual Local Plan need of 91 pitches.
- 2.11 It is now necessary to determine whether the G&T sites identified in the HELAA as potentially suitable should be considered for allocation in the Regulation 19 version of the Local Plan.

Employment land need

- 2.12 In terms of the Local Plan Review employment target and the selection of sites to be allocated in a Regulation 18 draft Plan consultation Full Council at its meeting on 4 December 2024 resolved:
- (1) That the potential employment sites available for allocation through the Local Plan be noted.*
 - (2) That the employment sites recommended by the Policy and Resources Committee on 11 September 2024 for consultation through the Regulation 18 Local Plan be agreed.*
- 2.13 The Policy and Resources Committee on 11 September 2024 recommended employment sites excluding CSF30, CSF47, and CSF50, if no housing development be put forward on the sites, for consultation through the Regulation 18 Local Plan. A link to the PTPWG report of 8 August 2024 that sets out the agreed employment land need of 73ha for the Local Plan Review and the employment sites considered is contained in section 8 below. The PTPWG report set out that removing sites CSF30, CSF47, and CSF50 would leave a total of 72.8ha against a target of 73ha.
- 2.14 Since these employment sites were agreed by the Council new employment sites were identified from a call for sites exercise that was carried out in the autumn of 2024 and through a review of existing sites in the HELAA. The HELAA draft findings in paragraphs 2.46 to 2.50 below go on to set out how the new employment sites can be considered alongside those that have been agreed by Council for the Regulation 19 Local Plan.

HELAA Draft Findings

- 2.15 The HELAA draft findings are presented in three sub sections that reflect their specific land supply and approach to assessment. The sub sections are:

- Housing sites;
- Gypsy and Traveller sites; and,
- Employment sites.

HELAA Housing sites

2.16 The methodology for the HELAA regarding housing sites has previously been presented to members and so is not replicated in this report. Previous member engagement has included:

- presented informally to members in February 2024 whilst the HELAA was being prepared;
- formally at the PTPWG meeting on 13 March 2025; and,
- informally again for new members of PTPWG in December 2025.

2.17 A link to the March 2025 report that covered the Autumn 2024 call for sites and progress on the HELAA is contained in section 8 below. The findings of the HELAA stage 2 detailed assessment have been presented as a series of appendices attached to this report. Also the sites can be viewed through an interactive mapping layer on the Councils website. The link: [HELAA draft Interactive mapping layers](#) will take you to the interactive map and the layers are contained within the menu tab labelled HELAA draft for PTPWG January 2026. Each HELAA layer can be viewed or turned off by clicking the blue tick box to the right of the layer name.

2.18 The initial draft findings of the HELAA were presented informally to members in August 2024 and a selection of the sites were considered appropriate for allocation within a Regulation 18 draft Plan consultation. However members felt that there were not enough appropriate sites to meet the balance of housing need for the Local Plan. As a result members asked officers to carry out additional work to:

1. identify sites in Sittingbourne town centre for additional homes;
2. identify sites for rural older persons housing;
3. review specific sites for densification potential; and,
4. review draft HELAA allocations from the perspective of alternative transport solutions (given the perceived direction of travel of national government in that regard).

2.19 To address work streams 1 and 2 a further call for sites exercise was carried out in the autumn of 2024 that amongst seeking any type of site (as is required), made clear the Council were specifically interested in sites within Sittingbourne town centre and for rural older persons housing. For work stream 3, the HELAA sets residential densities assumptions (paragraphs 2.35 to 2.36 below) that seeks higher densities in central and wider urban areas than would be appropriate in greenfield locations. For work stream 4 engagement has been carried out with Kent County Council (KCC) Highways on HELAA sites both existing and those received in the last call for sites. Feedback from KCC has focused on sites' suitability from an existing highways sustainability perspective'. To further inform

transport solutions, the transport modelling work for the Regulation 19 Local Plan stage will also include an additional piece of work on a 'Mode Share Strategy'. The strategy will inform the development of traffic modelling scenarios for the sites for allocation and provide a justification for assumed mode shares¹ and trip rate reductions². It will also identify and assess practical, sustainable transport interventions that can help mitigate the impacts of the proposed Local Plan growth on the transport network through assessing the sites for allocation.

- 2.20 The HELAA has assessed 423 sites taken from numerous different sources, including from the Council's various "call for sites" where landowners and developers were asked to put forward any sites they wanted to promote for development. Other sources included Local Plan allocations still not consented and Council-owned land.
- 2.21 The HELAA methodology set out in National Planning Practice Guidance (NPPG) requires sites to be assessed in three categories:
- Suitability;
 - Availability; and
 - Achievability.
- 2.22 Sites need to be considered suitable or potentially suitable (with mitigation), available and achievable to be considered appropriate for allocation in a Local Plan. Any sites which fail in any of the above categories receive an overall rating of "unsuitable." It should be stressed that the HELAA does not recommend sites for allocation, it simply provides a list of sites which allocations can be selected from. The selection of sites for allocation is a separate exercise from the HELAA, but it does need to take into account the HELAA findings.

HELAA Suitability

- 2.23 To assess suitability, an initial sieve of sites was carried out at Stage 1 of the HELAA, which removed sites that did not conform with the objectives of paragraph 11 of the National Planning Policy Framework (NPPF 2024) that concerns sustainable development and highest national policy constraints. Sites were removed for example where sites were over 400m (a standard walking distance measure) from any designated settlement built up area confine; sites were within the Special Protection areas/Sites of Special Scientific Interest or flood zone 3b; and sites that were below the HELAA site size threshold or had gained planning consent by the time of publishing the HELAA findings. The results of Stage 1 of

¹ Transport mode share refers to the percentage of travellers using a particular type of transportation or the number of trips made by a specific mode. It is a key measure used to assess the relative importance of different transportation modes in relation to total traffic volume.

² Transport trip rate reductions refer to the assessment of how new development impacts transport demand and connectivity. These assessments help in planning and managing transport infrastructure to accommodate future growth and reduce traffic impacts.

the HELAA can be found in Appendix I. This lists all the sites which were found unsuitable at Stage 1, and provides a brief summary of the reason.

- 2.24 A Stage 2 detailed assessment was then carried out on the remaining 252 sites. This involved officer site visits and an assessment of a variety of constraints sat under five planning topic areas that included:
- Environment;
 - Biodiversity;
 - Heritage;
 - Landscape; and
 - Sustainability.
- 2.25 Sites obtained a rating of either “suitable”, “potentially suitable”, or “unsuitable” against each of the above five headings. If any of these five assessments were unsuitable, the overall result was that the site is considered unsuitable. If mitigation could potentially solve any issues then a site was considered “potentially suitable.”
- 2.26 To help inform the assessment of stage 2 sites that had been evaluated by officers as “suitable” and “potentially suitable” informal engagement has been carried out with external organisations. This has included Kent County Council Highways and PROW teams, the Environment Agency, Kent Downs National Landscape Team and Historic England. The feedback received is contained within the HELAA stage 2 findings housing sites summaries housing site summaries (Appendix II) relevant planning topic areas attached to this report.

HELAA Availability

- 2.27 Due to the variety of sources used to identify sites and particularly old call for sites exercises an availability survey was carried out in Spring 2024 to reconfirm if sites were still available for the Local Plan Review. The availability of sites was considered by contacting the current owners/promoters of each site to check that the site was still available. Further, promoters were asked to confirm what 5 year timeframe of a 15 year plan period would the site be deliverable in. As part of this process where email addresses had previously been supplied, three attempts were made and one further attempt by post using land registry records where there had been no email response. Where there was no email address available, a minimum of two postal attempts were made.
- 2.28 Any sites where the owners/promoters indicated that they were not available, were considered “unavailable” which then resulted in the overall site rating of being “unsuitable”. For the autumn 2024 call for sites promoters of new sites at that time were asked to confirm availability and to specify the deliverability timeframe. The results of the availability assessment are contained within the HELAA stage 2 findings housing sites summaries at Appendix II.

HELAA Achievability

- 2.29 The Whole Plan Viability Assessment (WPVA), that was presented to PTPWG in November 2025, has been used to assess the achievability of sites. The Viability Assessment uses different typologies of sites to assess the likelihood of them being viable to develop against potential policies for the Local Plan. For example it considers greenfield versus brownfield, and small sites versus medium and large sites etc. It also considers land values in particular areas within the Borough.
- 2.30 One element of the Viability Assessment which was particularly heavily caveated in the evidence was the assessment of strategic sites. The Viability Assessment found that only three strategic sites SHELAA/012 Land west of existing Bobbing village, SHELAA/114 south east Faversham and SHELAA/118 Land East of Faversham expansion, were viable, but the assessment was done at such a high level, without taking into account any site specifics, that rejecting all the strategic sites when choosing strategic site allocations on this basis would most likely leave the Council open to potential legal challenge from the promoters of those sites. As 2 of the 3 of the strategic sites that are assessed as viable are the subject of current planning applications, it is apparent that those promoting those sites are persuaded that they are viable.
- 2.31 Another finding from the WPVA which officers consider should be looked at more closely is that all brownfield sites were unviable. There are sustainable planning reasons why we would not want to discount all brownfield sites. One of the most concerning implications of rejecting all brownfield sites would be that a number of the remaining adopted Local Plan allocations would need to be removed and not carried forward. Whilst we do need to check that all previous Local Plan allocations remain robust and are still likely to come forward for development, we would expect the majority of them to remain, particularly as some of the larger sites have the benefit of Homes England funding.
- 2.32 The WPVA generally found greenfield sites to be achievable, whereas brownfield sites were found to be unachievable against a draft policy requirement of 30% of homes to be for affordable housing. To address the achievability of brownfield sites the WPVA recommends a policy amendment to a 10% affordable housing requirement. Sites that are only unsuitable due to brownfield achievability are recorded in the overall HELAA assessment as “Unsuitable (brownfield only)” and with the policy amendment to 10% affordable housing those sites should be treated as potentially suitable sites.

HELAA stage 2 housing findings

- 2.33 From the 423 sites considered within the HELAA, 171 sites did not pass the high level stage 1 assessment. This resulted in 252 sites in the HELAA being subjected to a detailed stage 2 assessment consisting of:
- 15 Strategic sites with a gross capacity of 1,500 dwellings or more,
 - 170 major sites of greater than 1ha but less than 1,500 dwellings, and
 - 67 sites of less than 1ha in size.

- 2.34 The HELAA stage 2 found 77 sites were potentially suitable, 16 sites were unsuitable (brownfield only) and 164 sites were unsuitable. In dwelling numbers this equates to 19,276 dwellings as potentially suitable, 1,512 dwellings unsuitable (brownfield only) and 40,547 dwellings as unsuitable. Sites assessed as potentially suitable could, through the Local Plan drafting, then be made suitable. For example where HELAA recommended assessments have been satisfactorily carried out and site allocation specific policy criteria has been set within the Local Plan (e.g. landscape design and environmental mitigation).
- 2.35 Site capacities in the HELAA were determined through the use of the previous Strategic Housing and Land Availability Assessment (SHLAA) approach, an approach that was also used in the latest Whole Plan Viability Assessment and is set out in the two tables below. For greenfield sites officers have applied the lower position of 30 dwellings per hectare due to requirements for the Council's 20% Biodiversity Net Gain objective. The methodology below has also been deviated from where:
- Strategic sites - 60% of the area is considered developable with a density of 25 dwellings per hectare to allow for large scale infrastructure;
 - Use of dwellings referenced in a live planning application differs from assumptions;
 - Existing Local Plan allocation with a set out capacity; and,
 - Site areas amended where a significant constraint inhibits part of the site, but the site is of such scale the remainder could be delivered.

Residential Density Assumptions (WPVA Table 9.1 page 153)

Situation	Density Assumption
Central Urban Areas	60 dwelling per ha
Wider Urban Areas	50 dwellings per ha
Greenfield Sites	30 to 40 dwellings per ha

Net Developable Area Assumptions (WPVA Table 9.2 page 153)

Site Size	Net Developable Area
0.15ha to 0.4ha	100%
0.4ha to 2.0ha	80%
2.0ha and above	70%

- 2.36 There may be opportunities for higher site densifications than those set out in the methodology above. The Council will have the opportunity to determine this

through discussions with promoters of the sites chosen for allocation in Plan drafting. The discussions would include development of site-specific evidence as set out in the HELAA that may then adjust site capacities and delivery rates. However, it is worth noting that seeking higher densities on the site may reduce the available non developed areas of the site that would be used to enable better layout design and for mitigating landscape impacts. This site-specific evidence gathering will ensure realistic and timely delivery of sites in the Local Plan.

- 2.37 An overall assessment of the HELAA stage 2 housing sites findings is provided at Appendix II, that provides greater detail on the site's ratings. This appendix includes additional information such as site size, address etc, and provides various facts about each site based on GIS identified constraints. It also includes a summary of officer site visits and informal key stakeholder engagement against the planning topic areas, and includes all the various ratings in each section. A brief totals summary of the HELAA housing findings by settlement is presented in Table 3 below.
- 2.38 Table 3 below organises the settlements where sites have been submitted in the HELAA according to the settlement hierarchy, with Tier 1 being the largest, most sustainable settlement, down to the smaller, less sustainable settlements in Tier 5. The HELAA does not dictate which sites the Council selects for allocation. It is for members to provide a steer towards sites they consider appropriate for allocation from those presented in the HELAA. Those selected sites would then be tested through Plan making including formal consultation and accompanying whole Plan evidence base studies
- 2.39 Generally, when considering where to allocate sites, the approach is to propose larger developments at the larger settlements, and smaller ones at the smaller settlements. In that instance, the HELAA is simply telling us that there are more potentially suitable sites made available at that settlement than at others in that tier.

Table 3. HELAA Stage 2 findings dwellings summary by settlement

Settlement	Potentially suitable	Unsuitable (brownfield)	Unsuitable	Total
Tier 1				
Sittingbourne	468	301	9,868	10,637
Tier 2				
Faversham	6,028	0	8,817	14,845
Sheerness	152	0	797	949
Tier 3				
Minster & Halfway	3,017	0	2,392	5,409
Queenborough & Rushenden	0	1,015	3,071	4,086
Tier 4				
Boughton	44	0	194	238

Eastchurch	96	0	1,752	1,848
Iwade	1,641	0	3,810	5,451
Leysdown	197	133	16	346
Newington	459	63	1,435	1,957
Teynham	1,402	0	1,344	2,746
Tier 5				
Bapchild	0	0	833	833
Bayview	21	0	0	21
Borden	94	0	453	547
Bredgar	0	0	42	42
Dunkirk	0	0	2,567	2,567
Hartlip	26	0	151	177
Kingsborough Manor	0	0	440	440
Lewson Street	0	0	190	190
Lower Halstow	16	0	34	50
Lynsted	61	0	103	164
Neames Forstal	0	0	246	246
Oare	68	0	0	68
Upchurch	436	0	690	1,126
Warden	139	0	114	253
Tier 6 open countryside				
Bobbing	4,911	0	1,043	5,954
Tunstall	0	0	145	145
Overall Total	19,276	1,512	40,547	61,335

HELAA Gypsy and Traveller sites

- 2.40 As set out in paragraphs 2.7 to 2.11 above Gypsy and Traveller (G&T) pitch need is part of the overall housing requirement within plan making. However, it also has its own specific national policy to determine the need and supply of land for pitches. To address these specific G&T requirements, sites have been assessed using both the methodology for housing sites as set out above and also against the Planning Policy for Traveller Sites 2024 (PPTS) criteria set out in paragraph 2.7 above. Taking this combined approach will ensure that for the purposes of the Local Plan's sustainability appraisal all sites will have been subject to detailed constraints analysis and for G&T sites only they will be further tested against the requirements of the PPTS 2024.
- 2.41 There are 14 G&T sites identified in the HELAA with 13 coming from the GTAA 2023 previously discussed and 1 further site that was submitted through the autumn 2024 call for sites. All 14 G&T sites have been subject to the HELAA stage

1 testing as set out above. It was found that 13 sites met the criteria to progress to stage 2. Of the existing sites for intensification, one was found unsuitable at stage 1 due to ongoing enforcement action for a large number of unauthorised additional pitches on site far in excess of the potential considered in the HELAA.

HELAA Stage 2 Gypsy and Traveller site findings

2.42 The 13 sites subjected to a detailed stage 2 assessment consisted of:

- 1 new major site
- 12 existing G&T sites for intensification

2.43 The G&T HELAA stage 2 found that the one major site was unsuitable due to its scale, unsustainable location (being in a rural setting with sporadic non G&T uses), and landscape impacts. The remaining 12 existing sites for intensification are considered potentially suitable and if agreed for inclusion in the Regulation 19 Local Plan would provide 35 pitches.

2.44 For the purposes of plan making and being considerate that no one G&T site is exactly the same as another a capacity approach has been taken of 15 pitches per hectare, approximately half of that for homes. The lower density is considered appropriate to allow more land for the pitches to contain a mobile, tourer and parking of vehicles and landscaping. Full details on the G&T sites and their assessment can be found in appendix V and VI below. A brief totals summary of the HELAA G&T findings by settlement is presented in table 4 below.

Table 4. HELAA Stage 2 findings G&T pitches summary by settlement

Settlement	Potentially Suitable	Unsuitable	Total
Tier 1			
Sittingbourne	6	8	14
Tier 3			
Minster & Halfway	5	0	5
Tier 4			
Eastchurch	4	0	4
Newington	2	0	2
Tier 5			
Hartlip	6	0	6
Lower Halstow	5	0	5
Upchurch	7	37	44
Overall Total	35	45	80

2.45 If all 12 potentially suitable G&T sites were included in the Regulation 19 Local Plan they would provide 35 pitches. Taking these 35 pitches and including the 23 consented pitches since the GTAA base period as set out above there would be a shortfall of 22 pitches against the identified immediate 5 year need and a shortfall

of 56 pitches for the Local Plan period. This shortfall would place a heavy reliance on the remaining need for pitches being met through windfall planning permissions. It may also be appropriate for members to consider an alternative approach to address the need for pitches that could include a separate Development Plan Document for G&T that would include specific strategies seeking to meet need and supply. Alternatively, the Council could ask neighbouring authorities whether they have capacity within their land supply to meet any unmet need from Swale. However, before this second option the Council will have needed to explore all potential opportunities for meeting its own need for pitches.

HELAA Employment sites

- 2.46 The HELAA process has identified 24 sites for employment or a mix of uses that include employment and that had not been identified and assessed in the Council's Employment Land Review update 2024 (ELR). A link to the ELR is contained within section 8 below. From the 24 sites, 9 were identified from reviewing what site promoters had submitted existing sites in the HELAA for and the remaining 15 were identified through the Autumn 2024 call for sites exercise.
- 2.47 The 24 sites were subjected to the methodology of the housing sites set out above and found to be suitable for Stage 2 assessment. Further, as it is for Full Council amongst other matters to choose the land use for sites should they move forward for allocation, the sites have also been tested for employment or mixed use, using the assessment criteria of the ELR. Taking this combined approach of the HELAA and ELR will ensure that for the purposes of the sustainability appraisal for the Local Plan all sites will have been subject to the same detailed analysis and for employment and mixed use sites have been further tested against the methodology of the ELR.
- 2.48 Whilst the ELR assessment has similarities to the HELAA housing assessment in terms of planning topic matters, it goes further. This includes considering the suitability of the site against employment market factors, the strength of employment land market where the site is located and the prominence of the site's access to the local and strategic road network for commercial vehicle movements. The assessment conclusions of the ELR also differ in that sites are found to be either a 'yes', 'no' or 'possible' for allocation

HELAA stage 2 findings employment sites

- 2.49 As set out, in paragraphs 2.12 to 2.13 above, the Council has already agreed enough employment sites to meet its need of 73ha of land. However, the need has only just been met and the new sites identified through the HELAA may be more appropriate for allocation. The new employment sites offer members the opportunity to replace some of the existing sites and / or to build resilience into the employment land supply by allocating beyond the evidence need. For example, the housing land approach has a 5% resilience buffer agreed by members.

- 2.50 From the 24 new employment sites, 5 have been found as a yes for allocation, 6 possible allocation and 13 are a no for allocation. Should the sites assessed as yes be considered for allocation on top of the employment sites already agreed with members then this would result in an additional 6.62ha of land for employment use. In terms of the 6 sites for possible allocation that would include a further 16.67ha for consideration. In total from existing and new sites there is 70.72ha that are a yes for allocation and 112.67ha for possible allocation. A brief totals summary of the employment findings for the new and existing sites is presented in Tables 5 and 6 below. Full details on the employment sites including their location and assessment can be found in appendices VII and VIII.

Table 5. New employment sites capacity summary by settlement

Settlement	Yes	No	Possible
Tier 1			
Sittingbourne	0.07	20.035	4.3
Tier 2			
Faversham	0	3.75	0
Sheerness	0	22.46	0
Tier 3			
Minster & Halfway	0	49.55	0
Queenborough & Rushenden	1.45	149.04	0
Tier 4			
Eastchurch	0	10.85	0
Iwade	0	0	2.3
Newington	0	0	4.86
Tier 5			
Dunkirk	0	61.06	0
Tier 6 open countryside			
Bobbing	5.1	2.95	5.21
Overall Total	6.62	319.695	16.67

Table 6. Existing ELR sites capacity summary by settlement

Settlement	Yes	No	Possible
Tier 1			
Sittingbourne	25	81.4	51.6
Tier 2			
Faversham	23.8	32.7	20
Sheerness	3.7	111.5	0
Tier 3			
Minster & Halfway	0	0	5.6
Tier 4			
Boughton	0	2	0
Iwade	0	65	2.9

Newington	2	0	0
Tier 5			
Bapchild	0	3.8	3
Dunkirk	0	3.4	0
Hartlip	5.9	0	0
Tier 6 open countryside			
Bobbing	0	0.3	0
Dargate	3.7	0	12.9
Milstead	0	0.8	0
Overall Total	64.1	300.9	96

Selecting sites for the Regulation 19 Local Plan consultation

- 2.51 To enable adequate time for necessary work to be completed for the Regulation 19 Local Plan, it is now timely for members to agree the sites for testing through whole plan evidence development and consultation in the summer of this year. Failure to agree the sites for housing and employment now would make delivering a Regulation 19 Local Plan for consultation in the summer extremely challenging for both officers and members.
- 2.52 Appendix XII sets out the High level timetable for the Local Plan including the committee lead in times for a summer Regulation 19 consultation and the substantive work streams of reviewing and reporting the current Regulation 18 consultation feedback, updating the HELAA (and other remaining evidence base studies) and drafting the Regulation 19 consultation document.
- 2.53 Sites need to be agreed now so that enough time is given to consultants to produce technical studies and then for officers to review the findings that form the Local Plan approach on matters like transport, flooding, air quality and the sustainability appraisal and habitat regulation assessment. Much of these evidence pieces of work will require up to 4 months to complete once site allocations have been selected and this will need to be followed by a period of time for officers to consider the outputs of evidence. This means there is very little time to reconsider site options for a summer Regulation 19 consultation should they not be agreed now.
- 2.54 As discussed, the Councils Local Development Scheme in July 2025 set out the option of not submitting a Local Plan for examination under the current Plan making transition arrangements and that the option had been rejected. Report link: [PTPWG 15 July LP Timetable.pdf](#).

Growth approach for the Local Plan

- 2.55 In September 2024 the Policy and Resources Committee made a recommendation to Full Council on the growth approach for the Local Plan Review, report link: [PR report Local Plan Review Vision Objectives Growth Options Final.pdf](#) . A link to

that committee report is contained within section 8 below and the recommendation was:

(2) That Growth Option 6 be progressed to regulation 18 consultation stage as the Council's preferred option, with a requirement for a Member briefing on all six options being progressed, prior to Full Council.

- 2.56 Full Council chose to defer the growth decision in the Autumn of 2024 due to the Secretary of State (SoS) calling in the two Highsted Planning applications (as set out in paragraphs 2.4 to 2.5 above) before the Council could make its own decision on them. Whilst a decision from the SoS is awaited on the Highsted applications, a steer towards the Local Plan growth approach is required to enable key evidence to progress and drafting of the Regulation 19 Local Plan document to commence to a schedule which allows the Plan to be submitted within the transition window (i.e. before December 2026).
- 2.57 Should the Highsted applications be granted by the SoS they would have substantial implications for the growth of the borough due to the scale of the schemes proposed. Through discussions with the Councils Development Management officer who has been dealing with the planning applications for Highsted, the development is likely to have deliverability of infrastructure issues that will prevent early delivery of the scheme. It is likely the smaller application known as Highsted Park north could be built out in a 15 year Plan period whilst Highsted South has a number of infrastructure matters that need to be addressed should the scheme be granted and that delivery expectations from this site should be cautious and towards the end of a 15 period. It is unlikely therefore that development from Highsted would have an impact on the early or middle years of a Local Plan time period. Subsequently, the Highsted scheme will not enable the Council to demonstrate a 5 year housing land supply, a key requirement for a Local Plan to be found sound at examination, neither will it likely to provide a level of supply substantial enough to demonstrate a strategy to meet all the boroughs housing and employment needs for the Local Plan time period. This means there is no value in the Council considering triple tracking Regulation 19 versions of a Local Plan as previously discussed with members that would consider the scenarios of Highsted should it be granted or not, or one or the other of parts of the be granted as the contribution from the scheme would be limited over a 15 year Plan period.
- 2.58 This means that, despite the proposed housing numbers within the Highsted development exceeding the Local Plan housing requirement, comparably few of the units would be delivered during this period. Further, should the scheme not be granted or suffer subsequent legal challenges that stall, or the scheme not being granted, then an alternative or supplementary growth approach would need to be considered as part of Plan making.
- 2.59 A brief summary of the growth options previously considered by members is provided in Table 7 below. The table sets out the likely delivery expectations from known strategic sites with live planning applications and the residual housing need

required from non-strategic site allocations during the 15 years of a Plan period. However, members as part of considering strategic sites could also choose alternatives as set out in the HELAA. In terms of Highsted for option 5 in the table it is considered that all of the northern site would be deliverable within a Plan period and a small contribution of 750 dwellings from the southern site. The figures in the table 7 below are considerate of the balance of housing need of 8,068 dwellings from the Local Plan target as set out in paragraph 2.3 above.

- 2.60 Once a steer towards a preferred growth approach has been given, the approach will then be tested as part of the Local Plans sustainability appraisal and as part of this process 2 or 3 reasonable alternatives to the preferred growth approach will be tested alongside it. To reiterate, a Regulation 19 Local Plan document is a version of the Plan that the Council considers meets the requirement of a Plan examination and so should clearly set out what the development needs of the borough are, and what the strategy and sites are to meet those needs.
- 2.61 Members are being asked once again to provide their steer for a preferred growth approach from those set out below. Once a growth approach has been agreed then members will need to select the non-strategic sites to meet the residual housing need. Logically the consideration and selection of the employment allocations should then follow the growth approach.

Table 7. Growth options – strategic and non-strategic housing contributions

	Growth option	Strategic contribution (potential dwellings)	Potential strategic site options	Residual required from non strategic sites
1	Continue Bearing Fruits Local Plan approach	0	N/A	8,068
2	Strategic site in west of Borough/settlement hierarchy hybrid	2,500	22/503654 Land to the west of Bobbing (2,500 dwellings)	5,568
3	Strategic site in east of Borough/settlement hierarchy hybrid	2,500	23/505533 South East Faversham (2,500 dwellings)	5,568
4	Strategic sites in east and west of Borough/settlement hierarchy hybrid	5,000	23/505533 South East Faversham (2,500 dwellings) 22/503654 Land to the west of Bobbing (2,500 dwellings)	3,068

5	Strategic scale new settlement/settlement hierarchy hybrid	2,500	21/503914 Highsted (south 750 dwellings) 21/503906 highsted (north 1,250 dwellings)	5,568
6	Very large strategic site in east of Borough/settlement hierarchy hybrid	4,000	23/505533 South East Faversham (2,500 dwellings) +one or two major sites totalling 1,500 dwellings	4,068

Non-strategic site selection

- 2.62 The HELAA stage 2 housing sites that are both potentially suitable and brownfield sites that are only unsuitable on viability matters of affordable housing contributions have been presented in a high level table at appendix IV. Alongside the HELAA summaries for each site the table also sets out where sites had been informally discussed and supported by members in August 2024 and sites that maybe suitable for specialist housing like park homes and self build.
- 2.63 In a similar approach the employment sites are also presented in a high level table at Appendix IX that shows sites that are a “yes” and “possible” for allocation alongside information on the sites agreed by Full Council for allocation in December 2024.
- 2.64 Finally, with regards to the Gypsy and Traveller sites for consideration members are directed to Appendix V that is the HELAA stage 2 finding G&T summary. A high level table has not been produced for these sites due to the small number of them for consideration.
- 2.65 When members discuss the non-strategic sites it should be remembered that all growth options, apart from the first state that the residual development needs should be met against the settlement hierarchy strategy. Whilst selecting sites is not an exact science the settlement hierarchy strategy has the objective of selecting sites that meet much of the development need from settlements at the top of the hierarchy, with moderate levels of development at the middle order settlements with only minimal levels of development at settlements at the lowest tiers. This follows the key principles of sustainable development and the planning system as higher order settlements have a larger range services and facilities and sustainable and active transport options.
- 2.66 Members choosing a preferred growth approach and then a selection of non-strategic sites will enable key evidence to commence that will test those allocations to identify growth impacts across the whole borough and where mitigation can be

accomplished. Whilst a growth approach has not been agreed with Full Council, as set out above, due to the tight timetable for the Regulation 19 a steer is required from members now. By enabling the Regulation 19 drafting and final stages of evidence production to proceed, officers will then be able to commission and present evidence findings and how they are considered within the Regulation 19 consultation document. Taking this approach will allow members to consider all matters holistically rather than reviewing growth approaches or sites for allocation in isolation and subsequently not having all the detail before them to determine the Local Plan.

Removing unsuitable existing Local Plan Allocations

- 2.67 Unfortunately as part of reviewing the existing Local Plan Bearing Fruits allocations as part of the HELAA some existing allocations are not selected for the site allocation process. This is due to them having been found through the HELAA overall to be unsuitable. The details of those sites including the number of dwellings and reasons for removal are contained within appendix XI. In summary there are 16 sites not selected for continued allocation totaling 429 dwellings. The reasons for those sites not being selected range from identified policy constraints to sites no longer being available or not meeting the HELAA assessment thresholds. For example a site being below 0.25 hectares in size or unable to deliver 5 or more dwellings, as sites of this size fall within the housing land supply small sites windfall allowance.

Conclusion

- 2.68 The HELAA set before members is considered a robust document having used a mixture of methods including GIS mapping constraints, officer site surveys, independent viability assessment, availability questionnaires and informal comments from key stakeholders. Where appropriate for G&T and employment sites additional assessment criteria have been used specific to those land uses and evidence bases.
- 2.69 The HELAA has been stringent in following national planning policy and guidance requirements including removing sites where there is national and a significant local policy constraint/s whilst seeking realistic delivery of those housing sites that are potentially suitable. To help refine officers' assessments and potential mitigation of sites, informal engagement with key stakeholders has also been carried out.
- 2.70 The HELAA provides a suite of sites for housing, G&T and employment which can now be used to for discussion on the potential sites for testing through allocation in the Regulation 19 Local Plan consultation document. For the discussion on the non-strategic housing sites to be considered a table has produced that sets out sites by the includes the Borough's settlement hierarchy and includes the sites HELAA assessments, sites previously agreed informally with PTPWG and other specialist development matters including park homes and self build is presented in

appendix IV. For employment uses sites discussion a similar approach is set out in appendix IX.

- 2.70 To enable an additional, simpler way to navigating the HELAA stage 2 findings for housing, Gypsy and Traveller and employment sites, an interactive map has been built link to: [HELAA draft Interactive mapping layers](#). The layers in this link are contained within the menu tab labelled HELAA draft for PTPWG January 2026. Each HELAA layer can be viewed or turned off by clicking the blue tick box to the right of the layer name . As part of formally publishing the HELAA on the website the interactive map will then be supplemented through a linking to an interactive webpage that will enable readers to search the HELAA details in webpage format. The interactive map allows the reader to navigate the sites by the geographical location, see all sites collectively and their overall assessment. The version of the HELAA interactive map at this stage is for the purposes of this report.
- 2.72 Members are now asked to provide a steer towards the growth approach for the Local Plan and then select non-strategic sites for allocation. This is essential so that officers can commence drafting site allocation policies for the Regulation 19 consultation scheduled for summer of this year and so that key evidence can be undertaken and finalised. If agreement on these matters is delayed, a summer Regulation 19 consultation would become extremely challenging due to the time and resources required to draft the Plan in advance of the consultation.
- 2.73 If a decision is made by the Secretary of State before the Regulation 19 consultation in the summer that grants the two planning applications that form the Highsted Park, then officers will bring back to members the discussion on strategic growth options and its implications for Local Plan preparation. However, whether the Highsted Park applications are granted or not, there is likely to be a legal challenge to any decision made and that process would likely go beyond the transitional window deadline for submitting a Local Plan for examination by 31 December 2026. As part of any potential judicial review, it would be beneficial for the Councils case to set out through Plan making what its preferred approach to strategic growth should be within the borough.

3. Recommendations

- 3.1 That Members of PTPWG are asked to note the findings of the Housing and Economic Land Availability Assessment (HELAA) 2025.
- 3.2 Members of PTPWG are asked to confirm their preferred growth strategy for drafting of the Regulation 19 submission version of the Local Plan for recommendation to Policy and Resources Committee.
- 3.3 Members of PTPWG are asked to recommend to Policy and Resources Committee non-strategic sites for the drafting of the Regulation 19 submission version of the Local Plan including:

- Non-strategic housing allocations
- Gypsy and Traveller sites
- Employment land allocations

4. Alternative Options Considered and Rejected

- 4.1 Members can choose not to provide a steer towards the Local Plan growth approach and not select enough non-strategic sites for allocation in the Regulation 19 draft Plan consultation. However, this should be rejected as choosing this option will result in the Council being unlikely to complete the Regulation 19 Local Plan documentation in time for the intended Summer consultation. Failure to carry out the Summer consultation would then require a further revision to the adopted Local Development Scheme at which point the Council will need to notify the Government on how it will proceed with Plan making.
- 4.2 Should revisions to the Local Development Scheme set out that there is not enough time to submit a Local Plan for examination under the transitional windows of the existing Plan making system. Then the Council would need to commence Plan making under the Governments new system. Whilst the new system seeks to make Plan making simpler to understand and use, the detailed development of any Local Plan under this system will likely occur after the Government proposed reorganisation of local government. Subsequently, Swale Borough Council would not exist as the decision making authority on any detailed drafting or adoption of a Local Plan under the new system.

5. Consultation Undertaken or Proposed

- 5.1 No formal consultation has been undertaken on the HELAA as it forms part of the evidence base to inform drafting of the Local Plan Review. The Regulation 19 Local Plan will be subject to a period of formal consultation at which point comments will be invited on the Plan, its policies and the supporting evidence base including the HELAA.
- 5.2 The Call for Sites exercise from Autumn 2024 that informs part of the HELAA was subject to detailed consultation that included:
- The exercise ran for six weeks between 3rd October and 14th November 2024;
 - In addition to established publicity approaches of advertising on the Council's website and social media channels and letters/emails to interested parties from the Policy contacts database, the following new approaches were used:

- Town centre surveys were conducted by officers to identify vacant commercial units, followed by land registry searches so that letters could be sent to those property owners;
- Targeted emails were sent to the Council's business contacts from the Economic Development team;
- Targeted emails were sent to charitable organisations with landholdings;
- Targeted emails were sent to local property auctioneers;
- Targeted emails were sent to identified Park Homes companies (both local and national operators);
- Nearly 3,000 communications consisting of letters and emails were sent out advertising the exercise.
- Site submissions were directed towards a portal on the Council website. However, it was also possible to submit by email or letter submissions. Of the 101 submissions 93 were via the portal and 8 via email.

5.3 The Local Plan Regulation 19 consultation documents will be subject to scrutiny with members when they are considered by the Planning and Transportation Policy Working Group early in the summer of this year, then further at Policy and Resources committee and subsequently by Full Council where the decision will be made regarding consultation.

6. Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action: ● A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	The Local Plan work program is fully funded across a combination of base budget, committed reserves and a contribution from the Government's Local Plans Delivery Fund.
Legal, Statutory and Procurement	The timetable for the consultation is set out in the Council's Local Development Scheme (LDS) that was adopted in July 2024. The LDS is a legal requirement of Council and must be kept up to date. It notifies key stakeholders, interested parties and members of the public the Council's intentions toward Local Plan making. Not providing a growth and sites steer at this time will make completing the documentation for Summer consultation unlikely and this would require an update to the Council's LDS.

	Should revisions to the LDS set out that there is not enough time to submit a Local Plan for examination under the transitional windows of the existing Plan making system. Then the Council would need to commence Plan making under the Governments new system. Swale Borough Council would not exist under the local government reorganisation proposals and subsequently would not be the decision making authority on any detailed drafting or adoption of a Local Plan under the new system.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	No implications identified at this stage.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.
Local Government Reorganisation	No implications identified at this stage.

7. Appendices

Appendix I: HELAA stage 1 sites not suitable

Appendix II: HELAA stage 2 findings housing sites summaries

Appendix III: HELAA stage 2 housing sites maps

Appendix IV: Housing sites for allocation discussion

Appendix V: HELAA stage 2 findings G&T sites summaries

Appendix VI: HELAA stage 2 G&T sites maps

Appendix VII: HELAA stage 2 findings employment sites summaries

Appendix VIII: HELAA stage 2 Employment sites maps

Appendix IX: Employment sites for allocation discussion

Appendix X: Consented Gypsy and Travellers pitches 1 April 2022 to 31 December 2025

Appendix XI: Non selected existing Local Plan allocated sites

Appendix XII: Local Plan Review high level timetable to December 2026

8. Background Documents

8.1 Local Development scheme 2025

[Local Development Scheme July 2025.pdf](#)

8.2 PTPWG report Local Plan Review historic delivery and housing target

[Local Plan Review Housing historic delivery and housing target report PTPWG 8th August 2024.pdf](#)

8.3 Gypsy and Traveller Accommodation Assessment 2023

https://swale.gov.uk/_data/assets/pdf_file/0004/463027/Swale-GTAA-Final-Report-December-2023-AA.pdf

8.4 PTPWG report Local Plan Potential Employment Sites Discussion

[Formal PTPWG Potential Local Plan Employment Sites Discussion 080824 Final.pdf](#)

[Formal PTPWG Emp Sites discussion Appendix I FINAL.pdf](#)

[Formal PTPWG Emp sites discussion maps Appendix II Final](#)

8.5 HELAA draft interactive mapping layers for PTPWG January 2026

[HELAA draft Interactive mapping layers](#)

8.6 Employment Land Review update 2024

https://swale.gov.uk/_data/assets/pdf_file/0003/463215/ELR-Update-2024-002-AA.pdf

8.7 Call for sites and HELAA progress report March 2025

[Call for Sites and HELAA Progress PTPWG Covering Report-Final 003.pdf](#)

8.8 Local Plan Review - Timetabling and Way Forward July 2025

[PTPWG 15 July LP Timetable V2 JJ.pdf](#)

8.9 Local Plan Review – Vision and Objectives, and Growth Options September 2024

[PR report Local Plan Review Vision Objectives Growth Options Final.pdf](#)