

Policy and Resources Committee	
Meeting Date	11 th March 2026
Report Title	Local Plan Review - Growth Strategy and Sites for Allocation
EMT Lead	Emma Wiggins Director of Regeneration and Neighbourhoods
SMT Lead	Joanne Johnson Head of Place
Lead Officer	Stuart Watson Project Manager, Planning Policy
Classification	Open
Recommendations	• To recommend to Full Council a preferred growth strategy for the drafting of the Regulation 19 Local Plan consultation. • To recommend to Full Council the non-strategic sites set out in appendices I to VI 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 This report sets out the background to the recommendations made by Planning and Transportation Policy Working Group (PTPWG) during its meeting on 22nd January 2026 with regard to the growth strategy and selection of non-strategic sites for allocation in the draft Local Plan.
- 1.2 The purpose of the [PTPWG report](#) was to set out previous discussions on housing and employment need and the approach to meeting that need through selecting a growth strategy for the borough and non-strategic sites for allocation in the Local Plan. The report also set out the approach to drafting the Local Plan agreed in the Council's [Local Development Scheme July 2025](#) and the challenging program and timetable for the Local Plan (Appendix VII) to complete the work.

2. Background

- 2.1 The PTPWG report sets out in detail a summary of all the reports that had informed the discussions on Swale's development needs through Plan making and how the growth strategy options had been developed and considered. The report also set

out the Housing Economic Land Availability Assessment (HELAA) evidence base of sites and from the HELAA what sites were potentially suitable for consideration in drafting the Local Plan.

- 2.2 The PTPWG report set out the previously discussed growth strategy options, what housing delivery could indicatively be delivered against each option after known existing supply had been considered and what the balance of housing need would be on non-strategic sites for allocation. The report also set out a number of live planning applications for strategic sites, their proposed development, potential planning committee dates and how they would align with the growth options. The report within its appendices set out the non-strategic sites members could consider for the Local Plan. Those non-strategic sites were taken from the HELAA and the findings of this assessment were set out within the PTPWG report and its appendices.
- 2.3 Members of PTPWG discussed in depth the growth strategy options (Table 1 below) that included the residual housing need from non strategic sites. Members voted to recommend to Policy and Resource Committee to recommend to Full Council option 6, a “very large strategic site in the east of borough/settlement hierarchy hybrid”.

Table 1. 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

- 2.4 Members of PTPWG then discussed recommending non strategic sites. Members agreed to include the two Highsted Planning applications sites currently with the Secretary of State (SoS) for determination. The discussion on these sites included the practicalities and implications on the Council meeting its development needs should the applications be granted. The focus of the discussion included what could be delivered from the sites during a 15 year Local Plan period due to the detailed infrastructure and mitigation constraints and what contribution the sites could make to a 5 years housing land supply.
- 2.5 Members then discussed the national planning policy objectives of using brownfield land first that includes making as much use as possible of previously-developed or 'brownfield' land (National Planning Policy Framework paragraph 124). Following this discussion members unanimously agreed to recommend all the non-strategic brownfield sites en bloc.
- 2.6 Then the non-strategic greenfield sites that had been previously informally discussed with members were discussed in turn together with additional information where available. The process was then repeated for new greenfield sites that members had not previously discussed.
- 2.7 Finally, members delegated to the Head of Place in consultation with the Chair of PTPWG to compile the allocations agreed and to present these to the Policy & Resources Committee in a manner which differentiated those sites which would contribute to the five-year housing land supply position. Delegation was also given regarding any further allocations required to make up any shortfall and Gypsy and Travellers and employment land allocations. The lists of non-strategic sites and their site maps for housing, gypsy and travellers and employment are set out at appendices I to VI. The sites can also be viewed on the [HELAA 2025 interactive mapping layer](#).

- 2.8 At this stage of Plan drafting any five years supply expectation from a site can only be a high level indication of possibility and will need to be confirmed and demonstrated through evidence as the Local Plan progresses to examination. That said it is appropriate to make this high level review of possibilities now, as demonstrating a five years housing land supply is a key test of a Local Plan being found sound at examination. Sites that might contribute to a five years housing land supply are set out in the housing sites allocation list at Appendix I.
- 2.9 Officers have determined that from the housing sites agreed by PTPWG there are enough non-strategic sites to meet the residual housing need identified. With regards to employment sites the Council at its [Full Council meeting 4th December 2024](#) agreed enough sites to meet its employment need. To add resilience to the supply of employment sites officers have added new sites submitted through the call for sites 2024 that are identified as suitable in the HELAA. One existing site not chosen previously has also been added to the employment sites as it would align with the recommended strategic growth option. For the Gypsy and Traveller need all sites found to be potentially suitable for allocation in the HELAA have been proposed. Officers agreed the lists of housing, gypsy and traveller and employment sites with the chair of PTPWG and subsequently then informed members of the group for their comments. The lists of sites and site maps are contained in appendices I to VI.
- 2.10 It should be noted that there is a shortfall of Gypsy and Traveller (G&T) sites when measured against the identified need in the Councils [Gypsy and Traveller Accommodation Assessment 2023](#) (GTAA). Whilst the Council has sought G&T sites through its call for sites exercises only 1 site has been submitted in the last two exercises in 2022 and 2024. That site was found unsuitable for plan making amongst other matters due to the scale of potential development in context to surrounding uses and it being isolated in the countryside. Resultantly this has made identifying sites for Gypsy and Traveller use challenging with those proposed for allocation identified through site interviews carried out by consultants as part of the GTAA. Whilst some of the G&T shortfall against the need could be addressed through windfall planning permissions the Council may in the future wish to consider undertaking a standalone development plan document for this matter.
- 2.11 Should further new sites become available, either through the recently closed Regulation 18 consultation or other sources, that are potentially suitable for the Local Plan drafting, then these will be reported to members for their consideration.

3. Recommendations

- 3.1 Members of P&R are asked to recommend to Full Council a preferred growth strategy for the drafting of the Regulation 19 Local Plan consultation.

3.2 Members of P&R are asked to recommend to Full Council non-strategic sites set out in appendices I to VI 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 could choose to recommend a different growth option and different allocations to those recommended by PTPWG. This is not recommended as PTPWG is the group with the mandate to review all the information regarding preparing the Councils Local Plan and make informed recommendations.

4.2 Members could choose to not forward a growth option recommendation and/or not enough non strategic sites for allocation to Full Council. However, this would likely result in a Local Plan being unachievable in the time remaining to complete under the existing plan making system that has a deadline of December 2026. Members rejected the option of not submitting a Local Plan under the current plan making system as part of agreeing the Councils Local Development Scheme July 2025. Further any Local Plan developed under the new plan making system will likely be after local government reorganisation and subsequently Swale Borough Council would no longer be the decision maker.

5. Consultation Undertaken or Proposed

5.1 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 this summer, then further at Policy and Resources Committee and subsequently by Full Council where the decision will be made regarding the launch of the Local Plans public consultation. As part of the consultation members of the public, other stakeholders and key infrastructure providers will be given the opportunity to comment on the Local Plan.

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 2025. 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 window of the existing Plan making system, 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	The timetable for the Local Plan sets out that Local Plan will be examined in public by the government's Planning Inspectorate before implementation of the local government reorganisation.

7. Appendices

Appendix I: Housing sites allocations list

Appendix II: Housing site allocation maps

Appendix III: Gypsy and Traveller site allocations list

Appendix IV: Gypsy and Traveller site allocation maps

Appendix V: Employment site allocations list

Appendix VI: Employment allocation maps

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

8. Background Documents

8.1 [PTPWG report Housing Economic Land Availability Assessment 2025 findings , Local Plan growth strategy and sites for allocation discussion](#)

8.2 [Planning and Transportation Policy Working Group minutes 22 January 2026](#)

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

8.4 [Gypsy and Traveller Accommodation Assessment 2023](#)

8.5 [Full Council meeting 4th December 2024](#)

8.6 [Full Council meeting 30th July 2025](#)