

Planning and Transportation Policy Working Group	
Meeting Date	12 th March 2026
Report Title	Densification Study and Identification of New Sites for the Housing Economic Land Availability Assessment
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Classification	Open
Recommendations	• To note the Densification Study 2023. • To note the early indication of new sites for the Housing and Economic Land Availability Assessment.

1. Introduction and Executive Summary

- 1.1 The purpose of this report is to set out the findings of the Densification Study 2023 carried out by consultants BPTW and how those findings can be considered within the next Housing Economic Land Availability Assessment (HELAA) update.
- 1.2 The report also identifies the potential for other new sites not previously considered or made available for the Local Plan, and how they will be assessed as part of the next HELAA. Any sites potentially suitable for the Local Plan will be reported back to PTPWG for consideration before drafting the Local Plan Regulation 19 has been completed.
- 1.3 This report covers three main issues:
 - The findings of the Densification Study;
 - An officer sift of the Densification Study findings; and,
 - An indication of any other new sites that maybe suitable for the HELAA from both the Densification Study and the recent Regulation 18 Local Plan consultation.
- 1.4 As part of ensuring that “no stone is left unturned” when seeking sites for the Local Plan officers have reviewed the Densification Study and are identifying new sites submitted through the recent Regulation 18 Local Plan consultation. This work has sought to ensure that a range of options for development within urban areas has been considered and to bring to members’ attention at the earliest opportunity any new sites that may be potentially suitable for the Local Plan.

2. Background

Densification Study 2023

- 2.1 The Densification Study 2023 (Appendix I) was carried out by consultants BPTW to assess urban sites within the Council's ownership with a view to identifying which sites might be suitable for residential development or densification. The study uses a traffic light assessment to categorise a site's development potential. The study comprised a desktop assessment of site constraints with each site ranked Red/ Amber/ Green based on its development potential and concluding with a high level quantum based on density assessment.
- 2.2 The Densification Study identified 186 sites and grouped them within eleven Swale ward boundaries so they could be considered in their geographical context. The study focused on whether the physical attributes of each site and its local context would preclude site densification. To accomplish this, the assessment used a desktop review from aerial and street view mapping to remove unviable sites. Within the study some planning policy constraints analysis has been used including reference to flood zones and heritage assets.
- 2.3 The Densification Study sets out that any sites identified as having an Amber or Green development potential would then be subject to a more detailed assessment. The Densification Study itself does acknowledge the high level desk top approach taken and sets out that a part 2 detailed assessment would be undertaken on the 42 sites with development potential
- 2.4 As part of this officers have carried out an initial review of the study findings, sifting those sites that could be considered for detailed assessment in the Housing and Economic Land Availability Assessment (HELAA) for the Local Plan.
- 2.5 The benefits of officers sifting the amber and green sites rather than the consultants carrying out the detailed assessment includes cost and time savings, the direct use of the knowledge from the Council's Planning Policy, Urban Design, Assets and Parks and Leisure teams and the potential duplication between any detailed consultants assessment and the HELAA.
- 2.6 The HELAA is a detailed and robust approach. It ensures that sites for consideration in the Local Plan meet the tests of suitability on planning matters, they are available for development during the Plan period and are deliverable against the policy requirements of the Local Plan.
- 2.7 The Densification Study identifies that there are 42 sites from the 186 assessed that are likely to have development potential. The study sets out a possible range of housing from those 42 sites of 357 to 408 dwellings (Table 1). Whilst this delivery potential may sound promising strong words of caution need to be applied:

- The study findings are based on desk top assessment and lack any physical site surveys;
- Many sites identified are likely to result in strong local opposition from being proposed on well used green spaces and redevelopment of community facilities;
- The policy constraints used within the study would benefit from demonstrating how they align with the existing or emerging Local Plan policies;
- There is no consideration within the study on whether the Council would release the land for development. For example, where there is a viable existing use or valued community asset;
- The study does not include consideration of the benefits of releasing the sites for housing versus retaining them for existing uses;
- There is no detail on the methodology used to determine the types of residential development proposed and its scale and impact on the surrounding area. For example, where flats are proposed in semi detached dwelling areas.
- Some densification options proposed would require changes to existing local policies for example the provision of play spaces These opportunities would need to be thoroughly assessed and would require quite substantial merit to outweigh the existing policy rationale; and,
- Finally, legal investigations remain to be carried out. For example, to determine any legal covenants arising from S106 agreements to secure the green spaces assessed.

Table 1. Densification study summary of amber/green sites development potential
(Densification Study page 138 (Appendix 1))

Summary of Potential Sites			
Ward	No. of potential sites	Estimated lower potential no. of homes	Estimated higher potential no. of homes
Borden & Grove Park	2	8	8
Chalkwell	0		
Homewood	2	7	9
Kemsley	9	91	106
Milton Regis	6	29	43
Murston	7	161	174
Roman	8	23	23
Teynham & Lynsted	1	3	3
The Meads	2		
West Downs	2	5	5
Woodstock	3	30	37

Total	42	357	408
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Densification Study HELAA sifting

- 2.8 As set out in paragraph 2.4 and 2.5 above officers in the Planning Policy team have carried out an initial sift of the amber and green sites with development potential. This sift has included consultation with the Council's Urban Design, Assets and Parks and Leisure teams to determine those that could be considered in the next HELAA.
- 2.9 The sifting of sites for the HELAA focused on two main areas. Whether the site would be suitable for assessment in the HELAA and whether the site would be available for development through release by the Assets and Parks and Leisure team or whether the site's existing use better serves the communities they are located within.
- 2.10 The findings of the officer sift are set out in the Sift of Densification Study Amber / Green sites for HELAA (Appendix II). The sift includes identifying sites for further assessment through the HELAA and justifications for those sites that have not been selected for the HELAA. In summary the sift found:
- 4 sites could be considered for the HELAA with an initial development range of 38 to 53 homes;
 - Many sites could not be considered as they fell below the HELAA site thresholds. Sites of this small nature should they come forward would contribute to the Local Plan small sites windfall allowance previously discussed with members;
 - Some site's existing uses better served their communities, for example where it was a green link in the built environment, was an occupied industrial estate offering employment opportunities or a well-used community centre;
 - Some sites proposed are within a parcel of a recreation ground and were discounted due to play pitches overlapping with the developable area or that the areas were well used informally by local residents; and,
 - Some sites were discounted as they would require development in the rear gardens of several private properties. Sites of this nature are problematic for plan making due to the large number of land owners required to make the site available.
- 2.11 The findings of the officer sift are disappointing compared to the potential set out in the Densification Study. However, it needs to be remembered that the study was undertaken at a high level and many sites identified in the study provide green spaces in the built up area forming both formal and informal areas for residential activities. For sites to be considered appropriate for the Local Plan they have to be suitable on planning matters, available for development and deliverable. For example the National Planning Policy Framework 2024 at paragraph 207 sets out that sites identified as being a Local Green Space, are sites that hold a particular

local significance to the local community, are demonstrably special to a local community on matters like beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and the character the site provides to the area as a whole.

- 2.12 The 4 sites set out in Appendix II as suitable for the HELAA will be assessed as part of the next HELAA update. The findings of the next HELAA will be presented to PTPWG at a later date along with any other new sites that have the potential for allocation in the Local Plan.

Identification of other new sites for the HELAA

- 2.13 Whilst the HELAA 2025 has just been published, like any stock take it will be subject to updating as planning policy matters update, sites gain planning consent outside of the Plan making system and new sites become made available to the Council.
- 2.14 The Council is not actively seeking new sites for the Local Plan due to the number already made available and assessed as potentially suitable in the most recent, published HELAA. However, until the Local Plan is at an advanced stage of drafting, there is both the legal requirement and opportunity to consider any new sites. Particularly where they meet the objectives of the Local Plan, for example on brownfield matters and/or offer alternative site options.
- 2.15 Whilst the Local Plan Regulation 18 consultation did not seek new sites for the Local Plan, this type of consultation is often used by promoters of sites to submit new sites not previously made available to the Council or to submit details on existing sites to inform the sites suitability.
- 2.16 The Regulation 18 consultation closed at 5pm 23 February 2026 and officers are currently reviewing submitted responses to identify any new sites for the HELAA or information that may change the HELAA suitability status of existing sites. Unlike the Densification Study sites any new sites will be subject to the full process of the HELAA as they have had no previous assessment. Any new sites from the Regulation 18 consultation found potentially suitable through the HELAA and any new information that changes the suitability of existing sites will be reported to PTPWG at a later date.
- 2.17 In discussions with the Council's Assets team two new urban brownfield sites SMC Ford, Crown Quay Lane, Sittingbourne and The Appleyard, Avenue of Remembrance, Sittingbourne have been identified as placed on the market for sale. Both sites promoters have contacted to determine whether the sites are available for consideration in the HELAA. If the sites are available and if found potentially suitable for the Local Plan will also be reported to PTPWG at a later date.

- 2.18 Whilst the officer sift of the densification study Amber and Green sites has resulted in limited options there may be further options through the sites submitted during the Regulation 18 consultation and the two new market urban sites. At this stage it is not possible to provide any development potential from these sites as they will need to be tested through the HELAA. All new sites from these sources that are potentially suitable for the Local Plan will be reported to members for their consideration as allocations.
- 2.19 Seeking densification of the urban areas including making reuse of land that maybe redundant or derelict would align with national planning policy objectives. However, it is important to reflect that place making needs to be mindful of all policy objectives that include amongst other matters provision of accessible green spaces, opportunities for wildlife habitats and good design that provides a sense of place and embeds and enhances the character of an area. Resultantly, densification can offer opportunities to provide additional housing in urban areas but also needs to be sensitively considered to ensure the quality of place.
- 2.20 In terms of the scale of potential development sought from a site, the HELAA presented to members in January 2026 set out the dwellings and developable area per hectare assumptions used in site assessments (WPVA Table 9.1 and 9.2 below). The assumptions were developed with a view to the existing character of the boroughs urban areas whilst also seeking high densities in the most sustainable and well connected urban transport areas. The assumptions have informed the whole plan viability assessment to determine the likely deliverable of sites against the emerging policy requirements of the Local Plan.

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%

Conclusion

- 2.21 Whilst a sufficient quantity of sites have been recommended by PTPWG to Policy and Resources committee for allocation to allow Regulation 19 Local Plan drafting to commence, it is worth reviewing sites identified in the Densification Study and other new sites that may come forward. These new HELAA sites may offer members the opportunity to add in sites that will contribute to the brownfield development objectives and to build resilience to the supply of sites for the Local Plan as a whole (or to remove sites initially supported for allocation). Any new sites that are found to be potentially suitable through the HELAA will be reported to members for their consideration in the Regulation 19 consultation.

3. Recommendations

- 3.1 To note the Densification Study 2023.
- 3.2 To note the early indication of new sites for the Housing and Economic Land Availability Assessment.

4. Alternative Options Considered and Rejected

- 4.1 Both matters in this report concern informing members on the development of the Local Plan evidence base and are for noting with no decisions required.
- 4.2 Members could choose to not note the densification study. However choosing this option should be rejected as the study whilst high level provides a review of Council owned urban sites and identifies those that could have development potential.

5. Consultation Undertaken or Proposed

- 5.1 No formal consultation has been undertaken on the Densification Study as it forms part of the evidence base 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.

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	No implications identified at this stage
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 current Local Plan timetable expects the Local Plan to be submitted for its Examination in Public and to be adopted before local government reorganisation is expected to be complete.

7. Appendices

Appendix I: Densification Study 2023

Appendix II: Sift of Densification Study Amber / Green sites for HELAA