

## Appendix IIIb

### Swale Borough Council – Local Plan Review

#### Natural Environment Discussion Workshop

Swale House, 22<sup>nd</sup> June 2018

#### Attendees:

Nathan Coughlan, KCC	Anna Houghton, Maidstone Borough Council
Mark Loos, Medway Swale Estuary Partnership	Martin Randall, RSPB
Hayley Taylor, Birdwise/Medway Council	Tom Reid, Environment Agency
Mark West, Environment Agency (WFD)	Amanda Corp, NFU
Thomas Kennedy, KCC PROW & Access	Catherine Smith, Medway Council
Kate Ahern, LUC	Jennifer Wilson, Environment Agency
Cllr Gerald Lewin, Swale Borough Council	Karoline Allu, Environment Agency
Cllr James Hunt, Swale Borough Council	Nick Johannsen, Kent Downs AONB
Jon Byne, Environment Agency	Graeme Tuff, Swale Borough Council
Gill Harris, Swale Borough Council	Sally Evans, Mid Kent Downs Countryside Partnership
James Freeman, Swale Borough Council	Dora Querido, RSPB
Alan Best, Swale Borough Council (AB)	Lyn Newton, Swale Borough Council
Lisa Gadd, Canterbury City Council	Natalie Earl, Swale Borough Council
Matthew Woodcock, Forestry Commission	Anna Stonor, Swale Borough Council
Rosemary Godfrey, Natural England	
Georgia Patt, Natural England	

#### Strategic Overview of Natural Environmental Assets

1. AB welcomes everyone and begins the afternoon with an introduction to Swale's natural environmental assets. There is a very large natural resources in Swale. 2012 Habitats Survey illustrates breadth:
  - a. In terms of landscape there are 3 National character areas, 10 Kent Local Landscape Character Areas, and 42 Swale Landscape Character Areas. 59% of landscapes in SBC are designated.
  - b. Land uses include arable, horticultural and improved grassland. Swale has 20% of Kent's traditional orchards, 20% of Kent's neutral grassland including BAP habitats. Swale has 56% of Kent's coastal marsh. Swale has a low percentage of woodland – about 6% (4% of that top priority BAP woodland).
  - c. 26% of Swale has a national or international biodiversity designation (2,000 hectares) 20% of Swale is within the Kent Downs AONB, 40% of SBC is BMV agricultural which is estimated as contributing £250m to the economy. Each 100 hectares lost is a loss of £1.7m in agricultural output.
2. One issue is that GI is not mapped (hedges, veteran trees, etc), however all contributes to natural capital.

#### Local Plan Review and Future Growth

3. AB introduces the Local Plan Review. Bearing Fruits (the adopted Swale Borough Local Plan) was adopted in July 2017. SBC now required to undertake a review to 2038. Updated revised NPPF likely to require SBC to build 17.5k dwellings – 40% above current targets. (776 dwellings per

annum from 2017 plan amended to 1086 dwelling per annum – this is an additional 10k over the Bearing Fruits pipeline).

4. Government's Environment Plan is the background to NPPF – the new Local Plan will need to be responsive to biodiversity (net gain) and air quality.
5. SBC aim to adopt mid 2022 – very tight schedule. Issues and Options consultation (including strategic options and likely to include preferred option) scheduled for summer 2019. There will be further workshop opportunities to discuss issues.
6. Looking Ahead is a scoping document. SBC received a good response to this and it will be analysed in the next few weeks.
7. One option to consider is 'Business as usual' ie continue development strategy at Sittingbourne, Sheppey and Faversham's urban areas plus larger villages – this strategy has been around for 20+ years. South Sittingbourne, West Minster, SE Faversham, Teynham and Iwade likely to be in the frame with this.

#### **Future Growth General Issues – Round table discussion**

8. Natural England – air quality a concern. Support for GI (Green Infrastructure) – good plans already and keen to support. Important that access and people are at the heart of a GI strategy. Starting an early conversation with NE is beneficial to get all stakeholders at the forefront.
9. AB pointed out that a GI Strategy is to be commissioned. During the Bearing Fruits process housing targets went up at a late stage so hard for GI to respond. This time it will be done in the 'right order'. Alan asked if NE were concerned about level of growth SBC might be asked to take on. Natural England – not unduly worried at this stage. Marshes/SPA a concern, also the Downs due to recreational pressure, including secondary recreational pressure. Habitat may require a SAMMS type approach due to growth requirements of regional local planning authorities. Monitoring for disturbance will be key as well as building in buffers. Restricting access to different types areas may be required. GI an opportunity.
10. RSPB – concern about SPA – mitigation essential. Development up to SPA boundary brings a lot of questions which should be dealt with via SA/HRA. Building close to the SPA boundary is an immediate concern. Mitigate strategy in place should not be undermined. Pointed out that additional mitigation may be required adjacent to the SPA.
11. The issue of sites next to the SPA being the most favourable sites was discussed. Less favourable regeneration sites might be left behind. Alan Best agreed that planning is driven by delivery to ensure 5 year HLS and delivery test. Cherry picking of the most attractive sites is likely.
12. Medway Council – Good GI offers opportunities. Strong concern amongst local communities and stakeholders regarding the impact on the SPA. We need to strive for more than just not making things worse – how can we improve/net gain? Housing plus infrastructure brings viability challenges. GI should be a top of the list, but is always challenged by developers at site level. Medway Council officer stressed the need to hold on to planning ambitions for the environment as strongly as possible. Stressed that the debate is always about housing and environment is always 'poor relation' via mitigation. Environmental Strategy equally important and need to make sure it doesn't slip down the agenda. Integral part of strategy. Air Quality also needs to be made a significant social and cultural priority – this issue can't all be managed through the planning process.
13. AONB – strong support for what Medway Council set out. Natural Environment is a resources which is very important in this area. In SBC double natural environment of protected areas. Very challenging to balance with development. Government intention is environmental net gain not just nil detriment. Natural environment is not doing well. KCC predict 25-33% population

increase in the next 13 years. This massive scale of growth will have an impact on valued environments. The plan review has to be made in the context of population increase. Recreational impact is very important. Many parks/National Trust properties are turning people away on busy days. Farming also important. Biodiversity representatives are also expressing concern now before the main population increases kick in. Therefore needs very creative thinking. Environment for its own sake and quality of development must be a key issue in the debate. Plan and ambition must be assertive.

14. AONB Unit explain the current review of AONB/National Parks – are they fit for purpose? One question is parity between National Parks and AONBs – national parks only have to take local need. Planning will be at the forefront of this debate. This could have an impact for LP review, but timescales tight – review will be reporting due late 2019 for 70<sup>th</sup> anniversary of AONB Act. The outcomes are unclear at this stage, but expected to contribute to environmental net gain.
15. AB noted that most GI offsetting comes from new development. GI not a public spending top priority.
16. Environment Agency – suggested reviewing and grading SAMMS payment according to distance from the SPA boundary. Salt marsh/coastal habitats – very few wardens or implementation of protections. SAMMS needs teeth. Importance of blue as well as green infrastructure.
17. EA also stressed the importance of the water environment– water quality and stress. Councils take some responsibility to ensure river quality doesn't deteriorate. Flood risk is a constraint on development. Medway Estuary and Swale Strategy (MEASS) needs to be taken on board. This should be finalised in September 2011. Development needs are not necessarily alarming but need to respect the water environment. A revised SFRA is needed – EA happy to work with SBC on this. (EA explained that compensation for lost salt marsh is as a result of climate change, not development.)
18. NFU – issues for farmers include: development impacts on water supply; planners ignorance; transport from farm to other business; PROWs conflict with farming. NFU has flood management plan too.
19. AB reminded group that SBC has a significant percentage of the UK's BMV. He then brought up the issue of future development in SBC will be likely to use some BMV, particularly in the A2 corridor. This directly relates to the current settlement strategy. BMV doesn't have same status as other designations and therefore is not a showstopper. However, there are food security and environmental issues so it is an issue for the Local Plan. The value of agricultural land may change post Brexit. Alan asks when is scale of loss becomes significant? NE said they had no intelligence on this but would feed back.
20. Forestry Commission gave example of the South Downs National Park – development should support wider infrastructure of the National Park. Ancient woodland has equal status to AONB – NPPF reinforces this. Forestry Commission argued for less development and buffers eg as part of GI? SANGS schemes are problematic – SANGS should not be sites of most environmental value. Local Plan needs to find ways to add value to development product which also supports the environment. There is generally a lot of focus on the SPA, but disturbance on woodlands is not so obvious or well monitored – mitigation strategies for woodlands need to be carefully set out.
21. Forestry Commission also argued that local wood should be used in construction. Modular housing has less local impact and design of homes can reduce their environmental impact. Where heat is required use lower quality local wood which has air quality benefits. GI has value. They also discussed problems with woodland diseases.
22. Canterbury City Council said that they have a GI Strategy currently out to consultation. This is aimed at developers and planners and highlights issue of linking with cycle/walking strategy. No major cross-boundary issue with Swale.

23. AONB stressed that trees outside woodland also very important. It should be a goal to increase woodland cover across the borough. What does this mean for the local plan?
24. Air Quality - Natural England – will consider the expectations on LPAs and follow up in writing.
25. KCC stressed the pressure on water resources and water quality due to urbanisation. Southern Water are only planning for BF's growth – engagement needed.
26. KCC also stressed involvement of KWT and integration with their strategies for water voles, otters, etc which are being prioritised in Kent.
27. LUC – stressed the fantastic landscape resource (including marshes and downs) in Swale. Not all landscapes are designated and this means there will need to be subtlety at individual site level as all landscapes have value. There are opportunities around SBC's town and villages where there can be poor urban-rural transitions which could be worked on and enhanced.
28. Forestry Commission – nightingales very close at Medway. There are opportunities to create successful habitats in fairly short timescales.
29. AONB – agricultural environmental payments are a huge opportunity which can serve the public good. There are many challenges to farmers but also opportunities. Plan making equals an opportunity for evidence gathering.

#### **Future Growth - a new settlement/s as a choice for housing growth?**

30. AB introduces the subject of new settlements as a potential different strategy – not yet committee to this. Bretts high level study looked at the potential for garden cities based on geography. In terms of designations the A2 corridor and northern Sheppey are less constrained areas – but they not without issues eg A2 has some of the best BMV in the country. Nowhere is totally unconstrained.
31. AB explained the new settlement prospectus – looking for settlements of 2.5k or more and assessing market appetite. Expression of interest period closed in early June and 3<sup>rd</sup> August is deadline for submissions of detailed proposals. The workshop is seeking instant reactions and potential showstoppers and will help with the assessment. Alan makes point that there is a long lead in time to delivery of new settlements so new settlements will not be the whole land allocation story which may stretch over several LP reviews. The question to look at in the workshop is whether people at the table considered the new settlement approach might be better for the natural environment than the incremental 'business as usual' approach - a 40% of open space will be required.
32. Whilst SBC officers and Bretts have looked at potential sites for Swale, all of the sites discussed at workshop are promoted by landowners/developers so market generated.

#### **South East Sittingbourne**

33. This scheme is for approximately 11.5-12k dwellings and includes expansion of the Kent Science Park. Site includes dry valleys and mostly agricultural land with some woodland, including ancient woodland at Cromers Wood. New M2/J5a (including AONB) and South Sittingbourne Relief Road to A2 and onward to Northern Relief Road are included.
34. KCC PROW – stressed importance of maintaining existing PROW network and creation of new links. An attractive walking and cycling networks can be an alternative to short car journeys. Can be integrated with GI strategy and green corridors. Early engagement with stakeholders and partners important.

#### **Rushenden Marshes**

35. Scheme is for 2.5k dwellings. Site abuts SPA, flood zone and waste water works at Queenborough.
36. EA point out flood risk at this location where no active intervention/maintenance is planned so will flood. A developer could try to maintain the defences but this would need to be a sustainable commitment – they cannot just walk away once built.
37. RSPB ask about the knock on effect of land raising? For instance it will have a great impact on birdlife. RSPB would like buffers around the whole estuary to mitigate for less habitat created by climate change and sea level rise.

#### **Faversham A2/A251 and Lees Court Estate**

38. Scheme is for 5-6k dwellings amongst/adjacent to historic parkland, AONB – also veteran trees and Ancient Woodland. The Lees Court Estate is proposed for supporting GI - not clear how many or what development is proposed in the AONB. One question is how a scheme here could meet the NPPF's AONB test?

#### **South East Faversham**

39. Site is owned by the Duchy of Cornwall and the scheme proposes 2.5k homes. The site could extend north of the A2 to the railway/Graveney Road – this would add another 1k homes, totaling 3.5k. All of the site is BMV agricultural and intensively farmed. It is felt that this is the best of the options so far due to connectivity to existing community. Site abuts AONB but the M2 provides a boundary – already pedestrian links under the M2. Duchy also looking to use AONB land holdings to support this new settlement.

#### **Bobbing**

40. Scheme is for 2.5k dwellings, and lies west of A249 and north of Newington. A2 & A249 are problems which have been ignored by promoters so far. Intensively farmed site with some woodland. GI strategy north of Keycol and south of railway proposed. Includes Rook Wood ancient woodland.

#### **Round Table discussion of plans and strategies and final comments**

41. Forestry Commission explained the situation at Milton Keynes where 40% GI requirement was outlined from Day 1 – led to behavior change. Look at example of Jaskins in Gravesend – woodland and meadows and integrated open space on edge of town created from rapeseed prairie. This was supported by a Central Government grant, but lots of other resources can be tapped into.
42. LUC make point that masterplanning will be essential. EA believe GI is more achievable when all environmental stakeholders can be involved in new settlement. Landscapes outside designations are important.
43. AONB – how are alternatives such as urban intensification being looked at? Evidence is needed – eg impact on exiting urban areas.
44. EA – MEASS due end of 2018. Further flood risk modelling needed.
45. James Freeman adjacent areas of land to those promoted which could be integrated.
46. Cllr Lewin – new settlement does change land value. Prospectus makes clear that uplift must cover infrastructure. OAN not confirmed yet, but if it is then it's an opportunity.

47. KCC PROW – PROW under review (10 yearly) and looking at how PROW needs to be developed. Out to consultation June 2018 – should be cross referenced in Local Plan Review. Opportunities for integrating cycling and walking.
48. MBC – are also reviewing PROW plan. Biodiversity should be seen as an asset rather than a barrier to development.
49. SAMMS Officer – only careful permitted access to SPAs on estuary. Species list to developers for biodiversity in new planting. SUDS also need to be pushed in new developments especially as an adaptation to climate change
50. MSEP - Design should be local vernacular – useful Defra Guidance document. Incorporation of small details such as swift bricks is an easy win. JF – developers report mixed feedback on these
51. RSPB – Ecology environment not viewed in holistic way. Increasing connectivity/green corridors between green areas increases their value.
52. AONB – the management plan for the AONB is just starting as well as a Government Review of National Parks and AONBs.
53. Mid Kent Downs / KCC – don't forget orchards and horticulture especially in Faversham's Fruit Belt – a national asset. Community orchards within developments should be considered.
54. EA – ground water protection and water efficiency measures should be pushed – promoting 90 litres pppd. Water cycle study will provide the evidence base for this. No development on top of culverted rivers/water courses – open up if possible for biodiversity and amenity.
55. Medway Council – Local Plan will be at Regulation 19 stage later in 2018. Includes development on Rainham/SBC boundary. GI integral to improve degraded landscapes.
56. Canterbury City Council – GI strategy includes education as to what green infrastructure actually is – speaking to landowners and agents early on. Allotments and city gardens in strategic sites
57. Maidstone Borough Council at early stage of LP review. Green and Blue Infrastructure strategy integral.
58. Forestry Commission – tree-scapes important as are integrated landscape. CPO can be quite negative – instead work with landowners to draw in via constructive schemes.

#### **Local Plan Next steps:**

59. Follow up discussions will be held as necessary.
60. Next key milestone is the Issues and Options consultation in summer 2019.
61. The GI Strategy at SBC needs to be accelerated as a key bit of evidence.

*The comments below were received from Mark Loos of the MSEP following the workshop:*

- *Recreational disturbance is an important issue on the water as well as on land – due to the impact on intertidal and sub-tidal habitats. Users of estuary should be encouraged to use official launch sites.*
- *New marine and moorings facilities should be encouraged to have proper facilities for cleaning boats out of the water as well as pump out facilities to reduce amount of sewage entering the estuary.*
- *Green Infrastructure – SBC (or MSEP supported by SBC) could write a guide to GI which encourages native plants/trees and provides habitats.*
- *Green energy – encourage SBC to support solar panels on housing to avoid large scale solar farms.*
- *Developments should reflect local vernacular and sense of place – Peters Village on the Medway is an example where this hasn't worked well.*
- *Promote SUDS.*
- *Promote a buffer around the SPA.*
- *Promote value of scrub as a habitat.*