

Sustainability Appraisal (SA) of the Swale Local Plan

SA Report

February 2021

Quality information

Prepared by	Checked by	Verified by	Approved by
Chris McNulty, Senior consultant	Mark Fessey, Associate Director	Steve Smith, Technical Director	Steve Smith, Technical Director
Mark Fessey, Associate Director			

Prepared for:

Swale Borough Council

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
acom.com

© 2021 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract Swale Borough Council (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

1	Introduction.....	1
2	What's the plan seeking to achieve?	2
3	What is the scope of the SA?	4
	Part 1: What has plan-making / SA involved up to this stage?	6
4	Introduction to Part 1	7
5	Establishing growth scenarios	9
6	Growth scenarios appraisal	34
7	The preferred growth scenario.....	38
	Part 2: What are the appraisal findings at this stage?	39
8	Introduction to Part 2	40
9	Appraisal of the Local Plan Review	42
	Part 3: What are the next steps?.....	82
10	Plan finalisation	83
11	Monitoring.....	83
	Appendix I: Regulatory requirements	84
	Appendix II: Review of evidence	88
	Appendix III: Broad growth scenarios.....	115
	Appendix IV: Strategic site options.....	120
	Appendix V: Site options GIS analysis	123
	Appendix VI: Sub area scenarios	126
	Appendix VII: Growth scenarios	146
	Non-technical Summary	
	Technical Appendix	

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Local Plan Review (LPR). Once in place, the LPR will establish a spatial strategy for growth and change - in response to key issues and opportunities - over the period 2022 to 2038. The LPR will build on the adopted Local Plan ('Bearing Fruits'), which covers the period 2014 to 2031. The LPR will allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
 - What has Plan-making / SA involved **up to this point**?
– including with regards to consideration of 'reasonable alternatives'
 - What are the SA findings **at this stage**?
– i.e. in relation to the draft plan
 - What are **next steps**?

1.3 This SA Report²

- 1.3.1 This is the SA Report for the Swale LPR. It is published alongside the proposed submission version of the LPR (known as the 'Pre-submission LPR'), in line with the requirements set out under Regulation 19 of the Local Planning Regulations (2012).
- 1.3.2 The aim is to inform representations and subsequent plan finalisation.

Structure of this report

- 1.3.3 This report is broken down into **three parts**, according to the three questions above. Before answering the first question, there is a need to further set the scene by answering **two initial questions**:
 - What is the plan seeking to achieve?
 - What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2019). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely how and where regulatory requirements are met / are being met.

2 What's the plan seeking to achieve?

2.1 Introduction

- 2.1.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

2.2 The plan area and plan period

- 2.2.1 The LPR covers the entirety of Swale Borough and aims to cover the period 2022 to 2038. The beginning of the plan period is set at 2022 in light of paragraph 33 of the National Planning Policy Framework (NPPF), which explains that Local Plans should be reviewed at least once every five years.
- 2.2.2 An important point to note is that there is a large supply of housing that is already committed, in that it is set to come forward at a site already planning permission and/or an allocation in the current Local plan. A small proportion of this will come forward in 2021, but the great majority is expected to deliver housing in the period 2022 to 2038. These sites will be 'rolled-forward' into the new LPR, such that the task of the LPR can be thought of as building on a baseline position characterised by existing committed supply. Indeed, committed housing supply that is expected to deliver in the LPR plan period amounts to around 2/3 of the total housing need for the LPR plan period (see discussion in Section 5.2), which leads to a good degree of flexibility when preparing the LPR, particularly in respect of selecting sites for allocation.

2.3 Legislative and policy context

- 2.3.1 The Local Plan is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current government policy, as set out in the National Planning Policy Framework (NPPF, 2019) and Planning Policy for Traveller Sites (2015) and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- 2.3.2 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of Kent County Council, the South East Local Enterprise Partnership (LEP) and environmental bodies including the Environment Agency, Historic England and Natural England. Swale BC must also cooperate with neighbouring areas in respect of 'larger than local' considerations, including planning for housing needs, capitalising on growth opportunities across the Thames Gateway and planning for the Kent Downs AONB.
- 2.3.3 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans (NDPs), with a made Neighbourhood Plan for Faversham Creek and several others in preparation. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that all NDPs will be taken into account when preparing the Local Plan.

2.4 Plan aims and objectives

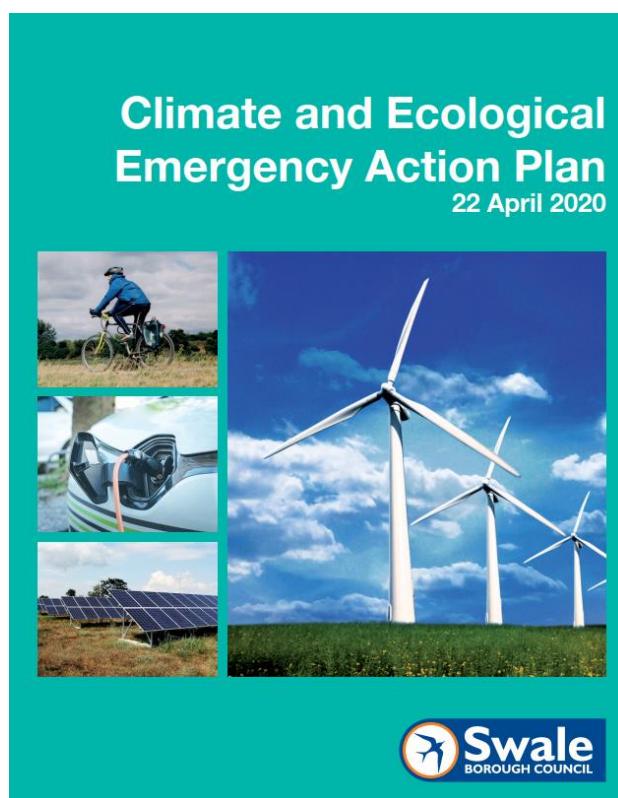
- 2.4.1 The LPR document explains that the Council is reviewing its adopted local plan to:
- deliver the spatial objectives of the Council's corporate strategy, including responding to the declared Climate and Ecological Emergency and subsequently published Action Plan;
 - reflect changes to national planning policy and guidance, particularly the new NPPF and the requirement to review local plans every 5 years;
 - extend the plan period to 2038 in order to ensure that there will be a 15 year time horizon from adoption for strategic policies as recommended in the NPPF in order to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements in infrastructure; and
 - provide for additional new housing, employment and other development that will be required to meet future needs over the extended plan period as required by the Government.

2.4.2 The LPR document explains that the key challenges for the LPR are:

- delivering a carbon zero Borough by 2030;
- meeting the varied housing needs of the growing population in the right places;
- supporting the needs of the local economy so that it can continue to be competitive and create quality local jobs;
- delivering the infrastructure requirements needed to support growth and create high qualities places;
- delivering sustainable growth while protecting and enhancing historic and natural assets;
- managing change in town centres so that they remain vital, competitive and attractive places to meet, live, work and enjoy; and
- embedding sustainable and active travel options and behaviour into existing and new developments to reduce greenhouse gas emissions, improve air quality, reduce traffic accidents, reduce congestion and improve the health and wellbeing of residents.

2.4.3 The objectives of the Local Plan are as follows:

- Provide for homes and jobs that are best suited to meet identified local needs;
- Support and sustain communities across the borough, big and small, by planning to meet identified needs, including needs for community facilities and infrastructure;
- Protect and manage our resources to address climate change through delivering sustainable growth that supports urban and rural economies and makes the best use of infrastructure;
- Locate development in the least constrained areas in reasonable proximity to transport hubs;
- Provide a mixed portfolio and locations of sites, big and small to meet a range of needs throughout the duration of the plan period up to 2038;
- Deliver a level of investment and growth at key locations to facilitate significant improvements to support infrastructure e.g. schools, healthcare and highways and active travel options to benefit communities;
- Focus development on the contribution that larger sites can deliver in a proportionate way to meet wider plan objectives and ensure delivery in the plan period.



Achieving a net zero Borough by 2030 is a key challenge for the LPR

3 What is the scope of the SA?

3.1 Introduction

- 3.1.1 The aim here is to introduce the broad scope of the SA, meaning the breadth of sustainability issues and objectives taken into account as part of the appraisal of reasonable alternatives and the emerging LPR.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA Report], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these organisations were consulted on the SA scope in 2019; this involved publication of a Scoping Report, which was then subsequently updated to reflect comments received.⁴

Evolution of the SA scope

- 3.2.2 The SA scope should not be ‘set in stone’ following consultation and finalisation of the Scoping Report, but rather must continue to evolve over time to reflect latest evidence, latest understanding of issues and objectives and the emerging scope of the plan / options. In this instance the SA scope has continued to evolve since 2018, including in light of the evidence review presented in Appendix II, but only evolved to a limited extent. The scope has not changed to the extent that further scoping consultation is required.

3.3 The SA framework

- 3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework established in 2018. Minor adjustments to objectives have been made since the Scoping Report.

Table 3.1: The SA framework

Topic	Objective
Air quality	<ul style="list-style-type: none"> Support the achievement of air quality improvement objectives within the Borough’s 5 designated AQMAs. Seek to minimise air pollution more generally, such as through supporting or enabling the use of low emission technologies and encouraging sustainable modes of transport such as walking and cycling.
Biodiversity	<ul style="list-style-type: none"> Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of international, national or local significance. Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats.
Climate change mitigation	<ul style="list-style-type: none"> Minimise per capita greenhouse gas emissions from transport, industry and the built environment. Deliver high standards of energy efficiency and water efficiency in new development.
Communities	<ul style="list-style-type: none"> Support good access to existing and planned community infrastructure for new and existing residents. Promote and support healthy communities, including through increasing access to green infrastructure and open space.

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

⁴ See <https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Looking-Ahead/FINAL-Swale-SA-Scoping-Report-DECEMBER-2018.pdf>

Topic	Objective
Economy and employment	<ul style="list-style-type: none"> Support the achievement of economic growth objectives, including in targeted growth sectors and established employment sectors. Support a strong, diverse and resilient economy that provides opportunities for all. Support and enhance the vitality of the Borough's town centres including through the identification of further regeneration opportunities where appropriate. Support provision of further education facilities in the Borough where practicable.
Flood risk	<ul style="list-style-type: none"> Avoid and mitigate flood risk by directing development away from the areas of the Borough at the highest risk of flooding. Deliver Sustainable Drainage Systems and other measure with a view to future proofing and building climate change resilience. Support the priorities identified in the Medway Estuary and Swale Shoreline Management Plan and the Isle of Grain to South Foreland Shoreline Management Plan.
Heritage	<ul style="list-style-type: none"> Conserve and enhance heritage assets and contribute to the maintenance of historic character through design, layout and setting of new development.
Housing	<ul style="list-style-type: none"> Support timely delivery of market housing and affordable housing. Promote an appropriate mix of housing types and tenures. Cater for existing and future residents' needs as well as the needs of different groups in the community.
Land	<ul style="list-style-type: none"> Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character and quality of the Borough's landscapes and townscapes through appropriate design and layout of new development. Protect and enhance the Kent Downs AONB where possible. Preserve important open gaps between settlements.
Transport	<ul style="list-style-type: none"> Promote sustainable transport use, including supporting the creation of additional walking and cycling routes, and reduce the need to travel, particularly by private vehicle. Support strategic transport schemes.
Water	<ul style="list-style-type: none"> Promote sustainable forms of development which minimise water consumption and wastewater flows. Maintain and enhance the quality of both surface and ground water resources where possible consistent with the aims of the Water Framework Directive. Promote efficient and sustainable use of natural resources.

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

- 4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: What has plan-making / SA involved up to this stage?

4.2 Overview

- 4.2.1 Plan-making has been underway since 2017. Key steps have included: a consultation entitled Looking Ahead; publication of a Garden Communities Prospectus; consultation on the SA Scoping Report (as discussed in Section 3); a wide-ranging programme of engagement with the Council's Local Plans Panel (LPP), Duty to Cooperate Partners and other select stakeholder organisations; and presentation of an Interim SA Report (focused on 'growth scenarios') to the Local Plan Panel meeting of 19th January 2020.⁵
- 4.2.2 However, the focus here, within Part 1, is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in 2020 and 2021. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
 - present an appraisal of the reasonable alternatives - see **Section 6**
 - explain the Council's reasons for selecting the preferred option - see **Section 7**
- 4.2.3 Presenting this information is in line with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report.

Reasonable alternatives in relation to what?

- 4.2.4 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan – see Section 2.⁶ Following discussion of plan objectives with officers, it was determined appropriate to focus on spatial strategy, i.e. the spatial approach to delivering development to meet needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the Local Plan.⁷
- 4.2.5 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.

What about site options?

- 4.2.6 Whilst individual site options invariably generate a high degree of interest, they are not reasonable alternatives, in light of the legal definition.⁶ If the LPR was setting out to allocate one site, then site options would be reasonable alternatives, but that is not the case. Rather, the **objective of the LPR** is to allocate a package of sites, hence reasonable alternatives must be in the form of alternative packages of sites.
- 4.2.7 Appraising alternative packages of sites amounts to exploring a discrete choice open to the Council, with the aim of rationalising complex choices and supporting effective debate. Debate can be hampered where there is a focus on site options without an understanding of how they would be delivered in combination.
- 4.2.8 Consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios. However, this is a proportionate level of analysis with the aim of contributing to "an outline of the reasons for selecting the alternatives dealt with" (Schedule 2 of the SEA Regulations) only.

What about employment land?

- 4.2.9 The process of establishing reasonable growth scenarios has been housing-led; however, there is also a need to ensure sufficient supply of employment land under all scenarios, in light of the targets set by the Employment Land Review (2018). This matter is discussed further in Section 5.5.

⁵ See services.swale.gov.uk/meetings/ieListDocuments.aspx?Cld=216&Mld=2423

⁶ Regulation 12(2) requires that reasonable alternatives are defined in light of "*the objectives and geographical scope of the plan*".

⁷ It was also considered appropriate to focus on 'spatial strategy' given the potential to define alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. This approach is in line with the SEA Regulations, and the Planning Practice Guidance is clear that SA "*should only focus on what is needed to assess the likely significant effects of the plan*". More broadly, spatial strategy has implications for all or most Local Plan objectives, and invariably generates a high degree of interest.

What about other aspects of the plan?

- 4.2.10 In addition to establishing a spatial strategy and allocating sites accordingly, the LPR must also establish strategic policies on a range of key thematic issues, development management policies and site-specific policies to guide decision-making as part of future planning applications. Broadly speaking, these can be described as development management (DM) policies. There can be the potential to establish and appraise reasonable alternatives (RAs) for DM policies; however, it can be a challenge to establish DM policy alternatives that are meaningfully different, such that the appraisal would serve to differentiate between the alternatives in terms of 'significant effects'.⁷ In this instance, following discussion between the Council and AECOM, no DM policy RAs were identified as warranting appraisal. N.B. DM policies are a focus of the plan appraisal in Part 2 of this report, with numerous recommendations for adjustments.
- 4.2.11 Other notable aspects of the plan, for which RAs have not been formally defined and appraised, are:
- Kent Science Park – the current proposal is to treat the science park as an employment allocation, rather than a regeneration ('Regen') area, as per the adopted Local Plan; however, the policy approach to the site is virtually unchanged. There are not considered to be RAs in respect of the science park itself, although there is a need to explore the option of expansion as part of a wider scheme for strategic growth in the vicinity (see discussion of Southeast Sittingbourne in Section 5.3).
 - Port of Sheerness Regen – paragraph 6.7.74 of the adopted Local Plan states: "*Longer term options within the emerging Port Masterplan, such as potential land reclamation... will be matters for a review of the Local Plan to consider, having regard to such further evidence that has been prepared and a further future review and consultation on the Port of Sheerness Masterplan....*" However, in practice the masterplan has not progressed, nor is there any other new evidence that serves to highlight any reasonable option other than rolling forward the existing policy, which is the proposed approach.
 - Sittingbourne Town Centre Regen – the proposal is to support a shift in policy, with a focus on housing, a consolidated retail offer, a new community quarter and increased office/employment provision; however, following discussions between officers and AECOM, no RAs were identified for appraisal. The forthcoming SPD will provide a forum for exploring detailed options.
 - Queenborough and Rushenden Regen – the policy for the existing regeneration / masterplan area is beginning to bear fruits - as reflected in delivery of new homes employment, retail and a link road. There are not considered to be RAs in respect of the existing masterplan area (although there are questions around flood risk and affordable housing); however, there is a need to explore the option of expansion ('Rushenden South'). This is a focus of discussion below, including Section 6.

4.3 Structure of this part of the report

- 4.3.1 This part of the report is structured as follows:
- **Section 5** – explains a lengthy process of establishing on growth scenarios
 - with supplementary analysis in **Appendices II, III, IV, V and VI**;
 - **Section 6** – presents a summary appraisal of the reasonable growth scenarios;
 - with detailed appraisal findings in **Appendix VII**;
 - **Section 7** – presents a statement provided by officers setting out reasons for supporting the preferred growth scenario / spatial strategy in light of the appraisal.

Whose responsibility?

- 4.3.2 It is important to be clear that: selecting reasonable alternatives (growth scenarios) is the responsibility of the plan-maker (Swale BC), with AECOM acting as advisors; appraising reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

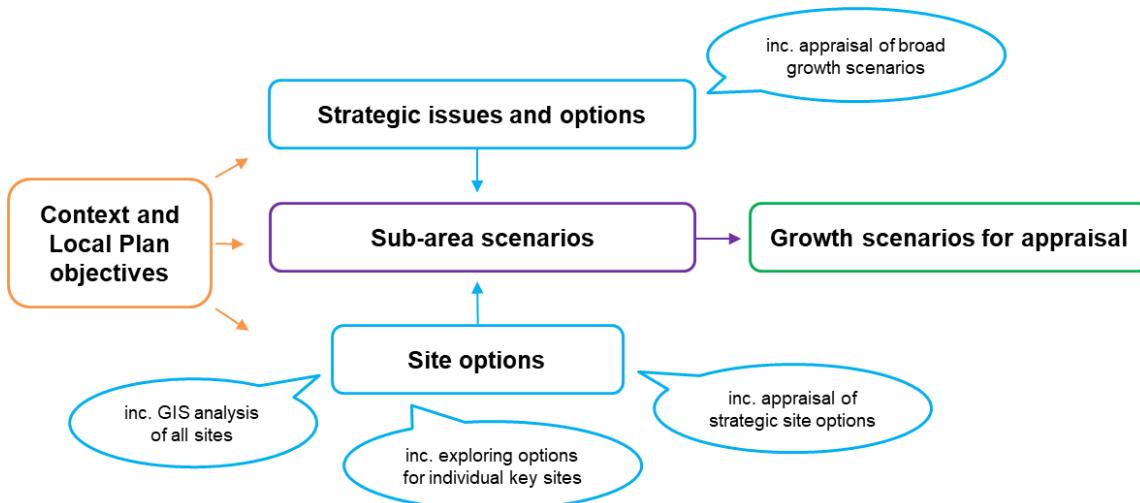
- 4.3.3 Comments are welcomed on: the decision to focus on growth scenarios (this section); the reasonable growth scenarios selected, with reference to the selection process (Section 5); appraisal findings in respect of the reasonable growth scenarios (Section 6); and the Council's reasons for supporting the preferred option in light of the appraisal (Section 7).

5 Establishing growth scenarios

5.1 Introduction

- 5.1.1 The aim is to explain a lengthy process that led to establishment of the reasonable growth scenarios that are a focus of appraisal in Section 6. Specifically, the aim is to explain the process set out in Figure 5.1.

Figure 5.1: Establishing growth scenarios – process overview



Structure of this section

- 5.1.2 This section of the report is structured as follows:
- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios
 - with supplementary analysis in **Appendices II and III**;
 - **Section 5.3** – explores site (and site-specific) options with a bearing on growth scenarios;
 - with supplementary analysis in **Appendices IV and V**;
 - **Section 5.4** – explore growth scenarios for individual sub-areas within the Borough;
 - with supplementary analysis in **Appendix VI**;
 - **Section 5.5** – draws upon the preceding sections to establish reasonable growth scenarios.

Limitations

- 5.1.3 Limitations to the analysis presented in this part of the report, and the supporting appendices, include:
- **GIS analysis** – the GIS analysis of site options presented in Section 5.3 and Appendix V is inherently limited and does not aim to be a formal appraisal of reasonable alternatives;
 - **Sub-area scenarios** – the analysis presented in Appendix VI stops short of appraising growth scenarios for any of the sub-areas, but the level of analysis is considered proportionate to the task;
 - **Evidence** – evidence to inform an understanding of baseline issues and opportunities is invariably limited, and this is particularly the case in respect of detailed evidence to inform consideration of site options. Limitations are discussed further within the ‘methodology’ sections within the appendices.
- 5.1.4 The analysis in this section of the report is considered proportionate to the task of arriving at reasonable alternatives / growth scenarios for formal appraisal (in Section 6).

5.2 Strategic issues and options

Introduction

- 5.2.1 The aim of this section of the report is explore the strategic issues and options with a bearing on the establishment of reasonable growth scenarios. Specifically, this section of the report explores:
- Quantum – how many new homes should the Local Plan provide for?
 - Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

- 5.2.2 This section aims to set out the established Local Housing Need (LHN) figure for Swale, before exploring arguments for the LPR providing for a quantum of growth either above or below LHN.

Background

- 5.2.3 A central tenet of plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance explains:⁸ “*Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*”
- 5.2.4 With regards to (A), the NPPF (para 60) is clear that establishment of **Local Housing Need (LHN)** should be informed “by a local housing need assessment, conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”
- 5.2.5 With regards to (B), many authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver the housing requirement (at a suitable rate/trajectory over time), which will invariably mean putting in place a ‘buffer’ to mitigate against the risk of some elements of the supply not delivering in the timescales anticipated (this can be a particular risk with complex strategic sites). However, under certain circumstances it can be appropriate to set a housing requirement that is above or below LHN.

LHN for Swale Borough

- 5.2.6 A standard method for calculating LHN was first published in September 2017 and at the time writing remains largely unchanged.⁹ However, there have been some notable changes to guidance in respect of the data that should be utilised as an input to the method. Specifically, following a consultation in late 2018¹⁰ the Planning Practice Guidance (PPG) was updated to require that the household growth projections used as an input to the Standard Method must be the 2014-based projections, rather than the more recent 2016-based or 2018-based projections. The PPG explains that the change was made in order to:¹¹ “*provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.*” Updates to the PPG in late 2020 confirmed that the 2014-based projections should still be used.
- 5.2.7 The standard method derived **LHN for Swale is 1,038 dwellings per annum** (dpa). This figure was confirmed by two studies presented to the Swale BC Local Plan Panel on 9th July 2020.¹² It is worth noting that this is an ‘uncapped’ figure, meaning that Step 3 of the standard method (“Capping the level of any increase”) does not have any bearing; see discussion at paragraph 2.38 of the Swale Housing Market Assessment, 2020).¹³ As such, there are no arguments for exploring an ‘uncapped’ LHN figure. LHN could change in the future following publication of updated affordability data; however, this is an unknown.

⁸ Reference ID: 2a-001-20190220 at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁹ A fourth step was added to the standard method in December 2020, namely the “Cities and urban centres uplift”; however, this has no bearing on LHN for Swale (although there are feasibly implications for unmet needs; see Table 5.1).

¹⁰ See www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need

¹¹ See paragraph 4 and 5 at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

¹² See services.swale.gov.uk/meetings/iListDocuments.aspx?CId=216&MId=2321&Ver=4

¹³ See services.swale.gov.uk/meetings/documents/s14870/HMA%20for%20Swale%20Appendix%201.pdf

Providing for above LHN?

- 5.2.8 All Local Plans must consider the implications of Paragraph 010 of the PPG on Housing and Economic Needs Assessment, which explains that:

"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated... Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable... (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or an authority agreeing to take on unmet need from neighbouring authorities... There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need... are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

- 5.2.9 However, in the Swale context arguments for providing for 'above LHN' are limited:

- There is no Housing Deal, or any equivalent growth strategy in place.
- There is no evidence to suggest locally arising housing need is in excess of the LHN figure.
- With regards to "strategic infrastructure improvements that are likely to drive an increase in the homes needed locally", there is nothing committed or 'on the horizon'; however, strategic housing and employment growth to the southeast of Sittingbourne (including expansion of Kent Science Park), alongside a new motorway junction, is an option for consideration (discussed below). A very large number of new jobs could be supported, which could lead to problematic in-commuting from outside the Borough (Employment Land Review, 2020) in the absence of sufficient accompanying housing growth.
- With regards to unmet need from neighbouring areas, the key point to note is that statements of common ground are in place with all directly neighbouring authorities confirming that Swale is not called on to provide for unmet need. However, there is also a need to look beyond neighbouring authorities to consider the whole of West Kent, where there are extensive NPPF footnote 6 constraints,¹⁴ pressures in respect of unmet needs emanating from London and emerging Local Plans facing challenges – see Table 5.1. In this light, it is fair to conclude that there is **some risk of unmet needs** arising prior to submission, which should be factored-in when establishing reasonable growth scenarios.

- 5.2.10 A final consideration is providing for **affordable housing** needs, with the PPG stating:¹⁵ *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* As initial point, it is important to note that it is inherently challenging to conclude that affordable needs serve as a reason for providing for 'above LHN', as additional affordable housing may not be deliverable in the absence of need/demand for market housing. Secondly, the following quote from the Swale Housing Market Assessment (2020) suggests little concern:

"... affordable housing need in Swale of 287 per year represents 27.7% of the annual dwelling growth of 1,038 in the Borough as assessed using the Standard Method. Subject to viability, it is reasonable to presume the affordable housing need identified in the model will be addressed by the dwelling growth identified by the Standard Method and no adjustment is required... to increase affordable provision."

- 5.2.11 However, the latest situation is that the LPR Viability Study (2020) serves to highlight that viability is somewhat 'tight', given a need to require developers to direct funds towards measures to meet a range of policy objectives, including in respect of decarbonisation and accessible building design. The Study indicates a strong argument for requiring 30% affordable housing on greenfield residential schemes in more viable parts of the Borough, and less for some other schemes, such that there is perhaps a degree of uncertainty in respect of delivering 27.% borough-wide over the plan period, under an LHN scenario.

¹⁴ NPPF footnote 6 lists protected areas or assets of particular importance that can provide a strong reason for restricting the overall scale, type or distribution of development in the plan area. Green Belt and AONB are the key constraints in West Kent.

¹⁵ See paragraph 024 at: gov.uk/guidance/housing-and-economic-development-needs-assessments

Table 5.1: Progress on neighbouring Local Plans

Area	LPA	Commentary
London		The Publication London Plan (2020) provides for 52,000 dpa, a reduction on the Draft London Plan (2017) and below the need figure of 66,000 dpa established by the London Strategic Housing Market Assessment (SHMA).
West Kent (Green Belt)	Dartford	A Preferred Options consultation document was published in January 2020, setting out (paragraphs B7 and B8) that it should be possible to meet and possibly even modestly exceed the established LHN figure.
	Gravesham	A Regulation 18: Stage 2 consultation document was published in October 2020, setting out that it may be possible to meet LHN, but that this would require significant Green Belt release, and hence discussions are ongoing with neighbouring authorities that share a housing market area - namely Dartford and Medway – in respect of capacity to provide for unmet needs (para 1.6.9).
	Sevenoaks	The District falls entirely within the Metropolitan Green Belt (as per Dartford and Gravesham), is also heavily constrained by the Kent Downs AONB, and has limited capacity within settlements. This led the Council (following a Green Belt Review) to submit a Local Plan providing for below LHN. However, the Inspector's Report (2020) concluded that the Plan could not be adopted due to a failure of the Duty to Cooperate in respect of unmet needs.
West Kent (Partial GB)	Medway	The Development Strategy consultation document (2018) presented four 'scenarios', none of which would provide for LHN (although there was uncertainty at the time regarding whether to plan for LHN or a lower 'OAHN' figure). However, the Strategic Land Availability Assessment (SLAA, 2019) serves to identify <i>potential</i> capacity to provide for LHN.
	Tonbridge and Malling	Following submission of the Local Plan in January 2019, the Inspectors wrote to the Council in December 2020, suggesting a likelihood that the Council had failed the Duty to Cooperate in respect of providing for unmet needs arising from Sevenoaks. It is also important to note that, should the plan need to be withdrawn, or should it be found unsound, any new Local Plan will need to provide for an LHN figure of c.840 dpa, as opposed to the OAHN figure of 696 dpa used as the basis for the submitted plan (because it was submitted in the transitional window following publication of the new NPPF in 2018).
Mid-west Kent	Tunbridge Wells	In short, there is confidence that the emerging Local Plans for Tunbridge Wells and Maidstone, which together with Swale might be considered to comprise a 'Mid-west Kent' cluster, will provide for LHN, specifically: <ul style="list-style-type: none"> • Tunbridge Wells – despite 75% of the Borough comprising Green Belt and/or AONB, the Draft Local Plan (2019) proposed providing for LHN (by identifying a supply amounting to LHN plus a buffer of 9%); • Maidstone – the north of the Borough falls within the AONB, but there are large parts not subject to NPPF footnote 6 constraints.¹⁴ The Draft Local Plan (December 2020) proposes to provide for LHN, and notably includes a new Garden Settlement on the boundary with Medway, very closely linked to the Medway Towns, serving to highlight the close links to Medway.
	Maidstone	
East Kent	Ashford	In short, there is no risk of unmet needs from East Kent: <ul style="list-style-type: none"> • Ashford - the Local Plan was adopted in 2019, and large parts of the Borough are not subject to NPPF footnote 6 constraints.¹⁴ • Canterbury - the Local Plan Review is at a very early stage of preparation, with an initial consultation on 'Issues' held in 2020.¹⁴ There are parts of the Borough not subject to NPPF footnote 6 constraints, hence there can be confidence that the Local Plan will provide for LHN in full. Furthermore, whilst it is recognised that Canterbury City itself relates quite closely to the eastern part of Swale (where there are constraints), there are also good transport links to parts of Thanet District and Dover District to the east, where there are few NPPF footnote 6 constraints.
	Canterbury	

Providing for **below LHN?**

- 5.2.12 Paragraph 11 of the NPPF states: “*... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]
- 5.2.13 In the case of Swale, there are parts of the Borough that are constrained by the “assets of particular importance” listed by the NPPF; however, there are also parts of the Borough that are not constrained by these assets. Furthermore, there is a need to consider that a lower growth strategy would lead to ‘unmet need’ having to be provided for elsewhere within a constrained sub-region (see Figure 5.1), for example:
- Medway Council is partly constrained by Green Belt and AONB, whilst the Hoo Peninsula is not well connected to Swale. There is also a need to consider the possibility of Medway being asked to provide for unmet need from neighbouring authorities to the west that are more constrained.
 - Those parts of Maidstone Borough and Ashford District that relate most closely to Swale Borough are constrained by the Kent Downs AONB.
 - The western part of Canterbury City Council is constrained by the Blean Woodlands complex.
- 5.2.14 A further consideration is the inherent transport and traffic constraints affecting Swale, as a coastal authority traversed by the M2 and A2 as two dominant east-west routes (i.e. without the benefit of radial routes taking traffic in a variety of directions), plus with A249 “effectively a cul-de-sac”¹⁶ and the Isle of Sheppey inherently constrained in transport terms. The significance of this constraint was recognised by a report prepared by Stantec in 2019, which stated:¹⁷
- “... we are acutely aware that Swale as a Borough may have grounds not to meet housing need in full in the next plan. Highways are the key concern with the possibility that the local network has reached saturation and/or no strategic investment is made in the M2 and its junctions.”*
- 5.2.15 However, the latest situation is that the need to provide for LHN in full is accepted. Notably, the officers report to the October 6th Local Plan Panel meeting began with the following statement: “*The Local Plan Review will update the adopted Local Plan ‘Bearing Fruits’ and will need to include enough additional land to meet the development needs of the Borough for the period 2022 to 2038.*”¹⁸ Regarding the specific matter of the transport constraint, the Pre-submission LPR consultation document (2021) explains that emerging transport modelling serves to suggest that:
- “the expected pattern of growth across the Borough as contained in the Local Plan can be accommodated. This however is subject to necessary highway modifications and policies which generate a reduction in trip rates based on the provision of sustainable and active travel options for new development. Further detail on the transport model and its sites are set out in the Swale Transport Strategy 2022-2037.”*

Conclusion on housing quanta

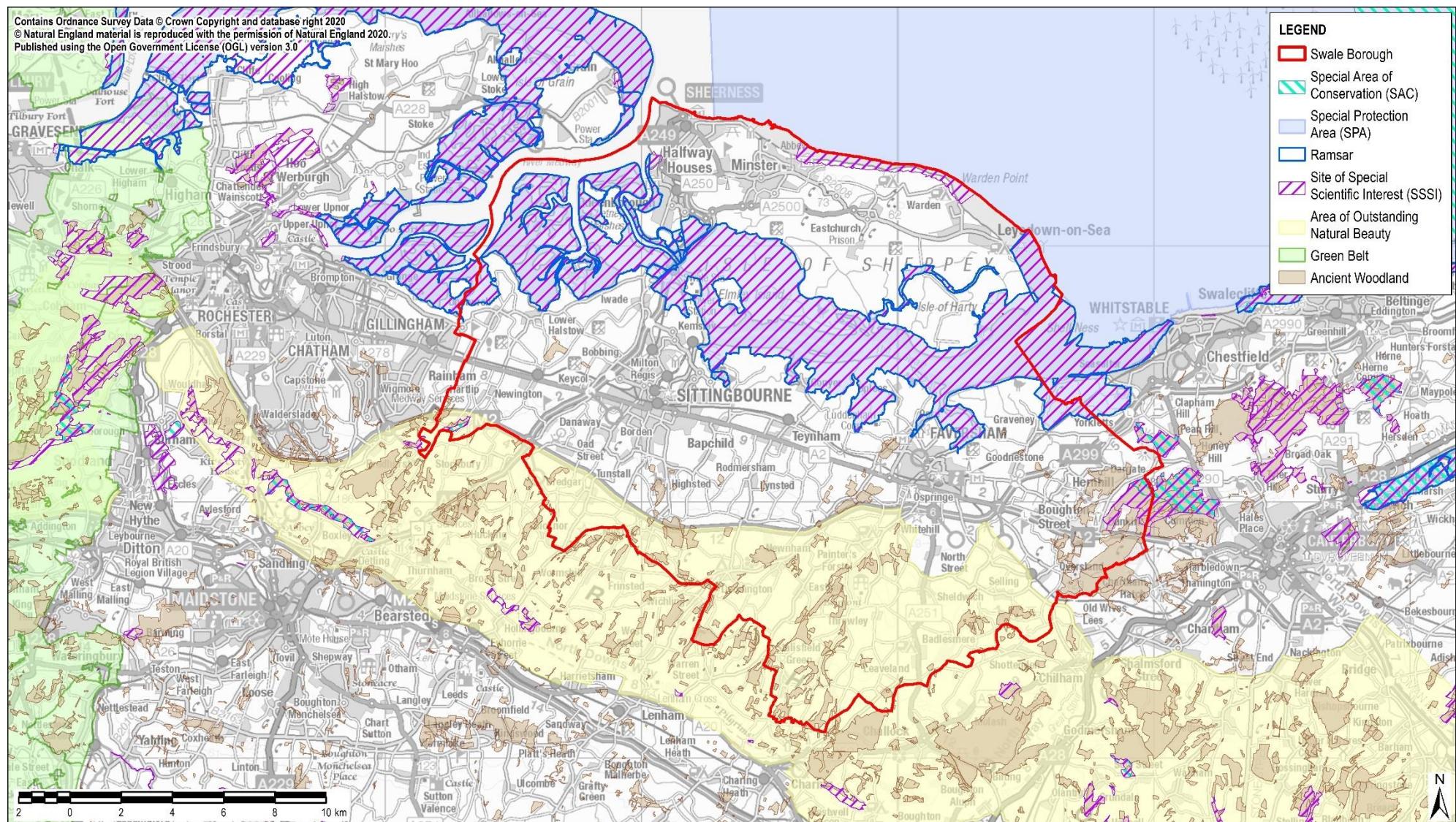
- 5.2.16 When seeking to establish reasonable growth scenarios there is a need to focus attention on provision for the established **LHN** figure. As for higher growth, there is little reason to suggest that any of Swale’s neighbouring authorities will request that Swale provides for unmet need, or that the LPR will struggle to provide for affordable housing needs; however, it is nonetheless prudent and proactive to explore modest higher growth. This matter is returned to below, within Section 5.5. As for lower growth, there is no reasonable need to explore this matter further.

¹⁶ See paragraph 11.1.2.3 of the Swale Infrastructure Delivery Plan (IDP, 2021) at: services.swale.gov.uk/meetings/documents/s16436/Appendix%20I%20Draft%20IDP%2014%2001%2021.pdf

¹⁷ See <https://services.swale.gov.uk/meetings/documents/s13308/Appendix%20I%20-%20PBA%20REPORT%202nd%20stage%20assessment%20Sept%202019.pdf>

¹⁸ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2323>

Figure 5.1: Key strategic barriers to exporting unmet needs to other authorities in the sub-region



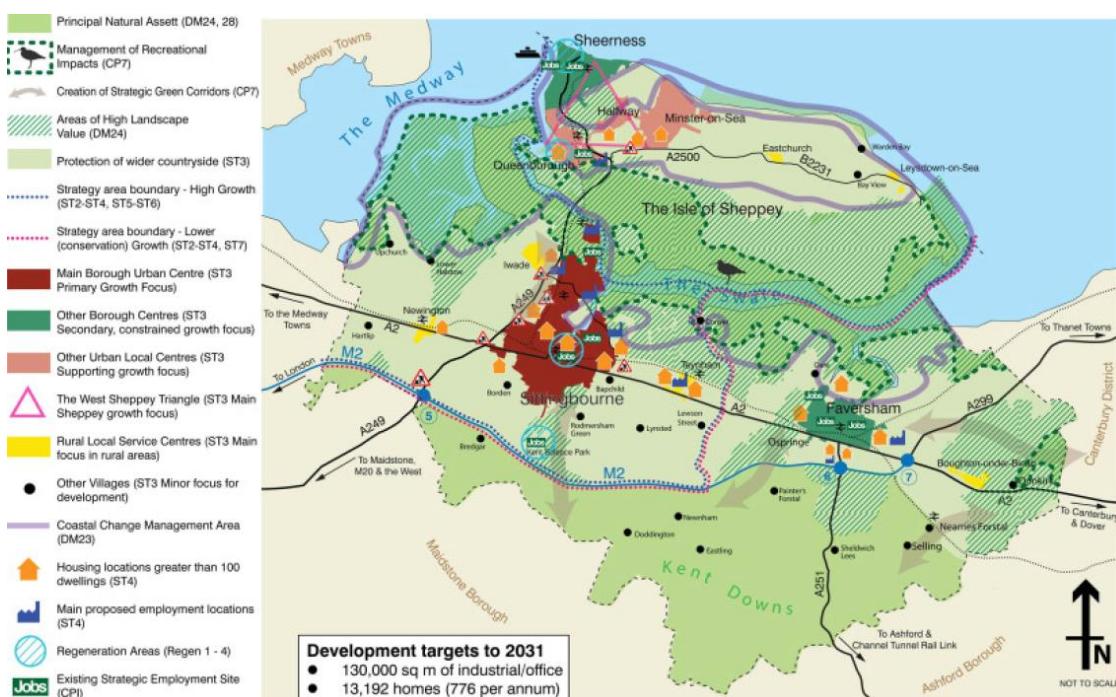
Broad distribution

- 5.2.17 This is a second section examining strategic issues and options relevant to establishing reasonable growth scenarios. This section considers: the adopted Local Plan; the 2018 Looking Ahead consultation; recent targeted evidence-gathering; the July 2020 'steer' on a preferred broad growth scenario; and work to appraise alternative broad growth scenarios in late 2020.

The adopted Local Plan spatial strategy

- 5.2.18 Sections 3 and 4 of the adopted Local Plan set out the spatial strategy and key diagram. The spatial strategy is described as responding to priorities including: building a strong, competitive **economy**; ensuring the vitality of **town centres**; supporting a prosperous **rural economy**; promoting sustainable **transport**; supporting high quality communications **infrastructure**; delivering a wide choice of high quality **homes**; promoting healthy **communities**; meeting the challenge of **climate change**, flooding and coastal change; and conserving and enhancing the **natural environment** and **historic environment**.

Figure 5.2: The adopted Local Plan Key Diagram



- 5.2.19 Importantly, Table 4.2.1 of the Local Plan splits the Borough into two planning areas and sets out that growth in the plan period should be directed primarily to one of these areas – see Table 5.2.

Table 5.2: Split of growth in the plan period (2014 to 2031) between the two planning areas

Planning area	Proportion of housing growth 2014-2031
Thames Gateway (Sittingbourne and Isle of Sheppey)	85%
Faversham and the rest of Swale	15%

- 5.2.20 Within this broad framework, the spatial strategy within the adopted Local Plan also takes careful account of the settlement hierarchy set out in Table 4.3.1, with the top four tiers of the hierarchy as follows:

- Tier 1 – Sittingbourne
- Tier 2 – Sheerness and Faversham
- Tier 3 – Minster / Halfway and Queenborough / Rushenden (the 'West Sheppey Triangle')
- Tier 4 – Boughton, Eastchurch, Iwade, Leysdown, Newington, Teynham.

2018 consultation on Looking Ahead

- 5.2.21 The consultation posed 46 questions, with a total of 3,308 responses received from 283 parties. Responses were received from several organisations with a borough-wide interest/remit, including the Environment Agency, Historic England and Natural England. A brief response was received from Maidstone Borough (confirming that the aim should be for both authorities to provide for LHN in full), with no responses received from other neighbouring authorities or Kent County Council. Detailed responses were received from several Parish Councils, primarily those associated with Sittingbourne area, including Teynham and Newington. Officers reported the findings of the consultation to the Local Plan Panel in October 2018.¹⁹ Issues and opportunities raised through the consultation are discussed in **Appendix II**.
- 5.2.22 A **Garden Communities Prospectus** was also published at this time, which lead to developers submitting four garden community (or 'strategic site') options, as discussed below in Section 5.4.²⁰ It is also important to note that the decision to publish the Prospectus was made in light of an earlier report on **Choices for housing growth**.²¹ This report, amongst other things: went through a 'sieving' process to identify locations potentially suitable for a new settlement; constructed and tested growth scenarios; and recommended setting out a 'design brief' for a new settlement, to inform site-specific proposals.

Recent targeted evidence-gathering

- 5.2.23 A range of evidence studies have been prepared to inform the LPR, many of which serve to identify strategic spatial issues and opportunities relevant to the task of establishing reasonable growth scenarios. These evidence studies have been reported to the Local Plan Panel over the past two or more years.²²
- 5.2.24 **Appendix II** presents a review under the following headings:
- Air quality – drawing on the Air Quality Modelling Report (2020) and the A2 Clean Air Zone Study (2020);
 - Biodiversity - drawing on a Biodiversity Baseline Study (2020);
 - Climate emergency – noting that Swale BC declared a Climate and Ecological Emergency in 2019, followed by publication of a Climate and Ecological Emergency Action Plan (2020), followed by publication of a Kent and Medway Energy and Low Emissions Strategy (2020);
 - Economy and Employment – drawing on the Employment Land Review (2018) and more recent evidence published at sub-regional and national scales;
- N.B.** a headline recommendation of the ELR is that: “A) Up to 40ha of new land for industrial uses is allocated. This should be in the West of the Borough... on sites that are market attractive for larger warehouses; B) Up to 15 of new land for offices and light industrial uses is allocated. This should be focused to the east of the Borough in or around Faversham on one or more sites.”
- Flood risk – drawing on the Level 1 Strategic Flood Risk Assessment (2019) and a subsequent report on applying the 'sequential test' (2020);
 - Green and blue infrastructure – drawing on the Green and Blue Infrastructure Strategy (2020);
 - Heritage – drawing on the Heritage Strategy and Action Plan (2020);
 - Housing – drawing on the LHN Study (2020), the Housing Market Assessment (2020) and the Gypsy and Traveller Accommodation Assessment (2018);
 - Infrastructure – drawing on the Infrastructure Delivery Plan (IDP, 2020);
 - Kent Downs AONB – drawing on the draft AONB Management Plan (2020);
 - Landscape – drawing on the Landscape Designation Review (2018); the Landscape Sensitivity Assessment (2019); and the Important Local Countryside Gaps report (2020);
 - Neighbourhood Planning – drawing on the regular updates presented to the Local Plan Panel;
 - Settlement hierarchy – drawing on the Settlement Hierarchy Study (2020);
 - Transport – drawing on the Transport Model Re-run (2020) and the Swale Transport Strategy (2021);
 - Viability – drawing on the Viability Report (2020).

¹⁹ A review of responses is available here: services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2094&Ver=4

²⁰ See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

²¹ See services.swale.gov.uk/meetings/documents/s8862/Appendix%201%20to%20PBA%20Report%20Item%20Feb18.pdf

²² Details of the Panel meetings are available at: services.swale.gov.uk/meetings/ieListMeetings.aspx?CommitteeId=216

The 2020 'steer' on a preferred broad growth scenario

- 5.2.25 In July 2020 the Swale Borough Local Plan Panel considered a report by officers entitled "Vision and Development Growth Options",²³ central to which was analysis of five **broad growth scenarios**, which essentially varied in respect of the extent to which there would be a departure from the strategy set out in Bearing Fruits (see Table 5.2). The officers' report also presented a discussion of the sites that could possibly deliver each of the broad distribution alternatives, drawing upon the evidence provided by the Strategic Housing Land Availability Assessment (SHLAA, 2020; discussed further below).
- 5.2.26 A key assumption of the officers' report was a need to plan for a good **mix of sites**, both in respect of type (e.g. large versus small) and location. As explained in the report: "*A strategy dominated by small to medium sized sites may not generate the critical mass required for significant improvements to infrastructure... which could benefit existing communities as well as new residents... A strategy dominated by a few larger sites would bring in to question whether the short to medium term housing needs of the borough would be adequately addressed given the long lead in times for significant delivery to come forward and the impact this has on meeting shorter term five year supply of housing. A supply of small/medium sites would also need to be allocated to maintain the rolling five year target.*"
- 5.2.27 The broad growth scenarios set out in the officers' report are summarised below. The scenarios benefited from being mutually exclusive, such that members were presented with a discrete choice; however, the corollary is that there were limits to the number of supply variables and options that could be reflected across the scenarios. The following bullet points discuss the **limitations** of the broad growth scenarios:
- The scenarios reflect a degree of emphasis on one of the four strategic site options (Southeast Faversham), as opposed to testing all of the potential combinations of strategic site options. The report explained a planning basis for this, namely that Southeast Faversham directly adjoins the settlement whilst the other three options are technically located within the Borough's rural area (albeit closely related to either Sittingbourne or Faversham). Also, by this point in the process officers had begun to focus on Southeast Faversham as the best performing of the four strategic site options, in light of much detailed evidence gathering and analysis over the preceding two years (as discussed further below).
 - Scenario E could feasibly have been broken down to reflect all of the potential/reasonable strategic site combinations. However, this was considered unnecessary, given the amount of attention given to the various competing strategic site options over the preceding two years.
 - The scenarios lend themselves to exploring options for Sittingbourne and Faversham, but less to options for Sheerness / Queenborough / Rushenden / Minster / Halfway and the tier 4 settlements.
- 5.2.28 Ultimately, the Local Plan Panel provided a clear "steer" in support of **Scenario C** – see Table 5.4.

Table 5.3: Summary of the July 2020 broad growth scenarios (TG = Thames Gateway; Fav = Faversham)

Broad growth scenario	Choice between small sites ²⁴	Strategic site(s)
A Roll forward Bearing Fruits (BF)	<ul style="list-style-type: none"> • TG – very little choice • Fav – good choice 	<ul style="list-style-type: none"> • None
B Faversham focus ... to begin to counter-balance BF	<ul style="list-style-type: none"> • TG – little choice • Fav – little choice 	<ul style="list-style-type: none"> • None
C Further Faversham focus ... to mostly counter-balance BF	<ul style="list-style-type: none"> • TG – good choice • Fav – good choice 	<ul style="list-style-type: none"> • SE of Faversham
D Further Faversham focus still ... to fully counter-balance BF	<ul style="list-style-type: none"> • TG – very good choice • Fav – little choice 	<ul style="list-style-type: none"> • SE of Faversham
E Strategic sites	<ul style="list-style-type: none"> • TG – good or very good choice • Fav – good or very good choice 	<ul style="list-style-type: none"> • One or two out of the four options (no more than one in each planning area)

²³ See services.swale.gov.uk/meetings/iListDocuments.aspx?CId=216&MId=2372&Ver=4

²⁴ It was not possible to define the approach to small sites with any certainty. We define a 'good choice' as a situation whereby there would be the potential to select only the best performing of the SHLAA 'suitable' sites for allocation, whilst 'little choice' is defined as a situation whereby all 'suitable' SHLAA sites are required as well as potentially certain 'unsuitable' SHLAA sites.

Table 5.4: Local Plan Panel views on the July 2020 broad growth scenarios (preferred scenario in bold)

Broad growth scenario	First choices	Second choice
A Roll forward Bearing Fruits (BF)	2	1
B Faversham focus	1	2
C Further Faversham focus	6	0
D Further Faversham focus still	0	4
E Strategic sites	0	0
Combination of scenarios	2	2
None	0	2

5.2.29 The Local Plan Panel “steer”, in respect of Broad Growth Scenario C was then accepted by the Swale Borough Council Cabinet on 23rd September 2020.²⁵

Broad growth scenarios appraisal

5.2.30 Subsequently, in late 2020, AECOM completed an appraisal of the five broad growth scenarios – see **Appendix III**. In light of the appraisal, the Council (in discussion with AEOMC) decided that, in addition to taking forward Scenario C (as per the Cabinet decision), there was also a need to give further consideration to scenarios involving: a more even distribution of LPR allocations across the two broad planning areas; and two strategic site options (one in each planning area), as per Scenario E.

Conclusion on broad distribution

5.2.31 This section has reviewed strategic spatial influences, as understood from the adopted Local Plan; the 2018 Looking Ahead consultation; recent targeted evidence-gathering; the July 2020 ‘steer’ on a preferred broad growth scenario; and work in late 2020 to appraise alternative broad growth scenarios.

5.2.32 There is a range of sometimes competing spatial priorities; however, certain key messages do come through quite strongly, which can feed into work to explore site options (Section 5.3), settlement/sub-area scenarios (Section 5.4) and, ultimately, the establishment of reasonable growth scenarios (Section 5.5).

5.2.33 Headline considerations include:

- There is a clear need to allocate a range of sites, in terms of both size and spatial distribution.
 - There is a strong argument for supporting one or more strategic growth locations, given the potential to realise wide ranging sustainability benefits over-and-above more piecemeal growth. There is currently an opportunity to deliver one or more strategic growth locations because of the extent and diverse nature of the existing committed housing land supply (around 2/3 of the LHN figure), recalling the lead-in times and risks associated with delivering strategic growth locations.
 - With regards to tier 5 settlements, whilst there is a need to support village vitality, there are limited arguments for Local Plan allocations, where poor transport connectivity serves to suggest a need for modest growth only, such that Neighbourhood Plans are well placed to allocate sites.
- With regards to the broad balance of growth between the two planning areas, there is a clear need to give considerable weight to Broad Growth Scenario C; however, the appraisal presented in Appendix III serves to highlight, firstly, that there is also a need to explore options that would involve a more even spread of allocations across the two planning areas, and, secondly, the possibility of supporting two strategic allocations / garden communities (one in each of the two planning areas).
- There are a range of infrastructure and environmental issues and opportunities to respond to through the spatial strategy, including with a view to supporting strategic infrastructure upgrades and responding to the declared climate and ecological emergency. There is also a need to deliver new employment land and employment opportunities more widely, in line with the findings of the Employment Land Review (2018) and latest understanding of national and sub-regional objectives.

²⁵ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=129&MId=2308>

5.3 Site options

Introduction

- 5.3.1 A large number of site options have been submitted to the Council, and a process of Strategic Housing Land Availability Assessment (SHLAA) has been completed in order to identify a shortlist of sites that are available and deliverable, and potentially suitable for allocation. The SHLAA provides an important input to the process of establishing growth scenarios (i.e. alternative packages of sites).
- 5.3.2 Within Swale Borough, as within other local authority areas, there is an important distinction to be made between strategic and non-strategic sites. Strategic sites are those with a housing capacity above circa 1,000 homes and which will be associated with economies of scale that enable delivery of a good mix of uses (also a good mix of homes), potentially to include employment land, and/or enable delivery of new or upgraded infrastructure (e.g. new road infrastructure, community infrastructure, green infrastructure).
- 5.3.3 This section firstly considers in detail the pool of available and potentially suitable **strategic sites**, before giving more light-touch consideration to the pool of available **non-strategic sites**.

Strategic site options

- 5.3.4 This section explains a lengthy process of identifying and appraising strategic site options.

Background

- 5.3.5 Close consideration has been given to the possibility of allocating one or more strategic sites since commencement of the LPR. An early step, on the part of the Council, was to commission and consider a report on *Choices for Housing* (February 2018),²⁶ which was followed by publication of a *Swale New Garden Communities Prospectus* (April 2018), which was a call for land-owners to submit sites for schemes in line with the Council's expectations. This was concurrent with the *Looking Ahead* consultation (discussed in Section 5.3), which sought views on the role that new garden communities might play in the LPR. Further garden community / strategic site focused work completed in 2018 included: workshops with landowners/developers, infrastructure providers and environmental bodies; a Member Q&A session with scheme promoters; and a Member coach tour to Cambridgeshire, to view new community examples.
- 5.3.6 Ultimately four strategic site options were identified necessitating detailed consideration in 2018, and all four have continued to evolve since that time. Figure 5.5 shows the current proposed 'red line boundaries' for each strategic site, and the following bullet points aim to present an introductory overview:
- **Southeast Sittingbourne** (also known as Highstead Park) – comfortably the largest of the strategic site options, with the proposal in 2018 being for 11,500 homes plus other uses,²⁷ although this was reduced to 8,000 in 2019 (at the 'Stage 2 Submissions' stage)²⁸ and the subsequently revised upwards to 9,250 homes.²⁹ A key aspect would be a new motorway junction and M2/A2 link road.
 - **North Street** (south of Faversham) – this is the second largest of the submitted schemes, proposed for circa 5,000 homes plus other uses to include a secondary school.³⁰ This site is notable for limited work having been progressed / presented to the Council by the site promoter since 2019.
 - **East / Southeast Faversham** – a smaller site proposed for circa 2,500 homes plus other uses was submitted in 2018 and examined in 2019;³¹ however, latest understanding is that the scheme would be brought forward alongside additional land to the north (of the A2), and also in combination with the committed Preston Fields scheme to the west, leading to a combined scheme of c.3,400 homes, of which c.3,250 would be delivered in the plan period.³²
 - **Bobbing** – also proposed for circa 2,500 homes plus other uses.³³ Since 2018 the site boundary has evolved significantly (essentially shifting to the north); however, the proposal remains for 2,500 homes.³⁴

²⁶ See services.swale.gov.uk/meetings/documents/s8862/Appendix%201%20to%20PBA%20Report%20Item%208Feb18.pdf

²⁷ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Sittingbourne-Prospectus-Submission.pdf

²⁸ See discussion at: swale.gov.uk/planning-and-regeneration/local-plans/sd-options

²⁹ See highstedpark.co.uk/

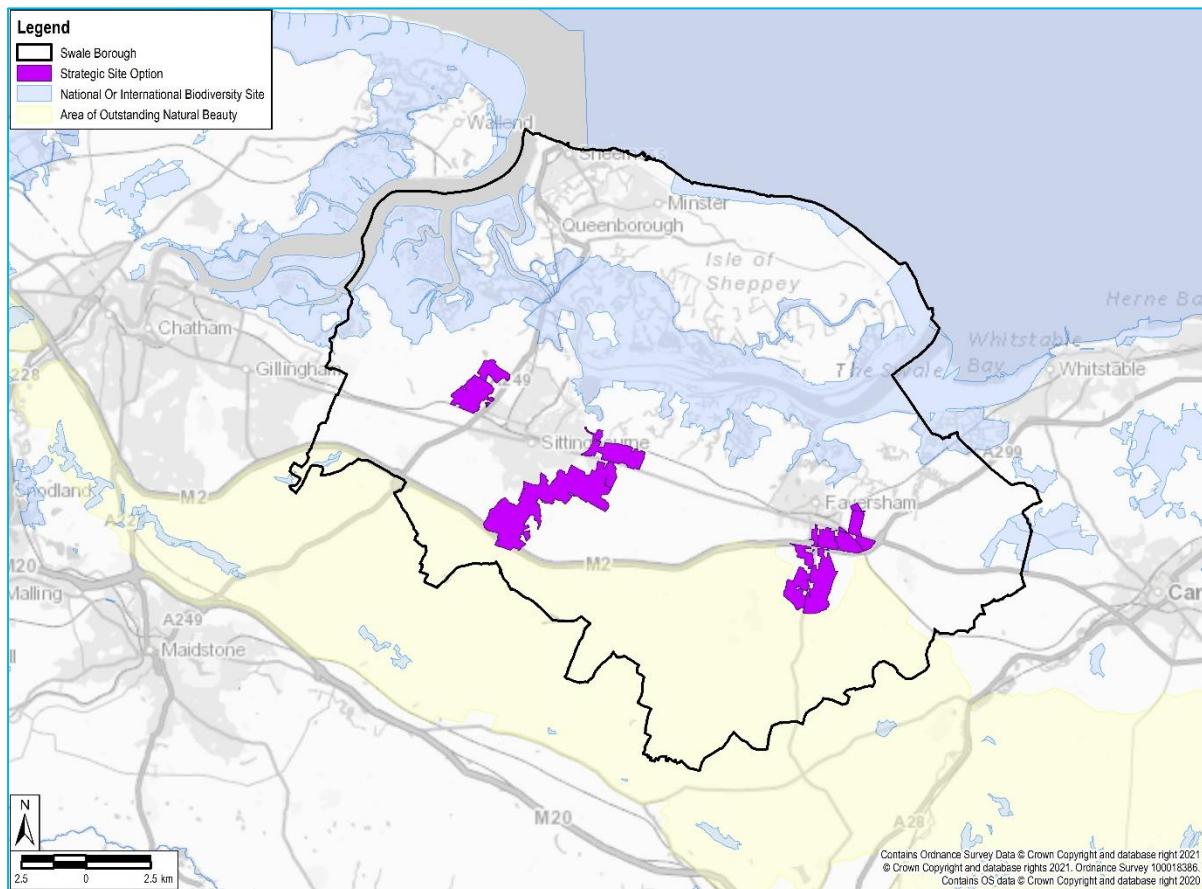
³⁰ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/North-Street-Sheldwich-Faversham-Prospectus-Submission.pdf

³¹ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Faversham-Prospectus-Submission.pdf

³² See services.swale.gov.uk/meetings/documents/s15712/LPR%20site%20selection.pdf

³³ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/Bobbing-Prospectus-Submission.pdf

³⁴ See bobbingplans.uk/masterplan

Figure 5.3: The strategic site options**Stantec reports**

- 5.3.7 A work-stream led by Stantec forms an important evidence-base for the examination of the four competing strategic site options. The work has led to two outputs, namely:
- Assessment of submissions (February 2019) – examined the four schemes submitted following the Prospectus in turn, and recommended a range of further work;³⁵
 - Assessment of Stage 2 submissions (October 2019) – considered changes made to the four schemes following the earlier assessment, and reached overall conclusions on each of the four schemes.³⁶
- 5.3.8 The process was notable involving ongoing dialogue with scheme promoters to obtain further information and clarification, with a view to elaborating the schemes to a point where they could be assessed on a reasonably level playing field, whilst recognising that some schemes were more developed than others. There was a particular focus on ensuring clarity and realism in respect of viability and deliverability.
- 5.3.9 Two headline conclusions from the September 2019 Report were as follows:
- North Street – stands out as performing relatively poorly. As stated at paragraph 10.15 of the report: “... we think this is too risky, as currently scoped, for it to be taken forward as a reasonable option with the Councils backing. This is particularly the case because there are other less risky sites, within less sensitive landscapes, which could be progressed.”
 - Southeast Sittingbourne is associated with risks and drawbacks over-and-above Bobbing and Southeast Faversham. This is evident from the summary “Comparative risk matrix” presented at paragraph 9.19.

³⁵ See services.swale.gov.uk/meetings/documents/q2142/Public%20reports%20pack%2014th-Mar-2019%2019.00%20Local%20Plan%20Panel.pdf?T=10

³⁶ See <https://services.swale.gov.uk/meetings/documents/s13308/Appendix%20l%20-%20PBA%20REPORT%202nd%20stage%20assessment%20Sept%202019.pdf>

Appraisal of strategic site options

- 5.3.10 Despite the Stantec work serving to suggest that North Street and potentially also Southeast Sittingbourne perform relatively poorly, and hence are not likely to be suitable for allocation in the LPR, the decision was made in late 2020 to subject all four strategic site options to appraisal – see **Appendix IV**.

N.B. the appraisal considers the latest “East and Southeast Faversham” (or ‘E/SE Faversham’), as opposed to the smaller “Southeast Faversham” scheme considered through the Stantec work.

Conclusion on strategic site options

- 5.3.11 In light of the appraisal presented in Appendix IV, the Council (in discussion with AECOM) was able to reach the following conclusions:

- An immediate conclusion is that **North Street** can be ruled out at this stage in the process, i.e. it need not feed into work to consider sub-area scenarios in Section 5.4. This is because E/SE Faversham is a preferable option, and there is no potential to allocate both sites within the LPR, given their proximity.
- A second conclusion is that both **Bobbing** and **E/SE Faversham** warrant being taken forward (to Section 5.4). Both options are associated with issues, but are judged to have a sufficient degree of merit overall, mindful of the drawbacks to alternatively delivering growth via piecemeal urban extensions.
- Finally, there is a need to consider **Southeast Sittingbourne**. This is a more marginal conclusion; however, on balance the option of strategic growth at Southeast Sittingbourne can be ruled-out at this stage. This is because Bobbing is a preferable option, and there is no potential to allocate both sites within the LPR, given their proximity and the risk of in combination impacts.

Options for strategic growth in at Southeast Sittingbourne have been subject to detailed consideration since 2018,³⁷ and latest proposals are given detailed consideration through the appraisals presented in Appendices III and IV of this report, which serve to highlight that growth could deliver transformational benefits in respect of transport and economy/employment objectives. However:

- there are risks and uncertainties around viability and therefore deliverability;
- the viability challenges mean that no more than 20% affordable housing can be expected;
- the scale of growth necessary to fund the new strategic link road and motorway junction leads to concerns in respect of landscape objectives; and
- the required scale of growth is beyond that necessary for the LPR, particularly given the need to also deliver growth at Faversham and elsewhere in the Borough, and arguably focus growth at Faversham.

A note on site-specific options

- 5.3.12 As discussed, schemes for each of the four strategic site options evolved through 2018 and 2019, and continued to evolve through 2020 to varying extents. In particular, “Southeast Faversham” became “East and Southeast Faversham” in late 2020, which is considered a very positive step, including as this evolution appears to have unlocked the potential to make land available for a secondary school.

- 5.3.13 Whilst there is a pragmatic need to ‘draw a line’ at some point in what is already a lengthy process, at the current time there is perhaps a need to question whether certain of the schemes could continue to evolve, or even transform into something significantly different. No site-specific ‘reasonable alternatives’ have been proposed, or are evident to the extent that they warrant formal appraisal; however, as part of appraisal work presented in this report (e.g. Appendices III and IV), there is some discussion of how alternative site boundaries and/or alternative development configurations within current site boundaries could potentially lead to benefits in terms of certain sustainability objectives. Also, within Appendix VI, which explores sub-areas within the Borough in turn, there is some discussion of options for ‘comprehensively’ planning for sub-areas, or landscape areas within sub-areas.

- 5.3.14 These discussions reflect a view that there can be merit to strategic planning at landscape scales and with a long-term perspective, rather than planning with a focus on land ownership scales. It is notable that whilst the Planning White Paper (2020) proposed that Local Plans should plan for a time horizon of ten years, rather than the current fifteen years (NPPF paragraph 22), the current consultation version of the NPPF (2021) proposes supplementing paragraph 22 with the statement: “*Where larger scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*”

³⁷ There is also a longer history to exploring options for a Sittingbourne Southern Relief Road, see highstedpark.co.uk/timeline.

Non-strategic site options

- 5.3.15 Whilst the Council's SHLAA was the main vehicle for considering the merits of non-strategic sites in isolation, for the purposes of establishing reasonable growth scenarios, a supplementary piece of analysis was completed, with the findings presented within **Appendix V**. Specifically, Appendix IV presents the findings of a quantitative GIS-based exercise, involving examining the spatial relationship (i.e. proximity to / percentage intersect) between all SHLAA sites and a range of constraint (e.g. flood zones, designated heritage assets) and opportunity (e.g. GP surgeries) features for which data is available in digitally mapped form across the Borough as a whole. The limited nature of the analysis is such that it did not enable overall conclusions to be reached on the merits of individual site options (i.e. no sites were identified as poorly performing, such that they should be sifted out); however, issues and opportunities highlighted through the analysis fed into the consideration of site options by sub-area, as discussed below.

5.4 Sub-area scenarios

Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' considerations around housing quanta and broad distribution; and B) 'bottom-up' consideration of site options. The next step is to consider each of the Borough's sub-areas in turn, exploring how sites might be allocated in combination. For each sub-area the aim is to arrive at a conclusion on growth scenarios that should be taken forward to Section 5.5 of this report, where the final step in the overall process sees the sub-area growth scenarios combined.
- 5.4.2 This section presents summary conclusions, supplemented by more detailed analysis in **Appendix VI**.

What sub-areas?

- 5.4.3 Sub-areas considered here are: Sittingbourne; Faversham; West Sheppey; Teynham; Newington; Eastchurch; Leysdown; Boughton; Iwade; tier 5 settlements and the rural area. It was decided, on balance (and in light of the discussion Sections 5.2 and 5.3), not to examine sub-divisions of the rural area.

When was this work undertaken?

- 5.4.4 This work was undertaken in **late 2020**, subsequent to a decision on an emerging preferred growth scenario by the Swale Borough Cabinet on 28th October 2020. As such, the emerging preferred growth scenario is the starting-point for each of the sub-area discussions, below.

Sittingbourne

- 5.4.5 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate Sittingbourne Town Centre as a broad area for the delivery of around 850 homes. There also is a need to explore higher growth scenarios, recognising that Sittingbourne is the Borough's main settlement, and in light of the discussion of issues and options presented in Sections 5.2 and 5.3, above.
- 5.4.6 A first port of call is the two urban extension options to the south of Sittingbourne (sites 18/017 and 18/021) that were presented as options at the Local Plan Panel meeting of 8th October, which together would deliver around 380 additional homes.³⁸ Furthermore, there is considered to be the potential for modest growth at Bobbing,³⁹ to the west of Sittingbourne, where most land is available and the SHLAA finds three sites to be potentially suitable (one for employment). The precise site(s) to allocate can reasonably be left undefined at this stage (site selection would be suited to a Neighbourhood Plan); however, on balance, it is considered appropriate to assume delivery of circa 120 homes. This brings the total number of additional homes under this scenario to 500. This is **higher growth scenario 1**.
- 5.4.7 Secondly, there is the option of strategic growth at Bobbing (i.e. support for the strategic site option discussion in Section 5.3, above). This would deliver c.2,500 homes (in the plan period), over-and-above the emerging preferred growth scenario. This is **higher growth scenario 2**.
- 5.4.8 In conclusion, **three growth scenarios** should be taken forward to Section 5.5.

³⁸ Two further urban extension options were presented to the 8th October meeting, but these are located to the east of Sittingbourne, which is a more challenging direction for growth.

³⁹ Borden is also notable as a small village closely linked to Sittingbourne where there is a high density of promoted sites, including one site that is found to be potentially suitable through the SHLAA.

Faversham

- 5.4.9 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support strategic growth to the east / southeast of the town, delivering c.3,400 homes (c.3,250 in the plan period). There is a need to explore scenarios involving smaller scale urban extensions, in place of strategic growth to the east / southeast, which in practice means exploring lower growth scenarios.
- 5.4.10 Five urban extension options have been identified that are judged to perform relatively well, for the purposes of arriving at growth scenarios, namely sites 18/030, 18/062, 18/077, 18/091 and 18/135. The combined yield of these sites, according to the SHLAA, is 1,065 homes; however, it is considered appropriate to round this figure down to 1,000 homes. This is **lower growth scenario 1**.
- 5.4.11 In conclusion, **two growth scenarios** should be taken forward to Section 5.5. N.B. additionally c225 homes are expected to be delivered through the Faversham Neighbourhood Plan.

West Sheppey

- 5.4.12 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate site 18/113 for 850 homes. Whilst this site has the potential to support regeneration objectives for Queenborough/Rushenden, it is subject to a range of constraints and delivery challenges. As such, there is a need to explore scenarios involving non-allocation.
- 5.4.13 One other site has been identified as performing relatively well, for the purposes of arriving at growth scenarios, namely site 18/038, to the southeast of Minster, albeit it might involve somewhat piecemeal expansion, with resulting 'planning gain' opportunities missed. The capacity of this site is c.650 homes, hence its allocation in place of site 18/113 would mean lower growth. This is **lower growth scenario 1**.
- 5.4.14 Additionally, there is the option of nil allocations, particularly given concerns regarding junction capacity under scenarios where there is also higher growth at Sittingbourne. This is **lower growth scenario 2**.
- 5.4.15 In conclusion, **three growth scenarios** should be taken forward to Section 5.5.

Teynham

- 5.4.16 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support an 'area of opportunity' at Teynham, expected to deliver around 1,100 homes. There is a need to explore lower growth scenarios involving one or more discrete allocations, in place of an area of opportunity.
- 5.4.17 Of the seven site options supported by the SHLAA, four have been identified that are judged to perform relatively well, for the purposes of arriving at growth scenarios, namely sites 18/106, 18/116, 18/122 and 18/123. The combined yield of these sites is c.350 homes. This is **lower growth scenario 1**.
- 5.4.18 Additionally, there is the option of nil allocations, given: committed growth; A2 traffic and air quality issues; and few clear infrastructure opportunities short of delivering a bypass. This is **lower growth scenario 2**.
- 5.4.19 In conclusion, **three growth scenarios** should be taken forward to Section 5.5.

Newington

- 5.4.20 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There is a need to explore higher growth scenarios, recognising that Newington is a tier 4 settlement that is well connected by road and rail.
- 5.4.21 One site has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site 18/229, with a capacity of c.200 homes. This is **higher growth scenario 1**.
- 5.4.22 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

Eastchurch

- 5.4.23 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Eastchurch, recognising its rural location; however, as a tier 4 settlement there is a need to remain open to the option of allocation.
- 5.4.24 One site option has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site 18/063, which would yield c.65 homes. This is **higher growth scenario 1**.

- 5.4.25 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

Leysdown

- 5.4.26 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Leysdown, as per Eastchurch; however, there is an argument for housing growth in support of village vitality objectives, e.g. with a view to supporting shops and services outside of the tourism season.
- 5.4.27 One site option has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site 18/121. The SHLAA records the yield of this site as 135 homes; however, parts of the site is constrained by flood risk, hence it is considered appropriate to assume a lower yield of c.100 homes. This is **higher growth scenario 1**.
- 5.4.28 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

Boughton

- 5.4.29 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate one site for 20 homes. This site is relatively firmly supported (there is a history of unimplemented planning permissions), hence there is no reasonable need to explore scenarios involving non-allocation of this site.
- 5.4.30 As for possible higher growth scenarios, there is only one site highlighted by the SHLAA as potentially in contention; however, on balance, there is not considered to be a reasonable need to explore a higher growth option involving additional allocation of this site, for the reasons set out in Appendix VI.
- 5.4.31 In conclusion, **one growth scenario** should be taken forward to Section 5.5 (i.e. growth can reasonably be held constant across the borough-wide growth scenarios).

Iwade

- 5.4.32 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. Three sites at Iwade are identified as potentially suitable for allocation by the SHLAA; however, there is considered to be a strong case for non-allocation at Iwade through the LPR, on the basis that Iwade is set to see significant growth through committed sites.
- 5.4.33 In conclusion, **one growth scenario** should be taken forward to Section 5.5.

Tier 5 settlements and the rural area

- 5.4.34 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate three adjacent sites at Neames Forstal to deliver 90 homes in total. These sites were not supported by the SHLAA, and there remain question-marks regarding suitability for allocation, as discussed in Appendix VI; however, these sites are expected to deliver within the first five years of the plan period, which is an important consideration (NPPF paragraph 67). As such, and on balance, there is not considered to be a reasonable need to take forward scenarios involving non-allocation of any of these sites to Section 5.5.
- 5.4.35 With regards to higher growth scenarios, attention focuses on the possibility of additionally allocating one of the sites identified as potentially suitable for allocation by the SHLAA. However, on balance, it is not considered appropriate to explore a higher growth scenario involving additional allocation of one or more of these sites, given that: there are limited strategic arguments for growth at any of the lower order settlements in question; there are question-marks regarding the suitability of certain of these sites; and there is the potential to allocate sites at lower order settlements through Neighbourhood Plans.
- 5.4.36 Finally, there is a need to give special mention to site 18/154 (Lamberhurst Farm), which is proposed as an employment allocation, following the Cabinet decision of 28th October, but which is being promoted as a mixed use scheme involving 300 homes. It is noted that there was some support for a mixed use scheme at the 8th October meeting; however, on balance the site is considered more suitable for employment, and it is not considered necessary to take forward the option of a mixed-use scheme.
- 5.4.37 In conclusion, **one growth scenario** should be taken forward to Section 5.5 of the main report. N.B. additionally c.225 homes are expected to be delivered through a permissive policy on park homes.

Conclusion on sub-area scenarios

- 5.4.38 Table 5.5 presents a summary of the sub-area scenarios taken forward to Section 5.5.
- 5.4.39 In summary, the decision was to take forward the emerging preferred scenario plus:
- one or more **higher growth** scenarios for Sittingbourne, Newington, Eastchurch and Leysdown; and
 - one or more **lower growth** scenarios for Faversham, West Sheppey and Teynham.

Table 5.5: Summary of sub-area scenarios (# homes in the plan period; emerging preferred scenario highlighted)

Sub-area	Sub-area scenarios taken forward to Section 5.5		
Sittingbourne	850	1,350	3,350
Faversham	1,000	3,250	-
West Sheppey	0	650	850
Teynham	0	350	1,100
Newington	0	200	-
Eastchurch	0	65	-
Leysdown	0	100	-
Boughton	20	-	-
Iwade	0	-	-
Tier 5 settlements	90	-	-

5.5 Reasonable growth scenarios

Introduction

- 5.5.1 Having gone through a process (as summarised in Figure 5.1) involving consideration of strategic issues/options, site options and sub-area scenarios, the final task was to draw together the understanding generated in order to arrive at a single set of borough-wide reasonable growth scenarios.
- 5.5.2 In practice, this involved exploring ways of combining the **sub-area scenarios** that emerge from Section 5.4, also mindful of housing supply from: **commitments** (i.e. sites with planning permission and/or an allocation in the adopted Local Plan and expected to deliver in the LPR plan period, i.e. post April 2022); **windfall** sites (i.e. sites that are neither an existing commitment nor an LPR allocation); the emerging **Faversham Neighbourhood Plan**; and a permissive policy on **park homes**.

What about employment land supply?

- 5.5.3 The process of establishing reasonable growth scenarios has been housing-led; however, there is also a need to ensure sufficient supply of employment land under all scenarios, in light of the targets set by the Employment Land Review (2018). This matter is discussed further in Box 5.1, at the end of this section.

Combining sub-area scenarios

- 5.5.4 This section considers ways of combining the sub-area scenarios to form reasonable growth scenarios.
- Parameters**
- 5.5.5 There are many potential combinations of these sub-area scenarios; however, it is possible to immediately rule out those combinations that would deliver too few or too many homes.

- 5.5.6 When seeking to understand the number of homes that must be delivered through the sub-area scenarios in combination, there is a need to take into account not only the total number of homes needed in the plan period (as discussed in Section 5.2), but also supply from: commitments (c.8,850 homes); windfall sites (2,200 homes);⁴⁰ the Faversham Neighbourhood Plan (c.225 homes); park homes (c.225 homes); and the need for a supply buffer of c.5 to 10% (i.e. a supply buffer in excess of LHN). On this basis, there is a need for combinations of sub-area scenarios to deliver **at least 5,930 homes**.⁴¹

Reasonable growth scenarios to provide for LHN

- 5.5.7 The first port of call is the emerging preferred growth scenario, following the Cabinet decision of 28th October. The sub-area scenarios in combination (see highlighted cells in Table 5.5) would deliver 6,160 homes in the plan period (plus c.150 beyond the plan period), which would lead to a total plan period supply of 17,660 homes, which amounts to LHN (c.16,600) plus a supply buffer of 6%. This would certainly mean that the housing requirement is set at LHN. This is **reasonable growth scenario 1**.
- 5.5.8 The next step is to vary the emerging preferred growth scenario by supporting the lower growth scenario for Faversham, namely 1,000 homes through urban extensions in place of strategic growth to the east and southeast. Given the sub-areas scenarios presented in Table 5.5, an immediately apparent way to make up for the decreased number of homes at Faversham would be to support high growth at Sittingbourne, namely 2,500 homes via strategic growth at Bobbing. Assuming that growth at the other sub-areas remains as per the preferred scenario, then the total supply would amount to 17,910 homes in the plan period, which equates to LHN plus a supply buffer of 8%. This would likely mean that the housing requirement is set at LHN. This is **reasonable growth scenario 2**.
- 5.5.9 The next step is to vary the emerging preferred growth scenario by supporting the lower growth scenarios at West Sheppey and Teynham, on the basis that the emerging preferred growth scenarios here give rise to a degree of delivery risk and sustainability challenges. Supporting the lower growth scenarios at West Sheppey and Teynham results in 950 fewer homes, and there is logic to addressing this shortfall by supporting: the higher growth scenarios at Newington, Eastchurch and Leysdown; and the middle growth scenario at Sittingbourne. This is on the basis that growth at Sittingbourne, Newington, Eastchurch and Leysdown, under these scenarios, would involve a collection of more 'traditional' urban extensions thought likely to be associated with fairly low delivery risk (overall). Total supply would amount to 17,575 homes in the plan period, which equates to LHN plus a supply buffer of 6%. This would certainly mean that the housing requirement is set at LHN. This is **reasonable growth scenario 3**.

Reasonable higher growth scenarios

- 5.5.10 Under the above three scenarios it would likely be appropriate to set the housing requirement as LHN, i.e. 1,038 dwellings per annum. However, as discussed in Section 5.2, there is also a need to consider modestly higher growth options, given a risk (albeit small) of the LPR needing to provide for unmet needs, and also mindful of the need to deliver 28% affordable housing (see discussion in Section 5.2).
- 5.5.11 A first port of call is to support the highest growth scenarios for both Sittingbourne and Faversham. This is a reasonable option to explore; however, it is difficult to decide what growth scenarios to assume for other sub-areas. On balance, it is considered appropriate to assume the lowest growth scenario for all other sub-areas, leading to a total supply of 18,210 homes, which amounts to LHN plus a supply buffer of 10%. This could enable a housing requirement set at a level slightly above LHN; however, this is unlikely, as a large supply buffer would be called for. This is **reasonable growth scenario 4**.
- 5.5.12 Secondly, there is a need to explore a scenario involving the emerging preferred growth scenario, following the Cabinet decision of 28th October, plus the additional modest urban extension options identified at Sittingbourne, Minster, Newington, Eastchurch and Leysdown, leading to a total supply of 19,175 homes, which amounts to LHN plus a supply buffer of 15%. This could well enable the housing requirement to be set at a level slightly above LHN. This is **reasonable growth scenario 5**.

The reasonable growth scenarios

- 5.5.13 The five reasonable growth scenarios that emerge from the discussion above are set out in summary in Table 5.6, in detail in Table 5.7 and also across the subsequent maps. Many other growth scenarios can be envisaged, but are judged to be unreasonable in light of the analysis set out above – see Box 5.2.

⁴⁰ Calculated as: 200 dwellings per annum for last 11 years of plan.

⁴¹ Calculated as: LHN (1,038 x 16 = c.16,600) + 5% buffer – (supply from commitments, windfall, FNP and park homes)

Table 5.6: Summary of the reasonable growth scenarios

Scenario	Description	Housing requirement
1	The emerging preferred scenario	
2	Scenario 1 but with higher growth at Sittingbourne (Bobbing) and lower growth at Faversham (four urban extensions in place of strategic growth to the E/SE)	LHN
3	Scenario 1 but with lower risk urban extensions (UEs) replacing higher growth strategies for Teynham and Rushenden	
4	Both strategic growth locations; lower growth scenarios elsewhere	Above LHN?
5	Scenario 1 plus lower risk UEs	

Box 5.1: Discussion of employment land supply under the reasonable growth scenarios

As discussed in Section 5.2, there is a need to provide for around 15 ha of new land for offices and light industrial uses in the east of the Borough, plus there is a need to consider allocation of 40 ha for warehousing.

Under **Growth Scenario 1** new employment land supply would be delivered at Faversham (at least 20 ha); Rushenden (10 ha) and Lamberhurst Farm (at least 2 ha). As such the 15 ha target would be exceeded, whilst the warehousing target would not be met. This leads to limited cause for concern, as the target is described in the ELR as ‘marginal’, plus the target is for the longer term and need only be met if suitable sites are available.

Employment land supply would be tighter under **Growth Scenario 3** because there would be a loss of 10ha of supply at Rushenden; however, the 15 ha ELR target would still be exceeded. There would be an argument for allocating one or more additional employment sites, but it is not clear what site(s) might be allocated in practice, hence this is left as an open-ended possibility, for the purposes of defining growth scenarios.⁴²

There is also a need to consider **Growth Scenarios 2 and 4**, under which there would be a loss of 10 ha of employment land at either Faversham or Rushenden, but with the shortfall partly addressed by strategic growth at Bobbing. The current proposal for Bobbing is to deliver a fairly modest area of “flexible employment space” at the southeast corner of the site; however, there might feasibly be potential for additional employment land, should it be required. This might be either within or outside of the current red line boundary. An employment hub stretching either side of the railway might be envisaged, potentially to include site 18/007.

Box 5.2: Unreasonable growth scenarios

As discussed in Section 4, there is a need to arrive at growth scenarios in the form of alternative packages of sites. This creates an inherent challenge for the SA process, because there are many feasible site packages.

The process discussed in this section (as summarised in Figure 5.1) is designed with the objective of addressing this challenge, and arriving at discrete site packages that are demonstrably ‘reasonable’. However, there is inevitably a significant amount of planning judgement involved when arriving at reasonable growth scenarios for appraisal, and the need to ensure a manageable number of scenarios – to the benefit of consultees – is a factor.

It is not necessary to list unreasonable growth scenarios, including because the list could never be comprehensive. However, it is appropriate to highlight that a stand-out “near-miss” growth scenario would see support for the ‘urban extension’ scenarios at Sittingbourne and Faversham (i.e. no strategic growth location / garden community) alongside the high growth scenarios elsewhere. This would deliver a total supply of 16,935 homes (LHN + 2%), which is arguably too few homes; furthermore, officers (in discussion with AECOM) judged this scenario to be unreasonable because there are strong arguments in support of delivering a garden community (see Section 5.2).

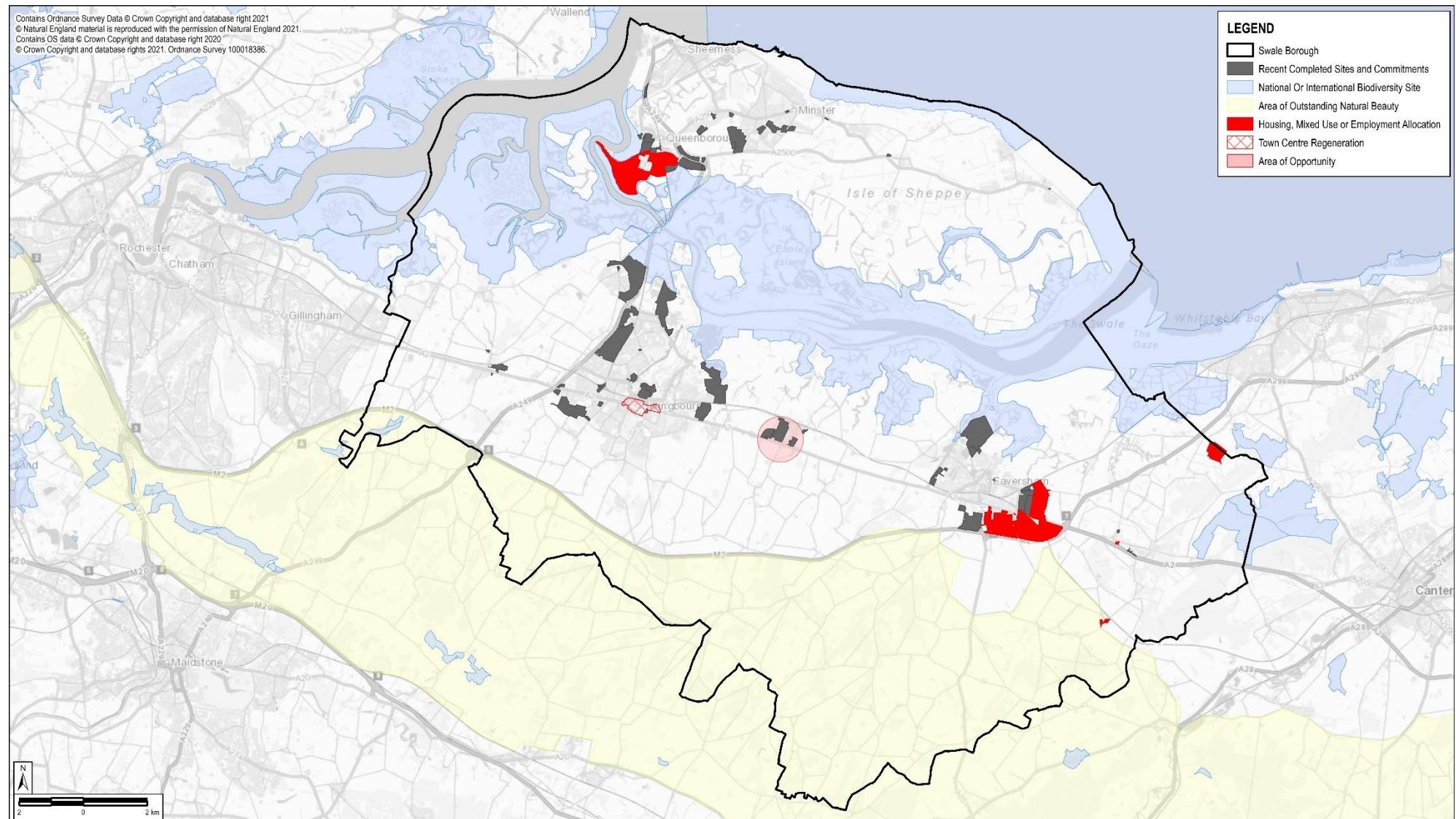
⁴² Sites that might be considered for allocation include: **18/007** (Land east of Sheppey Way, Bobbing; 1 ha) – however, suited to offices rather than industry; **18/018** (Land off Lower Road, Minster; 4 ha) – however, viability / deliverability on Sheppey is challenging; **18/105** (Halfway Egg Farm, Featherbed Lane, Sittingbourne; 2.9 ha) – promoted for retail, but the option of employment land might be explored, given its location adjacent to the A249 Grovehurst junction. Also, there would be the potential to support additional industrial supply within one or more of the **Areas of Search** examined within Appendix F of the ELR (see pages 21 to 24, in particular those Areas of Search with a favourable recommendation in columns 34 to 36).

Table 5.7: The reasonable growth scenarios (with constant elements of supply greyed-out)

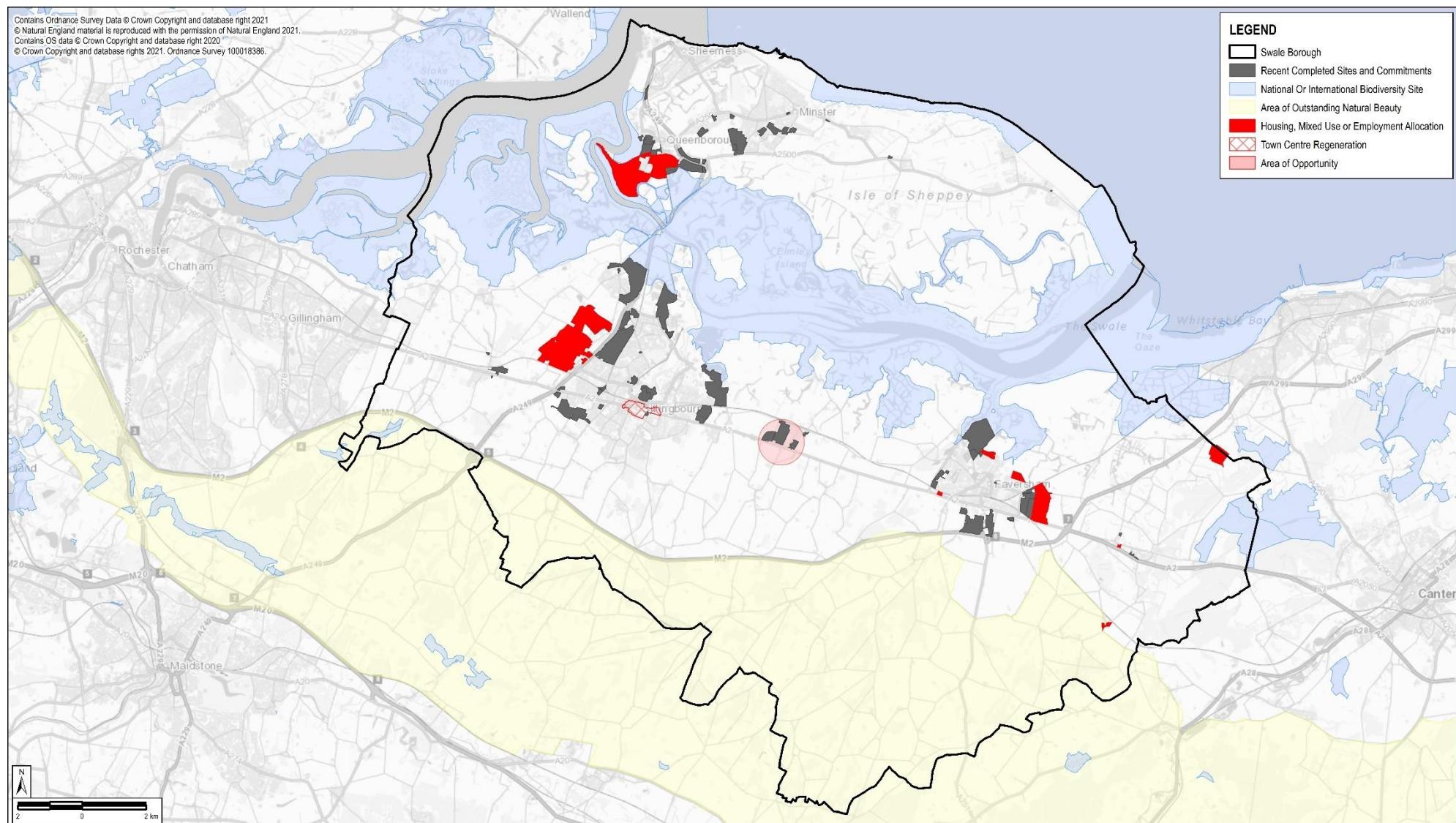
Growth scenario		Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario 5 Preferred scenario Low risk UEs
Source of housing supply						
Commitments		8,850	8,850	8,850	8,850	8,850
Windfall		2,200	2,200	2,200	2,200	2,200
Additional from Faversham NP and park homes		450	450	450	450	450
Allocations	Town centre	850	850	850	850	850
	Sittingbourne	Urban extensions	-	500	-	500
		Garden comm (Bobbing)	-	-	2,500	-
	Faversham	Urban extensions	-	1,000	-	-
		Garden comm (E/SE)*	3,250	3,250	3,250	3,250
	West Sheppey	Sheerness	-	-	-	-
		Minster / Halfway	-	650	-	650
		Q'borough / Rushenden	850	-	-	850
	Tier 4 settlements	Teynham	1,100	350	-	1,100
		Newington	-	200	-	200
Tier 5 settlements		Eastchurch	-	65	-	65
		Leysdown	-	100	-	100
		Boughton	20	20	20	20
		Iwade	-	-	-	-
		Neames Forstal	90	90	90	90
		Elsewhere	-	-	-	-
Total homes in the plan period (2022-2038)		17,660	17,910	17,575	18,210	19,175
Total homes per annum		1104	1119	1098	1138	1198
% supply buffer above LHN (1038 per annum)		6%	8%	6%	10%	15%
		Provide for LHN			Possibly provide for above LHN	

* plus c.150 homes beyond the plan period

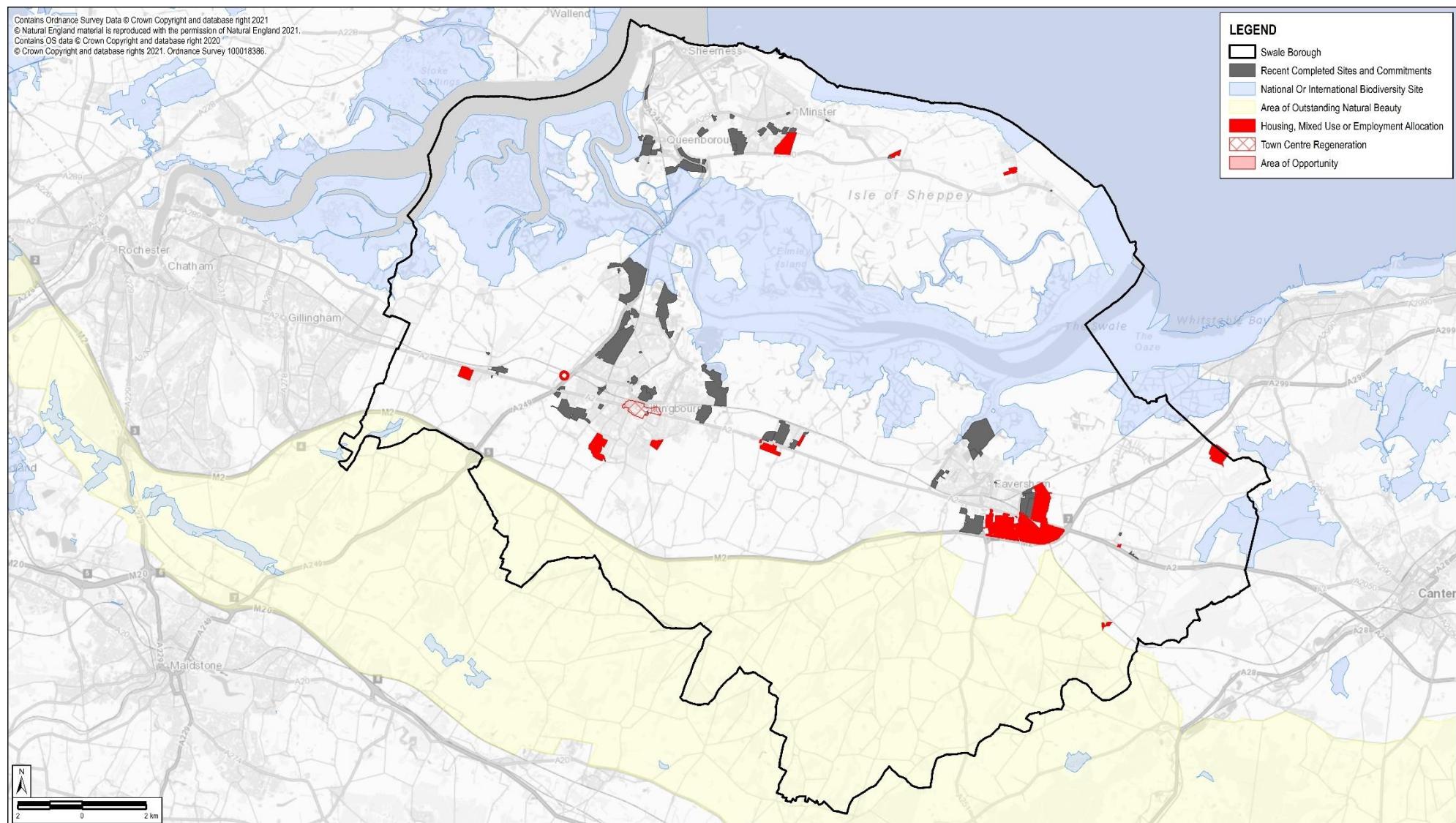
Growth scenario 1: The emerging preferred scenario



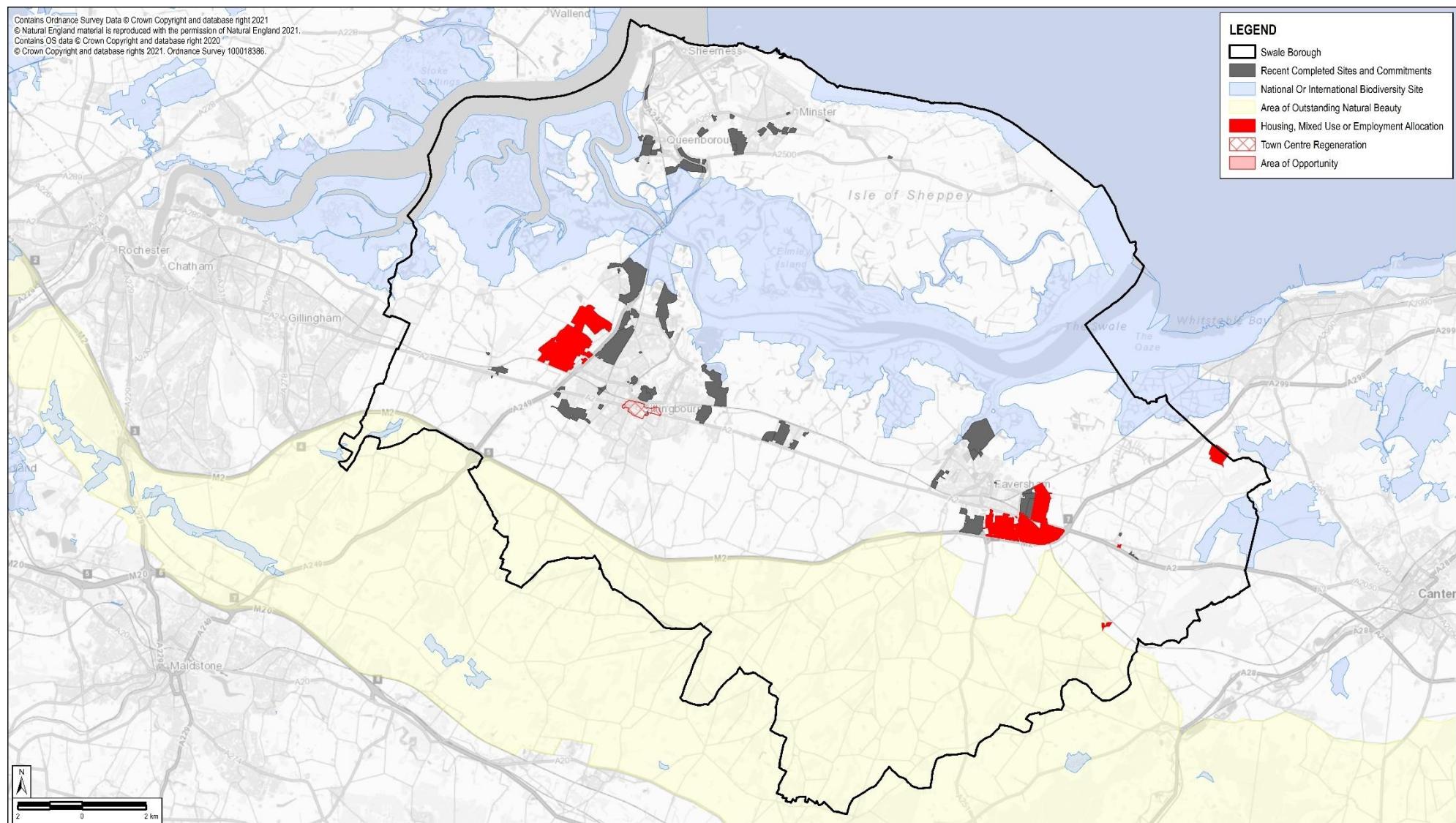
Growth scenario 2: Scenario 1 but with higher growth at Sittingbourne (Bobbing) / lower at Faversham



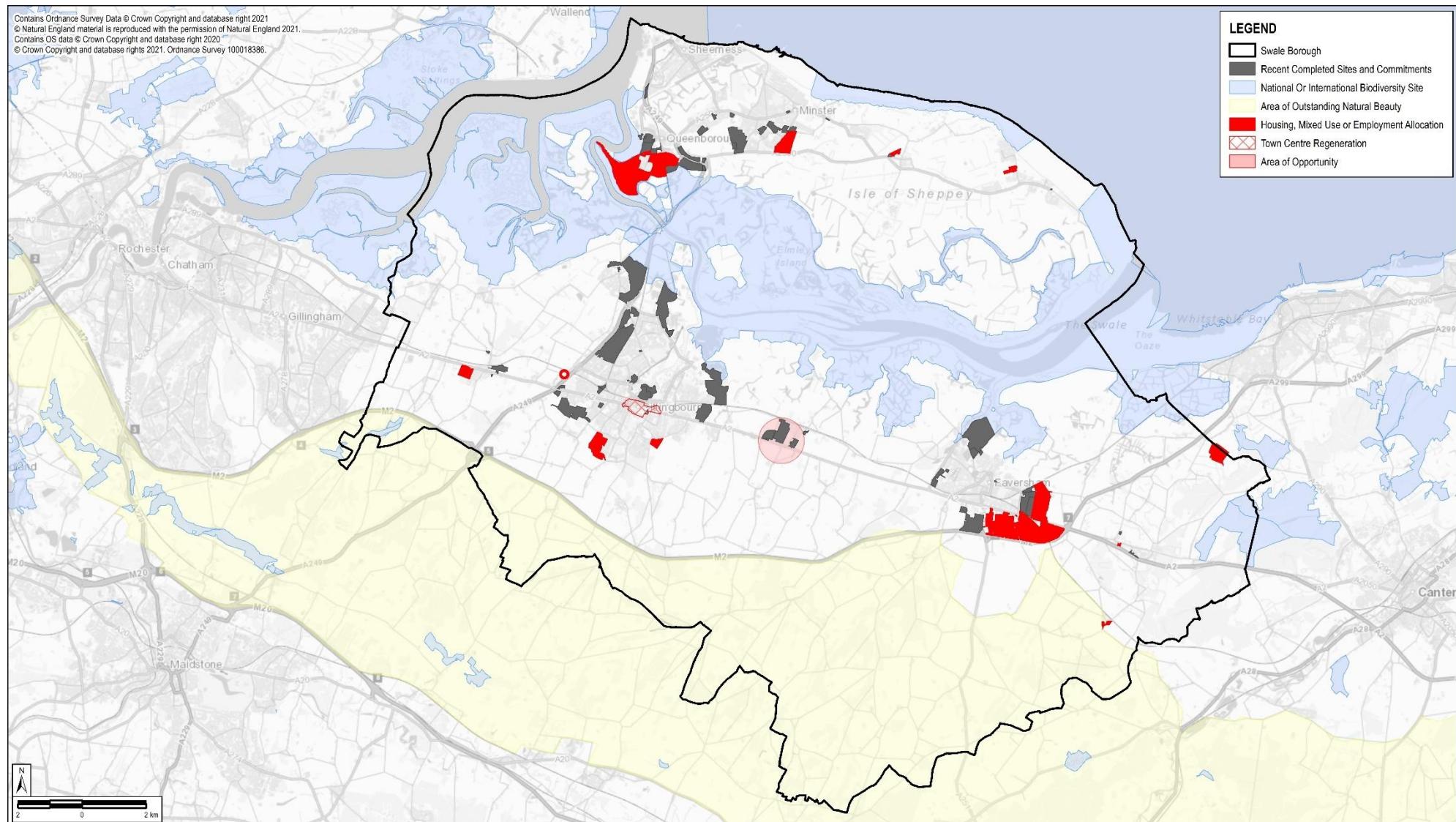
Growth scenario 3: Scenario 1 but with lower risk urban extensions (UEs) in place of higher risk



Growth scenario 4: Both strategic growth locations; lower growth scenarios elsewhere



Growth scenario 5: Scenario 1 plus lower risk UEs



6 Growth scenarios appraisal

6.1 Introduction

- 6.1.1 The aim of this section is to present a summary appraisal of the reasonable growth scenarios. Detailed appraisal findings are presented in **Appendix VII**, which also includes a detailed discussion of methodology.
- 6.1.2 The reasonable growth scenarios are set out (in summary) in Table 6.1, for ease of reference.

Table 6.1: Summary of the reasonable growth scenarios

Scenario	Description	Housing requirement
1	The emerging preferred scenario	
2	Scenario 1 but with higher growth at Sittingbourne (Bobbing) and lower growth at Faversham (four urban extensions in place of strategic growth to the E/SE)	LHN
3	Scenario 1 but with lower risk urban extensions (UEs) replacing higher growth strategies for Teynham and Rushenden	
4	Both strategic growth locations; lower growth scenarios elsewhere	Above LHN?
5	Scenario 1 plus lower risk UEs	

6.2 Summary appraisal findings

- 6.2.1 Summary appraisal findings are set out in Table 6.2, which comprises:
- 12 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and
 - five columns (one for each of the reasonable growth scenarios).
- 6.2.2 For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using red / amber / light green / green)⁴³ and rank the reasonable growth scenarios in order of preference.

Further points on methodology

- 6.2.3 A detailed discussion of the methodological approach taken to arriving at conclusions on rank of preference and significant effects is presented in Appendix VII. In summary, the discussion in Appendix VII covers:
- Significant effects – the aim is to “identify, describe and evaluate” significant effects in respect of each element of the established appraisal framework in turn.
 - Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance.
 - Evidence – extensive use has been made of: the evidence-base studies commissioned by the Council since 2017 (see Section 5.2); materials submitted and made available by strategic site promoters; and two reports examining strategic site options prepared by Stantec in 2019, namely *Assessment of Submissions* (Feb 2019)³⁵ and *Assessment of Stage 2 Submissions* (Oct 2019).³⁶

A key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and ‘planning gain’ (e.g. affordable housing). There is certainly a need to take site specific proposals into consideration; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

⁴³ Red indicates a significant negative effect; amber a negative effect that is of note but with limited or uncertain significance; light green a positive that is of note but with limited or uncertain significance; and green a significant positive effect.

Table 6.2: Summary appraisal of the reasonable growth scenarios

Scenario	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
	Preferred scenario	Bobbing Faversham UEs	E/SE Faversham Low risk UEs	E/SE Faversham Bobbing	Preferred scenario Low risk UEs
SA topic	Rank of preference and categorisation of effects				
Air quality	1	3	2	2	4
Biodiversity	2	3	1	1	2
Climate change mitigation	1	2	2	1	2
Communities	1	3	3	3	2
Economy & employment	1	3	4	4	2
Flood risk	2	2	1	1	2
Heritage	2	3	3	1	3
Housing	3	2	2	2	1
Land	1	1	1	2	3
Landscape	2	3	3	1	4
Transport	1	2	2	2	3
Water	1	1	2	1	3

Summary discussion

It is immediately apparent that Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) perform well in a number of respects, as indicated by the number of stars and green scores assigned (particularly Scenario 1) and the relatively low number of red scores assigned (particularly Scenario 4).

However, it does not necessarily follow that it is a straightforward choice between Scenarios 1 and 4, when deciding which is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to housing objectives, which could mean favouring Scenario 5.

Having made these opening remarks, the following bullet points summarise the performance of the reasonable growth scenarios in respect of each element of the SA framework in turn:

- **Air quality** – higher growth is not supported given air quality constraints affecting Swale (and neighbouring authorities), particularly along the A2 corridor and along the B2006 in Sittingbourne. Scenario 1 performs well because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns. With regards to significant effects, it is appropriate to flag a notable degree of risk under all scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period (in particular NO₂, with particulates pollution likely to prove more stubborn); however, air quality is currently a priority issue for the Council.
- **Biodiversity** - Scenarios 3 and 4 are judged to perform best, as allocation of site SLA18/113 at Rushenden would be avoided (albeit it is recognised that detailed work is underway to understand the potential to avoid and mitigate biodiversity concerns associated with the site, and HRA work has concluded no likelihood of significant adverse effects to the SPA, given the potential for mitigation through policy). Scenario 2 performs poorly, on the basis that strategic growth to the east and southeast of Faversham is judged to be preferable to strategic growth at Bobbing. With regards to significant effects, it is appropriate to flag a notable degree of risk in respect of the three worst performing scenarios. It is recognised that the best performing scenarios (Scenarios 3 and 4) could lead to significant positive effects, particularly given the potential for strategic growth locations to support achievement of biodiversity net gain; however, there is no certainty at the current time, given the available evidence.
- **Climate change mitigation** – whilst it is challenging to differentiate the scenarios, on balance Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) are judged to be joint best performing. Scenario 1 may be preferable from a transport emissions perspective, whilst Scenario 4 may be preferable from a built environment emissions perspective. With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect on the baseline, with the fact that there is a highly ambitious local net zero target in place. On balance, it is considered appropriate to flag a concern with all scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor, if not *the* key driving factor, influencing spatial strategy, site selection and development of site-specific proposals.
- **Communities** - Scenario 1 is judged to perform most strongly, as strategic growth at Faversham would deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including a detailed masterplan. Scenarios 2 to 4 perform poorly, as there would either be problematic piecemeal expansion at Faversham (Scenario 2) or a missed opportunity at Queenborough/Rushenden (Scenarios 3 and 4). There is also a concern regarding growth locations in combination impacting on existing community infrastructure capacity under Scenario 5. With regards to the significance of effects, it is appropriate to highlight Scenario 1 as performing significantly better than the other scenarios. Scenario 1 is clearly designed to ensure that housing growth delivers community benefits beyond meeting housing needs. The only stand-out concern, under Scenario 1, relates to the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. The other scenarios would all lead to mixed effects.
- **Economy and employment** - Scenario 1 performs most strongly given the assumed employment land supply at the proposed mixed use allocations, albeit there is some uncertainty, notably in respect of site SLA18/113 at Rushenden. Relative to Scenario 1: Scenarios 2 and 4 perform less well, as there would be a loss of 10 ha of employment land at either Faversham or Rushenden, with the resulting shortfall only partly addressed by strategic growth at Bobbing; and Scenario 3 performs least well, because there would be a loss of 10ha of supply at Rushenden (also potentially some missed opportunity at Teynham). With regards to significant effects, it is appropriate to flag a degree of risk under all scenarios, and predict that the worst performing scenario would lead to significant negative effects. These conclusions are reached in light of the headline targets set out in the Employment Land Review (ELR, 2018), albeit certain ELR targets are a range and require careful interpretation. It is also important to consider that the national and regional situation may have moved-on since the ELR.
- **Flood risk** - the key consideration is in respect of site SLA18/113 at Rushenden. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/Rushenden; however, at the current time, it is appropriate to 'flag' a significant risk.

- **Heritage** - Scenario 4 performs best as it would involve a focus at two strategic growth locations with *relatively* limited historic environment sensitivity. Scenario 1 also performs well on a similar basis, i.e. there would be a focus of growth at strategic sites; however, there is a concern regarding constraints at Teynham being a barrier to strategic growth. Scenarios 2, 3 and 5 perform poorly as there would be a need to allocate a number of urban and village extensions with historic environment sensitivities. With regard to significant effects, it is appropriate to take a precautionary approach, and flag a notable degree of risk under Scenario 1, and the strong possibility of significant negative effects under Scenarios 2, 3 and 5.
- **Housing** - it is appropriate to highlight Scenario 5 as best performing, as it is a higher growth scenario comprising a good mix of sites. Scenarios 2, 3 and 4 all also perform well on the basis that there would be a good mix of sites (including sites assumed to be associated with relatively low delivery risk, and certain sites thought likely to be able to deliver early in the plan period) and/or a good sized supply buffer. Scenario 3 also benefits from a focus on sites thought to have good potential to deliver affordable housing. Scenario 1 performs least well, as it is associated with both a lower supply buffer and a focus on sites with delivery risks. With regards to significant effects, it is certainly fair to highlight Scenario 5 as representing a highly proactive approach to responding to delivery challenges and risks; there would be very high confidence in respect of meeting market and affordable housing needs locally, and potentially some flexibility to provide for any unmet needs that might arise (N.B. Swale has not been asked to provide for unmet needs). Supply under the other scenarios would likely be sufficient to meet LHN over the course of the plan period, although there are uncertainties, particularly in respect of Scenario 1. Finally, it is important to note that any concerns are allayed by an understanding that supply, under all scenarios, would be strong in the early part / first half of the plan period because of committed sites from the adopted Local Plan building-out (plus certain new allocations, e.g. Neames Forstal, which is a constant across the growth scenarios). This is an important consideration in light of NPPF paragraph 67.
- **Land** - all of the reasonable growth scenarios would lead to significant negative effects, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. It is also likely that all would lead to loss of land that is currently used for fruit growing, or has been used for fruit growing in the recent past, which amounts to particularly high value agricultural land. On balance, it is appropriate to place the scenarios in an order of preference according to the total quantum of growth supported. N.B. a further consideration is the extent of minerals safeguarding areas across the Borough; however, these are very extensive, covering the majority of land along the A2 corridor. The Isle of Sheppey is less constrained; however, it is difficult to confidently differentiate the growth scenarios. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract prior to development.
- **Landscape** - Scenario 4 is judged to perform best. Scenario 1 performs second best, although there are concerns associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Scenarios 2 and 3 are judged to perform on a par, with certain of the urban/village extensions in question giving rise to a degree of concern. Scenario 5 gives rise to a concern, as a higher growth option, although the effect could be to prevent a situation whereby there is a need to accept windfall development in sensitive locations and/or the effect could be to reduce pressure for growth in sensitive locations in neighbouring authorities. With regards to significant effects, it is appropriate to flag a risk under all but the best performing scenario, including on the basis of the need to allocate at least one site within a locally designated landscape.
- **Transport** - Scenario 1 is judged to perform best, followed by those scenarios involving strategic growth at Bobbing, and then followed by Scenario 3, which would involve more dispersed growth. Scenario 5 (higher growth) is judged to perform least well, although there could be some potential for growth locations along shared transport corridors (e.g. the Lower Road on the Isle of Sheppey) to pool funding to deliver strategic transport upgrades, for example junction upgrades, cycle routes and improved bus services. With regards to significant effects, emerging transport modelling work is serving to suggest that Scenario 1 will not lead to severe impacts on the strategic road network, but it is appropriate to flag a degree of risk for the other scenarios, and flag a particular risk under Scenario 5, given known constraints in the west of the Borough.
- **Water** - there would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events (breaches of discharge permits); however, it is not possible to highlight concerns with any particular sites, or parts of the Borough, on the basis of the available evidence. It is therefore appropriate to flag a concern with Scenario 5, as a higher growth scenario, and also Scenario 3, which involves a degree of dispersal to locations relatively distant from a WwTW. It is not possible to predict significant negative effects, because there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth; however, given the uncertainties at the current time, it is appropriate to flag a degree of risk under all growth scenarios. It will be for the Environment Agency and Southern Water to comment further.

7 The preferred growth scenario

Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of reasonable growth scenarios is best, or ‘most sustainable’ overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response SBC officers to the AECOM appraisal.
- 7.1.2 Also, this section presents a concluding discussion on reasons for not allocating individual sites.

Officers reasons for selecting the preferred scenario

- 7.1.3 The following statement explains officers’ reasons for supporting Growth Scenario 1, in-light of the appraisal. It is important to be very clear that this statement is a response to the appraisal; it is not an appraisal:

Scenario 1 is judged to perform well overall in that it aligns well with a range of priority objectives, and whilst there are clear tensions and challenges, it is not possible to envisage an alternative strategy that would perform better overall. The appraisal serves to highlight Scenario 4 as potentially having a degree of overall merit, however the view of officers is that a strategy involving two garden communities would involve a high degree of delivery risk, and it is important to note that when the elected councillors of the Local Plan Panel considered broad growth scenarios on 30th July 2020 there was no support for a strategy involving two garden communities.

The appraisal highlights several stand-out risks; however, it is important to note that the appraisal is undertaken largely blind to the policy framework within the LPR that will guide delivery. In this light, officers do not judge any of the highlighted risks and drawbacks to be unacceptable (‘showstoppers’). Taking key matters in turn:

- Biodiversity – the proposed policy is seeking to accord with best practice nationally, and biodiversity net gain is being prioritised as one of the key ‘policy asks’ of developers;
- Flood risk - latest understanding is that there is good potential to reduce risk to an acceptable level through masterplanning and design measures, and there is a need to support growth at Queenborough and Rushenden if long standing regeneration objectives are to be realised;
- Heritage – the Council’s heritage specialists have been closely engaged as part of the spatial strategy, site selection and policy writing process, and there is scope for further strengthening of policy if necessary;
- Housing – the evidence suggests the proposed supply can meet needs, and whilst there are inevitably risks, these need to be balanced against a desire not to over-allocate, with resulting issues and impacts, and an understanding that the Local Plan must be reviewed at least once every five years. It is recognised that Rushenden South is associated with delivery challenges, but it is not needed to deliver homes in the first five years of the plan period, i.e. it is a “specific, developable site” (NPPF para 67) to deliver beyond year five.
- Landscape – a key concern relates to growth at Rushenden; however, there is confidence in the potential to address concerns through masterplanning and design.

Concluding comments on individual omission sites

- 7.1.4 As discussed in Section 4, individual site options are not reasonable alternatives, and hence are not a focus of the appraisal presented in Section 6. However, it is recognised that individual site options generate a high degree of interest, including omission sites, i.e. sites that do not feature in the preferred growth scenario.
- 7.1.5 Nine omission sites feature in the growth scenarios, plus there is the non-preferred option of supporting modest growth at Bobbing at undefined sites, plus there is the non-preferred option of allocating specific sites at Teynham in place of an Opportunity Area. In short, the appraisal finds that all omission sites / non-preferred options have a degree of merit, in light of strategic and/or site-specific considerations (indeed, this is why the feature in the growth scenarios); however, all are associated with drawbacks, in respect of in light of strategic and/or site-specific considerations. The Council may choose to give further reasons for ruling out individual sites, drawing on the appraisal of growth scenarios presented in Section 6 (also the discussion of individual site options presented in Section 5 and associated appendices) through a background paper, or a topic paper.
- 7.1.6 Also, numerous omission sites were ruled-out as part of the process of establishing growth scenarios (Section 5) and hence do not feature in the growth scenarios (Section 6). Reasons for ruling out these sites can be understood from Section 5, when read as a whole. The Council may choose to give further reasons for ruling out individual sites, drawing on the analysis in Section 5, through a background paper, or a topic paper.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the current version of LPR, which is known as the 'proposed submission' or 'pre-submission' version (henceforth pre-submission). This introductory section presents an overview of the LPR and then discusses appraisal methodology.

8.2 Overview of the LPR

- 8.2.1 The LPR comprises: 11 strategic policies including policy ST1 and ST2, which set out the spatial strategy; 19 policies specific to sites or areas; and 44 development management policies.
- 8.2.2 The housing land supply strategy is set out in Table 8.1 (employment land supply strategy is set out in Section 9). The strategy is also reflected in the LPR Key Diagram, which is reproduced as Figure 8.1.

Table 8.1: Summary of the spatial strategy (housing only)

Source of housing supply	Number of homes
Commitments + windfall + Faversham NP + park homes	11,500
Allocations	Sittingbourne Town centre (area of search)
	850
	East / southeast of Faversham
	3,250 (3,400)
	Rushenden south
	850
Teynham Opportunity Area	1,100
Former Garden Hotel, Boughton	20
Neames Forstal (three linked sites)	90
Housing supply (2022-2038)	17,670
Housing requirement	16,608 (1,038 per annum)
Supply buffer above requirement	6%

Figure 8.2: The LPR key diagram



8.3 Appraisal methodology

- 8.3.1 The appraisal identifies and evaluates 'likely significant effects' of the plan, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the SA framework (see Table 3.1).
- 8.3.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the LPR in more general terms.
- 8.3.3 Finally, it is important to note that effects are predicted / conclusions reached mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the LPR to impact on the baseline when implemented alongside other plans, programmes and projects that are 'in the pipeline'. These effect 'characteristics' are described within the appraisal as appropriate.

Adding structure to the appraisal

- 8.3.4 Whilst the aim is essentially to present an appraisal of the LPR 'as a whole', it is appropriate to also give consideration to individual elements of the plan in isolation. As such, each of the topic-specific appraisal narratives is broken-down under sub-headings – see Table 8.2.

Table 8.2: Structure of each topic-specific appraisal narrative

Sub-heading	Aims of the narrative
Commentary on the spatial strategy	Discuss the preferred spatial strategy option taking account of site specific proposals / site-specific development management policy
Commentary on other policies	Discuss the thematic, borough-wide policies
Appraisal on the plan as a whole	Predict and evaluate likely significant effects of the LPR

N.B. Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

A note on evidence

- 8.3.5 It is not possible to list all of the evidence sources that are drawn-upon as part of the appraisal; however, it is appropriate to highlight that extensive use has been made of: the evidence-base studies commissioned by the Council since 2017; materials submitted and made available on websites by strategic site promoters; and two reports examining strategic site options prepared by Stantec in 2019, namely *Assessment of Submissions* (Feb 2019)³⁵ and *Assessment of Stage 2 Submissions* (Oct 2019).³⁶

A note on infrastructure delivery assumptions

- 8.3.6 A key consideration is the extent to which it is appropriate to assume that development sites will come forward in-line with current proposals and policies, particularly in respect of infrastructure delivery. It is fair to take current proposals and policies at face value; however, in practice policies are associated with flexibility, and schemes can be subject to change, particularly on viability grounds. This is reflected in proposed Policy ST8 (Planning for Infrastructure), which explains: "*Where it is not possible to deliver the policy requirements in full, a viability assessment should be submitted in line with national Planning Practice Guidance.*" Supporting text to the policy goes on to present a sequential approach to prioritising developer contributions to infrastructure delivery, where it is the case that viability assessment demonstrates that funds are limited, i.e. it is the case that not all of the infrastructure that ideally would be funded can be funded. Risks and uncertainties are discussed further below, as part of the appraisal.

9 Appraisal of the Local Plan Review

9.1 Introduction

- 9.1.1 The aim of this section is to present an appraisal of the LPR under the 12 SA topics, drawing on available evidence and understanding of key issues and objectives established through scoping (see Table 3.1).

9.2 Air quality

- 9.2.1 Sustainability objectives:

- Support the achievement of air quality improvement objectives within the Borough's designated AQMAs.
- Seek to minimise air pollution more generally, such as through supporting or enabling the use of low emission technologies and encouraging sustainable modes of transport such as walking and cycling.

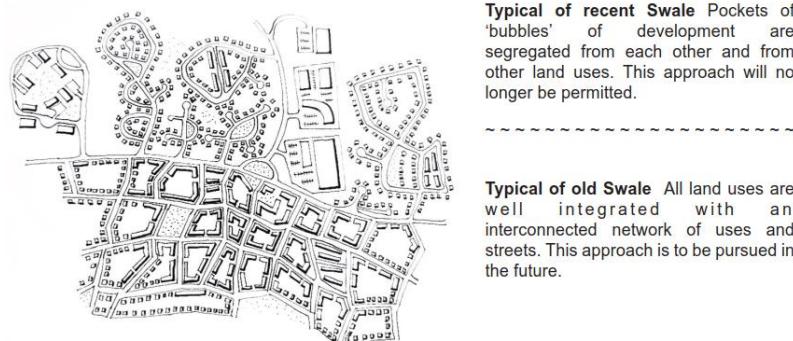
Commentary on the spatial strategy

- 9.2.2 Air quality is currently a widespread issue along the A2, given the number of homes and other 'sensitive receptors' located in proximity to this busy road, with AQMAs designated at Rainham (to the west of Swale), Newington, Keycol (declared in December 2020), Sittingbourne, Teynham and Ospringe, and other sensitive locations (typically junctions) highlighted by the Swale Air Quality Modelling Report (2020). Another AQMA is located along the B2006 (St. Pauls Street) in Sittingbourne, where HGV traffic is a particular issue, and the Air Quality Modelling Report (2020) also highlights the A251 (which links to Ashford) as problematic. Nitrogen dioxide is a key air pollutant, and emissions are set to decrease rapidly due to the switch-over of electric vehicles (EVs). Particulate matters (PMs) are the other key air pollutant, and are also set to decrease due to the EV switch-over, although issues will remain, given particulates from tyre wear, braking and road dust. The A2 Clean Air Zone Feasibility Study (2020) concluded that:

"Air quality along the A2 is expected to improve significantly... to 2022 as the vehicle fleet renews and the proportion of vehicles of the latest Euro emission standard increases significantly. As such by 2022 a standard reference forecast suggests the annual average NO₂ limit values will be achieved. However, there is... a risk of remaining exceedances especially in the St Pauls Street AQMA."

- 9.2.3 The central feature of the proposed strategy, namely strategic growth to the **E/SE of Faversham**, is tentatively supported, from an air quality perspective, including because there would be: two motorway junctions in close proximity (such that longer distance trips via the A2 are avoided); delivery of a mix of uses onsite that supports trip internalisation; funds directed to walking and cycling infrastructure (see discussion below); masterplanning and design measures focused on supporting walking and cycling (see Figure 9.1);⁴⁴ good potential to support relatively fast and frequent bus services to Sittingbourne, Canterbury and Whitstable (to be confirmed); good potential to walk or cycle to Faversham railway station; and some potential to walk/cycle to the town centre (albeit it would be somewhat distant, at greater than 2km from certain points of the site, noting barriers, including the railway line).

Figure 9.1: Masterplanning in support of walking and cycling



⁴⁴ There can be tensions with design measures advocated by the Police Service's Secured by Design guidance; however, Kent County Council is actively working to address these tensions through the Kent Design Guide. See securedbydesign.com/about-us/news/we-are-continually-striving-to-ensure-that-the-design-of-new-developments-always-minimises-the-opportunity-for-crime-across-kent-kent-police-host-third-designing-out-crime-seminar

- 9.2.4 However, the proposed **Teynham Opportunity Area** gives rise to a cause for concern, given Teynham's distance from a motorway junction and, in turn, its reliance on the A2 for journeys to higher order settlements that will inevitably involve passing through at least one AQMA (typically two or more). The assumption is that development along Lynsted Lane would be avoided, recognising that the junction of Lynsted Lane and the A2 is highly problematic; and the aspiration is for higher growth to support delivery of a village bypass, which is much needed from a perspective of wishing to address traffic and air pollution within the village centre, including within the designated AQMA; however, concerns remain, particularly as the potential for growth to 'unlock' land to deliver a bypass is far from clear, given the constraints that exist, including the conservation area. Furthermore, there is an argument to suggest that housing growth to unlock new road delivery will only serve to entrench car dependency and, in turn, increased traffic through air pollution hotspots along the A2 to the east and west of Teynham. The Borough's Climate Change Action Plan (2020) identified the need to explore the feasibility of major interventions "*along the length of the A2 from Brenley Corner to the western boundary with Medway*", and whilst the subsequent Clean Air Zone (CAZ) Feasibility Study (2020) found that a 'charging CAZ' would be disproportionate, the Borough Council's Cabinet resolved (16th December 2020): "*That the recommended option from the CAZ Feasibility Study of working in partnership with KCC to review the measures explored and develop in more detail a package of measures to reduce traffic, improve flow and improve the vehicle fleet along the A2 be pursued. This could be promoted as a local Low Emission Zone or similar.*" The latest situation is that the Swale Transport Strategy (2021) sets out the need to remove pinch points on the A2 and "*continue feasibility studies into a non-charging Clean Air Zone along A2 (with a focus on HGVs/LGVs).*"
- 9.2.5 Finally, with regards to the growth strategy for the **west of the Borough**, the key point to note is that a relatively low growth strategy is proposed, which is potentially supported from an air quality perspective, given the constraints that exist. Housing growth in Sittingbourne town centre will lead to challenges; for example, there could be a need to direct increased traffic away from the problematic B2006, where the AQMA was recently (December 2020) amended to include particulate matter (PM10) after the monitoring stations registered an increase in pollution levels; however, equally, there will be very good potential to support modal shift away from car dependency. With regards to growth at Rushenden, some traffic seeking to access the Medway Towns will take the A2 route, via the Keycol Hill AQMA (designated December 2020) and Newington AQMA; however, development will certainly follow upgrade of M2 Junction 5, hence it seems likely that the great majority of longer distance trips will avoid the A2 AQMAs.

Commentary on other policies

- 9.2.6 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – does not reference air quality, which is arguably an omission given the significance of the issue locally. However, there is brief mention of supporting active travel and also a reference to 'zero carbon' transport (which should be amended to either Ultra Low Emission Vehicles, ULEVs, or Electric Vehicles, EVs). It is recommended that the criterion on 'healthy communities' additionally references active travel, if not air quality.
 - Policy ST7 (Health and Wellbeing) – highlights air quality and signposts clearly to Policy DM33.
 - Policy ST9 (Sustainable Transport and Active Travel) – presents a strong discussion of active travel and other 'sustainable transport' priorities, but does also appear to support car travel, with a criterion dealing with "improving traffic flows" and another improving the transport network in the most sustainable way". It is recommended that EV charging infrastructure should be discussed as a stand-alone policy criterion (there is currently no reference to EVs within the strategic policies).

However, the key choice for the Council is not around the wording of this policy, but around the transport schemes that are prioritised within the Infrastructure Delivery Schedule that is available as an appendix to the Infrastructure Delivery Plan (IDP, 2021) and within Section 14.2 (Infrastructure Delivery Plan) of the Swale Transport Strategy (2021). See further discussion below, under 'Transport'.

- Policy DM10 (Managing transport demand and impact) – supplements Policy ST9. Importantly, the final criterion deals with emerging technologies, including "plug in or other ultra-low emission vehicles". It is recommended that this is clarified, possibly to "electric and hydrogen vehicles".

It is also recommended there is a need to:

- clarify links with the climate change focused policies (Policies DM3 and DM4); and

- set out links to the proposed A2 mitigation strategy (as set out in the IDP and Transport Strategy) and the ongoing work to explore feasibility of a non-charging Clean Air Zone (with a focus on HGVs/LGVs) along A2, as understood from the Transport Strategy (2020).
- Policy DM11 (Vehicle Parking) – also supplements Policy ST9. Importantly, the final criterion deals with EV charging. It is recommended that supporting text should clarify how the proposal relates to the standards set out in the Draft Parking Standards SPD (2020). Also, there could be merit to clarifying expectations around charging speeds, e.g. recognising that chargepoints associated with retail parking will typically need to be faster than charge speeds associated with home parking.
- Policy DM33 (Air Quality) – sets out key expectations of planning applications, including by specifying the information that must be included within submitted Air Quality Statements. Importantly, there is support for offsetting air quality impacts “if necessary”, where offsetting is defined as “proportionally contributing to air quality improvements elsewhere”. The policy goes on to explain that: *“Offsetting measures should be linked to objectives in the borough’s Air Quality Action Plan, the Green and Blue Infrastructure Strategy, Swale’s Parking Standards [SPD], the Swale Transport Strategy, the borough’s Climate and Ecological Emergency Action Plan and the...”* The supporting text also notably explains that: *“It is the intention of the Council to develop a Supplementary Planning Document on Sustainable Design & Construction which will contain detail on how Air Quality will be dealt with...”*

It is recommended that the supporting text should include further discussion of strategic priorities, including in respect of the A2 corridor, as understood from the Transport Strategy (2021).

- With regards to site specific policies – criteria on air quality are set out in Policy MU1 (East of Faversham Expansion) and Policy AO1 (Teynham Area of Opportunity) which is considered to be appropriate.
 - East/SE of Faversham – the requirement to implement the ‘School Streets’ concept is strongly supported. It is recommended that there is greater specificity around EV charging infrastructure expectations; for example, the potential to deliver a rapid charging hub, potentially in the form of a solar car port, could be explored. It is also recommended that there are clearer links to the IDP (2021) and the Transport Strategy (2021), for example the A2 Mitigation Strategy and Faversham rail cycle links (*“a cohesive, comprehensive network of walk and cycle paths both within new Local Plan developments and connecting the new development to central Faversham and railway station”*). There could also be reference to ongoing work to explore the feasibility of a non-charging Clean Air Zone (CAZ) for the A2, and, in light with one of the recommendations of CAZ Feasibility Study (2020), there could be merit to assessing the feasibility of a freight consolidation centre serving Faversham, which would be in line with the objective of the Energy White Paper (2020) to transform “last mile deliveries”.
 - Teynham Opportunity Area – the policy sets out that the masterplan prepared for the Opportunity Area should reflect a commitment to: *“Improving air quality and reducing the impact of private vehicles by creating viable alternatives.”* As per recommendations made above in respect of East of Faversham, it is recommended that supporting text references latest understanding of issues and objectives for the A2 corridor, following the CAZ Feasibility Strategy and Transport Strategy. There is also a need to emphasise the potential role of growth at Teynham supporting the Teynham to Sittingbourne Cycle Link and potentially the Sittingbourne to Faversham cycle corridor, which are two schemes set out in the Transport Strategy (2021). The Transport Strategy sets out that a Sittingbourne to Faversham route would use ‘existing side roads’, which could well suggest a need to use roads to the north of the A2, where the land is relatively flat.

9.2.7 Overall, there is a strong focus on air quality across the suite of policies, although there could be room for further improvements, subject to viability and balancing competing objectives.

Appraisal on the plan as a whole

9.2.8 Aspects of the proposed strategy are supported, in particular the focus of growth at a large-scale strategic urban extension to Faversham, and it is recognised that it is a great challenge to deliver growth in Swale whilst avoiding increased traffic through air pollution hotspots (see discussion of growth scenarios in Sections 6 and 7). Furthermore, it is recognised that a robust framework of development management policies is proposed (within the constraints of viability and the need to balance competing objectives) with the aim of minimising increased car movements, directing car movements away from air pollution hotspots and supporting the switch-over to electric vehicles. However, it is nonetheless necessary to **“flag a risk of significant negative effects”**, ahead of further transport modelling (and potentially an update to the Air Quality Modelling Report, 2020). The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period; however, air pollution is currently a priority issue for the Council.

9.3 Biodiversity

9.3.1 Sustainability objectives:

- Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of international, national or local significance.
- Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats.

Commentary on the spatial strategy

9.3.2 A key issue is avoiding impacts to the Swale and Medway Special Protection Area (SPA) / Ramsar sites (“North Kent Estuaries European sites”), including via increased recreational pressure, development of land that is functionally linked to the European sites (e.g. fields used for foraging or roosting by significant wildfowl or wading bird populations) and/or coastal squeeze, i.e. a situation whereby coastal habitats are not able to retreat inland in response to sea level rise. However, growth options in problematic locations are quite limited (more so than was the case when preparing the adopted Local Plan).

N.B. all matters relating to the SPAs, Special Areas of Conservation (SACs) and Ramsar sites are considered through a separate **Habitats Regulations Assessment (HRA)**, which is ultimately able to conclude that the LPR will not lead to significant adverse effects, so long as certain policy provisions are put in place. The aim here is to present supplementary discussion.

9.3.3 Aside from the internationally designated sites, nationally designated SSSIs are a limited constraint to growth at locations potentially in contention for allocation; however, locally important habitats are a widespread constraint, and there is also a need to recognise landscape-scale constraints and opportunities. The recent Biodiversity Baseline Study (2020) notably identifies a spatial framework of landscape-scale ‘Priority Areas’, which will be taken forward through a Local Nature Recovery Strategy.

9.3.4 The central feature of the proposed strategy, namely strategic growth to the **E/SE of Faversham**, is supported, from biodiversity perspective. This land is notably unconstrained in biodiversity terms, with very limited onsite priority habitat and limited designated land in close proximity. However, the northern extent of the scheme (beyond the Graveney Road) gives rise to a degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields Local Wildlife Site (LWS); the walking route to the SPA would be c.2.25km and the driving route to the SPA could be attractive to dog walkers, via Goodnestone. Also, land here, and also land to the south of Graveney Road / east of Love Lane (“Land at Lady Dane Farm”) is potentially functionally linked to the SPA, i.e. might provide habitat that supports feeding or roosting of significant bird populations. A further consideration is growth leading to a degree of increased pressure on the Blean Woodlands SAC to the east, potentially in combination with growth in Canterbury District. In particular, the HRA focuses on air pollution, with more limited concerns in respect of recreational pressure, given that the part of the SAC in closest proximity is managed as a National Nature Reserve, and the car park is on the eastern edge, well over 10 km distant. However, the HRA concludes no significant concerns.

9.3.5 As a further consideration, in respect of the proposed strategic urban extension to the east and southeast of Faversham, it is important to question whether growth is set to occur at the right scale, with a view to delivering strategic biodiversity benefits. It is noted that, whilst the current proposal includes three large areas of strategic open space as part of residential neighbourhoods, there is no proposal to deliver a new country park or similar new strategic greenspace. This could represent an opportunity missed, in light of the discussion of ‘innovative’ funding mechanisms set out in the Green and Blue Infrastructure Strategy (2020; see page 94). Delivering new strategic green/blue infrastructure within or in proximity to strategic growth locations can be a cost-effective mechanism, particularly where the new communities will benefit from the enhanced ecosystem service provision (e.g. recreational use, flood risk attenuation). See further discussion of ‘site-specific reasonable alternatives’ in Section 5.3.

- 9.3.6 Greater concern is associated with the proposed mixed use scheme at **Rushenden South**, which is proposed to deliver 850 homes plus 10 ha of new employment land. The site is shown by the nationally available dataset to include significant priority wetland habitat and is adjacent to the SPA (indeed, the SPA intersects the site, to a small extent), which gives rise to a significant concern.⁴⁵
- 9.3.7 Detailed work has been undertaken by the site promoters, and through the LPR HRA process, to understand the potential to bring the site forward without impacting the SPA or functionally linked areas, and the HRA is able to conclude the likelihood of being able to avoid significant adverse effects to the SPA, on the assumption that policy is in place and prescribed steps are taken through the planning application process. However, concerns do naturally remain, in light of the need to follow the mitigation hierarchy, i.e. seek to avoid effects ahead of relying on mitigation, where possible.
- 9.3.8 One concern to emerge, through the HRA process, is the potential for development to result in coastal squeeze, noting that the medium to long term strategy for this land, as set out in the Medway and Swale Shoreline Management Plan (SMP),⁴⁶ is managed realignment (thus enabling habitats to shift in accordance with sea level rise and climate change). In addition, the Medway Estuary and Swale Flood and Coast Management Strategy⁴⁷ identifies that the current through to 2118 management policy for BA8.5: Rushenden Marshes is “No Active Intervention”, i.e. current sea defences will not be maintained. Managed realignment is key element of the biodiversity and wider ‘natural capital’ vision for the entire Swale and Medway Estuaries area and, indeed, the entire Thames Estuary, and saltmarshes are also important from a carbon sequestration and therefore decarbonisation perspective. However, recent discussions with the Environment Agency (EA) have confirmed that there are sufficient locations elsewhere for managed realignment: “*The SMP policy for this area of Managed Realignment (MR) has largely been superseded by the MEASS policy of No Active Intervention. MEASS has determined the required area of habitat creation based on an assumption of Hold the Line everywhere. Therefore we have a ‘worst case’ scenario, and then have proposed sites across the strategy area to allow for this amount of compensatory habitat creation through MR. This site at Rushenden is not required for Managed Realignment.*” An early version of the HRA (specifically, that version presented to the Local Plan Panel meeting of 19th January 2021) recommended that managed realignment options should be explored within the site boundary alongside development; however, that recommendation has now been removed, to reflect discussions with the EA. Nonetheless, the possibility of managed realignment within the site should still be considered (albeit past landfill of dredging materials would likely be a constraint), with a view to supporting biodiversity and wider environmental (including carbon sequestration) net gain.
- 9.3.9 A final consideration, in respect of Rushenden South, is the possibility of Maidstone-bound traffic along the A249 leading to nitrogen deposition affecting parts of the North Downs Woodlands SAC within 200m of the road; however the HRA Report concludes that the effect of the LPR will be “barely perceptible”.
- 9.3.10 There are also issues and potentially opportunities associated with the **Teynham Opportunity Area**. Teynham is historically very strongly associated with fruit growing, and there remain remnant patches of traditional orchard priority habitat, including a significant cluster at the east and southeast extent of the village. This includes a patch that now an available site option (site 18/153) found to be ‘suitable and deliverable’ by the Strategic Housing Land Availability Assessment (SHLAA, 2020), and the wider cluster could well be impacted by any southern bypass to the village. However, none of patches of traditional orchard priority habitat at Teynham, as understood from the nationally available dataset (magic.gov.uk), are designated as a Local Wildlife Site (LWS), and the patches immediately to the east of the village now appear to be have been lost to either development or arable farming.⁴⁸ Furthermore, a strategic approach to growth at Teynham could support a strategic approach to achieving biodiversity net gain at an appropriate landscape scale. For example, the aim could be to deliver a north-south green and blue corridor linking the traditional orchard priority habitat at the southeast extent of the village to the grazing marsh priority habitat at Teynham Street, via the Lyn Valley (also with a focus on the PROW network).

⁴⁵ The Biodiversity Baseline Study (2020) states: “This entire site falls within the Swale Nature Recovery Priority Area. A large portion of the site is classified as Open Mosaic Habitat on Previously Developed Land, Floodplain Wetland Mosaic and coastal saltmarsh priority habitats. The portion of the site not classified as priority habitat is of high strategic significance for connecting areas of priority habitat and should be prioritised for habitat restoration through [biodiversity net gain] projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver [biodiversity net gain].”

⁴⁶ See <https://se-coastalgrou.org.uk/shoreline-management-plans/medway-estuary-to-swale/>

⁴⁷ See <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy>

⁴⁸ Historic aerial imagery (from Google Earth) shows orchards until quite recently.

- 9.3.11 The proposed allocation at **Neames Forstal** for a total of 90 homes is also of note, because the proposal is to deliver a small community orchard, which would be located just outside of two of the Priority Areas identified by the Biodiversity Baseline Study (2020), specifically the North Downs Priority Area (which extends north as the southern edge of Selling) and the Blean Woodlands Priority Area (not far to the east).
- 9.3.12 Finally, there is a need to consider the proposed employment allocation at **Lamberhurst Farm**, which is adjacent to common land (Victory Wood, a Woodland Trust nature reserve; not priority habitat) and in close proximity to the Blean Woodlands SAC. The proposed employment use gives rise to limited concerns; however, supporting text within the LPR notes that: "*The Council will work with Canterbury City Council... during a future plan review to explore opportunities to deliver a new, sustainable settlement.*"

Commentary on other policies

- 9.3.13 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – includes a significant focus on biodiversity and green infrastructure. It is recommended that these are consolidated, and that policies are clearly evidenced on the basis of the analysis set out in the Biodiversity Baseline Study (2020) and the Green and Blue Infrastructure Strategy (2020). High level Swale-specific guidance on expectations around delivering biodiversity net gains is to be encouraged; however, it must be evidenced. The current suggestion that net gain is to be measured at a scale comprising land "within and around developments" warrants scrutiny, and potentially conflicts with the subsequent suggestion that compensatory habitat enhancement or creation, where necessary, should occur "*at identified Biodiversity Opportunity Areas*".
 - Policy ST7 (Health and Wellbeing) – includes a strong focus on green infrastructure; however, there would be merit to demonstrating a stronger link back to the Green and Blue Infrastructure Strategy (2020), including its focus on reducing spatial inequalities around health deprivation (see Figure 21 of the Strategy) and access to multi-functional green and blue infrastructure (see Figure 11 of the Strategy).
 - Policy ST9 (Promoting Sustainable Transport and Active Travel) – references the Green Grid Network, which is well-established following the Swale Green Grid Strategy (2016); however, there is also a need to ensure that latest understanding of issues/opportunities is reflected, including as set out in the Green and Blue Infrastructure Strategy (2020). For example, the Strategy explains:

"In March 2019, Swale Borough Council commissioned Sustrans to complete a Cycling and Walking Audit in Faversham and on the Isle of Sheppey, which was one of the actions within Swale's Cycling and Walking Network Action Plan (2018-2022). Due to the many infrastructure works currently underway in Sittingbourne, an audit of the cycling and walking provision in this urban area is likely to come forward in the future... Where new routes have been implemented as part of new developments, such as the Aldi Distribution Centre on the Isle of Sheppey, the Audit aims to assess how effectively they are performing. Though the timescales of the Audit and the Swale GBI Strategy differ, the importance of considering the outcomes of the Sustrans Audit is recognised. Where areas for improvement are identified, these should be prioritised when funding becomes available."

- Policy ST10 (Conserving and enhancing the natural environment) – is an expanded version of the equivalent policy in the adopted Local Plan, hence is supported, from a 'biodiversity' perspective.

Most importantly, there is a proposal to require all developments to achieve a 20% biodiversity net gain (BNG), which exceeds the anticipated 10% national requirement currently set out in the Environment Bill. This approach is supported, from a biodiversity perspective, as 10% could potentially be within the margin of error for the valuation of habitats, such that it is too low to deliver real benefits.⁴⁹ The policy refers to using a recognised metric; however, it might additionally emphasise the importance of delivering BNG in accordance with a Local Nature Recovery Strategy (LNRS), to ensure that measurable gains are achieved at pre-agreed functional scales, as opposed to the development site scale.

Also, the policy criterion on ecosystem services – which is unchanged from the adopted Local Plan – might be updated to reflect work undertaken nationally in respect of the Environmental Net Gain (ENG) concept,⁵⁰ following the Government's 25 Year Environment Plan (25YEP, 2018). The 25YEP did not define ENG, but the Government's response to the consultation on mandatory BNG explained:

⁴⁹ See <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

⁵⁰ For example, see <https://cieem.net/i-am/influencing-policy/strategic-policy-sub-committee/environmental-net-gain/>

"Achieving environmental net gain means achieving biodiversity net gain first and going further to achieve net increase in the capacity of affected natural capital to deliver ecosystem services".⁵¹

- Policy DM2 (Achieving Good Design) – includes a section on 'Nature', which requires a "connected network and variety of multi-functional landscapes and open spaces" and signposts to other policies.
 - Policy DM3 (Mitigating and adapting to climate change...) includes a requirement to demonstrate that green infrastructure is delivered in support of climate change adaptation, and also supports green roofs.
 - Policy DM17 (Open space, sports and recreation provision) requires that applicants: "*Provide for the multi-use of open space, sports and recreation facilities as appropriate, with particular emphasis on contributing towards the Green and Blue Infrastructure Strategy.*"
 - Policy DM24 (Biodiversity and geodiversity conservation and biodiversity net gain) - is very similar to the equivalent policy in the adopted Local Plan; however, the supporting text has been updated to reflect updates to the national and regional context, including the Kent Biodiversity Strategy (2020). Consideration should be given to further updating the supporting text, and potentially the policy, to refer to planning for the Priorities Areas that are a focus of the Biodiversity Baseline Study (2020).
 - Policy DM29 (Woodlands, trees and hedges) – is an important policy in the Swale context, given the extent of traditional orchard priority habitat that is often not protected by a formal designation. The proposed policy is an expanded version of that set out in the adopted Local Plan, which is supported.
 - With regards to site specific policies – criteria on biodiversity are set out in Policy MU1 (East of Faversham), Policy AO1 (Teynham Area of Opportunity) and Policy Regen 3B (Rushenden South):
 - East/SE of Faversham: as discussed, development at this scale can give rise to strategic opportunities that must be realised / capitalised upon. The proposed development management policy refers to a number of priority issues (habitats), but could potentially go further, e.g. expanding on what "nature recovery networks" are likely to comprise in this area. The emphasis placed on tree-lined streets in the following statement could be questioned: *"Base the development on an integrated landscape strategy that will create a strong framework of open spaces, habitat retention and creation and planting, including the use of tree lined streets within the development."*
 - Teynham Opportunity Area: rather than a generic statement on 20% biodiversity net gain (although if the suggestion is that net gain must be achieved at the scale of the masterplan area, then it is less generic), the policy could potentially summarise priority issues/opportunities, as understood from the discussion in the preceding supporting text.
 - Rushenden South: the policy might clarify that the reference to biodiversity net gain refers to a 20% net gain. Also, the policy might address the question of whether there is the potential to enhance or create wetland habitats (which could potentially support the functioning of the adjacent SPA).
- 9.3.14 Overall, there is a strong focus on biodiversity across the suite of policies, although there could be room for further improvements, subject to viability and balancing competing objectives.

Appraisal on the plan as a whole

- 9.3.15 Whilst strategic growth to the east and southeast of Faversham is tentatively supported (in particular growth to the southeast), and the potential for growth at Teynham to support a biodiversity net gain (at an appropriate landscape scale) can be envisaged, there is a significant concern in respect of the proposed Rushenden South allocation, given its sensitive location adjacent to the SPA. It is recognised that detailed work has been completed, and further work remains underway, to understand the potential to avoid and mitigate biodiversity impacts. It is also recognised that there could be development options that would achieve an overall significant biodiversity net gain, in-line with the proposed borough-wide policy (and noting there has been recent experience of delivering new and enhanced habitats on Sheppey to compensate for habitat loss elsewhere (Neatscourt) on the island). However, on balance it is considered appropriate to **"flag" a risk of significant negative effects**, at the current time, ahead of further work on site specific proposals, in collaboration with Natural England.

⁵¹ See <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

9.4 Climate change mitigation

9.4.1 Sustainability objectives:

- Minimise per capita greenhouse gas emissions from transport, industry and the built environment.
- Deliver high standards of energy efficiency and water efficiency in new development.

Commentary on the spatial strategy

- 9.4.2 In respect of **transport emissions**, issues and opportunities are quite well understood, and the recent Energy White Paper (2020) presents a helpful overview of strategic priorities, namely: modal shift to public and active transport; place based solutions (“*why emissions occur in certain locations*”); decarbonising how we get goods (including transforming “last mile deliveries”); and decarbonisation of vehicles, including charging infrastructure and energy system readiness. A national Transport Decarbonisation Plan is due in spring 2021 and, ahead of that, a recent study has explored national priorities, with a focus on the links between planning and transport, and ensuring effective collaboration between local planning authorities and transport authorities at the county and sub-regional level.⁵² Also, the TCPA has recently prepared a guide setting out the particular opportunities associated with ‘garden communities’.⁵³ There are certainly opportunities associated with strategic growth locations in more viable locations over-and-above piecemeal growth in less viable locations; however, it is also crucial to consider proximity and existing ‘sustainable transport’ links between new homes and key destinations.
- 9.4.3 With regards to **built environment emissions**, there are strong arguments for supporting a focus of growth at one or more strategic sites and focusing growth where viability is highest, with a view to facilitating: low and zero carbon (LZC) infrastructure, including heat networks (which require strategic planning and typically necessitate higher densities and a fine grained mix of uses); buildings designed to achieve net zero regulated emissions (or otherwise ambitious levels of regulated emissions);⁵⁴ and an ambitious approach to unregulated emissions, including embodied and other non-operational emissions, including by supporting modern methods of construction (e.g. offsite construction of modular homes). Another consideration, in respect of built environment emissions, is the need to consider the possibility of locating growth in proximity to strategic heat sources (also locations with strategic heat demand, e.g. leisure centres), with a view to facilitating delivery of heat networks; however, no particular opportunities are known to exist in the Swale context. A further consideration, in respect of built environment emissions, is the possibility of strategic growth locations supporting the use of hydrogen, including potentially for heating. Hydrogen is a major focus of the National Grid’s work on Future Energy Scenarios (2020), the Government’s Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and a Hydrogen Strategy is due in 2021; furthermore, the Thames Estuary is currently being discussed as a potential national focus for hydrogen;⁵⁵ however, opportunities remain uncertain at the current time.
- 9.4.4 Another consideration is the need and smart energy systems, which are seen as a priority by the National Grid (nationalgrideso.com/future-energy/future-energy-scenarios) as well as by the Energy South 2 East Local Energy Strategy (2020) and the Energy White Paper (2020). This is a consideration that relates to **both transport and built environment emissions**, as it is EV charging and the electrification of heating (heat pumps) that together will put a huge strain on the national grid (which will also have to cope with peaks and troughs in supply due to wind and solar). Strategic growth can deliver smart energy systems, e.g. taking inspiration from Energy Superhub Oxford (energysuperhuboxford.org). Strategic growth locations might also feasibly support “community-led initiatives for renewable... energy” (NPPF para 152).

⁵² See tps.org.uk/news/tps-launches-its-state-of-the-nation-report

⁵³ See tcpa.org.uk/guidance-for-delivering-new-garden-cities

⁵⁴ Regulated emissions are those covered by the building regulations. It is common for Local Plan policies to require levels of emissions below the Building Regulations requirement, and potentially even to require net zero regulated emissions for major schemes (which almost invariably necessitates offsetting).

In 2019 the Government consulted on a Future Homes Standard, which would be a national requirement set out in the Building Regulations. The Government’s proposal was also that Local Plan policies would no longer be able to require levels of emissions below the Standard; however, latest understanding (January 2021; see gov.uk/government/consultations/the-future-buildings-standard) is that Local Plans will retain the ability to set policy of this nature, at least in the immediate term. Government state: “We recognise that there is a need to provide local authorities with a renewed understanding of the role that government expects local plans to play in creating a greener built environment... To provide some certainty in the immediate term, the government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes”. Regardless of national or local policy, there is always the potential for individual developers to seek to deliver flagship low carbon schemes, including by achieving net zero regulated emissions.

⁵⁵ See environmentjournal.online/articles/thames-estuary-invests-in-new-hydrogen-infrastructure/

- 9.4.5 In light of the above discussion, strategic growth to the **E/SE of Faversham**, is tentatively supported, because strategic growth locations give rise to an inherent opportunity to minimise built environment emissions, and because there is good potential to minimise transport emissions, as discussed above under 'air quality'. However, concerns and questions remain:
- Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (albeit possibly supportive of relatively fast and frequent bus services to Canterbury, Whitstable/Herne Bay and other locations to the east; unconfirmed);
 - There is uncertainty regarding potential to deliver growth to the north and south of the A2 in combination, as a combined scheme that leads to additional economies of scale and greater potential to deliver sustainable transport and LZC infrastructure, and other climate change focused measures; and
 - Site specific proposals are in the early stages of development, with little evidence available in respect of decarbonisation ambition, including the extent to which decarbonisation would be masterplanning / design / funding priority. See further discussion below, under 'Communities'.
- 9.4.6 The second element of the proposed strategy to consider is proposal to deliver around 850 homes as part of the regeneration of **Sittingbourne town centre**. Focusing on built environment emissions, higher densities and mixes of uses within the town centre could feasibly help to facilitate one or more heat networks; however, there is little reason to suggest that this would be achievable, with no obvious strategic heat sources to explore (Milton Creek and the industrial areas could feasibly represent an opportunity).
- 9.4.7 With regards to **Rushenden South** and the **Teynham Opportunity Area**, perhaps the key point to note is that both locations benefit from a rail station. Also, both proposals will involve the achievement of economies of scale to an extent, potentially supportive of low carbon infrastructure, for example rapid electric vehicle charging, potentially linked to solar PV and battery storage. Other points are as follows:
- Rushenden South - is thought to be quite well connected to Sheerness and Sittingbourne by bus and cycle routes (and/or there is good potential for enhancement). Also, Queenborough/Rushenden is an employment growth and regeneration area, such that the potential to reach destinations by walking/cycling is set to improve over time.
- However, growth here is likely to face delivery and viability challenges, which could potentially constrain funds available for low carbon measures – see Table 8.3 of the Viability Study (2020). The proposed site-specific policy requires "high standards in terms of sustainable design and construction"; however, there is uncertainty regarding the potential for development at this site to comply with the requirements of Policy DM3 (Mitigating and adapting to climate change through sustainable design and construction).
- Teynham - there is a possibility – albeit highly uncertain - of strategic growth supporting the aspiration of delivering a cycling link between Sittingbourne and Faversham. There is also a need to question the approach of directing housing growth to a location in order to enable delivery of a new road (namely a Teynham bypass), as this could run counter to encouraging modal shift away from the car (albeit it is recognised that the switch-over to electric vehicles is underway and picking up pace).
- 9.4.8 There is also a need to consider the proposal for 90 homes at **Neames Forstal**, which is a village that benefits from a rail station (also a bus service), but which has a very limited offer of local services and facilities. Three adjacent sites are being promoted as a combined scheme that would also deliver a new footpath link to Selling (c. 1.5km to the west), where there is a primary school and other facilities; however, there is a need for further work to confirm deliverability of the footpath link (which will be within the AONB). On balance, it could be fair to assume that Neames Forstal residents will have quite high car dependency. Also, a modest village extension of this nature would be unlikely to deliver low carbon infrastructure (e.g. a heat network), and might not be well-suited to achieving building-level emissions standards over-and-above Building Regulations (albeit it is recognised that viability at Neames Forstal is strong).
- 9.4.9 Finally, there is a need to comment on the proposed **employment land strategy**, which is discussed in detail in Section 9.6, below. The key point to note here is that there is a need to reduce commuting as far as reasonably possible, with the ELR (2018) reporting that rates of out-commuting are nearly twice that of in-commuting (albeit much will be by train, i.e. by a low carbon mode of travel). In turn, Policy ST4 (Building a strong, competitive economy) sets out a need to support sectors that are under-represented in Swale and/or might be "*attractive to the local population*" with a view to reducing commuting out of the Borough. There is also a need to consider the proposed total quantum of employment land supply, i.e. to consider the extent to which it aligns with ELR recommendations, as under-supply locally could potentially serve to further entrench, or increase, levels of out-commuting.

Commentary on other policies

9.4.10 The following bullet points aim to present a brief commentary on other policies:

- Policy ST3 (Sustainable Development) – presents two discussions of priorities in respect of minimising built environment emissions, that could be combined for clarity. In respect of transport emissions, there is an emphasis on “zero carbon and active transport”, which could potentially be expanded, e.g. to reference public transport and minimising the need to travel. Also, ‘zero carbon’ may not be the most appropriate terminology, given significant embodied / whole lifecycle emissions associated with EVs.
- Policy ST7 (Health and Wellbeing) – includes a strong focus on selecting sites for development that are “suitable for sustainable transport links with other places” and sets out that site development sites should be “is designed to be mixed use, compact and provided with safe pedestrian and cycle routes...”
- Policy ST8 (Planning for Infrastructure) – does not reference low or zero carbon infrastructure.
- Policy ST9 (Promoting Sustainable Transport and Active Travel) – see discussion under ‘Air quality’.
- Policy ST10 (Conserving and enhancing the natural environment) – seeks to “*recognise and value ecosystems for the wider services they provide, such as... climate change mitigation*”. This is an important consideration locally, particularly given the potential to maintain and enhance salt marshes.
- Policy A2 (Kent Science Park) – signposts to Policy DM3, which is summarised as supporting “reduced or zero carbon development”.
- Policy DM3 (Mitigating and adapting to climate change through sustainable design and construction) –
 - Lists ‘sustainability principles’ as “*the locations, linkages, layouts, land-uses and landscaping of schemes and the design and construction of buildings*. ” There might be additional reference to planning for LZC infrastructure (e.g. heat networks, EV charging), as well as the related matter of energy systems (e.g. battery storage, hydrogen), and the reference to ‘landscaping’ should be clarified.
 - The reference to supporting ‘passive’ approaches to climate change adaptation should be clarified. If the key issue is passive *cooling* (i.e. not air conditioning), then this should be stated.
 - As part of the discussion of ‘post construction’ requirements there could be reference to monitoring, in-line with the ‘Be seen’ tier of the energy hierarchy (as understood from the London Plan, 2020).
 - The policy might benefit from referencing nationally recognised conceptual frameworks, notably: the distinction between operational and non-operational emissions; the distinction between regulated and unregulated operational emissions; whole-life cycle and circular economy approaches to minimising non-operational emissions (including embodied emissions); and the energy hierarchy approach to minimising regulated operational emissions. It is recognised that the supporting text sets out a conceptual framework at paragraph 7.0.34; however, this warrants scrutiny, with a view to ensuring that the Local Plan approach is widely understood by both planning applicants and the wider public. The distinction between ‘carbon’ ‘greenhouse gas emissions’ and ‘energy’ can cause confusion.
 - Focusing on criterion 8, which deals with regulated operational emissions:

There is a need for the reader to immediately understand how points (a) to (f) relate to one another.

For example, there is a need to avoid confusion that might be created by perceived overlaps between (a) and (b). Specifically, in-line with (b), applicants might seek to minimise operational emission (i.e. emissions associated with the operational use of a building, as covered by Building Regulations) through energy efficiency measures (in-line with an energy hierarchy / fabric first approach), yet applicants might be unclear how this ties-in with requirements under (a). There may just be a need for a clear glossary of terminology, or a diagram to show how concepts inter-relate.

Equally, there is a need for clarity on how (c) relates to (b), recognising that air source heat pumps (referenced under (b)) are a form of on-site renewable energy generation (which is the focus of (c)).

It would be helpful if a clear statement could be provided to explain why there is no risk of (c) resulting in perverse outcomes, specifically: an approach to minimising regulated operational emissions that is contrary to the efficiency / fabric-first approach; and an approach that unduly prioritises on-site renewable energy generation ahead of community or district-level generation (heat networks).

Point (d) on offsetting warrants further scrutiny and explanation. Specifically, there is a need to 'benchmark' the proposed reliance on offsetting against advocated best practice approaches and approaches taken through recent Local Plans. There is a need to explicitly recognise (and communicate to the public) that offsetting is at the bottom of the energy hierarchy (because it is inherently associated with a degree of risk) and that risks arise due to Swale not having an offset fund/scheme in place. The supporting text notably defines offsetting as "**used to achieve the net-zero position when on-site zero operational carbon is not possible**" (emphasis added); however, this is not necessarily how offsetting is proposed to be used in this case. More positive wording might involve stating clearly that, from 2025, a 25% improvement on the Buildings Regulations baseline (regulated operational emissions) must be achieved onsite, and that a further 25% must be offset.

Finally, with regards to points (e) and (f), for the benefit of non-specialist readers, and with a view to furthering understanding of built environment decarbonisation strategy in the Swale context, there is a need for a clear explanation of cross-overs between achieving HQM standards on the one hand and, on the other hand, demonstrating through a submitted Energy and Sustainability Statement that operational emissions have been minimised in-line with points (a) to (d).

- Policy DM4 (Sustainable energy production, distribution and storage) – is strongly supported. This is a fast-moving policy area, with major recent developments nationally in respect of heat networks and rapidly emerging support for giving consideration to hydrogen for heating. The policy deals with this through suitably high-level requirements, although there could be benefit to further explaining the latest national context in the supporting text. The supporting text should certainly clarify that new CHP is now no-longer seen as a low carbon option, in light of the decarbonisation of the electricity grid, and might also discuss recent trends to low temperature ('5th generation') heat networks, which can favour smaller scale (e.g. on-plot) schemes ahead of larger schemes. There should also be some discussion of hydrogen, albeit it is recognised that this could be premature ahead of the forthcoming national strategy.

It is noted that detail is set out in respect of heat networks, but not in respect of electricity distribution or storage (or other aspects of future smart decentralised electricity networks). This is potentially appropriate, given the fast moving nature of this policy area, but warrants scrutiny.

- Policy DM10 (Managing transport demand and impact) – see discussion under 'Air quality'.
- Policy DM11 (Vehicle Parking) – see discussion under 'Air quality'.
- Policy DM32 (Coastal change management) – reference to the carbon sequestration could be added.
- Site specific policy – focusing on MU1, the policy does not appear to set any requirements over-and-above Policy DM3 requirements, which is surprising given the scale of the proposed scheme. For example higher densities and fine-grained use mixes in support of heat networks could be required.

9.4.11 Overall, there is a very strong focus on climate change mitigation across the suite of policies, and the proposed policy framework is a major step-change from the adopted Local Plan. The commentary above discusses aspects of the policy that warrant further scrutiny; however, it is recognised that this is a fast-moving and complex policy area, with Local Plan-makers currently at the stage of 'learning by doing'. One key consideration is ensuring clear policy that easily understandable, both to the planning applicant (recognising that confusion within the development industry was a primary reason for the Government proposing the Future Homes Standard in 2019) and the general public (recognising that the public will look to the Local Plan to understand key concepts around built environment decarbonisation).

9.4.12 There is also a need to enable an immediate understanding of the level of ambition that is reflected in the policy, such that this can be easily compared against with the level of ambition reflected in the 2030 net zero target. In particular, there is a need to understand whether the policy reflects any compromises on viability grounds. In this respect, it is noted that Table 8.2 of the Viability Study (2020) finds that "zero regulated carbon" can be achieved (alongside other key policy 'asks') by greenfield residential schemes.

9.4.13 As a final point, it is considered important to note that viability testing is far from an exact science, and is invariably associated with considerable uncertainties. For example, there is a need to consider the implications of mixed use developments, and also variations in viability across the Borough. There is no particular reason to suggest that low carbon policy requirements could be required to 'flex' in instances where planning applicants can demonstrate viability challenges, but it is a possibility. In turn, there is a need to return to the proposed spatial strategy, and question whether it maximises the likelihood of development coming forward that meets all of the policy requirements set out in Policy DM3, both by directing development to the more viable parts of the Borough and directing development to sites associated with inherent low carbon opportunities, due to scale and/or location.

Appraisal on the plan as a whole

- 9.4.14 The proposed strategy of targeting growth at strategic growth locations is supported from a perspective of seeking to minimise emissions from the built environment, and the proposed strategic growth locations are fairly well located, from a perspective of seeking to minimise transport emissions. There is also a robust policy framework proposed, comprising both borough-wide and site-specific policies, that seeks to ensure that built environment and transport decarbonisation is a foremost priority when bringing schemes forward through the planning application process. However, at the current time there remains a degree of uncertainty regarding how site specific proposals will capitalise on locational opportunities, and regarding the extent to which limited funds will be directed towards decarbonisation measures.
- 9.4.15 This being the case, and given that the extremely stretching nature of the Borough's 2030 net zero target, it is not possible to predict positive effects, i.e. **overall effects are judged to be neutral**.

9.5 Communities

- 9.5.1 Sustainability objectives:
- Support good access to existing and planned community infrastructure for new and existing residents.
 - Promote and support healthy communities, including through increasing access to green infrastructure.

Commentary on the spatial strategy

- 9.5.2 There is a need for growth to avoid creating or exacerbating issues around community infrastructure capacity, and support growth strategies that would deliver new or upgraded community infrastructure, both to 'consume the smoke' of new communities, and in response to existing known issues or opportunities. Beyond this, there is a need to support *high quality* community infrastructure provision; for example, there is a focus nationally on masterplanning and designing new communities with health and wellbeing as a central consideration, including via access to gardens, sports facilities, greenspace and countryside.⁵⁶ In this light, perhaps the key consideration relates to support for growth via strategic sites well suited to delivering new and upgraded community infrastructure, as opposed to growth via more 'piecemeal' urban extensions, where opportunities can be missed, despite mechanisms for gathering funds.⁵⁷
- 9.5.3 Beyond the matter of ensuring access to high quality community infrastructure, there are also wide ranging other 'communities' considerations, for example, supporting regeneration in the west of the Borough. Also, traffic congestion is often a key issue for many communities. However, it is considered appropriate for this section to focus primarily on matters relating to capacity of / access to community infrastructure.
- 9.5.4 In this light, the proposed **E/SE of Faversham** strategic urban extension is supported, particularly as the scheme would certainly enable delivery of a new secondary school (specifically, serviced land in an appropriate location would be made available). Following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, given limited surplus capacity at the two existing secondary schools (one grammar and one non-selective), limited potential for expansion (particularly the grammar school, which is in a constrained central location) and committed growth (noting that catchment areas extend to Canterbury District). KCC has been actively exploring potential locations for a new secondary school, but options are limited. Latest understanding is that the secondary school would come forward at the site directly to the east of Faversham.
- 9.5.5 Beyond the secondary school, the proposal is to deliver two local centres (although only one is currently shown on the concept map), two primary schools (the location of one of the schools is not entirely clear from the concept map) and a range of other measures; for example, it will be possible to design the road layout around the proposed schools to be 'school street' compliant (see schoolstreets.org.uk).
- 9.5.6 There should also be good potential to deliver high quality walking and cycling infrastructure, as discussed above under 'air quality', and high quality green infrastructure within the site (although the current percentage of the site area proposed for green infrastructure is not clear; and there is a need to account for the possibility that 'structural screen planting' along the motorway may have limited recreational appeal).

⁵⁶ E.g. see england.nhs.uk/ourwork/innovation/healthy-new-towns; and tcpa.org.uk/guidance-for-delivering-new-garden-cities

⁵⁷ Infrastructure funding by developers is most often secured through planning obligations (either through a Section 106 agreement or Section 278 highway agreement) or the Community Infrastructure Levy (CIL); however, there is no CIL for Swale.

- 9.5.7 A further consideration is the possibility of noise pollution associated with the motorway and high speed railway, with the current proposal being to use employment land to buffer these sources of noise pollution only to a limited extent. Finally, there is a need to note the football and cricket club facilities currently adjacent to the A2, which may need to be relocated further to the south (away from the centre of Faversham); however, this could prove acceptable, subject to discussions with Sport England.
- 9.5.8 Another important consideration, in respect of strategic growth to the E/SE of Faversham, relates to engagement, joint working and stewardship. Focusing on Southeast Faversham, the Stantec Assessment of Stage 2 submissions (2019) finds: *"The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail... As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards... Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust, which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues."*
- 9.5.9 This finding of the Stantec work is in many ways encouraging; however, there is perhaps a concern regarding an early focus on detailed design to the detriment of effective planning to realise strategic infrastructure, environmental and socio-economic objectives, including at the Faversham scale and wider scales. It is also noted that limited proposals or evidence has been made publicly available to update the August 2018 submission following the Garden Communities Prospectus (although the promoter engaged fully with Stantec as part of the 'assessment of submissions' process). There is no scheme website.
- 9.5.10 There are also significant 'communities' related considerations associated with **Rushenden South**. The aim is for an 850 home mixed use development to support regeneration at Queenborough/Rushenden, which is a well-established regeneration priority area (Policy Regen 2 of the adopted Local Plan). In addition to new high quality homes and employment opportunities, growth at this scale will enable delivery of targeted new community infrastructure, and there is understood to be the potential for a new primary school to *"sit in the heart of the new residential community and on a key new pedestrian axis..."* There is also an opportunity around green/blue infrastructure, as understood from the Green / Blue Infrastructure Strategy (2020). However, details of the proposed scheme are not known at the current time, and are subject to change given the need for further work to address constraints and delivery challenges.
- 9.5.11 Also, there is possibly a risk that allocation of Rushenden South could affect viability / delivery within the currently defined masterplan area, which is adjacent to the north. There is no available evidence to suggest that this is a risk of any significance, and the current proposed policy for Rushenden South sets out a need to "restore the local housing market area"; however, a concern was flagged as a concern by a local ward councillor at the Full Council meeting of 3rd February 2021. The masterplan area was defined in the 2008 Local Plan, with support for 2,000 homes; however, the adopted Local Plan (2017) explains that this figure was "optimistic" and supports 1,180 homes, with c.100 homes so far delivered.
- 9.5.12 With regards to the **Teynham Opportunity Area**, as discussed under 'air quality' and 'climate change', the aspiration to deliver a village bypass, and there is also the possibility of growth delivering a new A2 cycle link. More generally, there is a need to consider the possibility of achieving a critical mass of housing growth at Teynham alongside new employment land (in particular, the committed new employment land at Frogner Land) and improvements to the village centre. The Settlement Hierarchy Study (2020) serves to suggest that Teynham is already the best served of the tier 4 settlements (see the Settlement Audit Matrix), and the possibility of Teynham moving up a tier in the hierarchy can be envisaged.
- 9.5.13 Concerns have been raised by the local community at Teynham, as understood from the Full Council meeting of 3rd February 2021, including around route options for a new bypass, which could well prove necessary if 1,100 homes are to be delivered in a way that delivers sufficient community benefit. However, it is also important to note another aspect of the proposed strategy, which is to designate two new **Important Local Countryside Gaps** adjacent to Teynham. The gap to the west might be of particular importance, as land here is being promoted as part of the wider Highsted Park scheme, and presumably it is the Opportunity Area proposal that gives rise to a need for a designated gap.

9.5.14 The next point to comment on is the proposed strategy for **Sittingbourne town centre**, namely a strategy of supporting significant residential growth (850 homes). This is an approach to town centre regeneration that is increasingly common nationally as retail trends lead to challenges for high streets, and given a need to maintain the vitality of town centres and also encourage higher densities in locations where residents have the greatest potential to walk and cycle to key destinations and access public transport. Also, in the Swale-specific context, there is a need to recognise that regeneration of the town centre is needed, with a view to delivering benefits to existing communities and addressing issues of relative deprivation, but is challenging on viability grounds, hence there is an argument for supporting residential. However, there is a need to balance the “pros” of high density residential development in town centres with the potential “cons”, including around delivering homes with good space standards and access to gardens, green spaces and the countryside – increasingly seen as important in light of Covid-19.

9.5.15 There is also a need to briefly comment on **Neames Forstal**, where the proposal leads to a degree of concern in respect of access to community infrastructure, as discussed above, but where the current proposed scheme should also deliver a new community orchard, and potentially a new walking/cycling route to Selling, which would be to the benefit of existing as well as new residents.

9.5.16 Finally, there is a need to consider **Lamberhurst Farm**, which is proposed as an employment allocation, but in terms of which supporting text explains: *“The Council will work with Canterbury City Council, as the area straddles the borough boundary, during a future plan review to explore opportunities to deliver a new, sustainable settlement.”* There is potentially an opportunity to deliver community infrastructure to the benefit of Dargate, Highstreet and Yorkletts (there is notably no primary school in this area); however, it is difficult to envisage a scheme of sufficient scale.

A note on locations with no proposed allocations

9.5.17 It is not the aim of this section to comment in any detail on the implications of decisions taken to *not* allocate growth to particular settlements; rather, that is a focus of discussion as part of work to explore growth scenarios (Section 6 and Appendix VII). However, in brief, key considerations include:

- Sittingbourne – the proposed low growth strategy can be questioned, given that Sittingbourne is the Borough’s main urban centre; however, there is high committed growth, and also an anecdotal concern that recent and committed growth will lead to pressure on community infrastructure.
- Minster – Thistle Hill has been a focus of growth over the past thirty years, with significant new community infrastructure delivered alongside housing, and Bearing Fruits allocated significant additional growth. On this basis, there is a rationale for no further allocations through the LPR.
- Leysdown – there is an argument for housing growth in support of village vitality, e.g. with a view to supporting shops and services outside of the tourism season. The Settlement Hierarchy Study (2020) explains: *“Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services.”*

Commentary on other policies

9.5.18 The following bullet points aim to present a brief commentary on other policies:

- Policy ST3 (Sustainable Development) – includes a strong focus on promoting “healthy communities”.
- Policy ST4 (Building a strong, competitive economy) – supports educational facilities and *“an expansion of vocational learning, developing links between institutions and the private sector or work-based learning...”* This represents an important link between community and economy objectives.
- Policy ST5 (Delivering a wide choice of high-quality homes) – is discussed below, under Housing.
- Policy ST6 (Good design) – presents a helpful summary of key principles: sensitive, inspired, imaginative and responding to context. This is a notably slimmed-down version of adopted Policy CP4.
- Policy ST7 (Health and Wellbeing) – has already been discussed above as a strong policy, and is notable for building on adopted Local Plan Policy CP5 in a number of respects. One notable new proposal is to limit new hot food takeaways within 400m of a school perimeter through management of opening times.
- Policy ST8 (Planning for Infrastructure) – deals with community infrastructure (taking on the role of Policy CP6 (Community facilities and services to meet local needs) within the adopted Local Plan.

- Policy ST9 (Promoting Sustainable Transport and Active Travel) – builds on adopted Policy CP2 in a number of respects. The strong support for active transport will lead to health benefits, whilst support for public transport is important for those with limited or no access to a car.
 - Policy ST10 (Conserving and enhancing the natural environment) – seeks to “*recognise and value ecosystems for the wider services they provide, such as... recreation, health and well-being*”.
 - Policy ST11 (Conserving and enhancing the historic environment) - recognises the role of heritage in respect of supporting “a sense of place and special identity”.
 - Policy DM18 (Park homes) - is of particular note, because park home sites will often be somewhat remote from services and facilities, and flood risk can be a concern given the older age range of residents. The policy, which reflects a permissive approach, is discussed further below, under ‘Housing’.
 - Other DM policies – numerous policies will lead to benefits in respect of ‘communities’ objectives, such that it is difficult to present an overview discussion. Policy DM11 (Vehicle Parking) is potentially of note, as there can be tensions between wishing to ensure adequate parking for those with mobility issues on the one hand and, on the other, wishing to encourage non-car modes of travel by restricting parking.
 - Site-specific policies –
 - Policy MU1 (East of Faversham) – is appropriately prescriptive, such that there is good certainty that the scheme will deliver significant community benefits. A headline message is potentially that: “*The Masterplan will feature a series of walkable neighbourhoods, with legible streets and paths connecting neighbourhoods to nearby services and facilities.*” On a specific point, there is potentially a slight concern regarding noise pollution, given the proposal to avoid use of sound barriers.
 - Policy AO1 (Teynham Area of Opportunity) – the policy is notable for including considerably less detail than is the case for Policy MU1, with no conceptual masterplan, which does lead to a risk, from a communities perspective. The number of homes involved is only circa 1/3 the number of homes under Policy MU1, but the Teynham Area of Opportunity will involve new development in and around an existing community, much more so than is the case in respect of East of Faversham.
 - Policy Regen 3B (Rushenden South) – sets out important requirements, for example: “*Secure those improved services and facilities necessary for a healthy, sustainable community with a particular focus on significantly improving facilities within the Rushenden area*; and “[create] a green coastal edge to include the provision of public open space and the delivery of a coastal path...”
- 9.5.19 Overall, there is a strong focus on protecting community assets and securing community benefits alongside housing growth. Again, it is appropriate to flag a likelihood that there will be a need to accept some compromises on viability grounds, if homes are to be delivered at the required trajectory; however, it is not possible to foresee what those compromises will be, and the Viability Study (2020) provides confidence that the spatial strategy can be delivered in-line with the proposed framework of DM policies.

Appraisal on the plan as a whole

- 9.5.20 The proposed spatial strategy performs strongly, most notably as strategic growth at Faversham will deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including a detailed masterplan. Aside from growth at Faversham, the proposal to deliver growth at Rushenden South in support of regeneration efforts for Queenborough/Rushenden is supported, from a communities perspective (assuming that delivery within the existing regeneration masterplan area will not be affected), and there may also be a degree of strategic opportunity at Teynham. There is also a clear rationale for supporting residential growth within Sittingbourne town centre. The only stand-out concern is in respect of the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. Overall, there is confidence in the LPR leading to **significant positive effects**.

9.6 Economy and employment

- 9.6.1 Sustainability objectives:
- Support good access to existing and planned community infrastructure for new and existing residents.
 - Promote and support healthy communities, including through increasing access to green infrastructure.

Commentary on the spatial strategy

- 9.6.2 The Employment Land Review (ELR) sets out the amount of new employment land that must be delivered through allocations in the LPR (having factored-in existing committed supply and likely future losses of existing employment land, e.g. loss to housing), breaks down the overall requirement according to a series of employment land types and indicates where in the Borough delivery of each type of employment land should be focused. The headline recommendation of the ELR is as follows:
- "A) Up to 40ha of new land for industrial uses is allocated. This should be in the West of the Borough (Sittingbourne, Isle of Sheppey) on sites that are market attractive for larger warehouses.*
- B) Up to 15 of new land for offices and light industrial uses is allocated. This should be focused to the east of the Borough in or around Faversham on one or more sites."*
- 9.6.3 However, it is important to note that there is a considerable range that underpins recommendation (A). Specifically, the figure decreases if a lower "5-year 'margin'" is assumed, meaning an assumption that future losses of industrial land will not follow past trends. There is a strong argument for assuming a lower 5-year margin, because past trends (see Table 5.2 of the ELR) are skewed by an abnormally large loss in 2011 (Sittingbourne Paper Mill). Furthermore, the ELR is clear that if the margin does need to be provided for, then it "*does not necessarily need to be provided today because the logic of the margin is that it may only be needed towards the end of the plan period*". The ELR is also clear that, given that the need is not in the early years of the plan period, the LPR should not rush to allocate sites to meet the need, because the effect could be to allocate sub-optimal sites (see further discussion below).
- 9.6.4 In response to the ELR recommendations (which are essentially targets/requirements for the LPR), a central element of the proposed strategy is the proposed mixed use urban extension to the **E/SE of Faversham**. Specifically, there is the potential to deliver c.10ha of new industrial/warehousing land to the east of Faversham and another c.10ha of industrial/warehousing to the southeast (adjacent to M2 J7), as well as smaller scale 'pockets' of employment, likely offices or light industry, throughout the scheme (this aligns with the emerging design ethos). There has been discussion of delivering 1 new job onsite for every new home, at least for the Southeast Faversham part of the site (see Stantec Assessment of Stage 2 Submissions, 2019), which reflects a good degree of ambition, although it is perhaps worth noting that the Thames Estuary 2050 Vision (2018) proposed a ratio 1.3 new jobs to every new home.
- 9.6.5 A key point to note is that the 20 ha of new industrial/warehousing will contribute significantly to meeting recommendation (A) of the ELR, but the location limits the contribution. The ELR explains:
- "Although Faversham is an untested market for larger unit demand (which fuels the need for additional land) such a highly accessible area is likely to be in demand. The part of the area (closest to the motorway junction) would be particularly attractive to strategic warehouse operators (min area 10 ha), because of the excellent access to the M2. But should areas in the west of the Borough come forward these are likely to be preferable given they are closer to the M25 and benefit from better north / south access (A429)."*
- 9.6.6 The other key employment land allocation is at **Rushenden South**, which is expected to deliver 10 ha of new employment land, over-and-above existing employment land within the site, potentially complimenting the existing/ committed employment area at Neats Court. It is not entirely clear which of the ELR recommendations the employment land here will relate to most closely. The location could be suitable for warehousing in certain respects, given good links to the A249; however, there are landscape constraints and there is a desire to "*provide a more diverse and higher density range of employment uses, recognising that the existing open storage land uses around Cullet Drive provide very low level employment density.*" A further consideration is the need to consider the role of existing employment uses on-site to effective operation of the Port of Sheerness, with the proposed site specific policy stating: "*Where appropriate, assist with alternative accommodation for the displacement of existing businesses*".
- 9.6.7 The next allocation to consider is **Lamberhurst Farm**, which is the only employment only scheme that is proposed by the LPR. The allocation is for a 3.2 ha extension to the existing employment area, creating a 5.5 ha employment allocation, that should contribute to meeting ELR recommendation (A). It is also important to, once again, note the suggestion made in the supporting text that the potential to deliver a new settlement here will be explored ahead of the next Local Plan Review.

- 9.6.8 There is also support for new office space in **Sittingbourne town centre** within Policy Regen 2, which specifically proposes: "*Maintain and increase office floorspace provision above commercial premises within the town centre area with a focus on creative industries*". This provision should further contribute to meeting recommendation (B) of the ELR, albeit the recommendation is for a focus in the *east* of the Borough. There is also a need to factor-in other aspects of the regeneration plans for the town centre, including support for 850 new homes (likely to support new mixed used schemes to include new employment space) and the proposal the proposal of Policy Regen 2 to consolidate the retail offer, which will have implications for employment opportunities, including for younger people and other groups.
- 9.6.9 Overall, the proposed new employment land supply (over-and-above existing committed supply):
- might amount to 32 ha of new industrial/warehousing land, assuming that 10 ha is delivered at Rushenden, which is a figure some way short of the 41 ha recommendation from the ELR (which is taken forward as a requirement for the plan period by Policy ST1), plus there is a need to factor-in the potentially sub-optimal distribution; and
 - will deliver an unspecified amount of new offices/light industry, but thought likely to be less than the 15 ha recommendation from the ELR (which is taken forward as a requirement for the plan period by Policy ST1), plus there is a need to factor in the potentially sub-optimal distribution.
- 9.6.10 However, it is important to recall that the ELR recommendations are associated with assumptions and caveats, particularly recommendation (A), which is caveated on the basis that: "*while it is preferable to [allocate] now in order to offer a wider choice to the market, the land [required] does not necessarily need to be deliverable in the short or even medium term. This is an important consideration where new sites may become available for development following transport investment in the mid plan period and where newly accessible sites or areas of search are preferable to those which can be delivered on the short term.*" In light of this comment, it is important to highlight the work to explore growth scenarios set out in Part 1 of this report, which serves to highlight limited realistic/reasonable options for allocating additional employment land, in order to meet ELR recommendation (A) more fully. The primary option for consideration would involve very large-scale strategic growth to the southeast of Sittingbourne, which might well deliver transformational transport upgrades and employment growth (including benefits to Eurolink and Kent Science Park); however, the option of allocation through the LPR is ruled-out as unreasonable given a range of environmental and wider sustainability concerns (see Section 5.3).
- 9.6.11 Also, it is important to consider that windfall sites may become available, or could be sought by the Council if necessary, with Policy ST4 (Building a strong economy) highlighting priority locations including: the extension of an existing employment site; where benefits to deprived communities can be achieved; and sites well related to the A249, A2, Sittingbourne Northern Relief Road or A299 Thanet Way.
- 9.6.12 Finally, there is a need to comment on three wider aspects of the employment and economy strategy:
- Kent Science Park – the option of major expansion, potentially to include non-science park employment uses, is discussed in detail in the ELR. LPR Policy A2 is a modest evolution of Policy Regen 4 in the adopted Local Plan. LPR Policy A2 "*is intended to provide parameters and the policy framework to support proposals that are compatible or complementary with the use of the site as a 'Science Park' as defined by the UK Science Park Association.*"
 - Port of Sheerness – is also a focus of the ELR, plus there is a need to consider the recent national context in respect of support for expansion of port operations and associated uses. Proposed LPR Policy Regen 1 is very closely aligned with Policy Regen 3 in the adopted Local Plan. The adopted Local Plan states that "potential longer term options will be considered via a review of the Local Plan"; however, at the current time, it is difficult to envisage options for the LPR. The ELR concludes: "*Given land within the port is outside of [planning] control it is very difficult to estimate how much land outside the port may be needed. There is, and will continue to be, land allocated for 'general' employment nearby which could absorb additional demand as it emerges. But in summary the future of this part of the economy is dependent on continued close working between the port operator and the Council.*"
 - Agriculture – following a study completed in 2015, it is well established that best and most versatile agricultural land contributes significantly to local Gross Value Added (GVA), and this is particularly the case for land that is farmed for soft fruits. The study was a focus of discussion when preparing the adopted Local Plan, and remains an important consideration for the LPR; however, the only realistic strategic growth options that avoid best and most versatile agricultural land are on the Island of Sheppey, yet it is difficult to envisage a reasonable high growth strategy for the Island (see Section 5).

Commentary on other policies

- 9.6.13 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – notably identifies a headline priority as building an economy that is “competitive and green”. The policy goes on to highlight the importance of: meeting identified needs for employment land; supporting town centre vitality; and supporting the rural economy.
 - Policy ST4 (Building a strong, competitive economy) – has already been discussed at some length. As an additional point, it is notable that criterion 3 gives particular support for proposals involving: the manufacturing sector; the visitor economy and the pharmaceutical and science sectors.
 - Policy DM5 (Proposals for Main Town Center Uses) – sets out to ensure that town centre uses are concentrated in town centres, with a view to maintaining town centre vitality. As discussed in the supporting text, recent introduction of planning use class ‘E’, and the possibility of additional permitted development rights enabling change of use to residential, mean that it is a period of change and uncertainty, in respect of planning effectively for highstreets and town centres.
 - Policy DM7 (Loss of employment floorspace and land) – sets out in detail the evidence of marketing for continued employment use that must be presented as part of any application for a change of use away from employment (where permitted development rights do not apply).
 - Policy DM8 (The rural economy) – is near identical to Policy DM3 in the adopted Local Plan.
 - Policy DM9 (New holiday parks or extensions to existing parks and the occupancy of holiday parks) – is an amalgamation of Policies DM4 and DM5 in the adopted Local Plan. Importantly, the policy sets out the criteria that must be met if holiday caravans and chalets are to be occupied for up to ten months of the year. The supporting text explains: *“Whilst [concerns around longer occupancy] remain relevant, to give more... incentive to... modernisation and upgrading to take place, the Council considers that there will be occasions when a 10 month occupancy period will be acceptable, which will, in turn deliver tourism benefits and support for the local economy.”*
 - Site-specific policies –
 - Policy MU1 (East of Faversham) – sets out few requirements, in respect of the proposed employment uses, although it is specified that land adjacent to Brenley Corner (M2 J7) should comprise industrial and/or warehousing uses. It is noted that the concept map shows the committed employment allocation at Lady Dane Farm (adopted Policy MU6), but not the committed employment allocation at Graveney Road (adopted Policy A6; LPR Policy A3g). It is also noted that the proposal is now to secure access to the site from the east, whilst adopted Policy A6 requires access from the west.
 - Policy AO1 (Teynham Area of Opportunity) – the employment strategy is discussed above.
 - Policy Regen 3B (Rushenden South) – the employment strategy is discussed above.
- 9.6.14 Overall, there is a strong DM policy focus on protecting and building upon Swale’s economic strengths, and addressing economic challenges. A key uncertainty at the current time is around planning for retail, offices and light industry following amalgamation of former use classes into new class ‘E’, and there is further uncertainty given the recent consultation on extending residential permitted development rights.⁵⁸

Appraisal on the plan as a whole

- 9.6.15 The proposal to support two major mixed use developments reflects a good degree of ambition, plus the LPR is supportive of the emerging regeneration strategy for Sittingbourne town centre, is seeking to capitalise on an employment land opportunity at Lamberhurst Farm and is seeking to take an ambitious approach to growth at Teynham including because of the potential to support employment growth. The strategy is certainly supportive of objectives to grow the economic role of Faversham and the Isle of Sheppey / A249 corridor; however, there is a degree of uncertainty regarding the extent to which the strategy aligns with the conclusions and recommendations of the ELR (Section 6 of the report), particularly in respect of supporting industrial land and warehousing in the west of the Borough, hence there is a need to “flag” **a risk of significant negative effects**, at the current time. There could be merit in further work to update certain aspects of the ELR, in light of changes to the national and regional context since 2018.

⁵⁸ See gov.uk/government/consultations/supporting-housing-delivery-and-public-service-infrastructure/supporting-housing-delivery-and-public-service-infrastructure

9.7 Flood risk

9.7.1 Sustainability objectives:

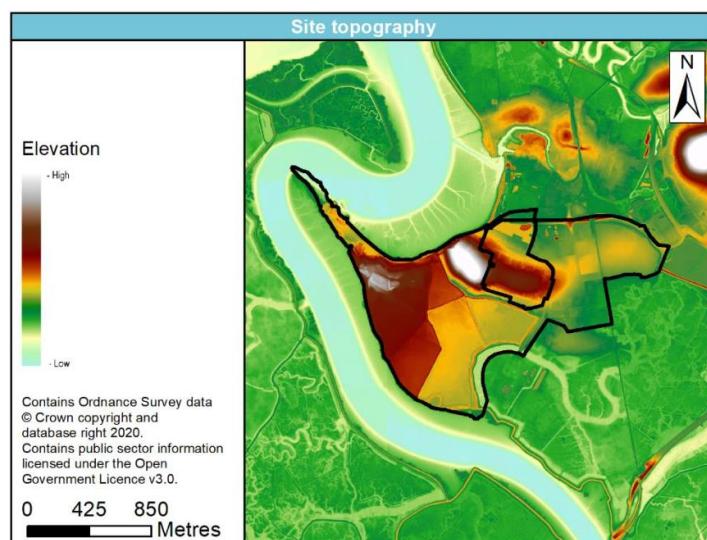
- Avoid and mitigate flood risk by directing development away from the areas of the Borough at the highest risk of flooding.
- Deliver Sustainable Drainage Systems and other measure with a view to future proofing and building climate change resilience.
- Support the priorities identified in the Medway Estuary and Swale Shoreline Management Plan and the Isle of Grain to South Foreland Shoreline Management Plan.

Commentary on the spatial strategy

- 9.7.2 Large parts of the Borough are constrained by flood risk, as set out within the Strategic Flood Risk Assessment (SFRA, 2019); however, most proposed growth locations suitably avoid the flood risk zones.
- 9.7.3 Strategic growth to the **E/SE Faversham** gives rise to limited concerns, from a flood risk perspective. Perhaps the key point to note is that Preston Fields - an existing Local Plan allocation that would see intensification of development as part of the E/SE Faversham scheme - is associated with a shallow valley, within which there is a band of surface water flood risk associated with 'pools' to the north of the site (due to linear infrastructure in the form of the A2 and railway), and which becomes an area of fluvial flood risk further to the north (i.e. downhill), affecting the Cyprus Road area of Faversham.
- 9.7.4 However, flood risk is a significant constraint to growth at **South Rushenden**, as it is for much of the western part of Sheppey, with the notable exceptions of Rushenden itself and the historic core of Queenborough, where the land is slightly raised (see 9.2). Some parts of the site are somewhat raised; however, this is due to past use as a landfill for dredged materials.
- 9.7.5 The site has been the subject of a Level 2 SFRA (currently in draft), which concludes "*part of the site is within Flood Zone 3b where more vulnerable development is not permitted. However, the site area is quite large and it may be possible to adopt a sequential approach to the site layout with more vulnerable development located outside of Flood Zone 3a or 3b.*" The following are further select quotes:
- "*... the majority of the site flooded in February 1953 as a result of the overtopping of defences... This dataset has been used to define Flood Zone 2 at this site, however it should be noted that changes in both sea level and ground levels since 1953 are likely to have resulted in a change to flood risk...*
 - "*The site is shown to be very sensitive to the impacts of climate change in comparison to the present day, with significant increases in flood extents across the site for both the 2080 and 2120 epochs for both higher central and upper end allowances for climate change. Flooded areas of site also include the existing industrial estate along Argent Road with depths indicated to be in excess of 1m... The 2120 epoch shows the most significant increase in flood extent, with the majority of the eastern side of the site and a large proportion of the centre of the site indicated to be within these flood extents in addition to areas where there are existing dwelling[s] in Rushenden. The centre of the site is not within these extents, however it is unclear whether safe access and egress would remain in the event of flooding and there is a risk that development could be cut off from surrounding infrastructure. A commitment would be required to the improvement in the standard of existing defences so that proposed development would be safe for its intended life.*
 - *The provisions should seek to improve the safety of the existing community in Rushenden."*
- 9.7.6 In parallel with the Level 2 SFRA, work is being undertaken by the site promoters to understand flood risk in detail and to respond accordingly. The emerging conclusion of this work is that flood risk can be dealt with within the proposed masterplan through the application of minimum floor levels and minimum access road levels such that these areas are set above the predicted flood levels. However, there are uncertainties around: the heights that will be required at the time that a planning application is submitted (in light of latest climate change and sea level rise modelling), which will likely not be for a number of years; and the potential for the land-owner to maintain the existing coastal frontage over the lifetime of the development (recalling that the Environment Agency's current plan for this land is 'no active intervention'; as discussed above, under 'Biodiversity').

- 9.7.7 Matters will be explored further at the planning application stage, which is appropriate in light of the NPPF, which supports allocation of sites through Local Plans ahead of detailed work being completed at the planning application stage (see paragraph 163, which sets out a list of detailed matters to be considered at the planning application stage). However, clearly there is merit to undertaking detailed work as early in the process as possible. For example, there is currently something a question-mark regarding whether work to take account of the “H++” climate change scenario should be undertaken now, or later.
- 9.7.8 At a broader level (seeking to avoid an undue focus on mitigation), there is a need to consider the emerging proposed spatial configuration of housing within the site, with the proposal being to concentrate most new housing to the south-southwest of the existing Rushenden settlement confines (mainly ‘yellow land’ in Figure 9.2), but also to deliver some new housing to the northeast ('green land' in Figure 9.2).

Figure 9.2: Elevation of land at Queenborough and Rushenden⁵⁹



- 9.7.9 With regards to the Teynham Opportunity Area, there is a degree of surface water flood risk, with notable channels flowing from south to north and issues around surface water pooling where its flow is hindered by the A2 and the railway; however, there will be good potential to deliver green and blue infrastructure within site boundaries in response to any flood risk that is found to exist, following detailed assessment at the planning application stage.

Commentary on other policies

- 9.7.10 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – includes a brief reference of flood risk, which might be elaborated on, perhaps to recognise that coastal flood risk is perhaps the key issue for the LPR.
 - Policy ST4 (Building a strong, competitive economy) – supports measures that secure *“improved resilience for existing businesses by measures to address flood risk, climate change and natural processes and lead to an expansion of businesses in the low carbon sectors.”* The link between resilience and supporting low carbon sectors should be clarified.
 - Policy ST10 (Conserving and enhancing the natural environment) – supports *“taking account of and integrating with natural processes, such as natural flood management”* and ensuring *“development is safe from the risks of flooding and coastal change...”* It also notably requires that *“mitigation and adaptation to climate change is a defining element of [all] proposals”*.
 - Policy DM3 (Mitigating and adapting to climate change through sustainable design and construction) – requires: *“Applications should demonstrate how the location, orientation and design of schemes makes them safe from flooding, how they incorporate sustainable drainage... [and other adaptation measures].”*
 - Policies DM31 (The Coast) and DM32 (Coastal change management) – set out policies to guide applications at or near the coast. Importantly, proposals must demonstrate *“the protection, management and enhancement, as appropriate, of biodiversity, landscape, seascape and coastal processes”*.

⁵⁹ This figure is one of a range of figures presented as part of the draft Level 2 SFRA for site 18/113 (JBA, 2020)

- Policy DM36 (Flood Risk) – is an elaboration of adopted Policy DM21, which considers flood risk, drainage and water together. The new proposed policy begins with a requirement that applicants: “*Seek opportunities to provide multifunctional benefits, linking flood risk management with strategies for...*” It is recommended that criterion 1 of the policy should relate solely to avoiding/minimising flood risk.
- Policy DM37 (Sustainable Drainage) – again emphasises the importance of achieving multifunctional benefits. Whilst multifunctional benefits are very important, there could be merit to differentiating between primary and secondary aims / benefits that are sought under this policy.
- Site-specific policies –
 - Policy MU1 (East of Faversham) – includes detailed requirements in respect of flood risk management.
 - Policy Regen 3B (Rushenden South) – sets out a ‘development principle’ as follows: “*Incorporation of any necessary flood risk mitigation.*” It is recommended further detail of the approach to flood risk management is set out, drawing on the Level 2 SFRA and work submitted by the site promoter.

9.7.11 Overall, there is merit to flood risk being discussed across a wide range of policies, although it is recommended that the flood risk and drainage policies might be focused more clearly on flood risk, and also that more detailed site specific policy is set out within Policy Regen 3B (Rushenden South).

Appraisal on the plan as a whole

9.7.12 The key consideration is in respect of proposed growth at Rushenden South. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/Rushenden; however, at the current time it is appropriate to ‘flag’ a **significant risk**. It will be for the Environment Agency to comment further in detail.

9.8 Heritage

9.8.1 Sustainability objective:

- Conserve and enhance heritage assets and contribute to the maintenance of historic character through design, layout and setting of new development.

Commentary on the spatial strategy

9.8.2 A key consideration is directing growth away from parts of the Borough associated with one or more conservation areas or clusters of listed buildings indicating historic settlement, with a need to take into account the grade of listed buildings and also the extent of their setting, for example parish churches are often in prominent locations, and rural farmsteads can also have an extensive setting. Furthermore, there is a need to consider ways in which designated assets relate to one another as part of historic landscapes.

9.8.3 Other important designated heritage and historic environment assets in the Borough include scheduled monuments and registered parks/gardens, and both can be associated with extensive settings or clear positions within historic (or ancient) landscapes; however, these assets tend to be located in parts of the Borough unlikely to come into contention for growth. Another important consideration for planning is the location of non-designated assets and archaeology, as understood from the Kent Historic Environment Record; however, it is difficult to use this dataset for strategic planning, because the dataset shows a very large number of assets and does not categorise assets according to significance.

9.8.4 In light of these introductory remarks, strategic growth to the **E/SE of Faversham** is tentatively supported, from heritage perspective. Faversham is highly sensitive to growth, with the Swale Heritage Strategy (2020) explaining: “*It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough*”. However, in this context, there is potentially merit to a strategic urban extension to the E/SE of the town, as the effect should be to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the E/SE of Faversham is relatively unconstrained in historic environment terms, given 20th and 21st Century expansion focused in this direction (although it is important to recognise the presence of the small Preston-next-Faversham Conservation Area, at the junction of Salter’s Lane and the A2). Also, there could be good potential to deliver a new community that supports Faversham as a thriving market town and visitor/tourist destination. However, there are other risks and uncertainties, including around:

- Traffic (including through the Ospringe Conservation Area);
- A new retail offer competing with Faversham town centre;
- Impacts to the historic agricultural and horticultural landscape setting of the town, including as experienced by motorists approaching along the A2 from the east, with the Swale Landscape Sensitivity (2020) explaining: *"The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area."*
- Impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. Key considerations include views from footpaths and cycle routes, and the rural landscape setting of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone. One of the farmsteads is associated with a grade 2* listed building and another associated with two grade 2 listed buildings. The third farmstead is not associated with any listed buildings, but is visible on the pre-1900 OS map.
- A particular concern relates to grade 2* listed Ewell Farmhouse, which is adjacent to the site, yet not shown on the current proposed masterplan. The proposal is seemingly to rely on the existing tree belt to screen the listed building (part of a farm complex), with residential built form encroaching to within perhaps 50 to 100m, as opposed to potentially aiming to integrated the listed building within open space.

9.8.5 Other significant considerations relate to the **Teynham Opportunity Area**, given:

- the likelihood (on the basis of the Strategic Housing Land Availability Assessment, SHLAA) modest housing growth within and/or abutting the conservation area;
- the risk a village bypass impacting on the conservation area, although a bypass might also reduce traffic in that part of the conservation area associated with the A2.
- two grade 2* listed buildings, to the west of the village (outside of the conservation area), that are adjacent to large potential development sites (supported by the SHLAA). Both are farmhouses likely be associated with an agricultural setting, and there is a need to consider views of the farm buildings – within their setting – from rural lanes and public rights of way; however, it is noted that the farmland surrounding these two listed buildings is currently in use for arable, as opposed to fruit growing (the traditional land use of the Teynham area, as discussed below).

9.8.6 Also, in respect of Teynham, it is noted that two sites supported by the SHLAA appear to be currently in use for fruit-growing (historic aerial imagery indicates that others have been in the past); however, these are both modest sites that are closely associated with the conservation area, such that sympathetic development, to include retention of valued trees, might be assumed. The Landscape Sensitivity Assessment (2020) explains [emphasis added]: *"The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic minor settlements and farmsteads, including Conservation Areas at Cellarhill, Bogle, Lewson Street (partially within the area) and Lynsted (adjacent to the area), with an associated concentration of listed buildings. The presence of pasture and traditional orchards within the area also contributes to its time depth. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger fields, particularly in the north of the area."*

9.8.7 With regards to **Rushenden South**, the site in question appears to have limited sensitivity (although there are landscape sensitivities), and regeneration of Queenborough/Rushenden is supported from a heritage perspective. The Queenborough Conservation Area is the only conservation area on Sheppey outside of Sheerness, with the Swale Heritage Strategy describing Queenborough as a 'planned medieval town' with a castle (the castle mound is a scheduled monument). The Strategy also describes Sheerness and Queenborough as "*beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey*".

9.8.8 Finally, there is a need to note that:

- Lamberhurst Farm (proposed for employment) includes one grade 2 listed building; and

- the Former Garden Hotel, Boughton (proposed for 20 homes) falls within the conservation area and includes a grade 2 listed building (with several others in close proximity), although there is understood to be good potential to bring forward a scheme that is sympathetic to the heritage sensitivities. As noted by the SHLAA, there is a history of unimplemented planning permissions.

Commentary on other policies

- 9.8.9 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – includes a criterion on the historic environment, but could potentially be reworded to ensure that planning for heritage and the historic environment is seen in a suitably positive light, as a consideration integrated as part of all initiatives involving planning for sites, settlements and landscapes. Links to ‘sense of place’ might be emphasised; also the role of ‘time-depth’, which is a concept examined in detail through the Landscape Sensitivity Assessment (2019).
 - Policy ST10 (Conserving and enhancing the natural environment) – criterion 7 refers to “the value, character, amenity and tranquillity of... landscapes”. The point on ‘character’ could potentially be expanded to reference heritage. Also, the criterion on supporting schemes that make ‘biodiversity and landscape’ their primary objective (in line with NPPF para 175) might also reference heritage.
 - Policy ST11 (Conserving and enhancing the historic environment) – goes beyond national requirements on the basis of the evidence and understanding set out in the Swale Heritage Strategy (2020). Prominence is given to important concepts including sense of place, special identity and “the integrity, form and character of settlements and historic landscapes”. Again, there might helpfully be discussion of ‘time-depth’, given the evidence from the Landscape Sensitivity Assessment (2019).
- N.B. the policy is near identical to adopted Policy CP8, bar proposed new criterion 7.
- Policy DM25 (Conserving and enhancing valued landscapes) – does not reference heritage, nor signpost to Policy ST11. It is recommended that heritage considerations be highlighted in a similar fashion to biodiversity, albeit it may be fair to give particular emphasis to biodiversity.
 - Policy DM29 (Woodland, orchards, trees and hedgerows) – recognises the heritage value of orchards.
 - Policy DM38 (Development Involving Listed Buildings) – proposes an important new criterion (relative to adopted Policy DM32): *“When considering the impact of proposed works and/or a proposed development on the significance of a listed building, great weight will be given to the building’s conservation (and the more important the listed building, the greater the weight will be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Where a development proposal will lead to less than substantial harm to the significance of a listed building, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
 - Policy DM39 (Development affecting a conservation area) – is much bolstered, relative to adopted Policy DM33. Amongst other things, there is a new requirement for certain schemes to submit a Heritage Statement presenting specified information; an added focus on new or replacement signage; and a new requirement that *“development within Swale’s conservation areas and their settings are required to be of high-quality contextual design so that they conserve or enhance a conservation area’s significance.”*
 - Site-specific policies –
 - Policy MU1 (East of Faversham) – there is a requirement to *“respond to a detailed heritage assessment (including for archaeology) of the site and mitigate any impacts identified”*. The supporting text does highlight certain key sensitivities; however, there could be merit to the policy highlighting key issues (and opportunities) that should be taken into account.
 - Policy AO1 (Teynham Area of Opportunity) – requires an *“urban design and landscape design approach, respecting and enhancing local landscape and heritage assets...”*. The supporting text discusses key issues and opportunities, but there could potentially be a clearer focus on risks associated with the grade 2* listed farmhouses to the west of the village.
 - Policy A5 (Lamberhurst Farm, Yorkletts) – sets out a requirement to: *“Enhance and improve the setting of the Grade II listed building.”*
- 9.8.10 Overall, a strong policy framework is proposed, although the policy of bolstering site-specific policy could be explored, with a view to generating confidence regarding the potential for sites to come forward in way that is respectful of heritage sensitivities and realises any heritage-related opportunities.

Appraisal on the plan as a whole

- 9.8.11 The focus of growth at east and southeast of Faversham is supported, recognising that there are strong arguments for supporting growth at Faversham – including on the basis of strong viability – and that this is a direction for growth associated with relatively limited sensitivity. In addition, the focus of growth at Rushenden is supported, from a heritage perspective (assuming that the new proposed scheme does not hinder the achievement of established regeneration objectives for Queenborough). However, there are some potential concerns in respect of heritage constraints being a barrier to growth at the Teynham Opportunity Area. A robust framework of policies is proposed in support of the spatial strategy, comprising both borough-wide and site-specific policies, on which basis it is possible to conclude **the likelihood of neutral effects**; however, there is some uncertainty. Historic England will wish to comment further.

9.9 Housing

- 9.9.1 Sustainability objectives:
- Support timely delivery of market housing and affordable housing.
 - Promote an appropriate mix of housing types and tenures.
 - Cater for existing and future residents' needs as well as the needs of different groups in the community.

Commentary on the spatial strategy

- 9.9.2 A housing land supply is proposed in excess of Local Housing Need (LHN), with the 'supply buffer' amounting to circa 6%. A supply buffer is important given the risk of unforeseen delays to supply, i.e. the risk of sites not coming forward for development as anticipated and/or not delivering homes at the rate anticipated. The size of buffer required is dependent on the 'riskiness' of the sites that make-up the supply, with strategic sites tending to be at relatively high-risk of delay, due to the range and complexity of the issues involved, for example around delivering required infrastructure upgrades.
- 9.9.3 Also, in addition to the question of how many homes are provided for over the plan period, there is a need to ensure a steady (or otherwise acceptable) trajectory of housing delivery across the plan period, including in the early years of the plan period. This necessitates a supply comprising a good mix of sites, both in terms of size/complexity and geographic location. In this respect, it is important to recall that there is a very good mix of committed sites following the adopted Local Plan (and windfall sites that have come forward since the adopted Local Plan). As discussed in Section 5, committed sites are expected to deliver around c.8,8500 homes in the LPR plan period, and whilst there is a degree of uncertainty associated with this figure (e.g. see discussion of Queenborough regeneration masterplan area sites, below), the general message is that supply from existing committed sites (plus certain new allocations, e.g. Neames Forstal) will mean that there is a strong supply / low risk of under-delivery against the requirement (LHN) in the early part / first half of the plan period, which is an important consideration in light of NPPF paragraph 67.
- 9.9.4 On one hand it is difficult to conclude that delivery risk is a 'housing' consideration for this assessment, as the NPPF puts in place mechanisms to redress unanticipated shortfalls in housing delivery (the presumption in favour of sustainable development); however, on the other hand, delivery risk is an important issue in Swale, with a desire to resist windfall schemes in unplanned locations. As stated within the officer's report to the 29th October 2018 Local Plan Panel (which reported back on the Looking Ahead consultation):⁶⁰ "*Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations.*" Viability need not necessarily constrain delivery if development costs are kept low, but this can lead to tensions with wider objectives, for example affordable housing and decarbonisation.
- 9.9.5 In light of these introductory remarks, the proposal to focus growth at a strategic site and sites with delivery challenges leads to a degree of risk; however, the nature of the existing committed supply, and the proposed supply buffer of 6% serves to reduce concerns. Also, **E/SE of Faversham** is thought to be associated with relatively low risk, for a strategic site of this scale. The Stantec Assessment of Stage 2 Submissions (2019) drew the following conclusion in respect of Southeast Faversham:

⁶⁰ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2094>

"Of the four schemes promoted this is clearly the lowest 'risk'. It is essentially an extension to Faversham and is more developed than the other three schemes, with fewer significant barriers to delivery within a short timetable. It has also been shown to be viable. There has been a commitment to accelerate the delivery rate which means the pace of delivery is more in line with the Council's objectives. However, there remains uncertainty about Junction 7..."

- 9.9.6 Strong viability should also enable delivery of a good mix of housing, potentially to include:
- at least the 30% affordable housing required under proposed DM15, noting that the SHLAA (2020) states "the landowner has committed to providing 40% as affordable housing";
 - a good mix of affordable housing tenures, in line with the 'indicative target' of 60% affordable/social rent (with the remaining 40% intermediate products) discussed in the supporting text to Policy DM15;
 - housing for particular groups - the Housing Market Assessment (HMA, 2020) discusses older persons, people with disabilities, family households, private rented households and self-builders; and
 - Gypsy and traveller accommodation – there is currently no proposal to deliver pitches within the site, but this could be an option to consider, given a need for new pitches in Swale, and an understanding that strategic sites can be suitable locations (although this may apply less to Swale, where there are over 60 existing sites, suggesting good potential to deliver new pitches through site extensions).
- 9.9.7 However, it is important to point out that there may be an element of uncertainty regarding the precise number of homes that can be delivered on-site, both in total (recognising that the assumed capacity of the sites reflects that set out in the SHLAA, which dates from May 2020) and in the plan period (recognising that the developer will deliver homes at a pace in-line with a 'model' that accounts for market demand and quality objectives). In respect of the former consideration, there are a wide range of masterplanning considerations that could lead to a need to adjust the total number of homes deliverable on the site; for example, buffering the railway lines and employment areas, and incorporating the committed employment area (adopted Policy A6; LPR Policy A3g), including its access, at the northern extent of the site.
- 9.9.8 Another important consideration is that **Rushenden South** is expected to deliver only c.10% affordable housing, reflecting viability challenges on Sheppey and anticipated site specific development costs. This is an important consideration for housing needs on the Island of Sheppey, where the policy in the adopted Local Plan is to require no affordable housing. A further consideration, in respect of Rushenden South, is proximity to the existing Queenborough and Rushenden Regeneration Area (adopted Policy Regen 2), where housing delivery has proved challenging since the Masterplan SPD was adopted in 2010 (the original intention was to deliver 2,000 homes, which was revised down to 1,180 homes through an addendum to the masterplan adopted in 2015, of which 101 have so far been delivered). A possible concern is that the new allocation could hinder delivery within the existing regeneration / masterplan area, which is a 'housing' consideration because delivery of the homes target for the existing masterplan area is assumed as part of the 9,700 homes commitment figure for the LPR plan period. However, there are site specific considerations that give rise to confidence that homes within the existing masterplan area are now set to come forward in the near future (whilst Rushenden South is not expected to deliver later in the plan period), with enabling and remedial works having been completed (funded by Homes England) and the recently completed homes having sold well.
- 9.9.9 There is also a need to briefly comment on **Neames Forstal**, because the Viability Study (2020) shows development viability to be high here (see Table 7.1 of the Study). As such, there might be scope to require above 30% affordable housing, also recognising that new homes at Neames Forstal might contribute to meeting rural housing needs across quite a large area.
- 9.9.10 Finally, in respect of the spatial strategy, it is important to consider that a lower growth strategy for the **west of the Borough**, through the LPR, partly reflects housing delivery considerations. Specifically, a number of existing allocations have been delayed, largely on account of delays to M2 J5, and are now expected to come forward in the early years of the LPR plan period, such that there could be limited further 'space' in the market for additional sites, recognising that the market here is not as strong as at Faversham.

Commentary on other policies

- 9.9.11 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – emphasises "providing housing opportunity, choice and independence with types of housing for local needs".

- Policy ST5 (Delivering a wide choice of high-quality homes) – importantly adds the following new criterion (over-and-above the criteria set out in adopted Policy CP3):

"Provide dwellings that meet minimum space standards M4(2) on 75% of all dwellings and the accessible standards M4(3) on the remaining 25% of dwellings."⁶¹

Ensuring that new housing is well suited to an ageing population is considered to be a priority issue locally, with the proposal being to deliver the maximum level, hence this policy is proposed despite significant viability implications, as explored through the Viability Study (see Table 8.2 of the study). However, as explained within the supporting text to the policy, there would ideally be “universal” achievement of standard M4(2).

- Policy DM9 (New holiday parks or extensions to existing parks and the occupancy of holiday parks) –
- Policy DM14 (Small and medium sites for housing development) – is an important new policy, stating that: *“In recognition of the important role small sites play and the value of SMEs to housing delivery in Swale, the Council will support the development of unallocated sites (windfalls) for housing providing the harm of such proposals do not demonstrably outweigh the benefits; and where... [criteria are met including] the site is being brought forward by a recognized SME developer or for self-build or for a community land trust initiative.”*
- Policy DM15 (Affordable Housing) – requires 30% affordable housing on greenfield sites, and 20% on brownfield sites (above 15 homes), such that there is a need for further work to clarify that the requirement for 28% affordable housing (as set out in the HMA, 2020) will be met (also noting site specific policy, discussed below, notably the requirement for 10% at Rushenden South).
- Policy DM16 (Rural exception housing) – is very similar to adopted Policy DM9. As such, it would be helpful if the supporting text presented data on rural exceptions housing delivery over recent years.

The supporting text notably explains: *“This [policy] combined with the Council’s policies within this Plan towards encouraging small sites developed out by SME builders and towards low cost Park Home operators within the right locations, should further promote the opportunities for rural affordable housing and to maintaining and enhancing sustainable rural communities.”*

- Policy DM18 (Park homes) – is an important new policy, setting out support for new park homes, provided that certain criteria are met, on the basis that: *“The Council’s Strategic Housing Market Assessment (SHMA)(July 2020) identified the need for accommodation for older people during the plan period. Park Home provision has an important role to play in delivering suitable accommodation to meet these needs... Park Homes are usually set within purpose-built enclaves and are particularly attractive to older people who are retired or part-retired and seek to be part of a close-knit community...”* The policy is permissive to the extent that c.225 homes supply from park homes are now anticipated in the LPR plan period, which will be focused in rural parts of Sheppey.
- Policy DM19 (Gypsy, Traveller and Travelling Showpeople accommodation) – sets out to ensure that accommodation needs, as established by the Gypsy and Traveller Accommodation Assessment (GTAA, 2018) are met. The supporting text explains:

“The Council has a proven track record of granting suitable planning permissions. Furthermore, and according to the GTAA, a significant proportion of future need will come from emerging households on existing sites who wish to stay on those sites. As such, it is not considered necessary to allocate sites to meet the need at this time, although this position will be reviewed periodically. Instead, Policy DM19 is intended to act as a criteria-based policy to guide planning applications...”

By way of context, the GTAA (2018) concludes: *“The GTAA 2018 has found evidence of Gypsy and Traveller pitch need over the next five years (2017/18 to 2021/22) equating to 39 pitches under the cultural definition, or 30 pitches under the PPTS 2015 definition of Gypsy and Traveller (which takes account of travelling behaviour). For the overall Plan Period to 2037/38 the GTAA has identified a cultural need for 76 pitches and a PPTS need for 59 pitches... The Local Plan should acknowledge this level of need. However, taking into account turnover on local authority sites and the potential expansion/intensification of existing sites during the Plan Period, the cultural need could be reduced to 14 pitches and PPTS need addressed (however this would be dependent on...[several factors].”*

⁶¹ Requirement M4(2): Accessible and adaptable dwellings - is met when a new dwelling includes features that make it suitable for a range of potential occupants, including older people, individuals with reduced mobility and some wheelchair users. Requirement M4(3): Wheelchair user dwellings - is achieved when a new dwelling provides reasonable provisions for a wheelchair user to live in the dwelling and have the ability to use any outdoor space, parking and communal facilities.

Further context comes from the Inspector's Report on the adopted Local Plan (2017), which explained: *“... I endorse the Council’s proposed modifications to... remove the requirement for larger housing allocations to include pitches for Gypsies and Travellers... I have taken account of criticisms of the proposed modifications received through the consultation. However I consider that the proposed approach will serve to make the Plan effective in addressing the needs of the Gypsy and Traveller community as advised in the 2015 PPTS, having in mind the fact that the early review of the Plan will require both need and supply to be reassessed soon after adoption.”*

- Site-specific policies –

- None require a level of affordable housing above the 30% figure required under proposed Policy DM15. This might be revisited for the Neames Forstal sites (thought to benefit from good viability) and Southeast Faversham (in respect of which there has been an understanding, since the time of the Stantec Assessment work in 2019, that 40% affordable housing is achievable).
- Policy Regen 3B (Rushenden South Area) – requires *“provision for affordable housing at a minimum of 10% and be subject to ongoing review during the long term construction phases expected.”*
- Policy Regen 3A (Queenborough and Rushenden Regeneration Area) – also notably requires 10% affordable housing, which is a departure from the equivalent policy in the adopted Local Plan, which did not require affordable housing (although paragraph 6.7.59 stated: *“A range of housing types should be brought forward in accordance with Policy CP3, including those for affordable housing, with 25% of the scheme overall expected to be affordable dwellings...”*).

9.9.12 Overall, a strong policy framework is proposed, with a strong emphasis on affordable housing, accessible housing standards, park homes (on the basis that they help to meet the housing needs of older residents) and small/medium sites for housing (also with benefits for local businesses / the local economy). However, the approach to meeting Gypsy and Traveller accommodation needs potentially warrants further scrutiny.

Appraisal on the plan as a whole

9.9.13 The aim is to provide for LHN in full (i.e. set the housing requirement at 1,038 dwellings per annum), and there is no reason to conclude that the proposed supply will be insufficient to achieve this aim, particularly given the nature of the existing committed supply (which will ensure strong supply in the early part / first half of the plan period), and the proposed supply buffer of 6%. Furthermore, the proposed strategic urban extension to the east and southeast of Faversham is associated with relatively low delivery risk, for a strategic site, and is associated with strong viability, which should be supportive of delivering a good mix of housing and accommodation more widely. However, there is currently a lack of detailed evidence available in respect of the proposed housing supply trajectory and delivery risks associated with key elements of the supply. Furthermore, it is fair to highlight that the proposal to focus growth at a strategic site and sites with delivery challenges leads to a degree of overall delivery risk, i.e. a risk of housing supply, at some point in the plan period, falling below the requirement, such that there is a risk of the NPPF's presumption in favour of sustainable development applying (which would could mean that windfall sites come forward in unplanned locations, potentially serving to meet housing needs but giving rise to other issues/impacts). A final consideration is affordable housing need, noting that not all sites will be able to deliver the headline 30% figure. On balance, it is fair to conclude **uncertain positive effects**.

9.10 Land

9.10.1 Sustainability objective:

- Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land.

Commentary on the spatial strategy

9.10.2 A key consideration is the need to avoid loss of best and most versatile (BMV) **agricultural land**, particularly grade 1 land that is of the highest quality nationally. Swale has an extensive resource of grade 1 land, known as the fruit belt, which is centred on the A2 corridor, hence it is very challenging to deliver growth whilst avoiding loss of BMV land, including grade 1. Sheppey is relatively unconstrained, with low-lying land shown by the nationally available dataset as being non-BMV (grade 4) and higher ground shown as grade 3 (which may or may not be BMV); however, there are barriers to growth.

- 9.10.3 Strategic growth at **E/SE Faversham** would result in the loss of high quality agricultural land, with the national low resolution dataset indicating that virtually all of the land is likely to be of grade 1 quality. None of the land has been surveyed in detail, other than the committed Preston Fields part of the site (it is typically the case that detailed survey work is undertaken as part of planning applications, but it can be undertaken to inform Local Plans), which was found to mostly comprise grade 1 land.
- 9.10.4 There are also concerns regarding growth at **Teynham**, which is strongly associated with grade 1 quality land (although detailed survey work at Teynham has found there to be some grade 2 quality land) and historical imagery (available for 1940 and 1960)⁶² shows near ubiquitous fruit growing; however, of the land in contention for allocation, very little (if any) now appears to be in use for commercial fruit growing.
- 9.10.5 Finally, with regards to **Sittingbourne town centre** and **Rushenden South**, growth here is strongly supported, from a 'land' perspective. With regards to Rushenden South, the national dataset indicates that the site is a mixture of grade 4 and grade 5 quality land, and part of the site comprises a former landfill (dredged materials, as opposed to waste), hence development could enable remediation and therefore represent a good use of despoiled or contaminated land.

Commentary on other policies

- 9.10.6 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – requires “*using areas of lower quality agricultural land for significant levels of development (singly or cumulatively) where compatible with other criteria*”. There is clearly a need to scrutinise the proposed allocations in light of this criterion, i.e. consider how planning applications for the proposed allocations will be judged against this criterion. There could be an argument for adjusting this criterion to specify that it applies to windfall schemes only, including with a view to avoiding giving the public an inaccurate impression of the Local Plan spatial strategy.
The Policy also requires “*applying national planning policy in respect of pollution, despoiled, degraded, derelict, contaminated, unstable and previously developed land*.”
Minerals are not referenced in this policy, or any DM policy, which is potentially an omission given the extent of minerals safeguarding areas across the Borough, and given that the possibility of minerals extraction can often be an important issue for consideration at the planning application stage.
 - Policy DM30 (Agricultural land) – is unchanged from the adopted Local Plan. The policy specifies that schemes involving loss of BMV agricultural land will be permitted where the site is an LPR allocation.
 - Policy DM34 (Pollution and Land Instability) – Is a new policy, and potentially an important policy in the Swale context, e.g. part of the Rushenden South site is a former landfill (dredging waste) and so there may be an element of contamination, and remediation of land has proved a key consideration within the Queenborough and Rushenden regeneration masterplan area.
 - Site-specific policies –
 - Policy MU1 (East of Faversham) – discusses minerals safeguarding / prior extraction. There is no discussion of agricultural land, which is potentially not an omission, given that there is little potential to mitigate the loss of agricultural land. There is one brief mention of local food growing (in respect of the Southeast Faversham part of the site), but no mention of community orchards.
 - Policy Regen 3B (Rushenden South Area) – requires: “*Investigation of potential land contamination; if further work and mitigation is identified, this will be completed as required*.”
 - Policy Regen 3A (Queenborough and Rushenden Regeneration Area) – also notably requires 10% affordable housing, which is a departure from the equivalent policy in the adopted Local Plan, which did not require affordable housing (although paragraph 6.7.59 stated: “*A range of housing types should be brought forward in accordance with Policy CP3, including those for affordable housing, with 25% of the scheme overall expected to be affordable dwellings...*”).
- 9.10.7 Overall, there could be merit to further explicit recognition that loss of BMV agricultural land is not something that lends itself to effective mitigation at the development management stage. There might also be further encouragement of local food growing and community orchards (recognising the historic extent of orchards within the fruit belt landscape of Swale) as a means of mitigating impacts, to an extent.

⁶² See <https://webapps.kent.gov.uk/KCC.KLIS.Web.Sites.Public/Default.aspx> or Google Earth

Appraisal on the plan as a whole

- 9.10.8 There is an unavoidable need to conclude that the LPR will lead to **significant negative effects**, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. However, the proposal to target growth towards Rushenden and Sittingbourne town centre is supported; and it is recognised that the analysis presented in Part 1 of this report finds there to be no reasonable alternative growth scenario that would avoid significant negative effects. A further consideration is directing growth to locations that fall within a Minerals Safeguarding Area. However, in practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract prior to development.

9.11 Landscape

- 9.11.1 Sustainability objectives:

- Protect and enhance the character and quality of the Borough's landscapes and townscapes through appropriate design and layout of new development.
- Protect and enhance the Kent Downs AONB where possible.
- Preserve important open gaps between settlements.

Commentary on the spatial strategy

- 9.11.2 There is a wide range of evidence to take into account, when considering landscape issues and impacts. In addition to avoiding impacts to the Kent Downs AONB, and its setting, there is a need to avoid impacts to locally designated landscapes and countryside gaps, as understood from the Landscape Designation Review (2018) and the Important Local Countryside Gaps study (2020). Additionally, the Landscape Sensitivity Assessment (2019) examines the sensitivity of all landscape parcels surrounding the main settlements. More broadly, there is a need to consider topography across the Borough, historic landscape character and important views, including from roads and public rights of way. There is also a need to be mindful of wide ranging ecosystem services delivered by landscape units (see discussion in Appendix II).
- 9.11.3 Strategic growth to the **E/SE of Faversham** is supported, from a landscape perspective, in light of the Landscape Sensitivity Assessment (2019), which finds the entire site to fall within a parcel of moderate sensitivity (parcel FM1), which equates to relatively limited sensitivity in the context of the Borough and, in particular, Faversham. The assessment notes that the "presence of major road infrastructure and heavy traffic" has a significant impact on "the sense of rurality and tranquillity". Despite this, however, the assessment also finds that the area "retains a strongly agricultural character" and that this character together with the "visual exposure of the area" results in a degree of sensitivity. It is important to recognise that development would breach a longstanding settlement boundary feature to the southeast of the town, namely the A2 which has historically marked the limit of the southern extent of the town (with the town centre focused on the creek, more so than the road and railway); however, existing Local Plan allocations have already breached the boundary of the A2 to the south of the town. Furthermore, expansion to the southeast has the benefit of being able to draw upon the M2 (with the AONB beyond) as a new strong/defensible long-term boundary. Having said this, the current proposal falls short of comprehensively planning for land as far as similarly defensible boundaries to the east (either the A299 or, should employment be a suitable use surrounding the motorway junction, the need to maintain a landscape buffer to Boughton) and the northeast (flood risk and heritage including farmsteads and the Goodnestone Conservation Area). The current proposal to deliver employment land to the east of the proposed 'structural screen planting' is questionable, from a landscape perspective, and there is a need to consider the possible landscape merits of a single main employment hub adjacent to M2 J7.
- 9.11.4 As a final consideration, there is a need to note the proposal to deliver 70 homes within the southern part of the committed Preston Fields site, which comprises land at the southwest extent of the E/SE Faversham site, namely land falling between the A251 in the west and Salters Lane in the East. The adopted Local Plan proposed that this land should be left as "accessible natural greenspace to maintain rural character".

- 9.11.5 The second most significant consideration relates to **Rushenden South**, which is associated with considerable landscape sensitivity, as it forms the western extent of the North Swale (Sheppey) Marshes locally designated landscape, with the land visible in the middle ground from the A249 Sheppey Crossing, with the Isle of Grain (London Thamesport and Grain Power Station) visible beyond. Furthermore, there is a likelihood of a mixed use scheme, and the Landscape Sensitivity Assessment identifies this area as having a *high* sensitivity to employment development. However, the site comprises a former landfill, which is thought to limit landscape value as experienced from close quarters, e.g. as experienced by the residents of Rushenden. There is one public footpath adjacent to part of the site, and there is understood to be the possibility of development supporting delivery of the England Coastal Path, alongside wider green/blue infrastructure enhancements to increase accessibility to the landscape, to the benefit of Queenborough/Rushenden, which is an area associated with significant levels of multiple deprivation.
- 9.11.6 With regards to the **Teynham Opportunity Area**, sensitivities associated with the fruit growing heritage have been discussed; however, the Landscape Sensitivity Assessment (2019) serves to indicate that, in the Borough context, there is a degree of relative landscape capacity to the west of the village. Specific considerations include:
- East – land here has higher sensitivity; however, the assumption is that any further expansion would not break the prominent north/south ridgeline (associated with public footpaths);
 - West - there is a need to maintain a settlement gap to Bapchild (this is explored within the Local Countryside Gaps study, 2020), and the possibility of delivering the final section of the Sittingbourne Northern Relief Road is a related consideration; and
 - Southwest - there is a degree of sensitivity, given views across this land from footpaths and Claxfield Road, which is designated as a rural lane, and a route to the Lynsted via historic farmsteads.
- 9.11.7 Finally, there is a need to consider the proposed allocation(s) at **Neames Forstal**. Three adjacent sites are being promoted for a combined scheme of 90 homes, plus there is a proposal to deliver a new footpath link to Selling (c. 1.5km to the west). The SHLAA judges these sites to be unsuitable, including due to the AONB constraint; however, the proposal is to deliver a combined scheme that responds to the AONB constraint. The two sites adjacent to the AONB are not considered likely to contribute significantly to the setting of the AONB, whilst the site within the AONB would only be developed in part, so as to round-off the village edge. There could also be a need to consider AONB sensitivities associated with the footpath link (which would be within the AONB), particularly if it is to be hard surfaced and have lighting.

Commentary on other policies

- 9.11.8 The following bullet points aim to present a brief commentary on other policies:
- Policy ST3 (Sustainable Development) – states the following under the ‘natural environment’ criterion: *“Use landscape character assessments to protect, and where possible, enhance, the intrinsic character, beauty and tranquillity of the countryside, with emphasis on the estuarine, woodland, dry valley, down-land and horticultural landscapes that define the landscape character of Swale.”*
 - Policy ST10 (Conserving and enhancing the natural environment) – criterion 7 refers to “the value, character, amenity and tranquillity of the Borough’s landscapes” and also supports schemes that make the enhancement of landscape (and/or biodiversity) their primary purpose (in-line with NPPF para 175).
 - Policy ST11 (Conserving and enhancing the historic environment) – recognises the importance of historic landscapes. There could potentially be further recognition of how assets and particular features come together to create ‘time-depth’ at landscape scales.
 - Policy DM25 (Conserving and enhancing valued landscapes) – is similar to adopted Policy DM24; however, there is an additional requirement to consider the setting of locally designated landscapes.
 - Policy DM26 (Kent Downs AONB strategy) – is a new policy, supplementing the AONB-specific requirements set out in DM25.
 - Policy DM27 (The separation of settlements - Important Local Countryside Gaps) – is identical to adopted Policy DM25, expect that several new designated gaps are proposed.

- Site-specific policies –
 - Policy MU1 (East of Faversham) – sets out a range of requirements and expectations. The proposed conceptual masterplan shows 'structural screen planting' around the majority of the development edge, to separate the scheme from the surrounding countryside; however, this is not proposed to the east of the employment area north of the A2.
 - Policy AO1 (Teynham Area of Opportunity) – the supporting text includes helpful detail on key landscape issues and opportunities, although there is no discussion of traditional orchards or fruit growing heritage, which is a matter discussed in the Landscape Sensitivity Assessment (2019).
 - Policy A4 (Land at Neames Forstal) – sets out requirements in considerable detail, including requiring "*active frontages that face outwards at the edge of the settlement to provide a definitive edge to the village and softened by the use of an extensive landscape buffer.*"
 - Policy Regen 3B (Rushenden South Area) – requires... *creation of a distinctive sense of place for the new development that also reflects the area's waterside location and wider area... [and] sensitive and innovative design...[to be] subject to scrutiny by the Swale Design Panel"*

9.11.9 Overall, a strong policy framework is proposed; however, site specific policies would benefit from greater consistency, and there would be merit to setting out discussion of site-specific landscape issues and opportunities with reference to consistent conceptual masterplans (as per the adopted Local Plan).

A note on Local Green Space designations

9.11.10 It is evident that the proposal is to significantly increase the number and total extent of designated Local Green Spaces. Focusing on the Isle of Sheppey, as an area where there is understood to be problematic levels of access to multifunctional greenspace, it is evident that the majority of new sites proposed for designation are now being taken forward for designation.⁶³ Several small parcels of land in Sheerness submitted as part of the call for sites are not being taken forward for designation; however, it is fair to assume that these sites fail to meet the criteria for designation for fairly clear-cut reasons. As a final point, it is noted that SHLAA site 18/171 was not submitted through the call for sites. This is a notable greenfield site within the settlement confines of Minster, although is presumably not accessible and is identified by the SHLAA as suitable for housing.

Appraisal on the plan as a whole

9.11.11 The proposed spatial strategy performs well overall, with efforts clearly having been made to select sites for allocation that give rise to relatively limited concerns in respect of impacts to the AONB, locally designated landscapes, important settlement gaps and landscapes judged to have moderate-high sensitivity by the Landscape Sensitivity Assessment (see discussion of growth scenarios in Part 1). However, there is some concern associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Alongside the proposed spatial strategy / package of proposed allocations is a robust policy framework comprising both borough-wide and site-specific policies, on which basis it is possible to conclude **the likelihood of neutral effects**. However, there is considerable uncertainty ahead of further work to confirm masterplanning proposals.

9.12 Transport

9.12.1 Sustainability objectives:

- Promote sustainable transport use, including supporting the creation of additional walking and cycling routes, and reduce the need to travel, particularly by private vehicle.
- Support strategic transport schemes.

⁶³ Sites proposed for designation were reported to the Local Plan Panel on 29th October 2020; see services.swale.gov.uk/meetings/ieListDocuments.aspx?Cld=216&Mid=2396&Ver=4

Commentary on the spatial strategy

- 9.12.2 Transport connectivity and traffic congestion is a key issue in Swale, given the inherent constraints that exist. The Borough is very well connected by rail; however, main settlements and potential growth locations feed onto a limited number of strategic road corridors, including the A2 which passes through the centre of settlements (the only bypasses are at Sittingbourne town centre and Boughton). Enabling longer distance trips via the M2 rather than the A2 is an important objective, but there are junction constraints, and just three junctions serving the Borough, which contrasts to four serving Medway BC.
- 9.12.3 Further context, which serves to indicate a significant transport challenge, is set out at paragraph 11.1.4 of the Infrastructure Delivery Plan (IDP, 2021): *"The Inspector who examined the Bearing Fruits Local Plan was satisfied that the level of growth in the first part of the plan period could be accommodated on the local road network. Beyond this there were implications in delivering the full housing need figure for both the strategic and local road network that would require the implementation of improvement works. At the time of the examination, the nature of improvement works had not been determined, but the Inspector did not consider this to be a showstopper to the Local Plan being adopted. The Inspector, therefore, found the Local Plan sound subject to a commitment to undertake an early review of the Local Plan to address the highway capacity issues. To support the... review, further transport modelling has been undertaken to assess and identify the necessary mitigation measures to accommodate the further development..."*
- 9.12.4 The IDP goes on to explain that initial transport modelling has been completed, but that a final model run needs to be undertaken (spring 2021). The IDP explains (paras 11.1.1.3 / 4) that the further model run will *"identify additional, if any, transport mitigation measures that may be required... A key infrastructure requirement, therefore, will be the junction and corridor improvements identified below and in the Infrastructure Delivery Schedule. It is expected that developer contributions will be needed to contribute towards the funding of the majority of these improvements."*
- 9.12.5 In light of the above introductory comments, strategic growth to the **E/SE of Faversham** is tentatively supported, from a transport perspective. In particular, this is because growth here will not load pressure onto **M2 J5**, which is currently heavily constrained, to the extent that Highways England currently seek to restrict, through the imposition of a Grampian condition on planning permission, new homes that would increase pressure on the junction. The IDP explains the latest situation, in respect of M2 J5, as follows:
- "Highways England have proposals to undertake improvements to the A249 Stockbury Roundabout at J5... The necessary Orders for the improvement scheme were published in June 2019 and the Public Inquiry into the Orders opened on the 9th November and closed on the 3rd December 2020. On the assumption that it is consented, the approximate scheme opening date is 2023... The scheme is identified in the national Road Investment Strategy 2 (RIS2) as a committed scheme for the period 2020/21 to 2024/25... Following scheme completion, J5 will have capacity to support the delivery of growth planned in the adopted Local Plan but further assessment will be required to determine how much, if any, of the further growth now planned could be accommodated."*
- 9.12.6 However, there are certain concerns in respect of **M2 J7**, which is the junction that may see the most additional traffic as a result of growth to the east and southeast of Faversham. These concerns were raised by the Stantec Assessment of Stage 2 Submissions (2019), which stated:
- "The primary issue is the M2 J7 which currently operates above capacity. Greater detail is required to understand the impact and mitigation... it is recognised that because the Duchy own the land there is the opportunity to address issues at J7, although this is not currently proposed as part of the scheme."*
- "The proposal appears to rely on the upgrades to [M2 J7], however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated..."*
- "While there is mention of the Preston Fields link [to M2 J6], which has the potential to mitigate some impact on the A2/A251 junction [and, presumably, reduce traffic using M2 J6], it has not yet been evaluated or agreed with the... developer."*
- 9.12.7 The IDP explains the latest situation, in respect of M2 J7, as follows:

"J7 (Brenley Corner), where the M2 and A2 meet, is a pinchpoint on the strategic transport route for traffic travelling onto Canterbury and Dover, particularly for HGVs travelling to the Dover port. The junction is currently operating at capacity level with the current configuration of the junction regularly creating peak hour congestion as traffic on the SRN mixes with traffic on the local road network leading to queuing on the approach roads. The capacity of the junction, therefore, is not only a constraint to development locally but also more widely across north and east Kent, particularly development in local authority areas along the M2/A2 corridor and also has wider strategic impacts on the economy of the south east.

There is currently no committed national improvement scheme to mitigate the above issues although KCC have proposals for minor improvements to the local roads approaching the junction. An improvement scheme to remove the congestion due to the gyratory, creating a continuous M2/A2 route and providing for a free flow of traffic is planned. The scheme has been included as a pipeline scheme in the national Road Investment Strategy 2 (RIS2) for development during 2020 - 2025, with potential delivery beyond 2025, although there is no commitment to the scheme ultimately being included in RIS3 for funding and taken through to construction. Highways England have indicated that until firm proposals for an improvement scheme come forward the RIS2 proposals cannot be relied on to mitigate the development planned for in the Local Plan and there will be a need to assess impacts and mitigation measures at a local level; this work is ongoing."

- 9.12.8 In respect of "wider strategic impacts", there is a need to note the Transport Strategy for the South East (2020), which does mention (albeit briefly) this junction as one of the "initiatives that will help address key international gateway and freight journey challenges", and it is also important to note that a "Freight, Logistics and Gateways Strategy" for the South East is due in Spring 2021.
- 9.12.9 Moving on to more **local level considerations**, a number of positive have been discussed above, including around ambitious proposals to support walking and cycling, and seemingly good (albeit uncertain) potential to support relatively fast and frequent bus services to key destinations. The following is considered to be a key statement from the Stantec Assessment of Stage 2 Submissions (2019):

"The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any 'calming' may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved..."
- 9.12.10 Table 9.1 summarises the junction and corridor improvements identified in the Infrastructure Delivery Schedule (IDS), which is Appendix 1 of the IDP, that are thought to be of relevance to the scheme.

Table 9.1: Infrastructure Delivery Scheme junction and corridor improvements of relevance to E/SE Faversham

Scheme	Cost	Funded?	Timing
M2 J7	Approx. £100M	No (identified in RIS2 as pipeline scheme but no commitment to scheme being funded)	Unknown
	<i>"Sites in Local Plan will need to 'wash their face' in terms of mitigation [of] impacts on J7. Subject to current modelling to determine what capacity there may be before mitigation required and nature of any interim scheme pending RIS3."</i> ⁶⁴		
A2/A251 junction	£1,680,000	Yes	2021 ⁶⁵

⁶⁴ The Swale Transport Strategy (2021) also discusses the potential for an interim scheme, explaining: *"Highways England are currently seeking developer contributions towards an improvements scheme in this location. At the time of writing Swale and KCC are awaiting RIS2/3 outcomes. In the meantime, we expect developers to design an interim scheme to deal with their potential impacts as there is a significant challenge to adhere to a necessary reduction on overall trip rates. As such a design to be used for the purpose of establishing a S106 contribution towards M2J7 strategic improvement and or bring forward interim scheme if not included in RIS3 (or earlier Government commitment)."*

⁶⁵ The IDP explains: *"The A2/A251 priority junction provides the primary access for Faversham and eastern Swale to the SRN. The junction caters for significant volumes of traffic and is currently operating over capacity in peak periods with serious levels of congestion and delay. This is a constraint to key strategic housing allocations in the Faversham area and to the economic wellbeing of the town. The proposed scheme replaces the existing priority junction arrangement with a new signalised junction, which will include a controlled pedestrian crossing across the A2 eastern arm."*

Scheme	Cost	Funded?	Timing
A2 Mitigation Strategy	£1-2M (“an estimate and depends on land values and availability”)	No; to be funded by S106	Anticipated ahead of development
A2 roundabout	Unknown	No, to be delivered by developer	
Graveney Rd roundabout			
Pedestrian and cycling routes linking to town centre and rail station	Unknown	No; to be funded by S106	
Extension of bus services	Unknown	No; to be funded by S106 + KCC + bus companies	

9.12.11 Also, it is noted that the Infrastructure Delivery Plan presented within the Transport Strategy (2021) discusses a possible cycle route “*through proposed development on the old goods yard at the end of Jubilee Way [which] could link the East of Faversham site with the railway station...*”

9.12.12 In summary, there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding M2 J7, a concern regarding the potential to achieve a link to M2 J6, a degree of uncertainty regarding the A2 Mitigation Strategy and a degree of uncertainty around whether opportunities to enhance bus connectivity are set to be realised. Concerns remain broadly as per those raised by Stantec in 2019, and it is unclear whether the evolution of the scheme since that time (specifically, addition of land to the east of Faversham) serves to increase or decrease concerns. As a final point, it is thought fair to conclude that the April 2020 re-run of the Swale Transport Model (discussed in Appendix I) served to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I); however, the forthcoming model re-run will provide a more accurate picture.

9.12.13 With regards to **other proposed growth locations** (the Teynham Opportunity Area, Rushenden South, Sittingbourne town centre, Neames Forstal), a detailed discussion is presented above, under ‘air quality’ and ‘climate change mitigation’. It is difficult to draw an overall conclusion as to whether growth in these locations is supported, from a transport perspective, with the next transport model run awaited, which will take account of detailed proposals for mitigation measures, e.g. junction upgrades.

9.12.14 In respect of **Rushenden South**, the key point to note is that the site benefits from good access onto the A249, and will not increase pressure on the problematic A2500 Lower Road; however, there is a need to consider pressure on M2 J5 (post upgrade).

9.12.15 In respect of **Teynham**, a fundamental consideration is distance from an M2 junction and therefore reliance on the A2, and a key question is whether growth here, in combination with strategic growth at Faversham, might support upgrades to the A2, potentially to include a new cycle route between Sittingbourne and Faversham. This is not listed in the IDP’s IDS; however, it is discussed within the Swale Transport Strategy (2021). Interventions discussed in the Transport Strategy, but not the IDP, are:

- Teynham-Sittingbourne Cycleway – “*Investigate the possibility of making cycling safer and more appealing, perhaps through a dedicated cycle lane on Lomas Road...*”. Costs are ‘TBC’.
- Sittingbourne to Faversham [Cycleway] – “*Develop an east-west cycle corridor parallel to the A2 linking Sittingbourne to Faversham using existing side roads.*”
- A2 AQ/flow capacity corridor improvements – “*a suite of measures to promote Public Transport between Sittingbourne and Faversham and improve the air quality of the A2 corridor.*”

9.12.16 Finally, there is a need to consider **Lamberhurst Farm**, which is proposed as an employment allocation, but in terms of which supporting text explains: “*The Council will work with Canterbury City Council, as the area straddles the borough boundary, during a future plan review to explore opportunities to deliver a new, sustainable settlement.*” There will be a need to carefully consider access to the expanded employment site, noting that access is via a fairly narrow lane that crosses an area of common land (Victory Wood); however, it is recognised that most people accessing the common land (from the car park) would not need to walk along or cross the lane.

- 9.12.17 With regards to the possible future option of a new settlement, this is a fairly isolated location, between Faversham and Whitstable, and not well linked to Canterbury; however, as discussed under ‘communities’, there is potentially an opportunity to deliver community infrastructure to the benefit of the existing small villages in the vicinity. The possibility of growth here, alongside growth at Faversham, leading to an improved bus service along the A299 corridor could be another possibility.

Commentary on other policies

- 9.12.18 Transport policies have already been discussed above, with the conclusion reached that a strong policy framework is proposed. However, there is also a need to scrutinise the specific proposals that are set out in the IDP/IDS and the Infrastructure Delivery Plan within the Transport Strategy. Having done so, some inconsistency between the two documents is evident (e.g. discussion of cycleways along the A2), and certain concerns do arise in respect of lack of detail and uncertainty over funding. Notably, the funding situation for all of the schemes discussed in the Transport Strategy are stated as ‘TBC’.

- 9.12.19 Site-specific policies:

- Policy MU1 (East of Faversham) – only one “key pedestrian and cycle connection” is shown on the concept map (it is also mentioned in the policy), which would serve only part of the site, and there is no indication of how this link connects to the train station and town centre. There is only brief mention of “bus priority measures” and “improved bus facilities”, with no discussion of priority routes, e.g. to Canterbury. The policy otherwise reflects a good degree of ambition, for example there is a requirement for measures *“including, but not limited to, the provision of a car club (for hybrid or EV cars) across the three sites, provide both a push bike and electric bike rental scheme/club, introduce bus priority measures on the sites.”* It will be important to maintain a watching-brief, in light of the forthcoming national Decarbonisation Plan and the Transport for the South East Future Mobility Strategy.
- Policy AO1 (Teynham Area of Opportunity) – the policy highlights the importance of alternatives to private car use, whilst the supporting text sets out an expectation that a “strategic cycle route” will be developed, connecting Sittingbourne to Faversham.
- Policy A4 (Land at Neames Forstal) – requires *“a safe pedestrian and cycle link to the primary school at Selling. This may be provided as an off road link as an upgrade to the existing public right of way or an alternative off road route unless it can be demonstrated that any links via Selling Road itself can be managed to ensure satisfactory levels of safety through appropriate traffic management measures.”*
- Policy Regen 3B (Rushenden South Area) – makes only a generic requirement: *“Assess the need for, and provide such transport initiatives and improvements as are necessary.”* The Transport Strategy (2021) does discuss some priorities for this part of the Borough, including linking Rushden to Queenborough and Queenborough to Sheerness.

- 9.12.20 Overall, a strong policy framework is proposed, as discussed above under air quality; however, there is scope to link more clearly to the measures discussed in the IDP and the Transport Strategy.

Appraisal on the plan as a whole

- 9.12.21 The spatial strategy performs well, from a perspective of seeking to minimise car trips and avoid increased car movements through problematic junctions and other traffic hotspots. This conclusion is supported by emerging transport modelling work, although there is a need for a further model ‘run’ to examine the latest proposed strategy, also taking account of expected mitigation measures. There is certainly support for a focus of growth at strategic growth locations, which can support investment in road infrastructure and sustainable transport measures, as well as a mix of uses in support of self-containment/trip internalisation. Furthermore, a very strong policy framework is proposed in support of modal shift away from reliance on the private car, although there is scope to add detail, with clear commitments to specific measures, for example the A2 cycle link between Sittingbourne and Faversham. On this basis, and recognising that the baseline (i.e. “no LPR”) scenario is not one whereby there would be no further growth in Swale, it is considered appropriate to predict the likelihood of **moderate positive effects**. However, there is some uncertainty, ahead of further work, for example in respect of the proposed A2 mitigation strategy.

9.13 Water

9.13.1 Sustainability objectives:

- Promote sustainable forms of development which minimise water consumption and wastewater flows.
- Maintain and enhance the quality of both surface and ground water resources where possible consistent with the aims of the Water Framework Directive.
- Promote efficient and sustainable use of natural resources.

Commentary on the spatial strategy

9.13.2 An important strategic consideration is waste-water treatment capacity. The Stantec Assessment of Stage 2 Submissions (2019) includes a section on utilities, which highlights limited concerns, concluding:

"There are no significant abnormal issues that have been identified that cannot be overcome. Although there is a capacity issue with Water Treatment works in the area, which applies equally to all proposals and has to be addressed as part of the water companies statutory duty."

9.13.3 There is some evidence to suggest that capacity at Faversham WwTW is a particular concern. In particular, the Kent Water Sustainable Growth Study (2017) noted that headroom capacity at Faversham WwTW would be exceeded by planned growth to 2031 (as set out in the adopted Local Plan), hence there would be a need for upgrades. However, as part of the assessment of the Southeast Faversham strategic site option, the Stantec Assessment of Stage 2 Submissions (2019) explains:

"The Sewage Treatment Works (STW) in Faversham is currently operating above its allowable discharge. However, there are solutions available to address the absence of capacity in the interim. The sewage discharge from the site can be temporarily pumped, for up to 2 years by the Water company, before the STW has been upgraded to sufficient capacity. We understand that this is an issue but can be managed. Further details of... costs, options and works duration [are being discussed]."

9.13.4 Equally, the IDP (2020) does not highlight any concerns, finding that:

"Southern Water have... advised that there is limited capacity at the Faversham WwTW and there will be a need to upgrade the WwTW to accept all the development proposed in the Regulation 19 Local Plan. Funding for the upgrade would be taken through the next AMP cycle covering 2025 - 2030... The timing of development may need to be phased inline with the delivery of the WwTW upgrade."⁶⁶

9.13.5 However, there is a need to apply caution, in the sense that there is a need to minimise any residual risk of capacity breaches (in respect of either treated or untreated effluent), with resultant water quality impacts.⁶⁷ In turn, there are arguments for directing growth to locations where there is existing capacity at the receiving Wastewater Treatment Works (WwTW), as opposed to relying on timely upgrades.

9.13.6 This point is made in the knowledge that Southern Water recently accepted 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events between 2010 and 2015, and it is understood that another investigation by the Environment Agency is under way that covers pollution incidents after 2015.⁶⁸

9.13.7 Attention focuses on Faversham WwTW; however, there is also understood to be a need to deliver upgrades at Queenborough WwTW. Another point to note is that whilst there is a WwTW at Teynham, Neames Forstal is somewhat distant from the nearest WwTW at Boughton, and local sewer network infrastructure can sometimes be a constraint to growth in rural areas.

⁶⁶ The IDP explains that "water companies work on a five year business planning cycle through which funding for new resource developments or improvements are secured. Proposals for the five year period are contained in the published five year Asset Management Plans (AMP). The AMP covers the building and modernising of water pipes to ensure a reliable supply, the reduction of the number of overflows from sewers and improvement of water and wastewater treatment works to deal with growing population and climate change. The current AMP period is 2020 - 2025."

⁶⁷ N.B. as discussed within the Swale LPR Habitats Regulations Assessment (HRA) report, there are relatively limited concerns around sewage effluent impacting the North Kent Estuaries European sites from treated sewage effluent. This is because these estuaries have a high sediment load, low water temperatures and high wave action. As such, smothering macroalgal growth, which has caused issues for European sites on the south coast, is not considered a threat to achievement of conservation objectives for these European sites.

⁶⁸ See kentonline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/

9.13.8 As for other ‘water’ considerations:

- Pollution to surface water in the vicinity of growth locations – whilst there may be variation in water quality across the Borough’s surface water bodies, it is inherently difficult to differentiate the merits of proposed growth locations, or conclude on the merits of the strategy overall, because there is very good potential to deal with water pollution arising from development schemes through Sustainable Drainage Systems (SuDS). Water pollution from breaches of capacity at WwTWs is considered to be a much more important strategic consideration for the LPR.
- Pollution to groundwater in the vicinity of growth locations – groundwater source protection zones are associated with the parts of the Borough associated with a chalk geology, with Sheppey, Bobbing, and most land at Faversham (bar land directly to the south) falling outside of a source protection zone. However, it is again the case that there is very good potential to suitably avoid/mitigate impacts through the development management process. Groundwater source protection zones can be a particular constraint for polluting developments (e.g. heavy industry, petrol stations).
- Water supply – the north west of the Borough, including the Isle of Sheppey, is within Southern Water’s Kent Medway WRZ (supplied from a mixture of groundwater and water from rivers), whilst the remainder of the Borough is located in the South East Water’s WRZ8, where drinking water is supplied by groundwater and imported water from Southern Water. Water scarcity is an issue that applies across the Borough and wider sub-region as a whole; however, neither water company has identified issues with the supply of water over the plan period.

Commentary on other policies

9.13.9 The following bullet points aim to present a brief commentary on other policies:

- Policy ST3 (Sustainable Development) – does not specifically reference the water environment, which is potentially an omission given the issues recently experienced in Kent and nationwide.
- Policy ST10 (Conserving and enhancing the natural environment) – briefly mentions pollution of the water environment, but might helpfully differentiate between different types, potentially to include different types of pollution issues associated with WwTWs.
- Policy DM3 (Mitigating and adapting to climate change through sustainable design and construction) – deals sets requirements for water efficiency through sustainable design and construction: “*All residential development will be designed to achieve a minimum water efficiency of at least 110 litres per person per day, in line with the Government’s Housing Optional Technical Standard for water efficiency, unless higher standards, as set out below, are required.*” The policy also sets out that development must achieve credits for water efficiency through the HQM (residential) and BREEAM (non-residential) certification schemes; however, there is no explanation of how the HQM/BREEAM requirements relate to the 110 litres per person per day requirement.
- Policy DM35 (Water Quality and Water Resources) – along with the supporting text, adds clarity around the relationship between the 110 litres per person per day requirement and the HQM/BREEAM requirements. The point on taking a catchment based approach is not intuitively clear, nor is the concept clearly explained in the supporting text. A catchment based approach might be defined as a holistic approach to managing the water environment, the wider natural environment and flood risk at catchment scales (e.g. see catchmentbasedapproach.org/), hence it is perhaps surprising that the sub-points in this policy refer to only two specific issues, including the very specific issue of piled foundations.

Finally, the requirement that certain planning applications must be accompanied by a Water Quality Assessment, to the satisfaction of the Environment Agency, is noted.

- Policy DM37 (Sustainable Drainage) – requires “*that post development run-off rates account for the latest climate change allowances as set by EA, for the lifetime of development, unless it can be demonstrated to the satisfaction of the Lead Local Flood Authority [LLFA] that site specific run off rates are more appropriate. Run-off rates will require a betterment value as agreed by the [LLFA].*”
- Policy DM27 (The separation of settlements - Important Local Countryside Gaps) – is identical to adopted Policy DM25, expect that several new designated gaps are proposed.

- Site-specific policies –
 - Policy MU1 (East of Faversham) – perhaps surprisingly does not require a Water Quality Assessment. The discussion of “sewerage infrastructure” might helpfully differentiate between A) the extent and capacity of sewers; and B) WwTW capacity.
 - Policy Regen 3B (Rushenden South Area) – does not reference the water environment (which is sensitive in the vicinity, given potential links to the SPA, although the LPR HRA Report screens out this impact pathway – see discussion under ‘Water quality’ in Section 4 of the report); nor WwTW capacity. The IDP (2021) does not identify the need for an upgrade to the Queenborough WwTW; however, the supporting text does explain that: *“The Kent Water for Sustainable Growth Study (2017)... showed... at Queenborough [WwTW] the available headroom capacity would be used by 2024, requiring Southern Water to apply for new discharge permits.”*

9.13.10 Overall, a strong policy framework is proposed, although it is recommended that key concepts (issues, opportunities, etc) are explained clearly across the suite of policies, to the benefit of planning applicants, stakeholders and interested members of the public.

Appraisal on the plan as a whole

9.13.11 There would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events; however, there is little evidence to suggest that the proposed strategy gives rise to any particular cause for concern, and there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth. It is also noted that a robust policy framework is proposed with the aim of improved water efficiency, including by requiring new homes to achieve prescribed standards of the Homes Quality Mark (HQM) and, as part of this, to gain HQM credits for water efficiency. On this basis it is possible to conclude the likelihood of **neutral effects** overall, although there is a degree of uncertainty. It will be for the Environment Agency and Southern Water to comment further.

9.14 Appraisal summary

9.14.1 This final section aims to present a summary of LPR appraisal set out above. Additionally, the opportunity is taken to present a commentary on select elements of the LPR in isolation, and also cumulative effects.

Summary of the LPR appraisal

- 9.14.2 The appraisal presented above finds that the LPR will lead to significant positive effects in respect of **communities objectives**. This is primarily on the basis of support for growth at east and southeast Faversham (3,250 homes (in the plan period) plus c.20 ha of employment) and Rushenden South (850 homes plus c.10 employment). There is also overall support for the LPR in terms of: **housing objectives**, given the proposal to provide for local housing need in full, although there is an degree of risk associated with the proposed supply; and **transport objectives**, once account is taken of the proposed focus at strategic locations and the clear policy focus on masterplanning with a focus on ‘sustainable transport’.
- 9.14.3 There is also a degree of support for the LPR in respect of **climate change mitigation, heritage, housing, landscape and water objectives**. For several of these topics, the proposed spatial strategy gives rise to concerns when viewed in isolation (see the appraisal of Growth Scenario 1 in Section 6), but concerns are reduced after having taken account of proposed development management policy.
- 9.14.4 However, the appraisal highlights significant concerns in respect of **flood risk** and **land** objectives, and more moderate or uncertain concerns in respect of **air quality, biodiversity** and **economy/employment** objectives. These conclusions reflect a precautionary approach, and it is recognised that further investigation, in respect of certain of these topics (not land), could well serve to allay concerns.
- 9.14.5 There will be the potential to make improvements to the plan through the forthcoming examination in public, if / where they relate to matters of soundness. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to explore the negative effects and uncertainties highlighted through the appraisal. As part of the examination in public there will also be the potential to explore some of the recommendations made in respect of policy requirements (both borough-wide and site-specific) within the appraisal presented above.

Commentary on individual proposed allocations

- 9.14.6 Whilst the primary focus of this appraisal is “the plan” (in-line with the legal requirement set out at Regulation 12(2) of the SEA regulations), it is recognised that individual proposed allocations generate a high degree of interest. Also, the Government’s Planning Practice Guidance suggests that individual site allocations subject to flood risk must be appraised in order to pass the ‘Exceptions Test’. As such, the following bullet points present concluding comments on each of the proposed allocations:
- Sittingbourne Town centre (area of search for 850 homes) – the proposal to support a shift in focus away from retail (to a degree) and towards residential, community, leisure and office uses is broadly supported, recognising national trends in respect of retail, and also transport decarbonisation objectives. It will be important to deliver car free or low car developments, given AQMAs and other highways constraints.
 - East / southeast of Faversham – there are strong arguments to suggest that this is the best option for strategic growth through the LPR (see appraisal of growth scenarios in Section 6, and discussion of work to establish growth scenarios in Section 5), including in-light of viability, community infrastructure and transport considerations, and the location is relatively unconstrained in many respects (notably not agricultural land quality), in the context of strategic growth options locally and, potentially, more widely. However, on the basis of the available evidence there remain significant question-marks at the current time, in respect of the potential to avoid impacts (e.g. traffic; waste water treatment capacity) and realise opportunities (transport, decarbonisation, economy, biodiversity), and there is an absence of work to explore scheme options, including site scale/extent options.
 - Rushenden south – is a constrained location in a number of respects, most notably flood risk; however, there is confidence in the ability to address issues / potential impacts through site-specific measures, although these will be associated with costs that could cumulatively impact on development viability. Assuming that the effect of the allocation is not to hinder delivery of long-awaited development within the existing Queenborough and Rushenden regeneration area, then the allocation is strongly supported from a perspective of wishing to deliver on regeneration and wider community objectives. It is also important to note that the allocation will deliver a very important component of the wider employment land strategy, in the context of stretching targets and few alternative options.
 - Teynham Opportunity Area – there are opportunities around achieving a critical mass of homes and jobs at Teynham, with growth leading to delivery of significant new infrastructure, notably a village bypass and upgrades to the A2 between Sittingbourne and Faversham (the plan document, the IDP and Transport Strategy discuss measures including a strategic cycleway). Teynham is also relatively unconstrained in some respects, although there are sensitivities, including air quality, historic environment / heritage and agricultural land quality. A key question is the extent to which - despite the rail station, potential improvements to bus and cycle connectivity and an improved local ‘offer’ - there will be a need to travel from Teynham by private car to higher order centres and to employment. This is a key question in light of the Borough’s net zero target and also air quality objectives, recognising that Teynham is distant from an M2 junction, such that car journeys must rely on the A2, and many journeys will pass through at least one AQMA. Air quality is set to improve significantly over the plan period; however, air quality is a priority issue at the current time, and issues will remain in the medium and potentially longer term. Finally, it is important to note that there are uncertainties at the current time, ahead of site allocations and further work to explore alignment options for the potential village bypass.
 - Neames Forstal (three linked sites) – there is logic to expanding the community here given the rail station and limited constraints in some respects, and it is understood that the key constraint – the Kent Downs AONB – can be addressed through masterplanning, landscaping and design. A key consideration is the potential to deliver a suitably high quality walking and cycling link to Selling (c. 1.5km to the west), where there is a primary school and other village services/facilities not available at Neames Forstal.
 - Former Garden Hotel, Boughton – the appraisal highlights few issues or impacts, noting that there is a history of unimplemented planning permissions.

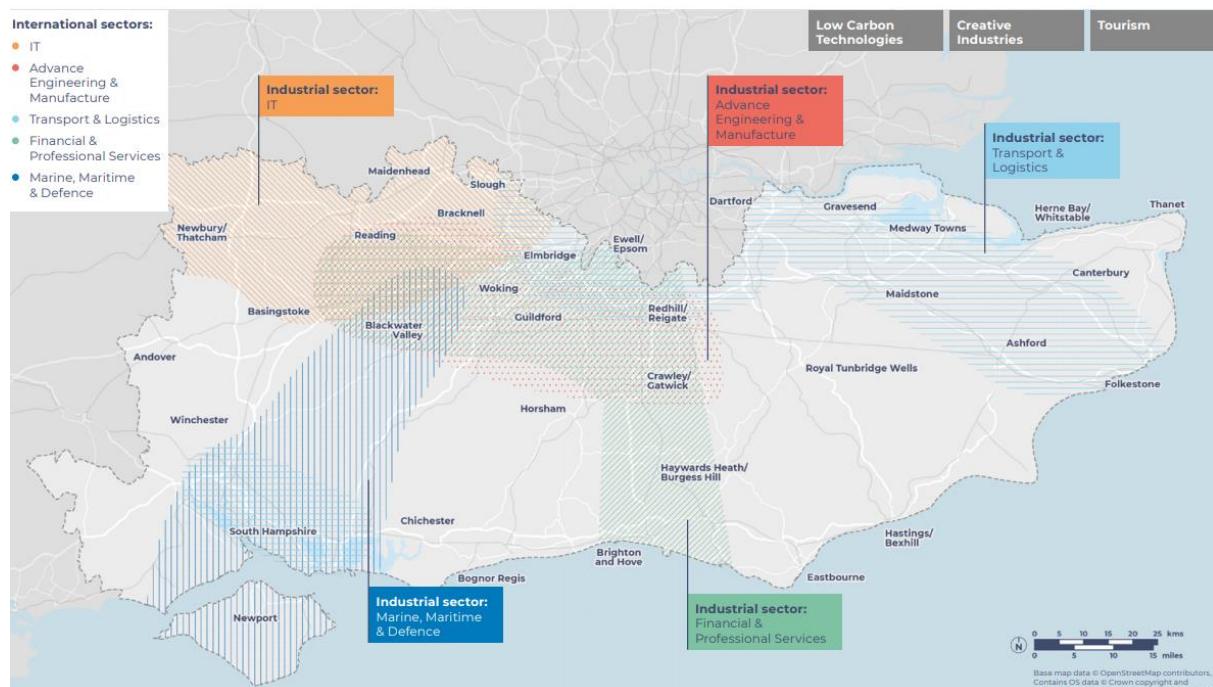
Commentary on cumulative effects -

- 9.14.7 Cumulative effects are those effects that become apparent once the LPR implementation is considered alongside implementation of other plans, programmes, strategies, projects etc. Giving consideration to cumulative effects is a way to ensure that the appraisal ‘casts the net wide’, both spatially and temporally.
- 9.14.8 The following bullet points draw-out and elaborate upon cumulative effects discussed in the appraisal:

- Air quality – increased traffic on the A2 corridor is an issue for existing air pollution hotspots not only in Swale but also in the neighbouring authorities of Medway and Canterbury.
- Biodiversity – a key consideration is the need to collaborate with Canterbury District Council in respect of planning for the Blean Woodlands and the Graveney Marshes / Sea Salter levels. Delivering coordinated managed realignment schemes within the Swale and Medway Estuaries is another important larger-than-local consideration, discussed above as part of the appraisal.
- Climate change mitigation – there is a need to work closely with Kent County Council and other stakeholders in respect of supporting strategic transport infrastructure upgrades (e.g. in support of fast and frequent bus services), as well as potentially a carbon offsetting scheme. The Thames Estuary is also potentially a wider scale at which climate change mitigation objectives are of relevance to the LPR.
- Communities – a key consideration is secondary school provision in the east of the Borough, where catchments extend into Canterbury District. Strategic health infrastructure can also be another consideration, but no particular opportunities are known to exist.
- Economy and employment – this is a key larger-than-local consideration for the LPR, as new employment land in Swale has the potential to support not only the local economy but the wider regional economy, particularly given Swale's links to ports and to London (see Figure 9.3). The forthcoming Transport for the South East "Freight, Logistics and Gateways Strategy" may highlight issues and opportunities of relevance to the LPR. There is also a need to consider Swale's role within the Thames Estuary sub-region, mindful of the Thames Estuary 2050 report (2018) and other ongoing work.
- Housing – as discussed in Part 1 of this report, Swale Borough has not been asked to provide for unmet needs arising from any neighbouring authority; however, there remains a degree of residual risk.
- Landscape – as per under biodiversity, a key consideration is thought to be in respect of collaborating with Canterbury District Council (and others) in respect of landscapes to the east of the Borough. There is also a need to work closely with the AONB board, particularly regarding growth at Neames Forstal.
- Transport – there is a need to work with Kent County Council and others to plan for the key road and rail corridors with a long-term perspective.

9.14.9 Overall, the LPR has clearly been prepared mindful of 'larger-than-local' considerations and with a long term perspective, for example the Council has been open to exploring the merits of higher growth options, as set out in Part 1 of this report. However, there is a need for on-going dialogue with neighbouring authorities, the County Council and other organisations with a strategic perspective. There will be a need to take careful account of consultation responses – see discussion of next steps, below.

Figure 9.3: Priority sectors in the South East, according to Transport for the South East (2020)⁶⁹



⁶⁹ The South East Transport Strategy (2020), see transportforthesoutheast.org.uk/our-work/transport-strategy/

Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 This SA Report is published for consultation alongside the proposed submission (or ‘pre-submission’) version of the LPR, under Regulation 19 of the Local Planning Regulations.
- 10.1.2 Following the consultation, the main issues raised will be identified and summarised, and a decision made regarding whether the plan is ‘sound’. Assuming that the LPR is considered to be sound, it will then be submitted to Government, alongside the summary of issues raised through consultation and other supporting documentation, including this SA Report.
- 10.1.3 An examination in public will then be held, overseen by one or more appointed Planning Inspectors. The Inspector(s) will consider whether the plan is legally compliant and sound, in light of the available evidence, including representations received at the Regulations 19 stage, this SA Report and (in all likelihood) evidence gathered through hearings.
- 10.1.4 The Inspector(s) will then either report back on the Plan’s soundness or identify the need for modifications. If there is a need for modifications these will be prepared and then subjected to consultation, alongside SA if necessary.
- 10.1.5 Once found to be ‘sound’ the LPR will be adopted by the Council. At the time of adoption a ‘Statement’ must be published that explains the ‘story’ of plan-making / SA process and sets out ‘the measures decided concerning monitoring’.

11 Monitoring

- 11.1.1 The SA Report must present ‘measures envisaged concerning monitoring’, albeit mindful that decisions on monitoring must be taken by Swale Borough Council (the last Authority Monitoring Report was published in 2017).
- 11.1.2 In light of the appraisal presented in Section 9, monitoring efforts could potentially focus on:
 - Emerging proposals at all LPR growth locations, ahead of planning applications, with a view to ensuring that proposals reflect strategic priorities, including in respect of:
 - the declared climate emergency and the urgent need to decarbonise ahead of the 2030 net zero target;
 - the declared local ecological emergency and the aims of the Environment Bill, including in respect of taking a strategic approach to nature recovery and net gain.
 - Air quality at key locations likely to see increased traffic due to LPR growth – again, monitoring in the short term could serve to inform forthcoming planning applications at LPR growth locations;
 - Borough-wide greenhouse gas emissions – the proposed monitoring framework set out in Appendix 1 of the LPR proposes to monitor per capita greenhouse gas emissions, which is appropriate; however, there is a need to reconcile with the Borough-wide 2030 net zero target, which deals with total emissions;
 - Low and zero carbon energy infrastructure – the proposed monitoring framework set out in Appendix 1 of the LPR proposes to monitor the number of “sustainable energy schemes permitted”; however, a more ambitious approach (albeit potentially unrealistic) could be to, for example, monitor the number of homes delivered with a heat pump and the number of homes connected to a heat network.
 - Employment land requirements – given that the Employment Land Review is now over two years old, and the regional and national economic context and baseline situation will have evolved since that time;
 - Flood risk – the Council might report annually on the number of homes in flood risk zones;
 - Housing – there is a need to closely monitor affordable housing delivery, including tenure split;
 - Water – ongoing consideration should be given to any risk of hydraulic capacity breaches or risks to the status of receiving water courses;
 - Agricultural land – it would be relatively straightforward to monitor loss of agricultural land by grade; also, it could be relatively straightforward to monitor loss of land used for fruit growing.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

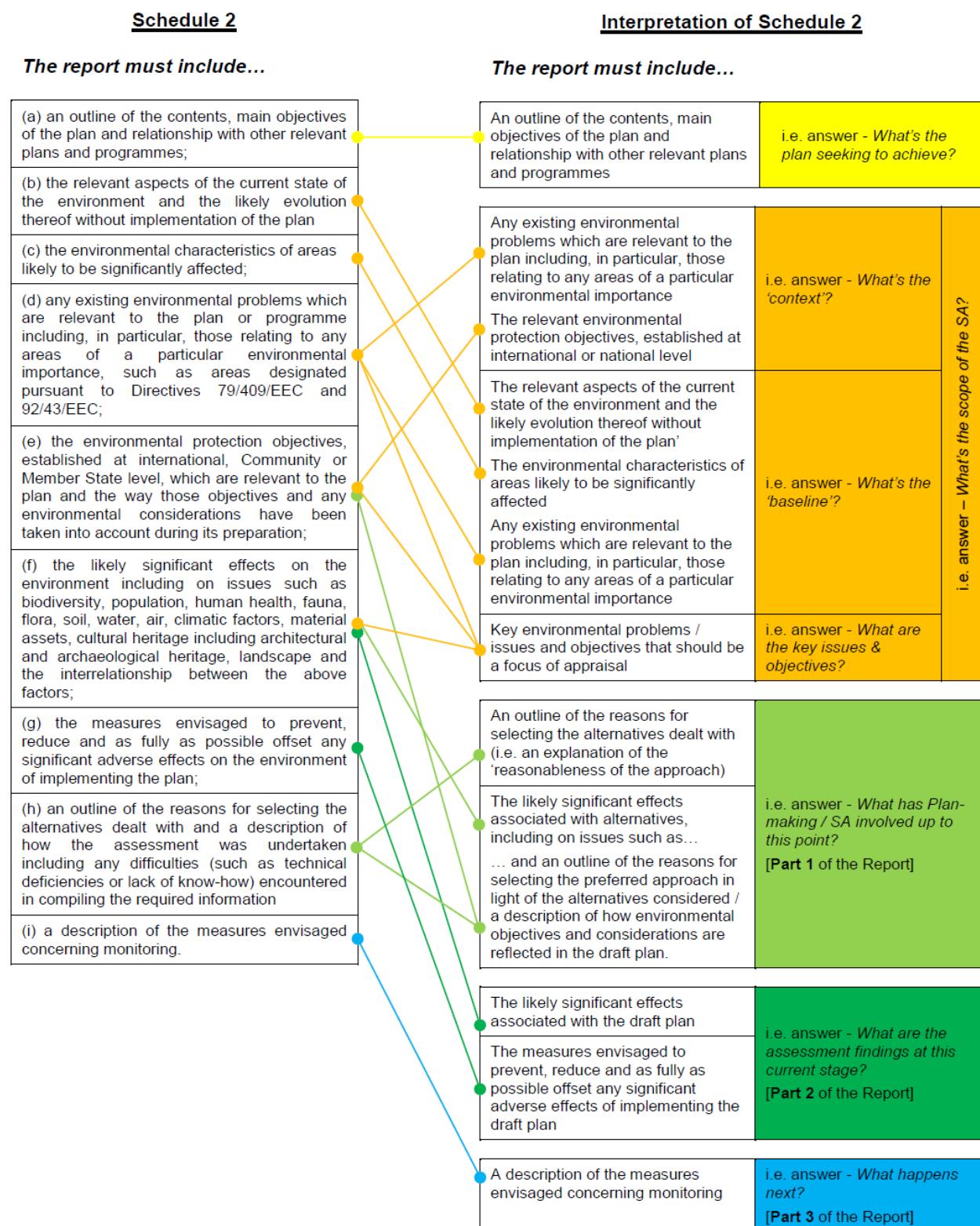
Table B: Questions answered by this SA Report, in-line with regulatory requirements

Table C presents a discussion of more precisely how the information within this report reflects the SA Report requirements.

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the LPR website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented – in an updated form - within Section 3 ('What's the scope of the SA').
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains why the preferred option is justified in-light of alternatives ('growth scenarios')
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation), whilst Section 9 presents an appraisal of the LPR as a whole. All appraisal work has naturally involved giving consideration to the SA scope, and the need to consider the potential for various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The appraisal has served to highlight a wide range of issues and impacts that could be addressed as part of plan finalisation, with a view to improving the performance of the plan in respect of sustainability objectives. The appraisal highlights many areas where policy could potentially be strengthened.

Regulatory requirement	Information presented in this report
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on certain issues / options.</p> <p>Also, Section 7 explains the Council's 'reasons for selecting the preferred option'.</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Section 11 presents measures envisaged concerning monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>
<p>The SA Report must be published alongside the draft plan, in-line with the following regulations</p>	
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>This SA Report is published alongside the pre-submission LPR in order to inform the consultation and subsequent plan finalisation.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>This SA Report will be taken into account when finalising the LPR, as part of the examination in public.</p>

Appendix II: Review of evidence

Introduction

The aim of this appendix is to present a review of key evidence gathered through evidence-base studies prepared in order to inform the Local Plan Review. In particular, there is a focus on evidence with implications for spatial strategy. This section is structured under a list of thematic topics reflective of evidence work undertaken. Evidence gathered through the Looking Ahead consultation (2018) is also discussed, as appropriate.

Air quality

An Air Quality Modelling Report was presented to the Local Plan Panel on 8th October 2020. The study modelled 'air quality dispersion' for two Local Plan scenarios, essentially a lower growth and higher growth scenario, where the latter scenario would involve a quantum of homes broadly in line with local housing needs (LHN).

With regards to methodology, the study

- Focuses on impacts at 'sensitive locations', defined as "*locations outside buildings or other natural or man-made structures above or below ground where members of the public are regularly present and might reasonably be expected to be exposed over the relevant averaging period of the objectives.*"
- Draws upon the Swale Highway Model (SHM), which developed by Sweco for 2017 (base year), 2027 and 2037 reference case (forecast years) to test the traffic impacts of both new developments and transport infrastructure across Swale.
- Has clear limitations, including in respect of the sites assumed to deliver the two growth scenarios. The conclusion of the study also explains: "*Overall, the model performed well but overall, the model could be improved by model adjustment...*"

Key conclusions include:

- Air quality is improving, with the 2027 reference case scenario – which assumes no new growth through the LPR – showing that, by 2027, there will be no locations where there are exceedances of the NO₂ annual mean air quality objective.
- However, at the current time air quality remains a concern at several locations – see Table A.
- The higher growth Local Plan scenario would lead to a worsening of air quality at 116 of the 155 sensitive receptors (compared to 90 under the lower growth scenario), including all ten of the locations where air quality is of greatest concern (see Table A).

However, the impact is small (below 1% at 63 of the 116 sensitive receptors that see a worsening). The highest worsening (4.7%) would be along the A2 at Teynham; however, air quality in this location (18.4 micrograms per cubic metre) would be well within the 'air quality standard' (40 micrograms per cubic metre).

Table A: Summary of locations where air quality is of greatest concern

Known air pollution hotspots	Designated AQMA?	Includes a top ten problematic sensitive receptor, as identified by the AQ Modelling Report?	
		2019	2037 Local Plan scenario
East Street, Sittingbourne (A2)	Yes	Yes (49)	Yes (27)
Ospringe Street, Faversham (A2)	Yes	Yes (42)	Yes (26)
Ashford Road, Faversham (A251)	No	Yes (37)	Yes (21)
Water Lane, Ospringe	No	Yes (36)	Yes (19)
Canterbury Road, Sittingbourne (A2)	No	Yes (35)	Yes (20)
St Paul's Street, Sittingbourne (B2006)	Yes	Yes (34)	Yes (20)
Newington (A2)	Yes	Yes (33)	No
Teynham (A2)	Yes	Yes (33)	Yes (19)

A second key study is the A2 Clean Air Zone Feasibility Study (2020), which was reported to the Swale Borough Council Cabinet on 16th December 2020.⁷⁰

Key messages for spatial strategy

Whilst air pollution is decreasing at an increasing rate, and all areas in the Borough will likely meet the nationally defined ‘air quality standard’ for nitrogen dioxide at the end of the plan period under any reasonably foreseeable scenario, there remain air pollution hotspots that should be addressed. In addition to the five AQMAs (four along the A2; one along the B2006 at Sittingbourne), the Air Quality Modelling Report identifies hotspots at other locations, notably including the A251 south of Faversham. The two stand-out problematic locations in the Borough appear to be the A2 in Sittingbourne (east of the town centre) and the A2 at Ospringe. The B2006 AQMA at Sittingbourne is also of note, as this is a route taken by HGV travelling to/from the Eurolink industrial estate, on route to/from the M2.

Biodiversity

A Biodiversity Baseline Study was presented to the Local Plan Panel on 8th October 2020. The study aims to inform preparation of a Local Nature Recovery Strategy (LNRS), which will soon be a requirement following enactment of the Environment Bill. Under the Environment Bill the intention is that LNRSs should, in turn, be used to inform delivery of Biodiversity Net Gain (BNG) and the national Nature Recovery Network (NRN). The report recommends that:

“In anticipation of the Environment Bill, SBC should develop a LNRS to guide the formulation of its Local Plan, particularly for the allocation housing sites, specific policy for delivering BNG, and general policy on biodiversity...”

A central finding of the study is that the LNRS “should cover three Nature Recovery Priority Areas centred on the Swale Estuary, the North Downs and Blean, with an additional Borough-wide strategy for Traditional Orchard Priority Habitat.”

The implication is:

- Site options intersecting or associated with a Priority Area must be closely scrutinised; however, such sites can be suitable for development where there is confidence that site will *“include provisions to avoid negative impacts on habitat networks and [deliver on] opportunities for creating and enhancing habitat through onsite BNG and Green Blue Infrastructure in order to meet LNRS targets.”* It is fair to say that this is quite a stringent test, which will lead to implications for development density and lead to costs, which could potentially lead to viability implications and, in turn, delivery challenges.⁷¹
- Where there BNG cannot be achieved onsite, and hence there is a need for offsite habitat enhancement, or creation, in order to deliver BNG, these offsite measures should be targeted so as to deliver LNRS objectives for the Priority Areas. Importantly, the study recommends that the Borough Council prepares *“a register of potential BNG sites, analysis of likely demand for offsite BNG and identification of where BNG can be used to meet other policy targets relating to climate change and green and blue infrastructure.”*

The spatial framework of Priority Areas is important; however, these areas affect a small proportion of SHLAA sites, and an even smaller proportion of those SHLAA sites that are genuinely in contention for allocation. When considering the merits of site options not associated with a Priority Area there is a need to avoid impacts to habitats and habitat networks, in particular those identified by the study as higher priority (particularly on the basis of higher ‘distinctiveness’). Targeted growth away from priority/distinctive habitats and habitat networks will lead to greater potential to achieve BNG onsite and, in turn, less need for offsite measures to achieve BNG. This represents a suitability precautionary approach at the current time, recognising that a LNRS has not yet been prepared, nor has work been undertaken to identify a register of BNG sites.

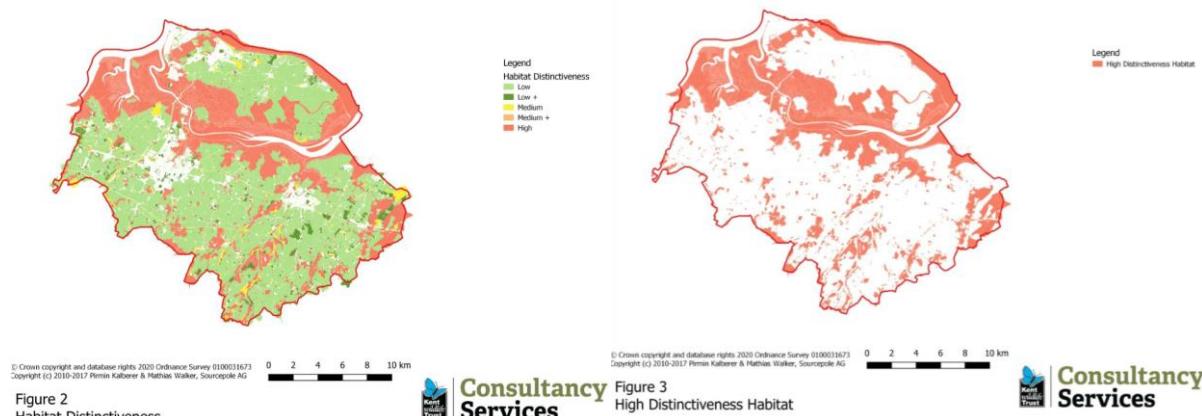
Figure A shows all habitats classified according to distinctiveness. It is difficult to generalise about potential growth locations that potentially give rise to a cause for concern in light of these figures; however, it is considered appropriate to highlight:

⁷⁰ See services.swale.gov.uk/meetings/ielissueDetails.aspx?Id=10051&Opt=3

⁷¹ The study discusses a good practice example of taking a proactive approach to development within a Priority Area, explaining: “KWT are currently undertaking work at the site “Land East of Iwade” [a Bearing Fruits allocation], which represents a good example of how, with carefully considered master planning to maximise opportunities, a development on the edge of an identified Nature Recovery Priority Area can provide substantial benefits for biodiversity.”

- Land to the north of both Sittingbourne and Faversham – constrained by the Swale Priority Area (PA); however, in practice these areas are constrained in several respects (including flood risk) such that there is limited or no growth potential;
- West Sheppey ‘Triangle’ – as above;
- Boughton - is constrained by the Blean Woodlands PA to the east;
- North downs – the PA stretches north to constrain land to the SE of Sittingbourne and S/SW of Faversham.
- Sittingbourne area – outside of the Swale PA (which contains land to the north) and North Downs PA (which constrains land to the southeast) there is a notable density of distinctive habitat patches (including but not limited to Traditional Orchard habitat, which is a priority) that may function as one or more ecology networks, such that intervening land may have a degree of sensitivity even where the onsite habitat is itself low distinctiveness. However, it is noted that limited land in this area is locally designated as a Local Wildlife Site.

Figure A: Habitats classified according to distinctiveness



Key messages for spatial strategy

Ahead of preparing a Local Nature Recovery Strategy (LNRS) and, as part of this, establishing a register of Biodiversity Net Gain (BNG) sites, there is a need to take a precautionary approach to spatial strategy and site selection. This should involve avoiding impacts to priority/distinctive habitats and ecological networks, such that there will be greater potential to achieve BNG onsite when the BNG metric is applied at the planning application stage and, in turn, there will be less call for offsite habitat enhancement and creation as a means of delivering BNG. Many of the more constrained parts of the Borough are not in realistic contention for growth; however, it is considered appropriate to highlight the following areas of sensitivity that could potentially be impacted: north of Sittingbourne and Faversham (the Swale Priority Area (PA)); West Sheppey ‘Triangle’ (the Swale PA); Boughton (the Blean Woodlands PA); southeast of Sittingbourne (North Downs PA); south / southwest of Faversham (North Downs PA); and the broad area around Sittingbourne (outside of the Swale PA and the North Downs PA there is a notable density of distinctive habitat patches, including Traditional Orchard habitat, which is a priority).

Climate emergency

Swale Borough Council declared a Climate and Ecological Emergency on 26 June 2019, with the aim of the Borough achieving net zero emissions by 2030.⁷² A Climate and Ecological Emergency Action Plan was then published in April 2020, and a Kent and Medway Energy and Low Emissions Strategy was published in June 2020.

The Action Plan (2020) includes a table of ten priority actions, with one identified as being a matter for planning. This relates to setting policy for achieving building emissions standards over-and-above the requirements of Building Regulations, with a 75% improvement required from 2025 and a 100% improvement (i.e. net zero regulated emissions) required from 2028. This is a matter for spatial strategy and site selection primarily in so far as it is a matter for development viability (discussed below), and in so far as there is a need to realise opportunities to deliver heat networks (discussed below).⁷³

⁷² See swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/cee-update

⁷³ Also, it is important to note that the Government consulted on a Future Homes Standard in October 2019 which, if implemented, would see a rapid ratcheting-up of the CO₂ emissions standards required through Building Regulations alongside a change to the Planning Practice Guidance removing the ability of Local Plans to require standards over-and-above Building Regulations.

It is also important to note that two ‘transport’ priority actions are identified, which are clearly of relevance to the LPR, namely: 1) Install EV charging points across the Borough; and 2) Improve facilities and incentives for walking and cycling. With regards to (1), this is a matter for spatial strategy and site selection primarily in so far as it is a matter for development viability (discussed below). With regards to 2) this is clearly a matter of paramount importance for spatial strategy and site selection.

Moving on to the Kent and Medway Energy and Low Emissions Strategy (2020), the Strategy:

- Draws heavily on the Energy South 2 East Local Energy Strategy (2020) – see Figure B; and then
- Identifies ten priorities.

A good proportion of the priorities are of relevance to the LPR spatial strategy – see Table B.

Finally, Figure C presents existing large scale renewable heat/power generation installations in the Borough (N.B. the recently consented 350 MW Cleeve Hill Solar Park scheme is not shown). Swale is something of a ‘hotspot’ for wind and solar farms; however, there are limited implications for spatial strategy / site selection (recalling that wind and solar farms feed into the national grid, rather than powering local communities).

Finally, it can be seen that Sittinbourne (Kemsley Paper Mill) is home to Kent’s largest CHP scheme, which is fuelled by both waste and gas. Latest understanding is that there is a very limited role for gas CHP moving forward (at least for heating homes), because decarbonisation of the national grid now favours electric heating solutions.

Figure B: Overview of the Energy South 2 East Local Energy Strategy (2020)

FIVE PRIORITY THEMES	PROJECT MODELS
 LOW CARBON HEATING	#1 District Heat Networks rollout #2 Off-gas grid homes #3 Hydrogen injection into the Natural Gas grid #16 New-build homes on hydrogen grid
 ENERGY SAVING AND EFFICIENCY	#2 Off-gas grid homes #9 Energy Efficiency in homes #10 SME Support Programme
 RENEWABLE GENERATION	#4 Offshore wind development #5 Solar and microgrid on landfill sites #6 Biomass fuel supply chain development #7 Solar energy for Network Rail #8 Car parks - solar potential #17 Biofuel evolution
 SMART ENERGY SYSTEM	#5 Solar and microgrid on landfill sites #11 Housing and community microgrids #12 EV charging & hydrogen-fuelling infrastructure #15 Setup of ESCO / MUSCO infrastructure #18 Support developments in CO2 capture
 TRANSPORT REVOLUTION	#12 EV charging & hydrogen-fuelling infrastructure #13 CNG fleet fuelling #14 Ports - modernisation of energy infrastructures

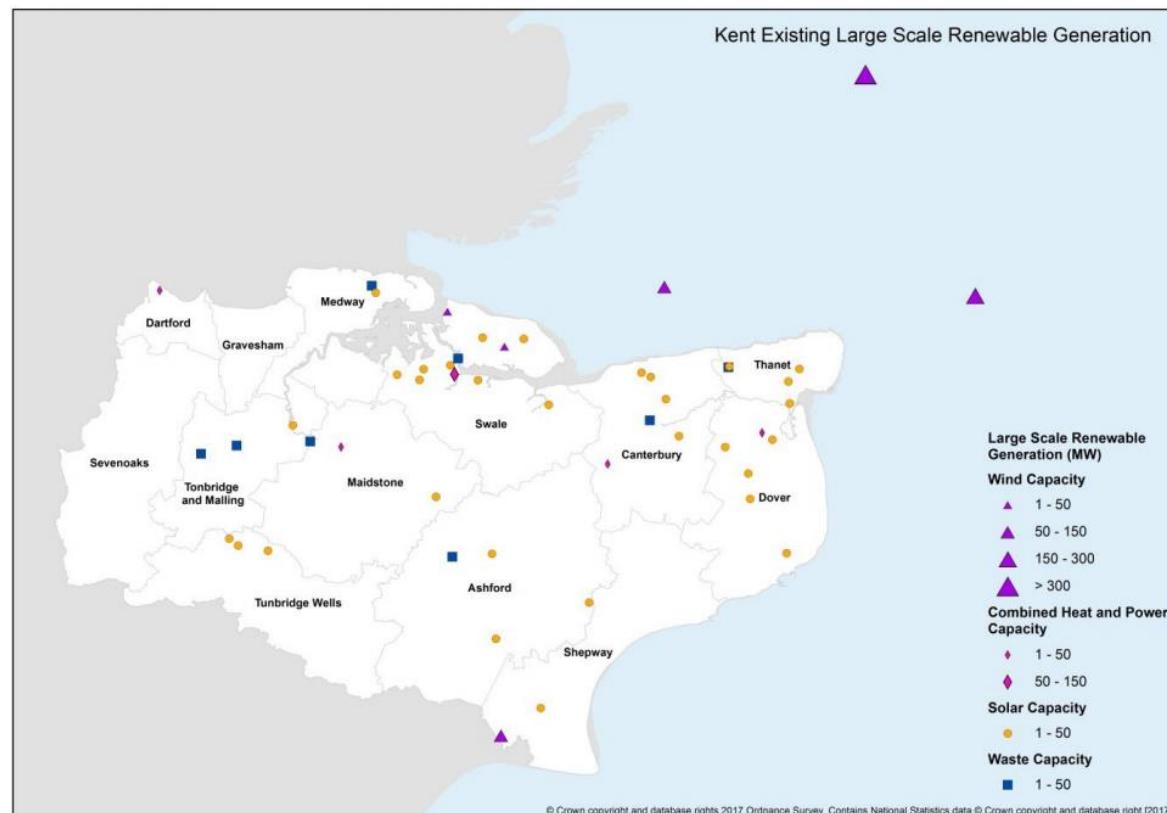
Table B: Links between K+M Energy and Low Emissions Strategy priorities and the LPR spatial strategy

Kent and Medway priority	Links to Energy S 2 E themes?	Relevance to LPR spatial strategy and site selection?
Set an emission reduction pathway to 2050 (inc. 5 year carbon budgets), so that decision makers understand where action and resources should be targeted.	All	Yes. Whilst there is no short term carbon budget for Swale, or agreed decarbonisation trajectory, there is undoubtedly an urgent need to decarbonise in the short term if the Borough is to remain on course to achieve net zero by 2030 (twenty years ahead of the national and county-wide target). Opportunities missed in the short-term will result in the need for a steeper decarbonisation trajectory later in the 2020s, which might become unachievable.

Kent and Medway priority	Links to Energy S 2 E themes?	Relevance to LPR spatial strategy and site selection?
Public sector decision-making	All	<p>Limited. The Borough Council is well placed to deliver and facilitate delivery of low carbon interventions, potentially leading to spatial opportunities to be realised through the LPR spatial strategy. The regeneration of Sittingbourne town centre potentially represents a decarbonisation opportunity of note, e.g. a higher growth strategy could potentially be supportive of delivering a heat network.</p>
Ensure integration into Local Plans and planning ; develop a clean growth strategic planning policy and guidance framework.	All	<p>Yes. The Kent and Medway framework is yet to be developed; however, in the interim, the Energy South 2 East list of priority themes and project models provides a good framework for LPR spatial strategy and site selection. In particular:</p> <ul style="list-style-type: none"> • Heat networks – require a strategic approach to concentrating growth in proximity to heat sources and heat demand loads; • Off-gas grid homes – only small scale schemes delivering in the short term are likely to seek gas connection. • Hydrogen – is a focus of the Ten Point Plan for a Green Industrial Revolution (2020), with demonstrator communities sought. • Energy efficiency – this has implications for spatial strategy in so far as it has implications for viability, which varies spatially. • Renewable energy – beyond supporting heat networks and renewable energy (heat pumps and solar PV) at the development scale, the LPR could identify sites or areas suitable for large scale renewables (solar farms); however, there are limited implications for spatial strategy / site selection. Solar car parks are another consideration of strategic importance. • Smart energy systems – in order to reduce the pressure on the national grid that will result from renewables, EVs and the electrification of heating there is a need for localised whole system approaches linking renewable heat/power, battery storage, EV charging and demand management. The Energy Superhub Oxford initiative represents current best practice. • Transport revolution – of great relevance to LPR spatial strategy.
Establish a trusted Kent and Medway carbon offset scheme and renewable energy investment fund	Heating; Renewable generation; smart energy systems	<p>Limited. In the absence of an investment fund the LPR spatial strategy must seek to realise opportunities as far as possible. The absence of a trusted carbon offset fund also serves to highlight the importance of seeking to minimise reliance on offsetting.</p>
Building retrofit programme	No (outside scope)	<p>Limited. Retrofitting existing buildings for energy efficiency and electric heating solutions is of crucial importance to achieving net zero; however, there is little or no role for LPR spatial strategy.</p>

Kent and Medway priority	Links to Energy S 2 E themes?	Relevance to LPR spatial strategy and site selection?
Set up a smart connectivity and mobility modal shift programme.	Transport revolution	Yes. Beyond minimising need to travel and maximising accessibility to destinations by 'sustainable transport' modes, there is a need to support strategic growth locations supportive of smart connectivity and 'future of mobility' objectives.
Set up an opportunities and investment programme for renewable electricity and heat energy generation.	Heating; Renewable generation; smart energy systems	Yes. As discussed, heat networks require strategic planning, and the same can be said for realising local 'whole system' approaches that will be crucial in order to minimise pressure on the national grid.
Green infrastructure	No	Yes. Discussed below.
Support low carbon business	Energy savings and efficiency	Limited. The LPR must provide new employment space suited to local needs, including the needs of low carbon businesses. The LPR should also support low carbon infrastructure, for which there is expected to be a great demand nationally for skilled labour (e.g. builders, engineers, fitters, assessors).
Communications	No	Yes. The LPR could support flagship net zero schemes supportive of the borough-wide net zero aspiration. The Local Plan must also effectively communicate key concepts and issues/opportunities/options.

Figure C: Existing large scale renewable heat/power generation in Kent⁷⁴



⁷⁴ Renewable Energy for Kent: Baseline carbon emissions and projected domestic electricity and gas demands (AECOM, 2017)

Key messages for spatial strategy

The Local Plan spatial strategy must proactively seek to minimise per capita emissions from both transport and the built environment, given the ambitious target of achieving net zero emissions at the Borough-scale by 2030. There is no target decarbonisation trajectory / carbon budget in place; however, it seems clear that opportunities missed early in the 2020s could lead to a required decarbonisation trajectory later in the decade that is unachievable. The LPR will have an effect on only a very small proportion of the Borough's emissions in 2030; however, there are important opportunities to be realised. Strategic planning for decarbonisation is a fast moving policy area;⁷⁵ however, at the current time, the five priority themes of a recent strategy document prepared by the three Local Enterprise Partnerships (LEPs) that cover the southeast of England present a useful framework for testing the LPR. In summary, these are: heating; efficiency; power; systems; and transport.⁷⁶ The Kent and Medway Energy and Low Emissions Strategy (2020) also provides an important framework, although it equally serves to highlight that the LPR is progressing in advance of work to establish county-wide strategies, programmes, investment frameworks etc (also a carbon offsetting fund) that will feed into Local Plans in years to come. Within this context, the LPR spatial strategy must distribute growth with a view to minimising per capita transport and built environment emissions, and, as part of this, consideration should be given to concentrations of growth / growth at scale, which can lead to particular opportunities, as explored through a recent study for the TCPA as part of their series on Garden City Standards.⁷⁷

Economy and employment

Firstly, by way of background, the adopted Local Plan summarises the strategic employment locations as follows:

- Town centres - with Sittingbourne town centre a particular focus of growth and change (Policy Regen 1);
- Sittingbourne - Ridham, Kemsley and Eurolink associated with the Milton Creek area to the north of the town and linking to the M2 primarily via the A249, including via the recently delivered Sittingbourne Northern Relief Road (although HGV traffic through Sittingbourne and along the A2 remains an issue); and Kent Science Park in a rural location to the south of the town, linking to M2 J5 via minor roads (the focus of Policy Regen 4 of the adopted Local Plan).
- Isle of Sheppey - Neatscourt located on the A249 to the east of Queenborough and forms part of the Queenborough and Rushenden regeneration area (Policy Regen 2); and Port of Sheerness, a "major" port and the focus of Policy Regen 3 of the adopted Local Plan.
- Faversham - the main industrial area is at the north west extent of the town, with the brewery complex toward the centre of the town another employment hub, and several other smaller existing and committed hubs around the edge of the town.

An immediate point to note is the limited potential to further expand the Borough's largest employment hubs to the north of Sittingbourne and Faversham, because of flood risk and environmental constraints. This potentially suggests a need to consider new locations well linked to the strategic road network.

Issues and opportunities were explored through the Swale Employment Land Review (ELR, 2018), with findings including:⁷⁸

- Port of Sheerness - the Port has added space to its portfolio in recent years and there is unmet demand for new port related uses. However, the port land is outside of normal planning controls, and it is difficult to estimate how much land outside the port may be needed. In summary the future of this part of the economy is dependent on continued close working between the port operator and the Council.

There is also a need to consider recent changes to the national context, e.g. support for ports through the National Infrastructure Strategy (2020; including a Port Infrastructure Fund) and the Freeports consultation and prospectus (2020).⁷⁹

⁷⁵ The Ten Point Plan for a Green Industrial Revolution explains that the Government will soon publish strategies and plans including the following: Net Zero Strategy; Heat and Buildings Strategy; Energy White Paper; Transport Decarbonisation Plan; Hydrogen Strategy.

⁷⁶ See southeastlep.com/our-strategy/energy-south2east

⁷⁷ See tcpa.org.uk/guidance-for-delivering-new-garden-cities

⁷⁸ See services.swale.gov.uk/assets/planning%20policy%202019/employmentlandreview.pdf

⁷⁹ See gov.uk/government/publications/freeports-bidding-prospectus

- Kent Science Park at Sittingbourne – is a highly constrained site and unable to grow. There are active proposals being promoted by the owners to address these constraints, including a new junction of the M2 and new local access, supported by major housing growth. It is important to consider these aspirations; however, an expanded Science Park would face “fierce” competition from elsewhere (new ‘non-Science Park’ uses would be deliverable). The ELR also finds: “*The scale of new jobs being promoted in this one area (>10,000) ... may require a shift in commuting to fill all jobs envisaged.*”
- Existing employment land - existing sites generally remain attractive for ongoing employment use. For industrial property, whilst the vacancy rate is so low there is no rationale to proactively release property. For office demand vacancy rates are higher, but not so high to suggest that there is an oversupply of property which needs to be addressed by proactively releasing sites from the stock.
- Warehousing and distribution – the study concludes that “*if Swale is able and willing to identify new sites for this market, it is quite likely to attract demand*”, and it is important to note that demand may have increased since 2018. However, there are concerns, including in respect of low employee densities.
- Targets for new land –
 - Strategic industrial land – the ELR recommends 40 ha of new land mostly on sites capable for accommodating large unit demand (i.e. warehousing) with a focus on the west of the Borough. However, should sites not be available then the evidence suggests circa 20 ha is needed to meet local needs (i.e. excluding strategic warehousing), given the existing pipeline of committed supply.
Also, the figure decreases if a lower “5-year ‘margin’” is assumed, meaning an assumption that future losses of industrial land will not follow past trends. There is a strong argument for assuming a lower 5-year margin, because past trends (see Table 5.2 of the ELR) are skewed by an abnormally large loss in 2011 (Sittingbourne Paper Mill). Furthermore, the ELR is clear that if the margin does need to be provided for, then it “does not necessarily need to be provided today because the logic of the margin is that it may only be needed towards the end of the plan period”.
 - Offices and light industrial uses - up to 15 ha of new land focused to the east of the Borough in or around Faversham. There is scope for Faversham to compete with Canterbury by providing a quality supply, including flexible edge of town ‘courtyard’ type developments as per the two recent schemes (the Foundry and Eurocentre). There may also be some small scale warehouse demand to cater for last mile delivery to service the growing population in Faversham and possibly Canterbury.
- Roads infrastructure – the ELR concludes: “*For Sittingbourne; as part of our consultations, we have repeatedly been told that the western side of the Borough is a good location for growth partly because it is a cost efficient location to buy and develop land. But, also because firms can still access markets outside of Swale. A robust transport network has been vital to securing a new generation of warehouses in Swale. But this transport network is reaching capacity with access onto the M2 acting as strategic ‘pinch point’ at Sittingbourne. Improvements are planned at Junction 5 which may relieve the junction and benefit both Sittingbourne sites and also those on the Isle. However, this will not automatically address the local network and the lack of any ‘orbital’ route around the town that avoids the town centre. Consultees noted that Eurolink is a market attractive site but is effectively a ‘cul de sac’.... In the longer term a new M2 junction and southern link road may be part of the solution. This will certainly open up the Science Park which cannot be expanded without major investment in the local network. But we also note that should this be developed then it opens a large amount of market attractive land for commercial development which is highly likely to attract additional logistics demand. Faversham does not, as yet, suffer the same transport and connectivity problems. It is also the case that commercial development here tends to be smaller scale, meeting local needs, and less dependent on the strategic network. However, there are concerns that the network here will struggle to absorb demand for housing and commercial growth without some improvements to the local junctions – with accessibility to Canterbury being important given we think that Faversham could attract more demand for commercial property from Canterbury should additional land be allocated in the town.*

Following on from the point made above regarding attracting demand from Canterbury, another point made by the ELR is that Swale has traditionally been seen as a more affordable location for businesses to locate relative to neighbouring Medway and Maidstone. In this respect it is also important to note that Maidstone BC has shown an interest in the economic ambitions of Swale BC,⁸⁰ in the sense that the option of unmet needs from Maidstone BC being provided for in Swale BC might be explored. However, the latest situation is that the draft Maidstone Local Plan (2020) proposes to provide for employment needs in full, including through a “prestigious business park at

⁸⁰ See paragraph 2.67 at:
services.swale.gov.uk/meetings/documents/s11009/FINAL%20Looking%20Ahead%20consultation%20results%20Covering%20Item%20DP%20amends.pdf

Junction 8 of the M20". As for Medway Council, a statement of common ground is in place setting out that Swale BC is not being asked to provide for unmet needs; however, it is recognised that there is background pressure, with the possibility of unmet needs emanating from London and West Kent.

Further important recent context comes from the **Kent & Medway Economic Partnership's Economic Renewal and Resilience Plan** (2020).⁸¹ The Plan focuses on responding proactively to the Covid-19 Pandemic over the period to 2020, concluding a need to focus on renewal and resilience. In this respect, the following are key statistics on unemployment, taken from the LPR document: "*Unemployment levels in Swale in October 2020 were 6.6%, above the South East average of 5.2% and Kent's 6%. For comparison, as these figures will be affected by Covid-19, Swale's unemployment in February 2020 was 3.6% compared to 2.9% in Kent and 2.1% in the South East.*"

The Kent & Medway Economic Partnership is also supportive of the **South East Local Enterprise Partnership's Economic Strategy Statement** (2019). The Statement includes a focus on the Thames Gateway, explaining: "*Parts of the South East also have particularly strong links to London's future growth. In particular, a shared strategy for the Thames Gateway has been advanced for many years, most recently within the recent report of the Thames Estuary 2050 Growth Commission and with the development of more recent initiatives such as the Thames Estuary Production Corridor.*" The Statement goes on to explain that there is a need to: "*Work with partners to develop a new economic narrative for the Thames Estuary*". There is a focus on decarbonisation, and also the future of mobility "*with implications for... the way in which we plan towns, cities and transport systems.*" There is also a notable focus on 'creating places', including so as to put settlements "*on the 'front foot' in responding to new technology and changing work patterns*", and there is also a focus on delivering "*quality of life and quality of place*", including: Develop the 'economic narrative' both for our Garden Communities and other major settlements; Maximise investment in those assets that deliver long term quality of place and distinctiveness; Create places that will be successful for the long term, valuing the 'natural capital' and environmental quality that we enjoy in the South East, embedding it in place making and making the best use of technology to ensure that our communities are smart, resilient and sustainable.

Further recent context also comes from the **Transport Strategy for the South East** (2020), which helpfully sets out the tonnage of imports from ports across the region – see Figure D.

Figure D: Ports across the South East, including Sheerness (Medway Ports)⁸²



⁸¹ kmepe.org.uk/documents/Renewal_and_Resilience_Plan - August 2020.pdf

⁸² The South East Transport Strategy (2020), see transportforthesoutheast.org.uk/our-work/transport-strategy/

Key messages for spatial strategy

A primary objective for the LPR spatial strategy is to allocate new land for employment. As a minimum there is a need to provide for around 15 ha of new land to the east of the Borough, including around Faversham, for offices and light industrial uses. However, there is also a need to consider allocation of a significant amount of land in the west of the Borough to respond to the ‘larger-than-local’ need for warehousing in locations well linked to ports and London. It is difficult to conclude on the basis of the evidence available that there is an objective need for the LPR to allocate land for warehousing; nevertheless, there is a need to consider whether there are available and suitable sites. Finally, beyond allocating land for employment, there is a need to consider wider aims and objectives, including as set out within the Kent & Medway Economic Renewal and Resilience Plan (2020), which is focused on responding to the Covid-19 pandemic over the period to 2022; and also the South East Local Enterprise Partnership’s Economic Strategy Statement (2019).

Flood risk

A Level 1 Strategic Flood Risk Assessment (SFRA) was presented to the Local Plan Panel on 29th November 2019, and then a report on applying the ‘sequential test’ on 11th June 2020.

A key output of the SFRA is a map of flood zones (Figure E), which immediately serves to highlight areas unsuitable for new housing (flood zone 3b) and areas where housing could only be judged to be a suitable land use following the Exceptions Test having been passed, i.e. after it having been demonstrated that the benefits of housing in that location outweigh the flood risk disbenefit (following a detailed, site specific examination of flood risk). These zones cover much of Sheppey and most of the land to the north of Sittingbourne, Teynham and Faversham.

Also, the study identifies “surface water functional flood zones” associated with around seven dry valleys emanating from the Kent Downs, which the study treats as the equivalent to flood risk zone 3.

The study also identifies a small number of areas as falling within flood risk zone 2, where housing is a suitable use so long as it can be demonstrated that the sequential test has been passed, i.e. it can be demonstrated that there are not alternative locations at lower flood risk where development would achieve the same objectives.

Finally, another key map output of the study shows the extent of land at risk of a 1 in 200 year tidal flooding event in 2070 under a climate change scenario, with the area at risk broadly corresponding to the area currently understood to fall within flood risk zone 3.

In light of the SFRA, a key aim for the spatial strategy is to direct growth away from flood risk zones as far as possible, mindful of risks and uncertainties associated with climate change. As part of this, there is a need to take a precautionary yet proportionate approach to taking into account site specific proposals / likely approaches to developing sites, both with respect to avoiding and mitigating flood risk and delivering benefits that might serve to outweigh residual flood risk, mindful that the NPPF (paragraph 163) sees an important role for site specific flood risk assessments in support of planning applications.

Finally, the LPR should take a proactive approach to addressing flood risk that goes beyond simply directing growth away from flood risk zones. Paragraphs 155 to 161 of the NPPF, which deal with flood risk and Local Plans, notably raise:

- *Cumulative impacts in, or affecting, local areas susceptible to flooding* – although it is inherently challenging, in practice, to suggest that any given development, let alone developments in-combination, will lead to increased downstream flood risk, given the potential to design developments so as to store water and slow surface water.
- *Safeguarding land from development that is required, or likely to be required, for current or future flood management* – such land will typically be in flood zone 3b, where there is limited potential for development, but can potentially be in flood zone 3a, where there is some potential for development, hence there can be merit in safeguarding through the Local Plan.

A related consideration is the need to fund such flood management interventions and, in particular, new Flood Storage Areas (FSAs) in the flood plain, which can be a spatial strategy / site selection consideration, in that strategic growth in proximity may be able to fund interventions of this nature, in particular where the effect is to create a new area of open / green space that is of recreational value. However, it is not clear that opportunities present themselves in the Swale context (in particular, it is not clear that FSAs could be an appropriate response to the surface water functional flood zones shown in Figure F).

Managed coastal retreat / coastal realignment essentially equates to creation of an FSA, and there are opportunities in Swale Borough; however, there are limited implications for the LPR, as potential locations will invariably be some way distant from locations under consideration for growth. A further consideration is the possibility of growth supporting investment in coastal defences; however, it is not clear that there are opportunities for the LPR.

Key messages for spatial strategy

Extensive flood risk affects the Borough's coastline and that part of the Borough associated with the Swale, and there are also around seven dry valleys emanating from the Kent Downs associated with surface water functional flood zones. There is a need to avoid flood risk as far as possible, taking account of the risks and uncertainties associated with climate change, albeit mindful that steps can be taken to avoid and mitigate flood risk at the site level. There is also a need to recall that development in areas at risk of flooding can be appropriate in exceptional circumstances, which is an important consideration on the Isle of Sheppey, where there can be a need to balance flood risk and regeneration objectives. Finally, there is a need to be mindful of proactive approaches to addressing flood risk through Local Plans, for example supporting investment in new flood storage areas; however, it is not clear that any opportunities present themselves that might serve to have a bearing on the LPR.

Figure E: Watercourses in Swale (from the Green and Blue Infrastructure Study, 2020)

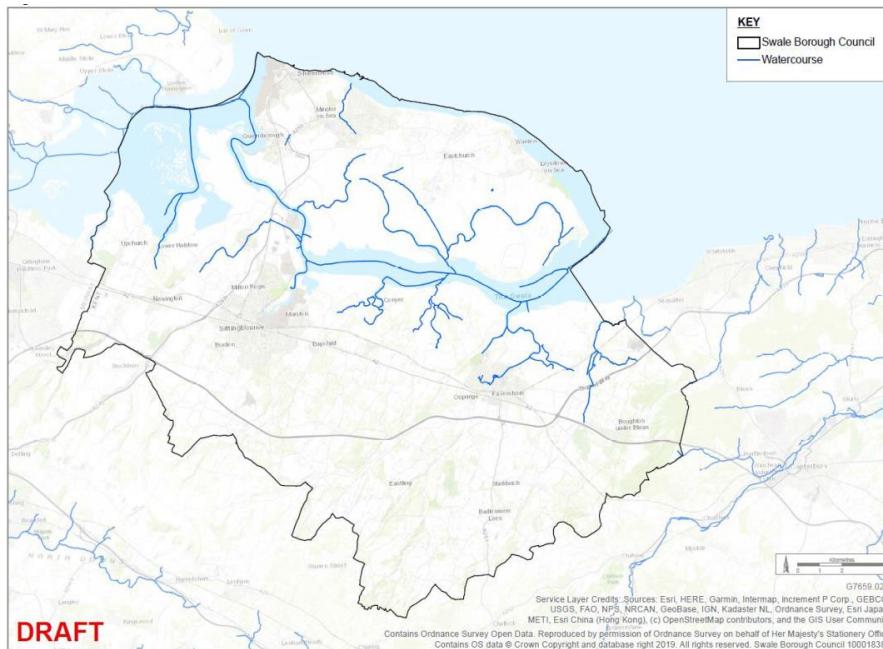
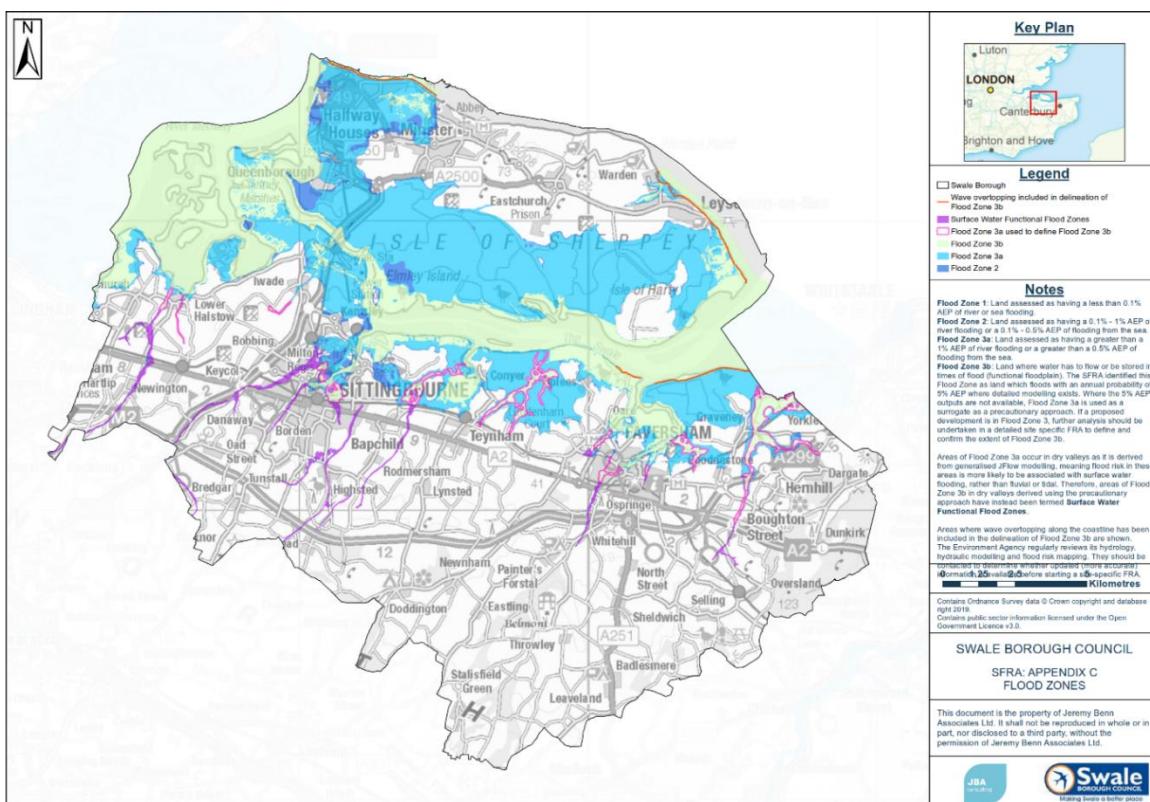


Figure F: Map of flood zones

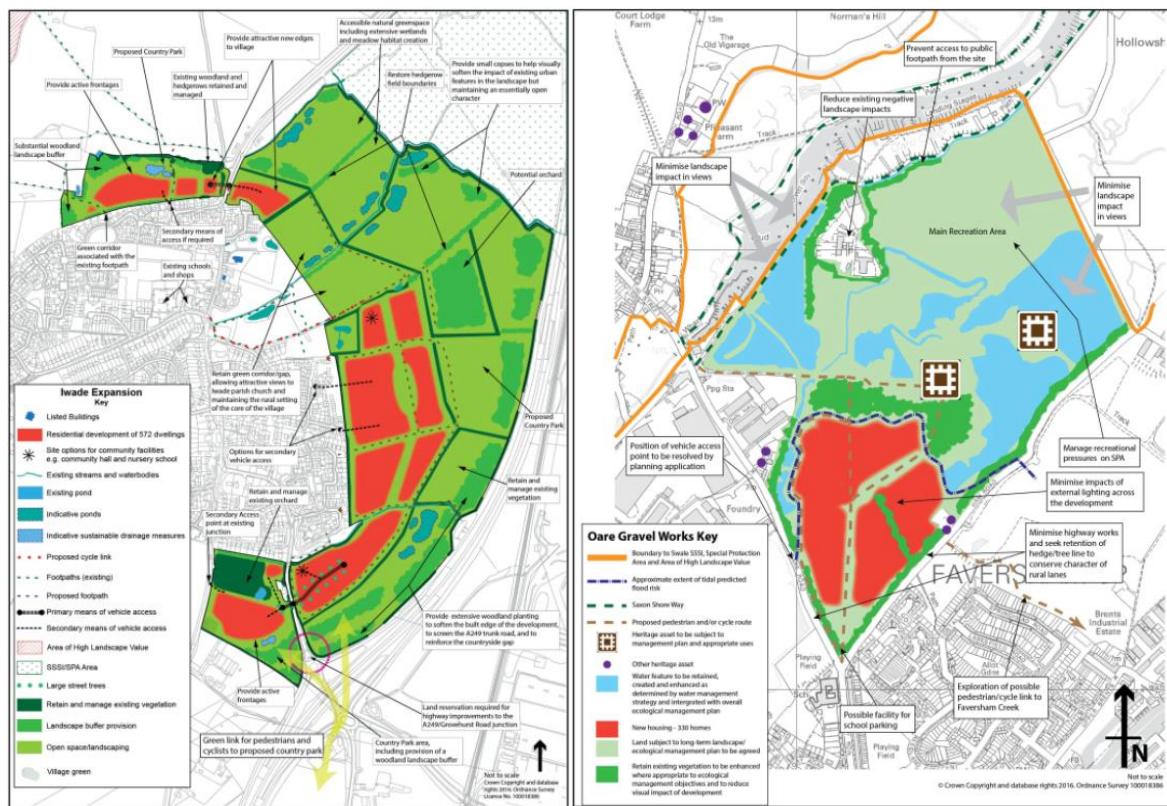


Green and blue infrastructure

A Green and Blue Infrastructure Study was presented to the Local Plan Panel on 20th September 2020. Many of the assets and initiatives discussed are of limited relevance for the LPR because they relate to the coastal zone, the AONB or the Blean Woodlands, i.e. locations that will not be a focus of growth through the LPR. Other matters discussed are considerations for masterplanning and urban design (and, in turn, development management policy) more so than spatial strategy and site selection; however, the Study does also serve to highlight a range of relevant issues and opportunities.

By way of context, it is also important to examine what was achieved through the adopted Local Plan (2017). A range of strategic green infrastructure has been delivered, or is being delivered, as a result of the Local Plan spatial strategy. Most notable is the extensive area of new country park and other accessible natural greenspace that is being delivered as a result of the strategic expansion of Iwade, and which will link to existing strategic green infrastructure (including Milton Creek Country Park) to the north of Sittingbourne – see Figure G. Also of particular note is the Oare Gravel Works allocation, to the north of Faversham, where a central aim of the allocation is “conservation, enhancement, and long term management of the site’s ecological and heritage assets”. In both cases the land that is a focus of green infrastructure enhancement could never have alternatively been developed, given the extent of constraints (including flood risk and SPA); however, it is nonetheless the case that funds raised through development will serve to deliver major green infrastructure benefits over-and-above a baseline situation whereby the land would be subject to less management and be less accessible to the public.

Figure G: Two key allocations in the adopted Local Plan delivering new strategic green and blue infrastructure

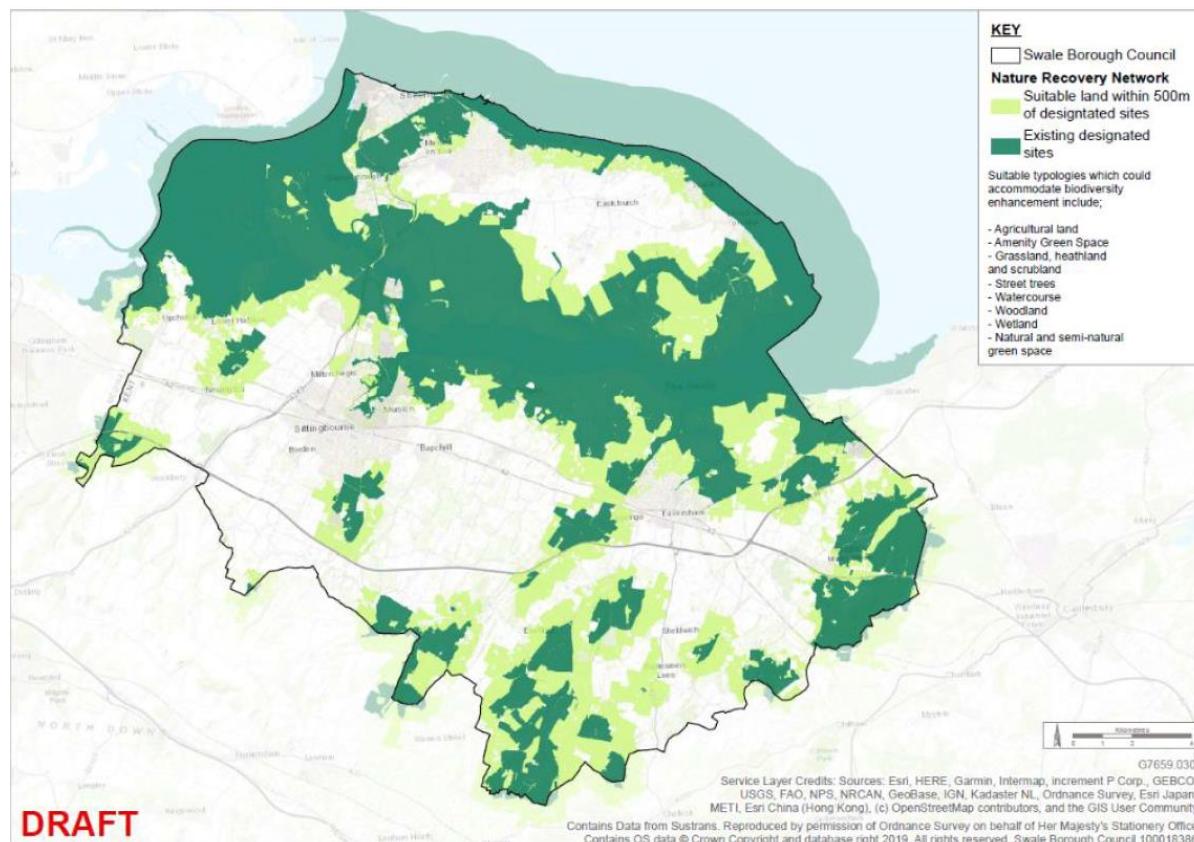


Potential opportunities to be realised through LPR spatial strategy and site selection include:

- New strategic green grid routes – the Swale BC Green Grid Study (2016) identified the potential for four new routes linking Newington, Sittingbourne (2) and Teynham to the AONB to the south, via villages with pubs and places of interest.
- Sheppey – stands out on the basis that A) there are extensive areas where communities experience high levels of multiple deprivation; and B) whilst there is extensive green and blue infrastructure, much of it has low multifunctionality.
- Blue infrastructure – Boughton stands out as a settlement associated with a watercourse (as opposed to a dry valley), namely the White Drain, which the Study identifies as being associated with a significant enhancement opportunity.

- Links to biodiversity and flood risk objectives – as discussed above. For example, the Study identifies a possible Nature Recovery Network for Swale – see Figure H.

Figure H: Existing international, national and locally designated sites plus adjacent land



Key messages for spatial strategy

There is a need to realise opportunities for growth to deliver or facilitate delivery of strategic green and blue infrastructure. Inspiration can be taken from the achievements of the adopted Local Plan; however, opportunities might be harder to come by for LPR, in that there will be a need to look beyond enhancing land subject to flood risk and SPA constraint, recognising limited further growth opportunity to the north of Sittingbourne and Faversham. The Isle of Sheppey could well warrant being a focus of efforts to deliver enhanced strategic green and blue infrastructure, given a prevalence of communities that experience relatively high levels of multiple deprivation, and given limited existing green and blue infrastructure offering high multifunctionality. Creation of new walking / cycling / green links between the A2 settlements and the AONB is another strategic opportunity potentially to be explored.

Heritage

A Heritage Strategy and Action Plan as presented to the Local Plan Panel on 3rd September 2020.

- Aviation & defence – with a particular focus on Shepway given the strategic importance of Sheerness Docks and the role of Eastchurch in the early history of aviation.
- Industrial heritage – including brickmaking (northern mainland part of the Borough); gunpowder manufacturing (Faversham); brewing (Faversham); and paper making (Sittingbourne).
- Maritime and transport heritage – including barge traffic and boatbuilding (widespread, but most notably Milton Regis); Cinque Port (Faversham); bridges and ferries (Sheppey); roads and pilgrims (Watling Street; the A2); Victorian and Edwardian Railway expansion (Sittingbourne and Faversham);
- Agricultural, horticultural and rural heritage – most famously fruit and hop growing and picking; but also marshland farming and mixed farming and woodland management in the Kent Downs AONB.
- Towns and high streets – for example, Sheerness developed around the Royal Naval Dockyard and in part as a Victorian and Edwardian seaside resort; and Queenborough was a planned medieval town following the building of a castle.

- Villages and hamlets – “*A good example of a village and series of smaller hamlets with heritage interest can be found within the parish of Borden (immediately southwest of Sittingbourne).*”
- Churches, chapels and memorials – including scheduled monuments and many grade 1 listed parish churches, often prominent within the landscape.
- Historic landscapes – including, but not limited to, the grounds of four grand houses (Lees Court, Belmont House, Doddington Place and Mount Ephraim) now on the national Register of Parks and Gardens.
- Archaeology – “*Swale has an incredibly rich and varied archaeological resource. This richness is a legacy of its strategic location at the mouth of the Thames and Medway rivers, it lying astride the principle conduit of people and trade between the continent and London, together with its varied geography including coast, marshland and chalk downs which have been exploited by peoples since ancient times.*”

Key messages for spatial strategy

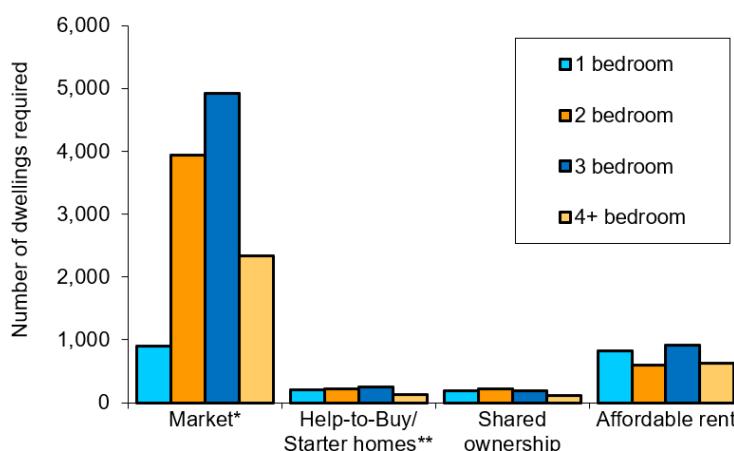
There is the potential for spatial strategy and site selection to support the conservation and enhancement of both historic assets and historic landscapes. As set out in the Heritage Strategy, there is the potential to support “*positive management of the borough’s heritage, and capitalizing on the physical and economic regeneration this can bring.*”

Housing

Two studies were presented to the Local Plan Panel on 9th July 2020, one dealing with Local Housing Needs (LHN), with limited implications for spatial strategy, and the other presenting a Housing Market Assessment. The Housing Market Assessment reaches conclusions on the following matters with implications for spatial strategy and site selection:

- Tenure split – around 28% of new housing delivered will need to be affordable, that is available for below market rates to those able to demonstrate that they cannot meet their needs in the market. This has implications for spatial strategy in so far as it has implications for viability, which varies spatially. It is challenging to deliver 28% affordable housing on Sheppey in particular (indeed, the Policy DM8 of the adopted Local Plan requires 0% affordable housing on Sheppey).
- House-size split – there is a clear need for family sized homes more so than flats – see Figure I. This has implications for site selection and density assumptions.
- Specialist accommodation – including for disabled and older people. Strategic sites can have the benefit of delivering specialist accommodation alongside typical market and affordable housing.

Figure I: Requirement for all new housing in Swale over the plan period



There is also a need for new Gypsy and Traveller pitches, drawing on the Swale Gypsy and Traveller Accommodation Assessment (GTAA, 2018). The GTAA concluded (for the period 2017 to 2038): “... a cultural need for 76 pitches and a PPTS need for 59 pitches (after considering the households who met the definitions of travelling set out in the PPTS). The Local Plan should acknowledge this level of need. However, taking into account turnover on local authority sites and the potential expansion/intensification of existing sites... the cultural need could be reduced to 14 pitches and PPTS need addressed (however this would be dependent on a turnover of 8 pitches on Council sites... and an additional 54 pitches becoming available on existing authorised sites).” The GTAA also identified the need for one new Travelling Showperson plot.

Key messages for spatial strategy

In addition to meeting the overall housing target, there is also a need to deliver an appropriate mix of housing, in respect of both tenure (affordable housing) and size (family housing); and there is also a need for specialist accommodation including to meet the needs set out within the Gypsy and Traveller Accommodation Assessment (GTAA, 2018). These considerations can serve to suggest a need to focus housing in locations where development viability is highest, and potentially favour strategic sites.

Infrastructure

An Infrastructure Delivery Plan Scoping Study was presented to the Local Plan Panel on 11th June 2020. As an initial point, it is important to make the distinction between:

- current infrastructure issues and opportunities that could be exacerbated or addressed as a result of the LPR; and
- the infrastructure needs / issues that will be generated as a result of the LPR.

This point is borne out from the following statement made as part of the report by officers to members reporting on the findings of the Looking Ahead consultation explains:¹³ “[T]he reality will be that the vast majority of future infrastructure provision will be developer led. The degree to which this will be a continuance of an infrastructure bolt-on approach or a more settlement wide approach will be a matter dependent upon the next Local Plan settlement strategy.”

The June 2020 report to members explains:

“The initial stage of preparation is also looking at an overview of current infrastructure quality and capacity to identify any infrastructure issues which could be barriers to growth. This is drawing from the responses to the 2018 ‘Looking Ahead’ consultation, the outcomes of a workshop held with infrastructure providers in June 2018 (see Section 5) and completed and emerging Local Plan evidence base reports, such as the ongoing traffic modelling work. The ‘Looking Ahead’ consultation and infrastructure workshop identified the following key infrastructure issues as matters to be addressed: M2 Junction 7; M2 Junction 5/A249; Sittingbourne Northern Relief Road; A2 and A249 corridors; Education provision, particularly the provision of secondary school places; Primary healthcare provision; Rail station improvements.”

Taking each of these matters in turn:

- M2 Junction 5/A249 - the National Road Investment Strategy (RIS 2, 2020) committed to commencing an upgrade, and this work is due to complete by 2024/26.⁸³ The extent of headroom capacity for growth beyond that which is committed is unclear, and topography constrains and further upgrade.

There is a need to note the proposal for a new Junction 5a to the south of Sittingbourne to serve an expanded Sittingbourne Science Park and significant housing growth, which is another one of the strategic site options discussion in Section 6.

For completeness, there is also a need to note Junction 6 (A251). This is a more minor junction which operates satisfactorily. New strategic site options nearby (south of Faversham) are a consideration for this Local Plan (see Section 6), which might need to deliver non-strategic upgrades, likely in the form of signalisation.

- M2 Junction 7 (A2 / A229, known as Brenley Corner) - RIS 2 identifies upgrades as a ‘pipeline’ scheme for the future. There is also an ambition for ‘interim’ upgrades, as discussed in the adopted Local Plan; however, the timetable is uncertain. This is a national accident hotspot.⁸⁴
- Sittingbourne Northern Relief Road - the adopted Local Plan safeguards land within which route options might be explored to deliver the final section of the NRR, which would link the Sittingbourne industrial and commercial areas, including the Eurolink estate, to the A2 in the vicinity of Bapchild. The value of this final section in combination with a new road linking to a new M2 junction to the southeast of Sittingbourne is clear, in that it would relieve pressure on Sittingbourne town centre (the A2) and the B2006 (another air pollution hotspot), and this is an option for the Local Plan (discussed below); however, the value of the final NRR section on its own is less clear, with no plans to bring forward the scheme.

⁸³ See highwaysengland.co.uk/our-work/south-east/m2-junction-5-improvements/

⁸⁴ See assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/600312/Kent_Corridors_to_M25_Final.pdf

- A2 corridor – the A2 is a central spine road directly serving all of Swale's main settlements other than Iwade and those on the Isle of Sheppey. Only Boughton and Sittingbourne town centre are effectively bypassed, which leads to major issues with traffic, including HGVs, passing through town and village centres. Air pollution is one such issue, with AQMAs declared at Newington, Sittingbourne, Teynham and Ospringe (southern extent of Faversham), as well within Rainham in Medway, immediately to the west of Swale. Teynam is one location where there is an aspiration for a bypass or relief road.
- A249 corridor - the adopted Local Plan discusses committed improvements at the Key Street (southwest of Sittingbourne) and Grovehurst (northwest of Sittingbourne / Iwade) and states that the Bobbing junction (west of Sittingbourne) may also need to be reassessed.⁸⁵

For completeness, there is also a need to note the A2500 Lower Road, Sheppey, which is known for suffering problematic traffic congestion in the summer tourism season, adding to issues of rural isolation for residents of eastern Sheppey. The adopted Local Plan discusses a programme of improvements, with significant funding generated from housing growth (in particular the 620 home Barton Hill Drive scheme); however, there remains an aspiration for further upgrades.

- Education provision – following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, given limited surplus capacity at the two existing secondary schools (one grammar and one non-selective), limited potential for expansion (particularly the grammar school, which is in a constrained central location) and committed growth (noting that catchment areas stretch to include Canterbury District). KCC has been actively exploring potential locations for a new secondary school, but options are limited. Latest understanding is that the secondary school would come forward at the site directly to the east of Faversham.
- Primary healthcare provision – there is currently limited understanding of locations in the Borough where there is a need to improve access to primary healthcare; however, Newington stands out as a higher order settlement lacking a GP surgery, and that there is no GP surgery within the rural part of the Borough, to the south of the M2. There is also understood to be a desire to explore the option of a general hospital locally. A 2018 workshop with Swale Clinical Commissioning Group (CCG) found that primary care is the key issue, with GP lists in Swale significantly higher than the national average (2,500 versus 1,800), but that "*acute hospital provision [is] an issue, with travel from Swale a particular concern.*"⁸⁶
- Rail station improvements - the Borough is very well served by rail, with the nine stations mostly serving the higher order settlements, with the notable exception of Selling Station at Neames Forstall (nearby to the village of Selling). The Kent Routes Study (2018) identified the possibility of a new rail link between Faversham and Ashford, to relieve pressure on the problematic A251; however, the conclusion reached is that commuting for employment between the two towns is currently insufficient to warrant giving the link further consideration (plus there are topography and environmental challenges).

Key messages for spatial strategy

Delivering new and upgraded strategic infrastructure to 'consume the smoke' of new development, as well as potentially to address existing issues / realise opportunities, is a key issue for spatial strategy and site selection, and can suggest a need to concentrate growth such that economies of scale are achieved that serve to generate the required funds. Furthermore, there is a need to take careful account of the likelihood and timing of *very strategic* infrastructure upgrades that are largely outside the control of the LPR, most notably motorway junction upgrades, and also liaise with County-level, sub-regional and national organisations in respect of plans and aspirations for new *very strategic* infrastructure.

Kent Downs AONB

The draft AONB Management Plan was presented to the Local Plan Panel on 3rd September 2020. Focusing on the section dealing with "vibrant communities", there is a notable focus on the House of Lords Select Committee on Rural Economy, including the following quote:

"Rural communities and the economies in them have been ignored and underrated for too long. We must act now to reverse this trend, but we can no longer allow the clear inequalities between the urban and rural to continue unchecked. A rural strategy would address challenges and realise potential in struggling and under-performing areas, and allow vibrant and thriving areas to develop further. Doing nothing is not an option."

⁸⁵ See <https://kccconsultations.inconsult.uk/consult.ti/A249swalejunctionimprovements/consultationHome>

⁸⁶ See <services.swale.gov.uk/meetings/documents/s11012/Appdx%20IIIa%20Infrastructure%20Workshop%20Note%2012jun18.pdf>

Another highly relevant quote from the Government's Landscape Review (2019) is also presented: “*One thing stood out, talking to people in the course of this review and examining the responses to our call for evidence. They worry that longstanding communities feel under great pressure, and point in particular to house prices and jobs.*”

In addition to housing and jobs, another key matter of relevance to the LPR is the maintenance of village services and facilities, with the Management Plan explaining: “*There has been long run concern about the decline in community and village services such as village shops, post offices, churches and pubs. Consequently the loss of such assets can trigger the creation of community run enterprises which in themselves are a community development catalyst and can be a vehicle to support a sustainable local economy which supports landscape character there are several examples across the AONB of successful community run facilities working alongside more ‘traditional’ businesses.*”

The plan does not call for new market housing, let alone Local Plan allocations. Rather, it calls for (sensitively located and designed) “*affordable housing for (i) those with proven local needs, and (ii) workers whose activities directly contribute to the purposes of the AONB designation.*” There is also strong support for the preparation of Neighbourhood Plans.

The section of the Plan dealing with “sustainable development” is of relevance, including discussion of remoteness, tranquillity and dark skies. These are described as recurring themes, and the Plan points out support in the NPPF (paragraph 180) for protecting areas of tranquillity. The section on sustainable development lists a range of issues and threats, including:

“Cumulative loss of landscape features, tranquillity and character and suburbanisation has been experienced in the AONB due to incremental poorly located, designed and badly screened development, leisure uses, intensive agricultural and forestry practices, pressure from traffic and significant levels of urban growth and development.”

Finally, the Plan presents helpful analysis of changing attitudes to towards the AONB over time, as understood from surveys going back 15 years. The analysis serves to highlight significantly increased concern regarding maintenance of tranquillity and dark skies, and increased concern regarding rural lanes and other highways is also of note.

Looking Ahead consultation

By way of further context, it is important to note the following statement made within the 28th October 2018 report to the Local Plan Panel, which sought to communicate key messages received through the Looking Ahead consultation (2018):

“There was recognition that designations can prevent new development being located in the most sustainable areas and can put extra pressure on undesignated land. It was considered that some development in the AONB could be less damaging than outside an AONB.”

Also, the detailed report presented to the Local Plan Panel, which presented a lengthy table summarising key messages received through the Looking Ahead consultation, explained:

“[The Kent Downs AONB Unit is not] opposed to any new housing in the AONB, particularly if development increased the supply of affordable housing for those with proven local needs. However, it would need to relate well to existing villages, be of a limited scale and complimentary to local character in form, setting, scale and contribution to settlement pattern. Advocate the use of landscape capacity studies to ascertain the capacity of AONB villages. Opportunities for growth at Neames Forstal are considered very limited.”

Key messages for spatial strategy

There is a need to avoid major development in the AONB unless there are exceptional circumstances, and no such circumstances have been suggested in the Swale context. The LPR could consider the possibility of modest allocations in the AONB, with a view to addressing local housing needs and potentially also supporting rural employment and the maintenance of rural services and facilities; however, there does not appear to be support for this approach within the Kent Downs AONB Management Plan, given the potential role of Neighbourhood Plans. Neames Forstal is a key location for consideration, recognising that it has a rail station. Finally, there is a need to consider constraint posed by the setting of the AONB, which extends north of the M2 to include extensive areas of land to the south of A2 settlements that come into consideration as potential locations for growth.

Landscape

Three landscape studies have been prepared recently to inform the LPR: a Landscape Designation Review (2018); a Landscape Sensitivity Assessment (2019); and an Important Local Countryside Gaps study (2020). Also, an important starting point for considering landscape is topography locally and the landscape character areas – see Figures J and K.

The Landscape Designations Review examined all of the existing locally designated landscapes, which fall into two tiers (Kent level and Swale level), before concluding that all of these locally designated areas should be taken forward through the LPR, and that several of the existing local designations should be extended. The study also proposed that there should be just one level of local landscape designation (as opposed to two). Figure L shows the proposed local landscape designations.

Much of the land falling within a proposed local designation is subject to wide ranging constraint (notably flood risk and SPA); however, areas of note are:

- Blean Edge Fruit Belt – constrains land north and south of Boughton, including land east of Selling Station;
- Lower Halstow - Iwade Ridge – could feasibly serve to ‘frame’ growth to the east at Bobbing / Iwade;
- Kent Downs: Rodmersham, Milstead and Highsted dry valleys – is a constraint to growth southeast of Sittingbourne;
- Kent Downs: Syndale Valley - is a constraint to growth southeast of Sittingbourne;
- Kent Downs: North Street Dip Slope – is a constraint to the new settlement option to the south of Faversham;
- North Kent Marshes - the vast bulk of this area is not in realistic contention for growth; however, a site to the southwest of Rushenden is under consideration as a potential location for growth;
- The Blean – constrains Dunkirk and other land to the east of Boughton.

The Landscape Sensitivity Assessment examined landscape parcels surrounding the main settlements, in the knowledge that these are locations that naturally come into consideration as potential locations for growth. Findings are presented in Figures M and N, with the following points of particular note:

- East of the Borough – is highly constrained, other than land to the east / southeast of Faversham;
- Land to the west of Bobbing – is a notable area of limited constraint; also the Leysdown area.
- Newington and Teynham – area associated with a mixed picture, with some areas of limited sensitivity.

Finally, with regards to the Important Local Countryside Gaps study, this examined five *potential* Important Local Countryside Gaps that might be designated through the LPR, in addition to the existing designated Important Local Countryside Gaps, which (the study explains) can safely be rolled forward into the LPR. Figure O shows the existing and potential new designations. With regards to potential new designations, the study finds that all meet the criteria for designation, although there is a slight question mark regarding the Faversham to Ospringe gap, as this is “*a small area, and Faversham and Ospringe have to some extent already coalesced.*”

Key messages for spatial strategy

Landscape sensitivity/capacity outside of the AONB varies significantly across the Borough. Some of the more sensitive areas are also constrained in wider respects, such that they are not realistically in contention for significant growth through the LPR; however, there are some sensitive landscapes that must be considered as potential locations for growth given wider LPR objectives, perhaps most notably land to the southeast of Sittingbourne. A ‘landscape-led’ approach to spatial strategy and site selection could involve a focus of attention on the Bobbing area, Leysdown, land to the east and southeast of Faversham and also potentially some areas around Newington and Teynham, which are areas that the Landscape Sensitivity Assessment finds to be relatively unconstrained in the borough-wide context.

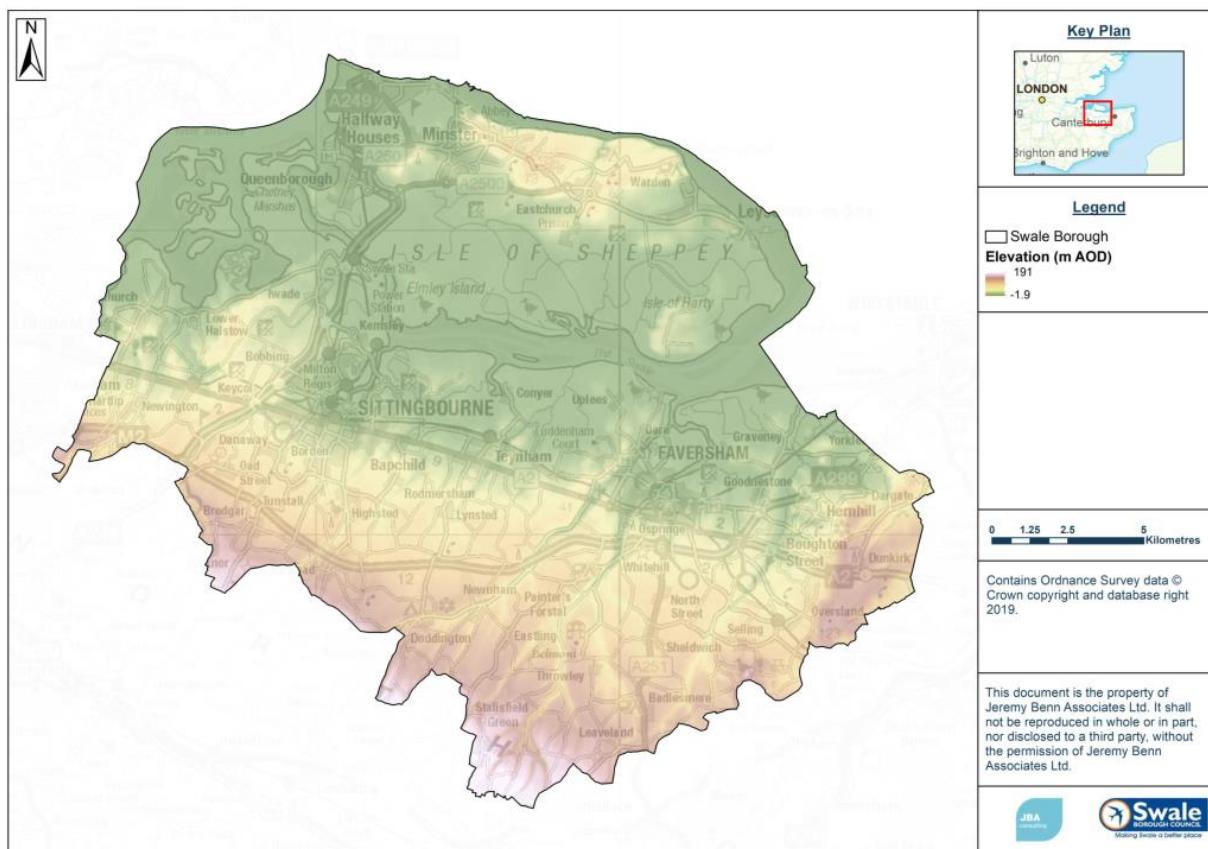
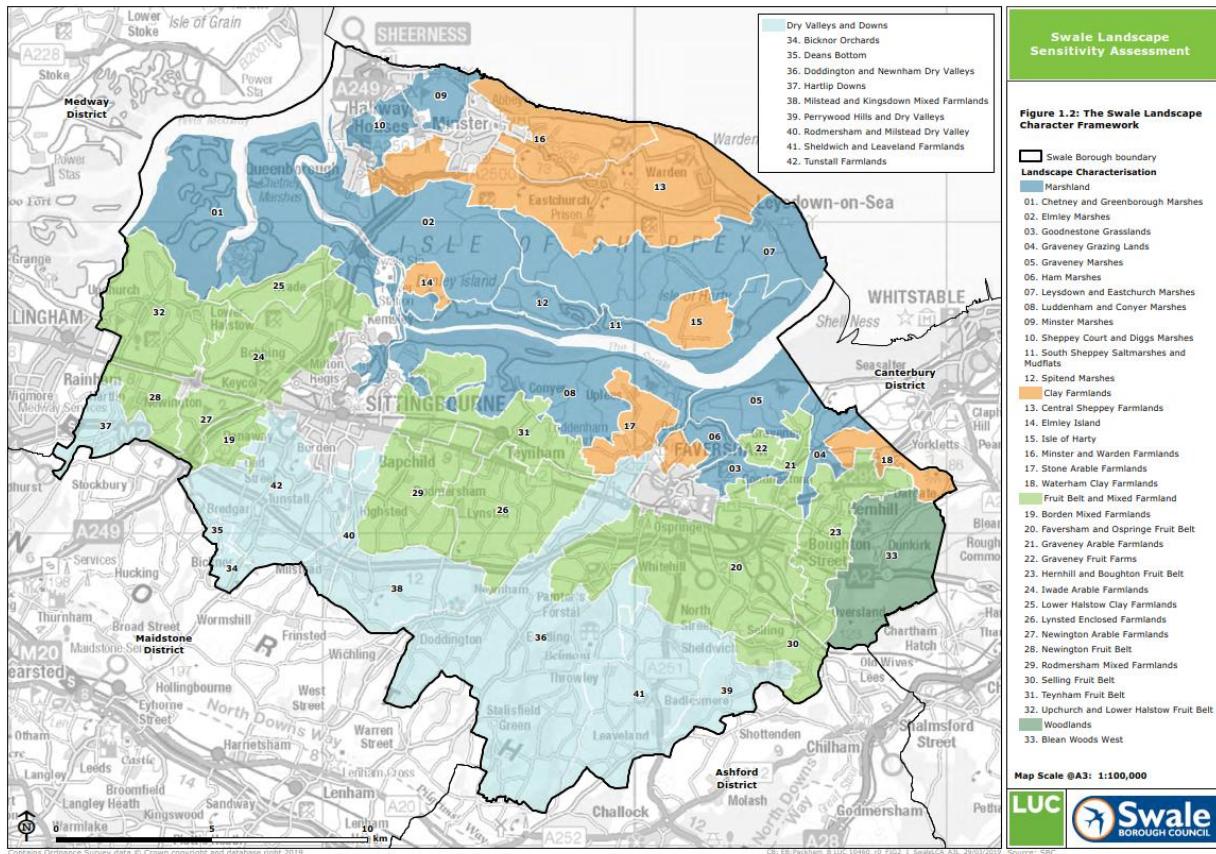
Figure J: Variation in topography across the Borough (source: SFRA)*Figure K: Landscape character areas across the Borough*

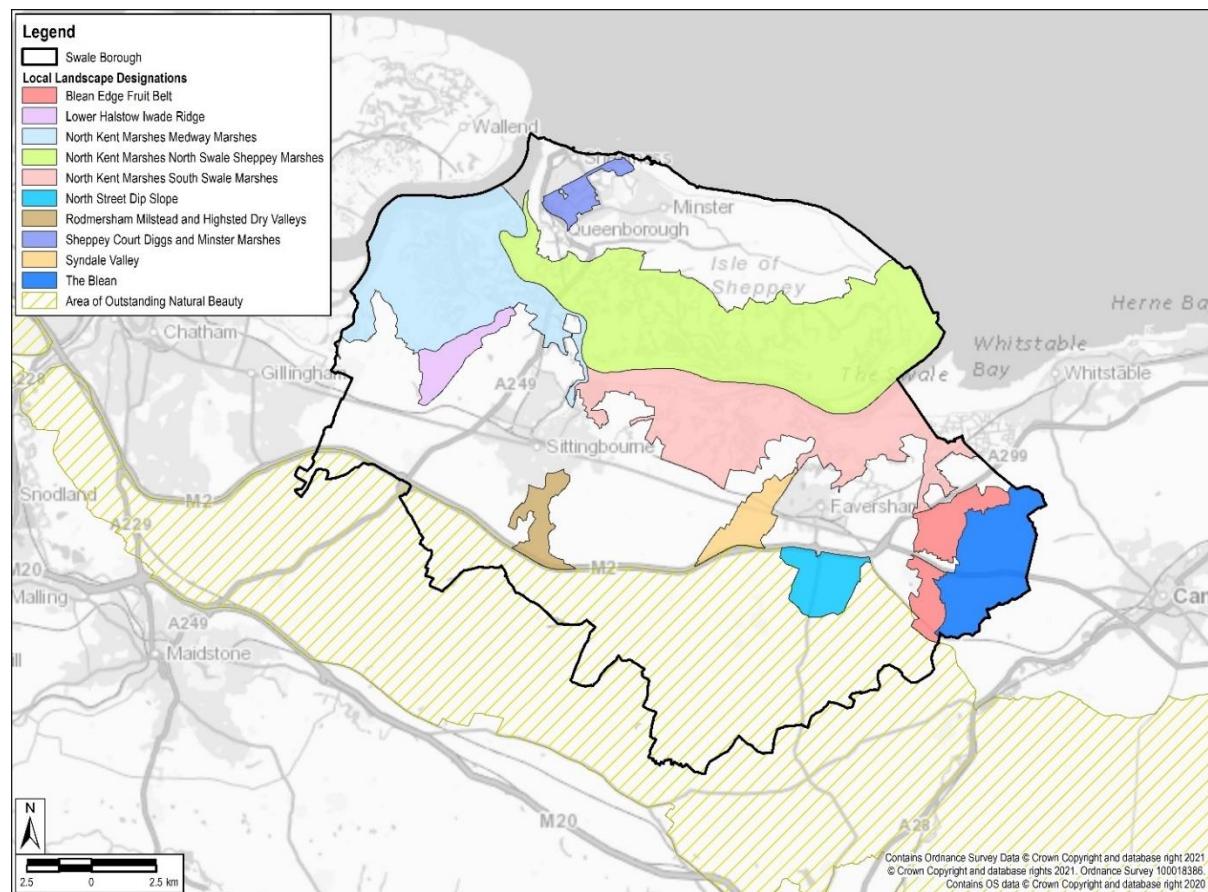
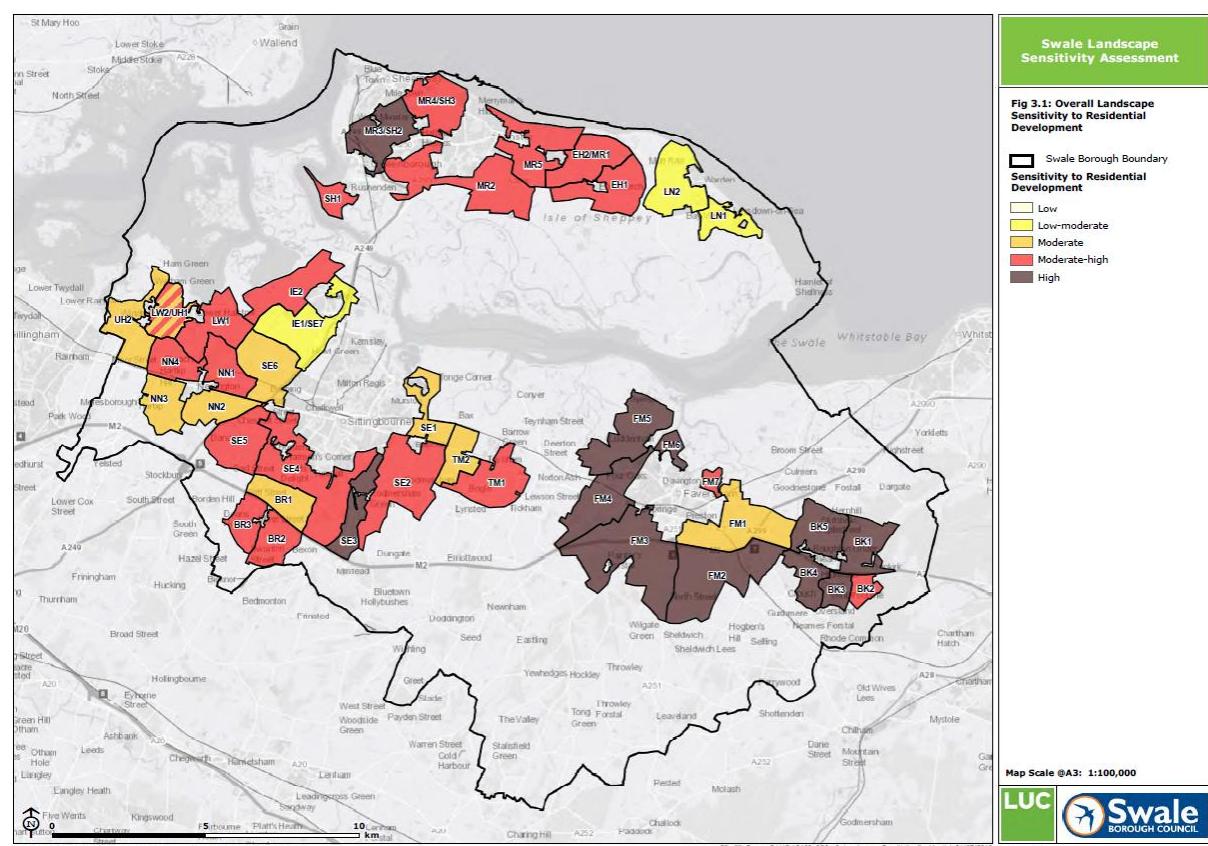
Figure L:: The AONB and proposed local landscape designations**Figure M: Sensitivity to housing**

Figure N: Sensitivity to employment

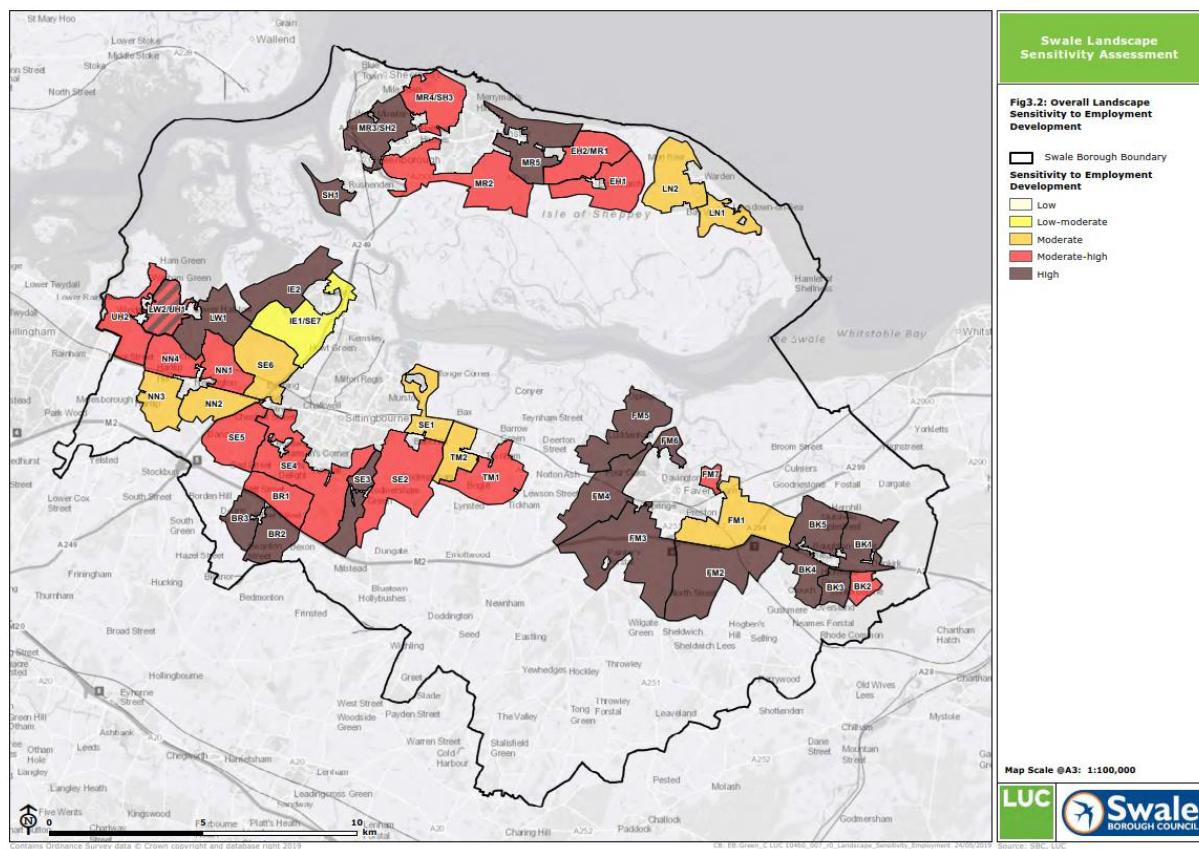
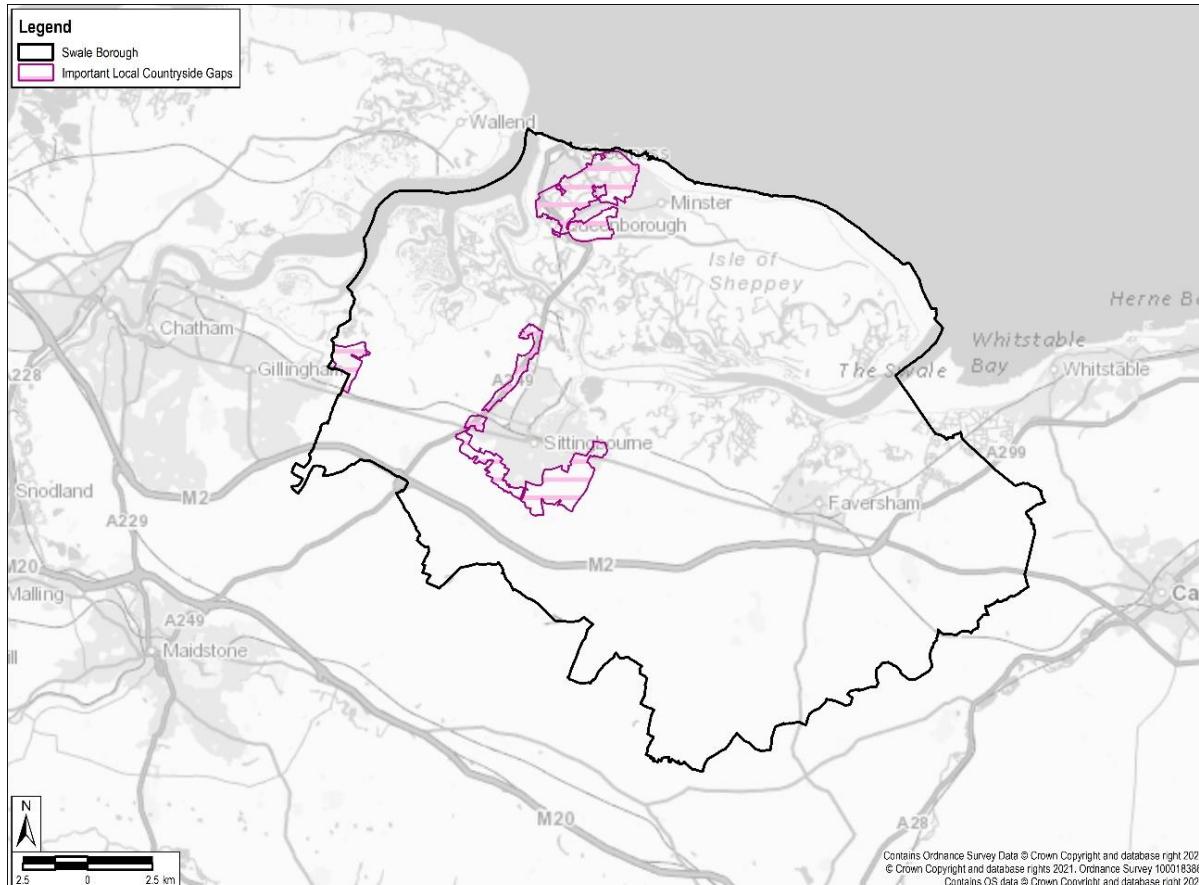


Figure O: Existing and potential new Important Local Countryside Gaps



Neighbourhood Planning

The most recent neighbourhood planning update was presented to the Local Plan Panel on 9th July 2020.

Most importantly, a Faversham Neighbourhood Plan is in the early stages of development, led by Faversham Town Council. There are a number of sites within the confines of the settlement that are available and potentially suitable for development, and there is an expectation that the Neighbourhood Plan will be well placed to allocate one or more sites, thereby providing for a significant number of homes.

A Neighbourhood Plan is also under preparation for Boughton-Under-Blean and Dunkirk. This is a constrained part of the Borough, where it is a challenge to identify larger sites that are suitable for development; hence the Neighbourhood Plan should be well placed to allocate one or more sites to deliver a modest number of homes.

Hernhill and Minster are also designated areas for neighbourhood planning purposes; however, neither Neighbourhood Plan is known to be advancing. It is perhaps surprising that no other parish councils are seeking to prepare a Neighbourhood Plan; however, it is fair to assume that interest in neighbourhood planning will continue to increase over the plan period, and that a proportion of the Parish Councils in the Borough will bring forward Neighbourhood Plans that allocate land for homes to meet local needs and support village vitality.

Key messages for spatial strategy

There is an expectation that the emerging Faversham Neighbourhood Plan will provide for a significant number of homes within the town, and it may be the case that the emerging Boughton-Under-Blean and Dunkirk Neighbourhood Plan is able to provide for some new homes in this constrained part of the Borough. It is not possible to point to any other emerging Neighbourhood Plans that are likely to deliver new homes, or that have any other implications for the spatial strategy / site selection; however, it is fair to assume that, over the plan period, a proportion of the Parish Councils in the Borough will bring forward Neighbourhood Plans that allocate land for homes to meet local needs and support village vitality.

Settlement hierarchy

A Settlement Hierarchy Study was presented to the Local Plan Panel on 3rd September 2020. The study broadly confirmed that the existing settlement hierarchy (see paragraph 5.3.4, above) remains robust.

Leysdown is of note as its current position in the hierarchy is somewhat marginal; specifically, there is an argument for moving Leysdown to tier 5. On one hand this could indicate a need to restrain growth to a level below that which might otherwise be considered appropriate for a tier 4 settlement; however, on the other hand, there is an argument for seeking to support investment in the town via housing growth, such that its tier 4 status is reinforced, given the population size of the village and the population of the rural area that it serves in combination with Eastchurch, where there accessibility to higher order centres / rural isolation is an issue. The Settlement Hierarchy Study explains: *"Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services."*

Key messages for spatial strategy

There is invariably a need to take the settlement hierarchy as a starting point when distributing growth, although there can be good reasons for departing from the hierarchy to an extent, including in instances where the effect of a 'high growth strategy' will be that a settlement moves up a tier in the hierarchy. Leysdown is of note as its current position in the hierarchy is somewhat marginal, with its offer possibly having decreased over time. The LPR could potentially seek to respond to this by promoting additional growth in support of retention/enhancement of services, facilities and retail.

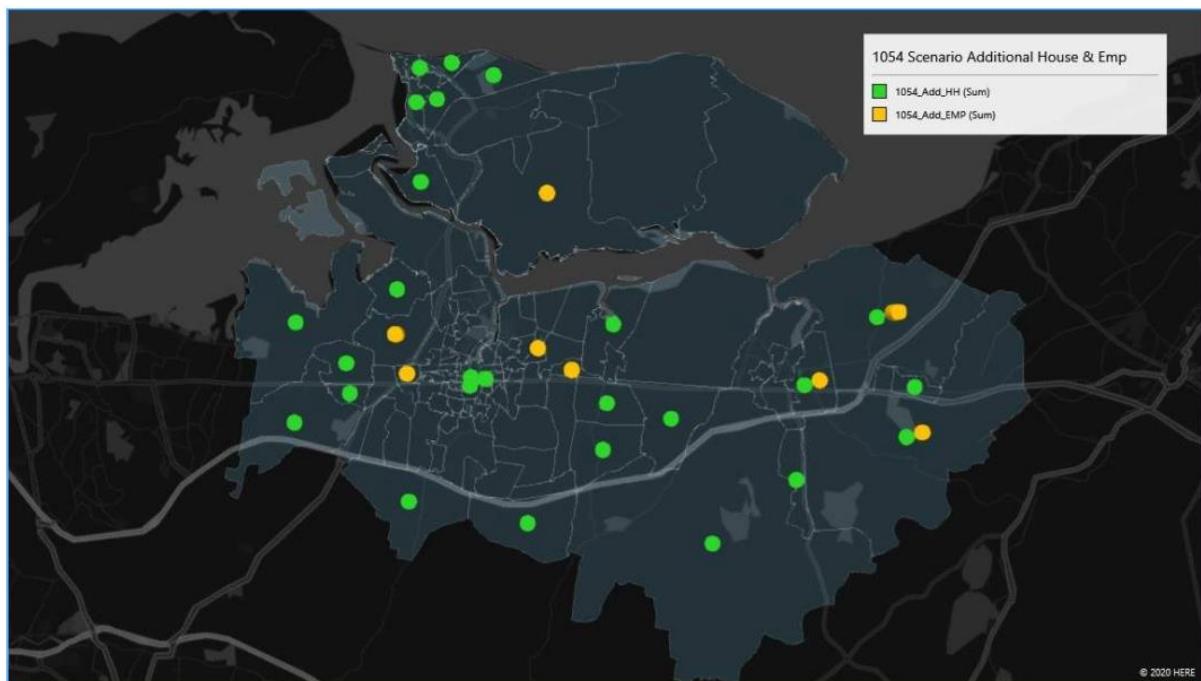
Transport

A Local Plan Transport Model Re-run report was presented to the Local Plan Panel on 11th June 2020. Two scenarios involving provision for 1,054 dwellings per annum were modelled: a 'do minimum' scenario; and a 'do something' scenario that assumed implementation of mitigation measures, including junction upgrades and trip reduction measures.

Whilst it is clearly the case the traffic hotspots identified by the model reflect the distribution of sites assumed to deliver the strategy (see Figure P), it is likely to be the case that many of the hotspots would exist under many or all of the reasonably foreseeable distribution scenarios. Problematic junctions highlighted through model are shown in Table C.

Table C: Problematic junctions highlighted through the April 2020 model re-run⁸⁷

Area	Junction	Weighted volume over capacity (V/C)			
		Do minimum scenario		Do something scenario	
		AM	PM	AM	PM
Maidstone	M20 J7	106	104	106	103
Ashford	A2042 Faversham Road/Trinity Road	104	86	105	85
Faversham	East Street/B2040	98	88	88	92
Sheppeney	Minster Road/ A250 Halfway Road	97	91	80	85
Sittingbourne	B2006/ B2005	84	91	81	91
Sheppeney	A249/A2500	91	68	91	71
Faversham	A2 London Road/Western Link	83	91	73	88
Faversham	A2/A251 Ashford Road	74	96	37	56
Sheppeney	A2500 Lower Road/Barton Hill Drive	90	89	88	81

Figure P: Locations assumed to deliver growth in the April 2020 model re-run

When developing the model, one important consideration was the trip rate internalisation that could be assumed for strategic sites / growth locations. The model assumed:

- Rushenden - 8 -10% reduction on currently modelled car trip rates for the location;
- Sittingbourne town centre - 20% reduction on currently modelled car trip rates for the location;
- East / southeast of Faversham - 18% - 35% reduction on currently modelled car trip rates for the location.

With regards to the “do something” scenario, Figure Q shows the mitigation measures that were assumed. These mitigation measures should be taken to be indicative (only) of what might prove appropriate for the LPR in practice.

⁸⁷ Junctions shown in the table are those shown to have a weighted V/C ratio of over 90 in either of the 1,054 dwelling scenarios.

Furthermore, the report recommends a wide range of additional mitigation measures, including:

- Sheppey - build a new cycle and pedestrian crossing across the A249 to improve the connection between Rushenden / Neats Court Retail Park and the Sheppey Way / Queenborough Road cycling corridor, connecting with the ongoing cycle/walk upgrades along the A2500 Lower Road;
- Sheppey – invest in Sheerness Way walk and cycle route to improve connectivity from Rushenden/Queenborough to Sheerness and rest of the Isle of Sheppey;
- Sheppey - financial support for turn up and go level bus service (3-4 buses an hour) linking Rushenden/Queenborough to Sheerness. Potentially designate Whiteway Road as bus-only through access to Queenborough;
- Sheppey - ensure all stations on Sheerness rail branch are step free and stations are accessible to all non-car modes to enable people to connect to the local rail by non-car modes;
- Faversham - create a cohesive, comprehensive network of walk and cycle paths both within new Local Plan developments and connecting the new development to central Faversham and railway station;
- Faversham - pay for bus extension from central Faversham to new developments to provide turn up and go connection to the town centre (N.B. assumes a strategic growth location);
- Sittingbourne - develop high quality segregated cycle link along B2205 / B2006 corridor between Iwade, Kemsley, and Sittingbourne to support the local walk and cycle trips in the area;
- Sheppey / Sittingbourne - upgrade Sheppey Way to improve bus and cycle links between Sheerness and Sittingbourne;
- A2 corridor - develop an east-west cycle corridor parallel to the A2 linking Sittingbourne to Faversham. Figure R shows the current extent of the National Cycle Network in the Borough.

Figure Q: Mitigation measures assumed under the ‘do something’ scenario

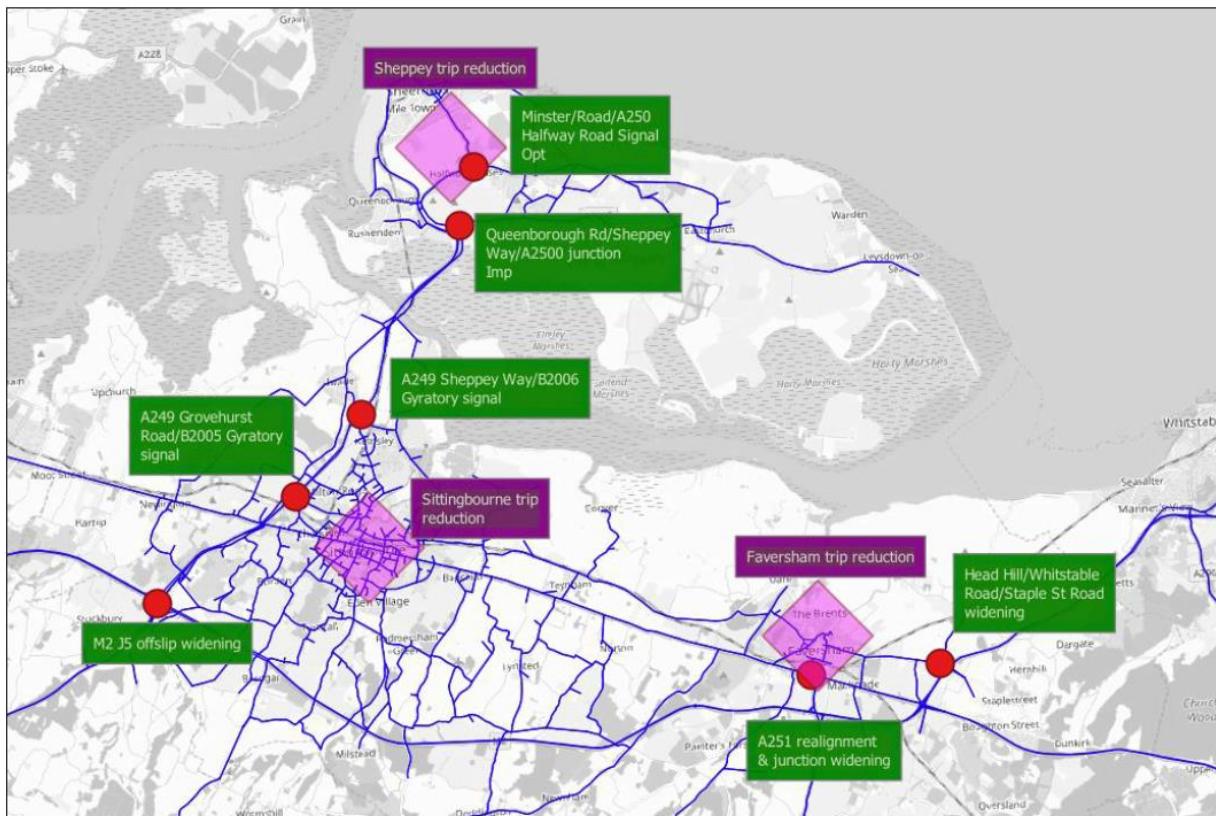
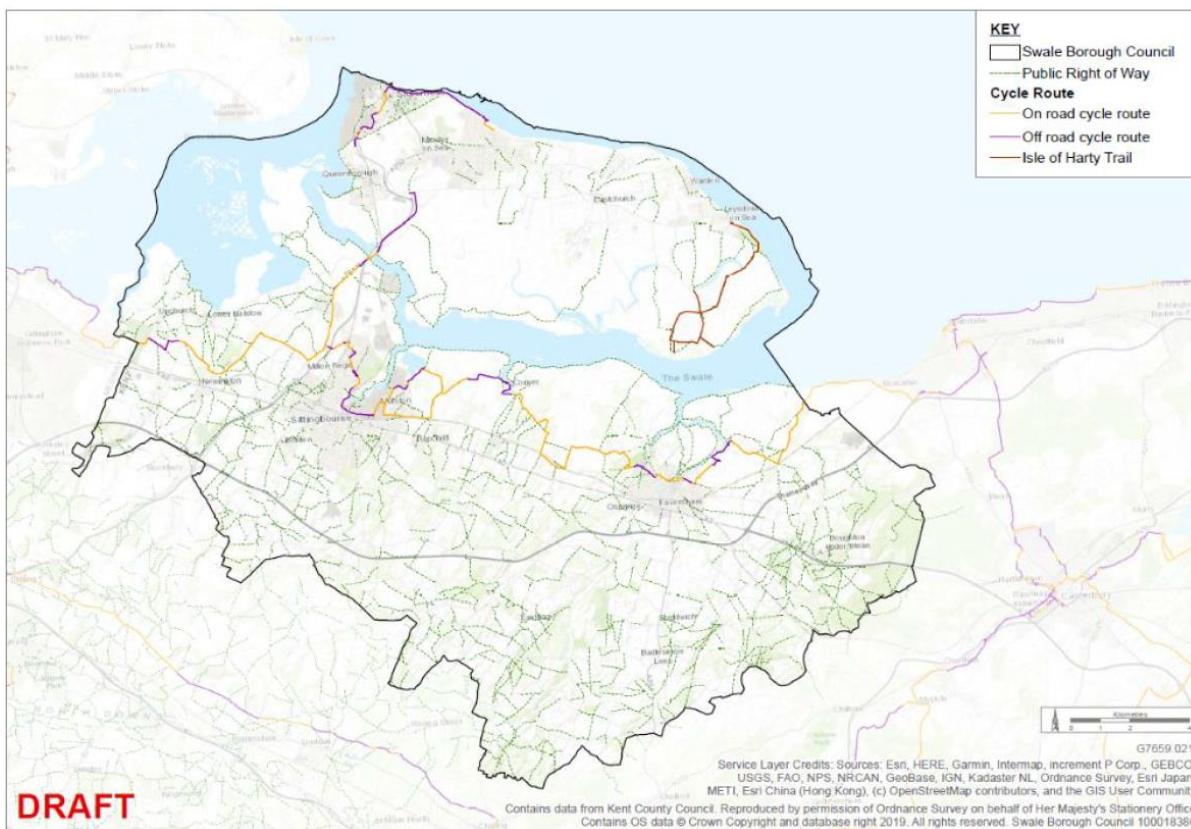


Figure R: Current extent of the cycle network (from Green and Blue Infrastructure Study)

Further recent context also comes from the **Transport Strategy for the South East (2020)**. Two important map outputs are presented below. These serve to highlight the pressure on the A2 corridor, and relatively low levels of bus usage.

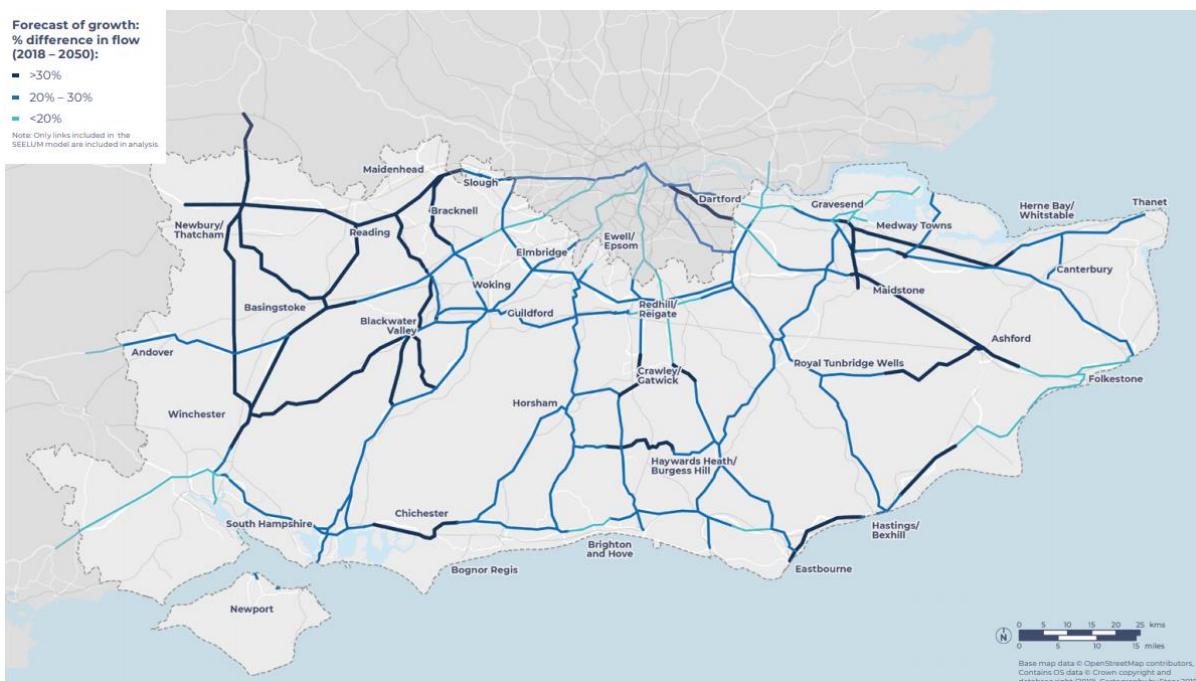
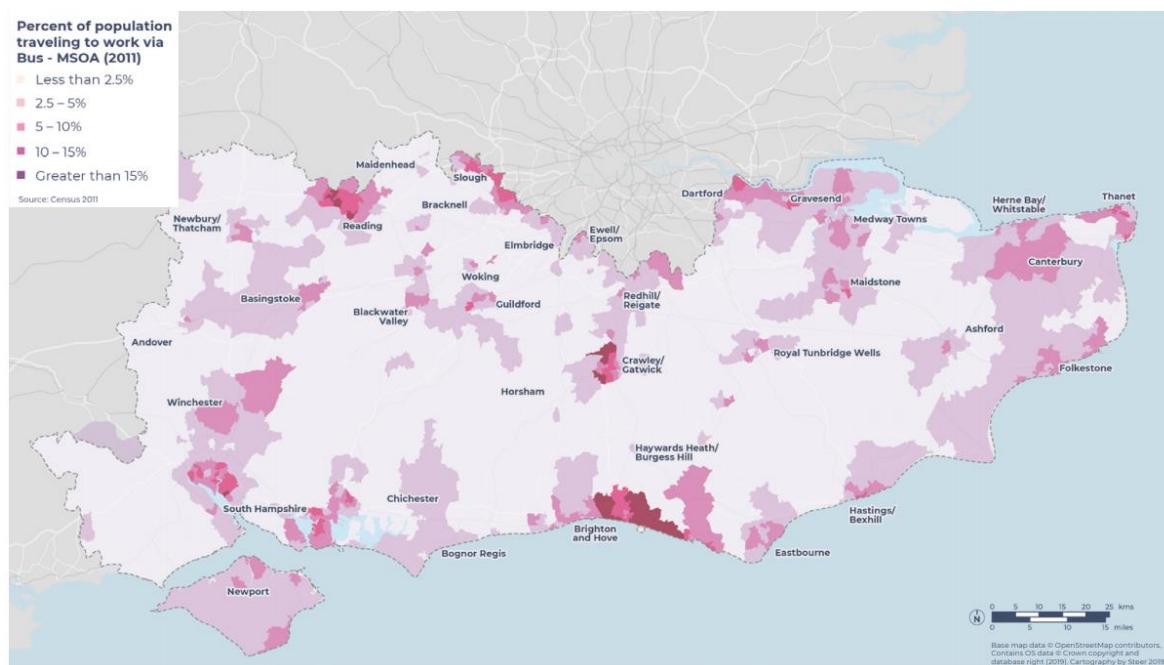
Figure S: Forecast growth in traffic⁸²

Figure T: Levels of bus use⁸²

Key messages for spatial strategy

There is a need for past transport model runs to feed into spatial strategy and site selection, and once the preferred strategy emerges, then there will be a need to run that through the model, with a view to confirming that the LPR will not lead to unacceptable traffic impacts, and also with a view to making fine tuning adjustments to the spatial strategy / mitigation strategy. Finally, it is important to note that modelling work undertaken to date highlights: M20 J7 (Maidstone) as the most problematic junction relevant to the LPR; the importance of achieving self-containment / trip internalisation at strategic growth locations (and variation in the potential to achieve this between strategic growth locations); and a wide range of opportunities to deliver enhancements to bus routes and walking/cycling infrastructure, for example an easily commutable cycle route between Sittingbourne and Faversham.

Viability

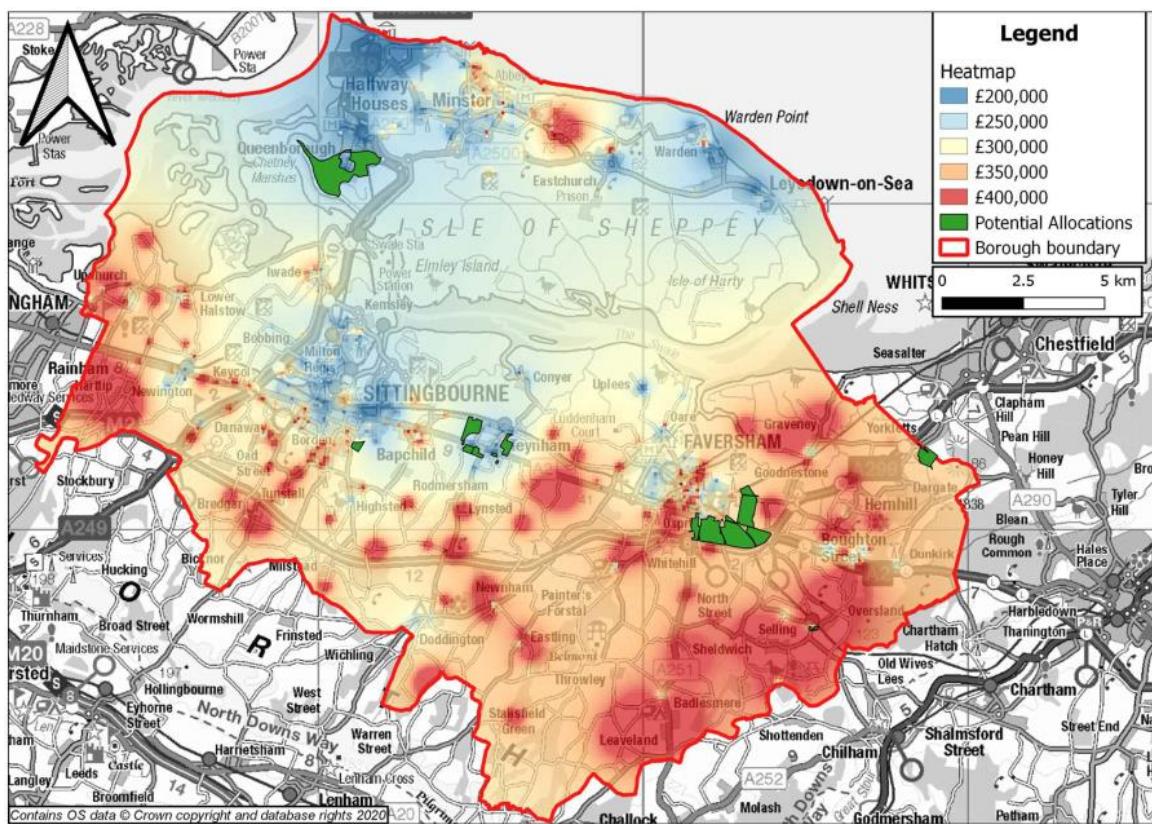
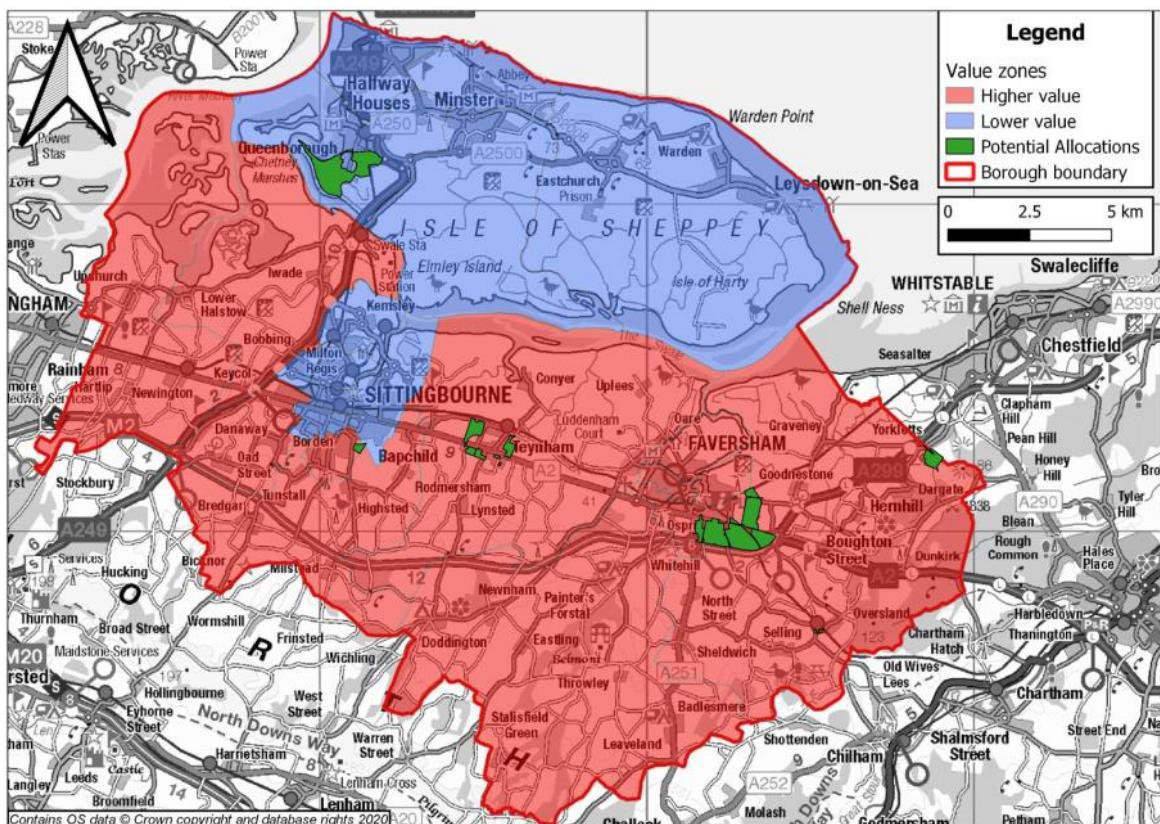
A draft Viability Report was presented to the Local Plan Panel on 2nd December 2020. Set out below are the two key maps from the report, which serve to highlight significant spatial variation in viability across the Borough. By way of further context, it is important to note the following **statement** made within the 28th October 2018 report to the Local Plan Panel, which sought to communicate key messages received through the Looking Ahead consultation (2018): *“Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations.”*

A spatial strategy that focuses growth at those locations with greater viability will lead to greater opportunity to fund delivery of measures including:

- affordable housing;
- building CO₂ emission standards above the do-minimum (up to ‘net zero’ standard);
- electric charge points;
- levels of biodiversity net gain above the do minimum;
- accessibility standards above the do minimum (e.g. wheelchair accessible).

Key messages for spatial strategy

A spatial strategy that focuses growth at those locations with greater viability (also with least need to deliver costly infrastructure upgrades in support of growth) will lead to greater opportunity to fund delivery of measures including: affordable housing; building CO₂ emission standards above the do-minimum (up to ‘net zero’ standard); electric charge points; levels of biodiversity net gain above the do minimum; accessibility standards above the do minimum (e.g. wheelchair accessible).

Figure U: Variation in average house prices**Figure V: Summary of viability zones**

Appendix III: Broad growth scenarios

Introduction

The aim of this appendix is to present an appraisal of the broad growth scenarios (Table A) that were considered by the Swale Borough Council Local Plans Panel on 30th July 2020, and which are discussed in Part 1 of this report (Section 5.2), as part of the wider discussion of establishing reasonable growth scenarios for appraisal (Part 2). N.B. this appendix presents summary appraisal findings, with further detail in a separate **Technical Appendix**.

Additionally, this appendix presents a ‘note on planning for inter-relating issues and objectives at landscape scales’.

Table A: The July 2020 broad growth scenarios

Broad growth scenario	Small sites ⁸⁸	Strategic site(s)
Roll forward Bearing Fruits (BF)	<ul style="list-style-type: none"> • TG – very little choice • Fav – good choice 	
A i.e. 85% focus on Thames Gateway		<ul style="list-style-type: none"> • None
Faversham focus ... to begin to counter-balance BF	<ul style="list-style-type: none"> • TG – little choice • Fav – little choice 	<ul style="list-style-type: none"> • None
Further Faversham focus ... to mostly counter-balance BF	<ul style="list-style-type: none"> • TG – good choice • Fav – good choice 	<ul style="list-style-type: none"> • SE of Faversham
Further Faversham focus still ... to fully counter-balance BF	<ul style="list-style-type: none"> • TG – very good choice • Fav – little choice 	<ul style="list-style-type: none"> • SE of Faversham
E Strategic sites	<ul style="list-style-type: none"> • TG – good or very good choice • Fav – good or very good choice 	<ul style="list-style-type: none"> • One or two out of the four options (no more than one in each planning area)

A note on Southeast Faversham

At the time of establishing the broad growth scenarios in July 2020 “Southeast Faversham” was understood to be one of the four strategic site options in consideration. Specifically, the focus was on the scheme submitted by the Duchy of Cornwall following the Garden Communities Prospectus (2018). However, latest understanding is that growth to the southeast of Faversham would be delivered in combination with growth to the east. Specifically, understanding is that landowners can and would work together to bring forward a combined masterplan and to deliver strategic infrastructure (notably a secondary school). There remains some uncertainty in respect of how this would happen in practice; however, for the purposes of this appraisal it is considered appropriate to assume a combined scheme. This is referred to as **East / southeast of Faversham**.

Appraisal methodology

Summary appraisal findings are set out in Table B, which comprises:

- 12 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and
- five columns (one for each of the broad growth scenarios).

For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the broad growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁸⁹ and rank the broad growth scenarios in order of preference.

⁸⁸ It was not possible to define the approach to small sites with any certainty. We define a ‘good choice’ as a situation whereby there would be the potential to select only the best performing of the SHLAA ‘suitable’ sites for allocation, whilst ‘little choice’ is defined as a situation whereby all ‘suitable’ SHLAA are required as well as potentially certain ‘unsuitable’ SHLAA sites.

⁸⁹ **Red** indicates a significant negative effect; **amber** a negative effect that is of note but with limited or uncertain significance; **light green** a positive that is of note but with limited or uncertain significance; and **green** a significant positive effect.

Summary appraisal findings

	BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
	Rank of preference and categorisation of effects				
Air quality	2	4	3	4	1
Biodiversity	1	2	1	2	1
Climate change mitigation	4	4	1	3	2
Communities	4	5	1	3	2
Economy and employment	4	3	2	3	1
Flood risk	4	3	2	1	1
Heritage	2	3	1	3	1
Housing	4	3	2	1	5
Land	1	2	2	2	1
Landscape	4	4	2	3	1
Transport	4	4	1	3	2
Water	?	?	?	?	?

Overall appraisal conclusions

It is immediately apparent that scenarios A and B are assigned relatively few stars (indicating highest rank of preference) and green scores, and more red scores than is the case for scenarios C to E. Focusing on scenarios C to E, it is apparent that Scenario D has fewer stars, fewer green scores and more red scores than is the case for scenarios C and E.

However, it does not necessarily follow that it is a straightforward choice between BGS-C and BGS-E, when seeking to decide which is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to Air quality, Biodiversity, Housing and Land objectives, which could mean favouring BGS-A overall.

Having made these opening remarks, the following bullet points summarise the performance of the broad growth scenarios in respect of each element of the SA framework in turn:

- Air quality – BGS-B and BGS-D perform poorly, as there is a strong likelihood of increased traffic through Ospringe, which is an air pollution hotspot. The Air Quality Modelling Report suggests that air pollution in Ospringe could roughly halve by the end of the plan period; however, it is nonetheless appropriate to flag a notable degree of risk. It is fair to highlight BGS-E as performing best, on the assumption that there would be a focus of growth at the two best performing strategic sites, namely Southeast Sittingbourne and East / southeast of Faversham.
- Biodiversity – BGS-B and BGS-D perform poorly, as there could be a need to allocate constrained sites to the north of Faversham, and it is appropriate to flag a notable degree of a risk (however small) of SPA/Ramsar impacts. It is difficult to confidently differentiate the other scenarios. BGS-C arguably performs relatively well; however, there is a concern associated with strategic growth to the east of Faversham extending north as far as the railway line.
- Climate change mitigation – it is inherently challenging to differentiate the scenarios, including because there can be tensions between objectives around minimising built environment emissions on the one hand and, on the other hand, minimising transport emissions. However, on balance it is considered appropriate to highlight BGS-C as performing best, because there would be a focus of growth at a strategic urban extension that is well-related to a higher order settlement, albeit there are a range of issues and uncertainties. With regards to the other broad growth scenarios, it is considered appropriate to highlight BGS-E as second best performing, given the opportunities associated with strategic growth; however, there is a very high degree of uncertainty, given that the locations in question are not ideal from a transport connectivity perspective and/or there would be viability challenges. With regards to effect significance, it is difficult to draw conclusions; however, on balance it is considered appropriate to flag a concern with all scenarios, even that which is best performing. This reflects a view that Swale Borough's 2030 net zero target date is so ambitious that decarbonisation must be a primary driving factor influencing spatial strategy and site selection.
- Communities – a key consideration is the need to deliver a new secondary school at Faversham to meet existing and committed future needs. This serves as a reason to conclude that BGS-C will lead to significant positive effects, and BGS-B would lead to significant negative effects. However, there is a degree of uncertainty ahead of detailed site-specific proposals. It is also appropriate to flag a degree of opportunity associated with BGS-E, although there is considerable uncertainty, given viability constraints in the Sittingbourne area, competing costs and uncertainty regarding the deliverability of site specific proposals. As for BGS-A, it is appropriate to flag a degree of risk associated with piecemeal expansion at Sittingbourne 'loading pressure' onto existing community infrastructure.
- Economy and employment – the Employment Land Review (ELR) serves to highlight a significant opportunity associated with Southeast Sittingbourne, hence it is appropriate to flag BGS-E as having the potential to result in significant positive effects; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viable) and implications for the wider Borough and elsewhere. BGS-C also performs well, as the employment land strategy could align with key recommendations from the ELR.
- Flood risk – it is appropriate to highlight those broad growth scenarios involving less growth directed to the Isle of Sheppey as performing well; however, this is highly uncertain, as there is the potential to deliver growth on the island whilst avoiding growth in a flood risk zone, and growth in the flood risk zone on the island is a very specific matter for consideration (as a potential 'exceptional circumstance') given potentially overriding regeneration objectives. Significant negative effects are not predicted, but it is considered appropriate to flag a concern in respect of BGS-A.
- Heritage – the broad growth scenarios involving a focus on further piecemeal urban extensions give rise to a significant degree of concern, and it is appropriate to highlight BGS-B and BGS-D as performing worst, as Faversham is highly constrained. Negative effects could be notably less significant under BGS-C and BGS-E; however, this conclusion is subject to the views of Historic England. Of the strategic site options under consideration, Southeast of Sittingbourne and North Street give rise to the greatest concern.
- Housing – it is appropriate to highlight a concern with BGS-E, given reliance on strategic sites leading to delivery risks. BGS-A also performs relatively poorly given viability challenges; however, there is considerable uncertainty. BGS-D performs most strongly, as there would be: a focus of growth at Faversham, where development viability is highest; a spread of growth between a strategic site and smaller urban extensions assumed able to deliver early in the plan period; and support for a strategic site where the current proposal (to be confirmed) is to prioritise affordable housing.

- Land – it is appropriate to conclude that any reasonable broad growth scenario would lead to significant negative effects, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. It is appropriate to highlight BGS-A and BGS-E as performing best; however, this is marginal and uncertain.
- Landscape – it is appropriate to highlight BGS-E as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and East / southeast of Faversham. The potential to comprehensively plan for the very long term future growth of the Borough's two main settlements can be envisaged; however, in neither case are the current proposals considered to respond to the opportunity in full. As such, it is not possible to predict positive effects (plus there is a need to *apply caution* when drawing conclusions in respect of BGS-E, as there are concerns associated with North Street and SE Sittingbourne). As for the other scenarios, BGS-C is judged to perform relatively well, given the focus of growth at East / southeast of Faversham, whilst those scenarios involving numerous 'piecemeal' urban extensions give rise to a cause for concern.
- Transport – it is difficult to differentiate those broad growth scenarios involving dispersed growth across smaller sites (BGS-A and BGS-B) and those involving a concentration of growth at one or two strategic sites. However, an overriding consideration is that piecemeal urban extensions can lead to opportunities missed in respect of delivering strategic transport infrastructure upgrades, and in respect of supporting 'trip internalisation'. In respect of the strategic site options, all are associated with challenges, but East / Southeast of Faversham may give rise to fewest concerns. This leads to a conclusion that BGS-C performs best. It is considered appropriate to highlight BGS-E as second best performing, given the potential for Southeast Sittingbourne to deliver transformational transport benefits, albeit there is uncertainty regarding deliverability. With regards to effect significance, there are uncertainties and concerns regarding all of the broad growth scenarios, and it is fair to flag the risk of significant negative effects for the two worst performing.
- Water – focusing on the matter of capacity at WwTWs, it is considered appropriate to highlight uncertain negative effects for all scenarios. Whilst there can be merit to focusing growth at strategic sites, and there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, it is not possible to differentiate the broad growth scenarios with certainty, on the basis of the evidence available.

A note on planning for inter-relating issues and impacts at landscape scales

Whilst this current appraisal of broad growth scenarios must necessarily involve considering issues and impacts to a large degree in 'silos', exploring broad growth scenarios should also provide an opportunity to explore how issues and impacts inter-relate at strategic scales, perhaps most notably at landscape scales. For example, the Kent Downs AONB Management Plan discusses a wide range of inter-relating issues and opportunities that require management and planning 'in the round'; and the Swale estuary and marshlands is another highly valued landscape associated with a wide range of 'natural capital' stocks and 'ecosystem service' flows, leading to benefits in terms of biodiversity, climate change, heritage, health, jobs, food production and more.

The Nature Recovery Priority Areas are a good starting point for holistic consideration of issues and opportunities.

[The Kent Downs AONB](#)

There is limited likelihood of growth directly impacting on the AONB, although: growth to the south of either Sittingbourne or Faversham leads to a need to consider impacts to the setting of the AONB; and there is also a need to consider the possibility of modest growth at Neames Forstal. In turn, perhaps a foremost consideration is the possibility of strategic growth delivering strategic enhancements and therefore benefits, for example:

- South of Sittingbourne – growth in the vicinity of Kent Science Park could feasibly deliver strategic enhancements to the dry valley(s) between Sittingbourne and Bedminton / Wormhill / Frinsted / Torry Hill in Maidstone Borough. The dry valley, which splits into three dry valleys at Bottom Pond, is associated with a very high density of ancient woodland, and Milstead – adjacent to the east – is associated with two very large woodlands as well as Torry Hill Park (in private ownership); however, it appears that the woodlands in this area have limited accessibility. There could be the potential to, for example: deliver circular walks and cycle routes; work with landowners to increase public accessibility; and deliver land management initiatives aimed at minimising surface water run-off and therefore risks of flash flooding.
- North Street – two dry valleys link the west of Faversham and Ospringe to the AONB, both associated with a high density of woodlands and heritage assets. Land to the south of Faversham is more distant from high points in the AONB than is the case for land to the south of Sittingbourne; however, this does not detract from the importance of these valleys. The possibility of strengthening landscapes to the west and southwest of Faversham as part of a comprehensive approach to planning for the town's expansion might be envisaged. For

example, an aim might be to deliver a circular cycle route that follows and then links the two valleys, also taking-in historic villages; and possibly linking with Milstead and the dry valleys south of Sittingbourne. There could also be an opportunity to link the series of four country estates (three of which are on the list of registered parks and gardens; all grade II) that are a feature of the Kent Down dip slope south of the A2.

Swale Marshes

A key opportunity could be around strategic expansion to the east of Faversham serving to strengthen and enhance the marshlands, and associated historic hamlets and farmsteads on raised land, that lie between Faversham and Seasalter/Whitstable, mindful of the committed Cleve Hill Solar Farm. A national cycle route already links Faversham to Whitstable; however, there could be opportunities to further enhance accessibility. The concept of 'rewilding' could also feasibly be explored, including with a view to adding to the local tourism offer. The Kent Wildlife Trust is supportive of re-wilding in appropriate parts of the County – see kentwildlifetrust.org.uk/wilderblean.

On the Isle of Sheppey the option of strategic growth on a par with that under consideration for Sittingbourne and/or Faversham is not considered to be a realistic option for the LPR; however, there could be significant growth nonetheless. Attention focuses on the west of the Island, given that this is the area most suited to growth, and also given that the extensive marshes in the central and eastern parts of the islands are associated with limited growth-related opportunity (given distance and limited accessibility, plus they are already well-managed, with two extensive National Nature Reserves). The Green and Blue Infrastructure Study (2020) identifies some targeted opportunities for enhancement, and also serves to highlight the Isle of Sheppey as experiencing notable health deprivation and having limited access to multifunctional green and blue infrastructure.

The Blean

The Boughton and Dunkirk area is heavily constrained, and hence not likely to be a focus of strategic growth. A new settlement is being promoted, but is not considered to be in realistic contention for allocation through the LPR. As such, the key landscape area for consideration is the Blean Edge Fruit Belt locally designated landscape, which covers land to the north and south of Boughton, to the west of the Blean woodlands. The value of this landscape could increase under a scenario involving strategic growth southeast of Faversham. Also, there is also a need to consider the possibility of growth at Neames Forstal. Alongside any strategic interventions focused on the locally designated landscape there should also be consideration given to land in the vicinity of Boughton Church Conservation Area, which falls outside of the locally designated landscape.

Faversham

The discussion above serves to highlight the possibility of comprehensively planning for the long-term future growth of Faversham alongside strategic planning for the surrounding landscapes of: the Swale marshlands and marshland edge landscapes to the north – to which Faversham relates very closely; dip slope dry valleys to the southwest; and the fruit belt landscape that separates Faversham and Boughton / Neames Forstal to the southeast. This leaves one final sector to the south, where it is more challenging to suggest that this landscape should be a focus of protection / conservation / enhancement in the long-term. This is something of an open 'plateau' type landscape between valleys to the east and west, historically sparsely settled and with very limited priority habitat.

Other settlements

Faversham is perhaps the stand-out example of a settlement in Swale Borough where there is the potential to plan strategically for growth alongside strategic planning for surrounding landscapes, with a view to leveraging funding to secure and enhance natural capital and ecosystem services, to the benefit of the growing population, but any other settlement that is a focus of strategic growth might benefit from this approach. For example, a scenario might be envisaged where, as a quid pro quo for accepting major growth at those locations around Sittingbourne that are less sensitive from an environmental perspective (also recalling that there is a committed high growth strategy for Iwade), government funding might be made available to support both protection and enhancements of sensitive landscapes to the south and southeast of the town as well as delivery of a new motorway junction and southern link road. As for the Isle of Sheppey, the island is largely characterised by two distinct geographies, namely the marshes and the raised 'clay spine' to the north. This could indicate a strategic planning opportunity, crucially to include major transport upgrades. This could be a matter to explore at the sub-regional scale.

Conclusion

Large scale 'zoning' of land uses, with a view to securing natural capital and ecosystem service benefits, is potentially in-line with emerging thinking on planning for the natural environment alongside growth. For example, locally prepared Local Nature Recovery Strategies under the Environment Bill will come together to deliver a national Nature Recovery Network, the Wildlife Trusts are calling for a new planning designation of Wild Belts and the concept of targeted 'rewilding' is also gaining traction. However, there are also arguments for allowing settlements and surrounding landscapes to evolve more organically over time.

Appendix IV: Strategic site options

Introduction

The aim of this appendix is to present an appraisal of the four competing strategic site options discussed in Section 5.3, as part of the wider discussion of establishing reasonable growth scenarios for appraisal. N.B. this appendix presents summary appraisal findings, with further detail in a separate **Technical Appendix**.

Appraisal methodology

Summary appraisal findings are set out in Table A, which comprises: 12 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and four columns (one for each of the strategic site options). For each topic, the aim is to both categorise the performance of each of the strategic site options in terms of significant effects (using red / amber / light green / green)⁹⁶ and rank the options in order of preference.

Summary appraisal findings

	Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
	Rank of preference and categorisation of effects			
Air quality	1	3	1	2
Biodiversity	3	2	1	1
Climate change mitigation	1	2	1	2
Communities	2	3	1	4
Economy and employment	1	4	2	3
Flood risk	2	2	2	1
Heritage	3	1	2	3
Housing	4	2	1	3
Land	1	2	3	2
Landscape	2	1	1	3
Transport	1	3	1	2
Water	?	?	?	?

Overall appraisal conclusions

It is immediately apparent that Option 3 (East and SE Faversham) is assigned the most stars (indicating highest rank of preference) and has joint fewest red scores (significant negative effects). However, it does not necessarily follow that Option 3 is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to 'economy and employment' objectives, in which case Option 1 might be considered to be best performing overall.

Having made these opening remarks, the following bullet points summarise the performance of the broad growth scenarios in respect of each element of the SA framework in turn:

- Air quality – Option 2 (Bobbing) performs poorly given relatively limited potential to support good links to a higher order centre by walking, cycling and public transport, and the likelihood of generating increased traffic flows through AQMAs. However, significant negative effects are not predicted, given good potential for mitigation, and because air quality is improving over time and set to improve significantly over the plan period, due to the switchover to electric vehicles.
- Biodiversity – Option 1 (Southeast Sittingbourne) stands out as having potential for adverse effects on habitats of at least local significance, including several areas of ancient woodland. Option 2 (Bobbing) is also notably constrained by Rooks Wood, which is an ancient woodland. Significant negative effects are not predicted, recognising that strategic sites can and should deliver strategic enhancements. All four schemes have made high-level commitments, including around ensuring that at least 50% of the total site area is brought forward as open-space; however, at the current time it is not clear that any stand-out opportunities or proposals exist, hence significant positive effects are not predicted.
- Climate change mitigation – two options are judged to perform relatively well:
 - Option 1 (Southeast Sittingbourne) – the proposals for minimising built environment emissions are encouraging, but are nonetheless high-level and potentially subject to change, recalling that scheme viability is challenging; also, there are certain question-marks regarding potential to minimise per capita transport emissions.
 - Option 3 (East and SE of Faversham) – performs well from a perspective of minimising transport emissions, as it would involve a strategic urban extension to a higher order settlement. However, Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (although this could support good bus connectivity with Canterbury and beyond). Also, there is uncertainty regarding potential to deliver growth to the south of the A2 in combination with growth to north of the A2, as a combined strategic scheme that leads to additional economies of scale and potential to deliver LZC infrastructure and other climate change focused measures; and there is a degree of uncertainty regarding the extent to which the masterplanning and design ethos of the scheme is supportive of minimising emissions.

It is challenging to reach a conclusion on effect significance; however, on balance, it is considered appropriate to flag a concern with all strategic site options. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a primary driving factor influencing site selection and site-specific proposals.

- Communities – a key consideration is the need to deliver a secondary school at Faversham to meet existing and committed future needs. This serves as a reason to support Option 3 (East and SE Faversham); however, there is some uncertainty, given the evidence available. It is also appropriate to flag a degree of opportunity associated with the other options, in particular Southeast Sittingbourne.
- Economy and employment – Option 1 (Southeast Sittingbourne) could realise a significant opportunity; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viable) and implications for the wider Borough and elsewhere. Option 3 (East and SE Faversham) also performs well, given the potential to deliver major new employment land well linked to both Faversham and the M2. Option 2 (Bobbing) is found to perform most weakly as it proposes the smallest overall quantum of employment land; however, none of the options perform poorly, as there would be the potential to support a borough-wide strategy in line with the Employment Land Review recommendations.

- Flood risk – Option 4 (North Street) stands out as notably unconstrained, whilst it is difficult to differentiate the other strategic site options with any confidence. Significant effects are not anticipated under any of the options, given the likely levels of risk involved, and good potential to address flood risk through masterplanning/design and SuDS.
- Heritage – Option 1 (Southeast of Sittingbourne) and Option 4 (North Street) give rise to the greatest concern, whilst Option 2 (Bobbing) gives rise to least concerns. Significant negative effects are not predicted at this stage; given good potential to respond to the historic environment constraints through sensitive masterplanning and design.
- Housing – Option 3 (East and SE Faversham) performs well, both in the sense that the proposal has been to deliver 40% affordable housing (unconfirmed) and in the sense that there is low delivery risk; however, there remains uncertainty ahead of further detailed work in respect of masterplanning and viability, including detailed work to understand infrastructure costs.
- Land – all four options would result in significant loss of ‘best and most versatile’ agricultural land, including significant areas of grade 1 land which is a scarce resource nationally. East / SE Faversham is potentially most constrained, and Southeast Sittingbourne potentially the least constrained; however, differences are quite marginal.
- Landscape – both Option 1 (Southeast Sittingbourne) and Option 4 (North Street) give rise to wide-ranging landscape concerns, including around the potential for AONB impacts. By contrast, Options 2 and 3 are found to have relatively limited potential for adverse effects in relation to landscape, although both schemes are associated with sensitivities.
- Transport – Option 3 (East and Southeast Faversham) is associated with a relatively high degree of certainty regarding the potential to deliver growth without leading to capacity issues on the strategic road network, although there remains a degree of uncertainty, both in respect of capacity at junction 7 of the M2, and around the potential to achieve a road link to the A251 and junction 6 of the M2. It is also appropriate to highlight Option 1 (Southeast Sittingbourne) as performing well, as growth could deliver transformational transport benefits; however, deliverability is uncertain.
- Water - whilst there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, it is not possible to differentiate the strategic site options with certainty, on the basis of the evidence available.

Appendix V: Site options GIS analysis

Introduction

As discussed in Section 5.3, whilst the Council's SHLAA was the main vehicle for considering the merits of non-strategic sites in isolation, for the purposes of establishing reasonable growth scenarios, a supplementary piece of analysis was completed, involving GIS analysis of SHLAA sites.]

N.B. this appendix presents summary findings, with further detail in a separate **Technical Appendix**.

Appraisal methodology

The analysis involved examining the spatial relationship (i.e. proximity to / percentage intersect) between all SHLAA sites and a range of constraint (e.g. flood zones, designated heritage assets) and opportunity (e.g. GP surgeries) features for which data is available in digitally mapped form across the Borough as a whole.

Summary findings of the analysis

The following bullet points present a discussion of key findings of relevance not only to the process of selecting reasonable growth scenarios, but also the task of scrutinising reasonable growth scenarios and the proposed allocations set out in the Pre-submission LPR at the current time.

Agricultural land

- Focusing on those 106 sites that are neither supported by the SHLAA nor taken forward to the reasonable growth scenarios, 78% intersect either grade 2 or grade 2 agricultural land, which *potentially* serves to indicate that agricultural land was assigned a good degree of weight in the process of selecting reasonable growth scenarios.
- At Faversham 24 of the 27 site options intersect grade 1 or grade 2 agricultural land (of which 23 intersect grade 1), which equates to 89% of site options. In contrast, on the Isle of Sheppey 5 out of 40 sites are constrained to this extent, which equates to 12.5%.

Air quality management area (AQMA)

- The 16 sites in closest proximity to an AQMA were supported by the SHLAA and several progressed further through the plan-making SA process.
- Focusing on those 106 sites that are neither supported by the SHLAA nor taken forward to the reasonable growth scenarios, the average distance to an AQMA is 3.7km, which contrasts to an average distance of 3.2km for sites that progress further through the plan-making SA process.
- The average distance of sites at one of the six tier 4 settlements is 2.5km, which contrasts to an average distance of 8.6km for other sites.
- Focusing on the 24 site options that intersect the Kent Downs AONB, the average distance to an AQMA is 4.5km; however, there is a need to consider that many car journeys from villages in the AONB to a higher order centre along the A2 corridor will involve passing through an AQMA.

Special Protection Area (SPA)

- Of the 20 sites in closest proximity to an SPA, nine progressed no further than the SHLAA (45%). In contrast, of the 20 sites furthest from an SPA, 18 progressed no further than the SHLAA (90%). This reflects the fact that sites most distant from an SPA are located in the rural area, often in the AONB.
- The average distance of sites at a tier 4 settlement *other than Iwade* is 2.3km, which contrasts to an average distance of 0.85km for other sites.

Special Area of Conservation (SAC)

- The site in closest proximity (287m) is Lamberhurst Farm, which is a proposed allocation (plus the plan states support for exploring the possibility of a new settlement through a future Local Plan Review).

- Of the next ten sites in closest proximity (five of which are located at Dunkirk), nine progress no further than the SHLAA in the plan-making / SA process. The one site that did progress further than the SHLAA is Pond Farm at Newington, which features in the reasonable growth scenarios.

Site of Special Scientific Interest (SSSI)

- In the great majority of cases, where a SSSI is a notable constraint it is the case that the SSSI is also designated as either an SPA or an SAC. One notable site constrained by a SSSI that is not additionally designated SPA or SAC is Foresters Lodge Farm, at Dunkirk. This site is being promoted for a new settlement, and was discussed in the Officer's Report presented to the 29th October Local Plan Panel meeting; however, it was not progressed any further in the plan-making / SA process.

GP Surgery

- Sittingbourne sites – average distance of 551m
- Faversham sites – average distance of 777m
- Tier 4 settlement sites – average distance 954m
- Of the ten sites most distant from a GP surgery, nine are not supported by the SHLAA (and progress no further in the plan-making / SA process), whilst one is a proposed employment allocation (Lamberhurst Farm, where the Local Plan notes that the option of a new settlement will be explored ahead of a future Local Plan Review).

Primary school

- Of the 30 sites most distant from a primary school, the only sites to progress any further than the SHLAA are A) the three adjacent sites at Neames Forstal that are proposed allocations in the LPR; and B) Lamberburst Farm (an employment allocation in the LPR, see discussion above).

Secondary school

- Sites most distant from a secondary school are located at: Boughton, Dargate, Doddington, Dunkirk, Hartlip, Highstreet, Leysdown/Warden (in particular), Neames Forstall, Newnham, Rainham and Upchurch.

Train station

- Minster, Eastchurch and Leysdown are notable as settlements relatively distant from a train station where site options have been progressed beyond the SHLAA. For example, the reasonable growth scenarios feature a site at Minster (3.6km from a station), Eastchurch (6.8 km) and Leysdown (10km).

Flood zone 2

- The average intersect of the SHLAA sites is 11%. Focusing on those 96 sites that are neither supported by the SHLAA nor taken forward to the reasonable growth scenarios, the average intersect is 10%.
- The average intersect of sites at Queenborough/Rushenden is 87%.

Conservation area

- The average distance is 930m, whilst the average distance of sites on the Isle of Sheppey is 2,900m.

Grade 1 listed building

- The three sites in closest proximity to a grade 1 listed building are all located east of Sittingbourne. Three are supported by the SHLAA, and the fourth (South East Sittingbourne) is identified by the SHLAA as suitable but not deliverable.

Grade 2* listed building

- Average distance = 1030m
- Average distance of sites at tier 4 settlements excluding Iwade = 690m
- Average distance of sites at Faversham = 346m

Grade 2 listed building

- Average distance of sites at tier 4 settlements = 148m
- Average distance of sites at Faversham = 206m
- Average distance sites on the Isle of Sheppey = 418m

Registered park or garden

- Of the 20 sites located closest to a registered park or garden, 17 were identified as unsuitable through the SHLAA and progressed no further in the plan-making / SA process. Of the three remaining sites: the site in closest proximity (300m) was considered as a strategy site option (North Street), but not progressed to the reasonable growth scenarios; a site at Boughton (490m) was identified as suitable by the SHLAA but not progressed any further; and another site at Boughton (800m, but within the village confines) is a proposed allocation (The Garden Hotel, Boughton).

Scheduled monument

- The two sites intersecting (or, at least adjacent) to a scheduled monument are:
 - SLA18/108 Land at Brett House, Bysing Wood Road – SHLAA suitable, and discussed in the officers report presented to the 29th October Local Plan Panel, but not progressed any further in the plan-making / SA process; and
 - SLA18/014 - Danley Farm, Drove Road – SHLAA suitable, but discussed in the officers report presented to the 29th October Local Plan Panel; not progressed any further in the plan-making / SA process.

Kent Downs AONB

- Of the 27 SHLAA sites within or adjacent to (within 5m) the AONB, all were found to be unsuitable by the SHLAA, and were not progressed any further in the plan-making / SA process, bar:
 - North Street – examined as a strategic site option (see Section 3, above) but not progressed any further (see Section 5.3 of the SA Report)
 - Southeast Sittingbourne - examined as a strategic site option (see Section 3, above) but not progressed any further (see Section 5.3 of the SA Report)
 - Three sites at Neames Forstall – are proposed allocations in the Pre-submission LPR.

Appendix VI: Sub area scenarios

Introduction

The aim of this appendix is to present a discussion of growth scenarios for the following sub-areas:

- Sittingbourne
- Faversham
- West Sheppey
- Teynham
- Newington
- Eastchurch
- Leysdown
- Boughton
- Iwade
- Tier 5 settlements and the rural area

The conclusions from each sub-area discussion are presented in Section 5.4 of the main body of the report which, in turn, feeds into the establishment of borough-wide reasonable growth scenarios (Section 5.5).

Methodology

For each sub-area the aim is to discuss sites in contention for allocation, consider how sites might potentially be brought forward in combination ('growth scenarios'), and then arrive at a conclusion on reasonable growth scenarios to take forward.

Key sources of evidence include:

- the Council's Strategic Housing Land Availability Assessment (SHLAA)⁹⁰
- the GIS analysis discussed in Appendix V;
- the discussion of sites presented in the Officers Report to the 8th October Local Plan Panel;⁹¹ and
- discussion with officers.

Sittingbourne

Sittingbourne is the Borough's main settlement, and a significant settlement in the wider sub-region, including because of major employment centres at Eurolink and Kent Science Park (to the south of Sittingbourne). For these reasons, and because land has been available subject to limited constraint, Sittingbourne has seen significant growth over recent years and decades, and there is significant committed growth. Perhaps most notable is committed strategic growth to the north of the town, where over 1,500 homes will come forward at Northwest Sittingbourne and over 550 homes at the closely linked settlement of Iwade.

It is also important to note that Sittingbourne town centre is in the process of significant transformation and regeneration. In 2019, the Council's multi-storey car park opened, freeing up small and under-used surface car parks for re-development. In addition, an entertainment complex, hotel and public realm improvements have sparked further investment with small scale residential, retail and leisure development completed or in the pipeline.

As a final introductory point, it is important to note that Sittingbourne's expansion has encroached on the surrounding parishes of Bobbing, Borden, Tunstall, Rodmersham, Bapchild and Tonge. Within these parishes the main rural settlements are Bobbing, Borden, Tunstall, Rodmersham Green and Bapchild (all of which have a primary school). These rural settlements are appropriately considered here, as they relate closely to Sittingbourne.

⁹⁰ See <https://services.swale.gov.uk/meetings/mgAi.aspx?ID=8571>

⁹¹ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2323>

A shortlist of potential growth locations and site options are discussed in Table A, with Figure A presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table A: Potential growth locations and site options at Sittingbourne

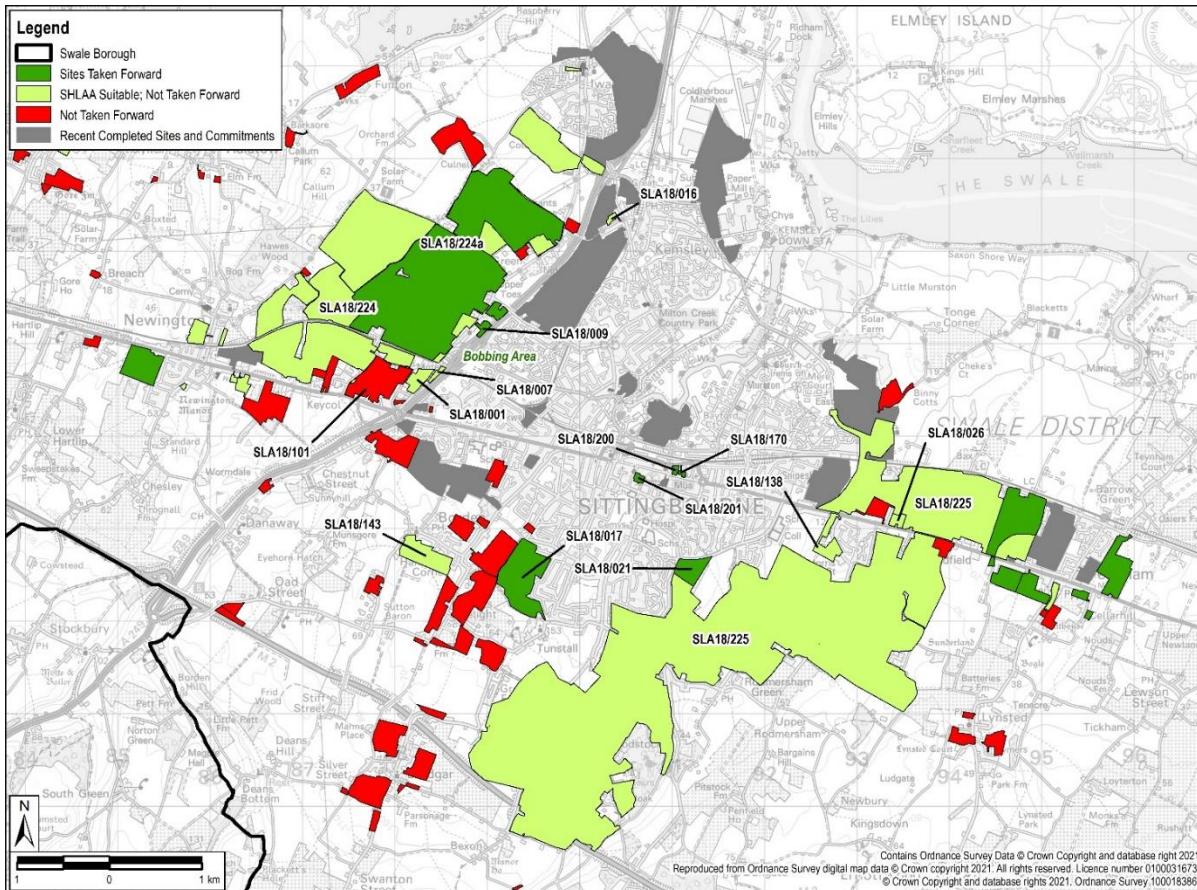
Potential growth location	Supported by SHLAA?	Discussion	
Town centre	SLA18/170 SLA18/200 SLA18/201	Yes, but not deliverable	<p>The emerging preferred growth scenario, following the Cabinet decision of 28th October, is to allocate Sittingbourne town centre as a broad area for the delivery of around 850 homes.</p> <p>This quantum of homes reflects the sites identified in the SHLAA, mindful that site deliverability can be addressed through the committed Sittingbourne Town Centre Planning and Urban Design Supplementary Planning Document (SPD). A considerable amount of work has already been completed to explore masterplanning principles for the town centre, identifying areas suitable for housing, including the eastern and western gateways to the high street, 'backland' areas well connected to the high street by alleyways, St Michael's Avenue and Eurolink Way, and there is confidence that growth locations will be identified through the SPD. The vision for the town centre is to consolidate the retail offer, whilst supporting residential, cultural and leisure uses, which aligns with the recent national changes to the town centre planning use class orders (i.e. introduction of the new class E use class, which includes retail alongside other uses, to support evolution of high streets).</p> <p>In short, the 850 homes figure is considered to be suitably conservative figure. Whilst there are viability challenges, there is considered to be good potential to deliver at least this number of homes, hence there are limited arguments for exploring a lower growth approach. Equally, there are limited arguments for exploring higher growth. The merits of potential higher growth options can be suggested in theory (e.g. delivering low carbon infrastructure); however, in practice, there is a need for town centre planning to be driven by detailed work on masterplanning, design, site availability/assembly etc.</p>
Strategic site	SLA18/225 SE Sittingbourne		Ruled out for the reasons given in Section 5.3.
	SLA18/224 / 224a Land at Bobbing ⁹²	Caveated support	<p>Taken forward for the reasons given in Section 5.3.</p> <p>N.B. the proposal is to assume a scheme in line with that proposed by the site promoter at the current time; however, it is noted that alternative site extents have been proposed in the past..</p>
South	SLA18/017 Land at Ufton Court SLA18/021 Chilton Manor Fm	Yes Yes	<p>Were presented as options to the 8th October Local Plan Panel, who recommended allocation of SLA18/021; however, the decision was subsequently made at 28th October Cabinet to <i>not</i> allocate the site.</p>

⁹² The larger site was submitted through the SHLAA and the smaller site as part of subsequent work to explore strategic site options.

	SLA18/137 Land between A2 Bapchild and existing NRR	Yes	Also, presented as options to the 8 th October Local Plan Panel; however, considered to be less suitable than the two 'South' sites. Reasons are given in the Officers report to the LPP meeting. More broadly, any further expansion to the east of Sittingbourne (beyond the two allocations in the adopted Local Plan) would need to be very carefully considered, with a view to: avoiding coalescence with Bapchild and Tonge (both historic parishes with grade 1 listed churches); respecting landscape sensitivity (notably to the south of the A2); avoiding 'sprawl' towards Teynham; and ensuring delivery of the final segment of the Sittingbourne Northern Relief Road. At the current time there is no certainty regarding what a scheme might involve, and whilst the potential transport benefits of delivering the new road link are recognised, it is far from clear that benefits would outweigh the disbenefits.
East	SLA18/138 Land at Fox Hill/ School Lane	Yes	
Bobbing	18/001 West of Sheppey Way	Yes	Presented to the LPP Panel with a recommendation for non-allocation; however, for the purposes of establishing growth scenarios, there is considered to be potential for modest growth at Bobbing, given: village services and facilities, good links to higher order centres and a dispersed built form potentially suited to consolidation. One or both of the sites supported by the SHLAA could be suitable for allocation, and potentially that part of 18/101 east of the electricity pylons and rising land to Rook Lane / Keycol. Sites other than those in the SHLAA might also feasibly be explored, potentially through a Neighbourhood Plan.
	18/009 Church Farm	Yes	
	18/101 Land at Hill Farm	No	
Borden	SLA18/143 Land at Home Farm	Yes	Borden is one tier higher than Bobbing in the settlement hierarchy (albeit the local offer is very similar, as understood from Settlement Hierarchy Study, 2020), but this broad area, to the south of Sittingbourne, is considered to be subject to higher landscape, heritage and biodiversity constraint. There is a high density of promoted sites, and one or more might be found to be suitable (in whole or in part) upon further investigation (potentially through a Neighbourhood Plan). However, for the purposes of the LPR, it is not considered necessary to take forward a scenario that sees allocation at Borden. This decision is made mindful of the constraints to growth, the nearby committed site at South West Sittingbourne and also nearby site 18/017 (discussed above).
	Other sites	No	
Bapchild	SLA18/138 Land at Fox Hill/ School Lane	Yes	Bapchild is a tier 5 settlement, and overall has a better local offer than Borden, as understood from Settlement Hierarchy Study. SLA18/138 has been discussed above, as a possible (albeit unlikely) component of strategic expansion to the east of Sittingbourne, but might alternatively be considered as an extension to Bapchild. It is, however, subject to constraints, including in terms of landscape (moderate-high sensitivity), coalescence / gap to Sittingbourne (the site would split the field that forms the bulk of the gap) and heritage (grade 1 listed church). SLA18/026 is potentially less constrained overall, but relates less well to the village, is further from Sittingbourne, would be more visible from the A2 and comprises grade 1 agricultural land (adjacent land parcels have been surveyed in detail) currently used for orchards (not priority habitat).
	SLA18/026 Land off Hempstead Lane	Yes	In conclusion, it is not considered necessary to take forward a scenario that sees any allocation(s) at Bapchild, in light of site specific constraints and strategic considerations, including a general view that further growth in this part of the A2 corridor – over-and-above the adopted Local Plan allocations - must be carefully considered, rather than piecemeal.

Other sites supported by the SHLAA but not discussed in the rows above are: SLA18/016 (small site with access constraints); SLA18/007 (suitable for employment only, discussed in Box 8.1); and sites that are committed (SLA18/175, SLA18/182, SLA18/184, SLA18/195, SLA18/208, SLA18/217, SLA18/218, SLA18/222).

Figure A: Potential growth locations taken forward at Sittingbourne



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate Sittingbourne town centre as a broad area for the delivery of around 850 homes. There is a need to explore **higher growth scenarios**, in light of the discussion presented in Sections 5.2 and 5.3 of this report.

A first port of call is the two urban extension options to the south of Sittingbourne (18/017 and 18/021), which together would deliver c.380 homes. Furthermore, as discussed in Table A, there is considered to be the potential for growth at Bobbing. The precise number of homes and sites to allocate can reasonably be left undefined (there would be merit to taking forward allocation(s) through a Neighbourhood Plan); however, on balance, it is considered appropriate to assume delivery of circa 120 homes. This brings the total number of additional homes under this scenario to 500. This is **higher growth scenario 1**.

Secondly, there is the option of strategic growth at Bobbing. This would deliver an additional circa 2,500 homes (possibly with additional growth beyond the plan period). This is **higher growth scenario 2**.

In conclusion, **three growth scenarios** should be taken forward to the reasonable growth scenarios.

Faversham

Faversham is a tier 2 settlement in the adopted settlement hierarchy, alongside Sheerness. Environmental constraints to growth are well understood, perhaps most notably heritage constraints; however, the adopted Local Plan allocates several significant sites, most notably mixed use urban extensions to the north (c.370 homes), east (c.350 homes) and south (c.650 homes). Committed growth to the south is of particular note, as growth here will lead to a significant change to the urban form of the town. Faversham historically extended between the marshes and creek-side industry in the north and the A2 in the south, but committed sites mean that there is now more potential to consider expansion of the town as far south as the M2.

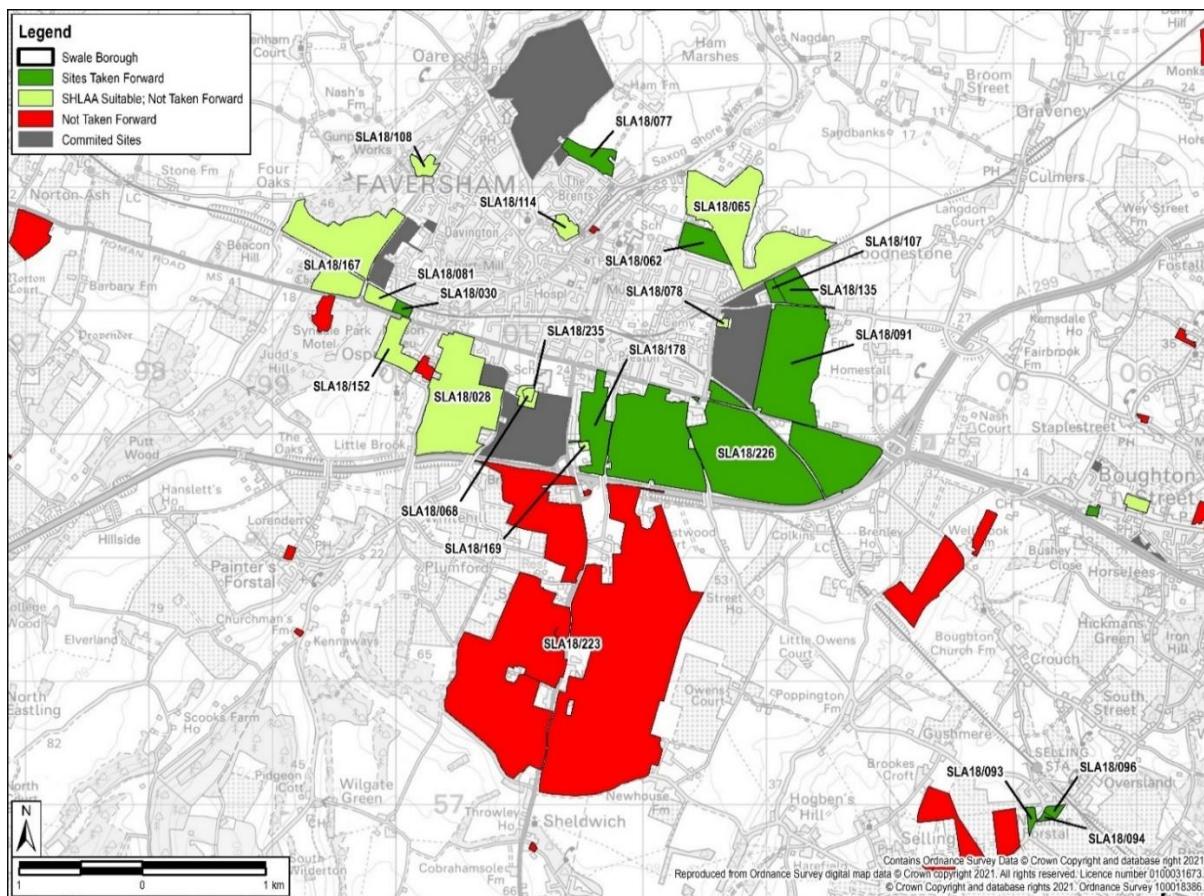
A shortlist of potential growth locations and site options are discussed in Table B, with Figure B presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table B: Potential growth locations and site options at Faversham

Potential growth location		Supported by SHLAA?	Discussion
Urban and small sites	SLA18/078	Yes	A Faversham Neighbourhood Plan is in preparation, and would be well placed to allocate one or more of these urban or small sites, and/or identify further sites, including with a view to supporting town centre vitality (see discussion of Sittingbourne town centre, above); however, the safe option (at the current time) is not to assume any supply.
	SLA18/114		
	SLA18/169	Caveated support	
	SLA18/235		
East and southeast	SLA18/226 South East Faversham	Yes	The emerging preferred growth scenario, following the Cabinet decision of 28 th October, is to support strategic growth to the east / southeast, delivering around 3,400 homes across these four sites (3,250 in the plan period). SLA18/226 is the central component, having been examined as a stand-alone garden community option since 2018. SLA18/091 would comprise a 600 home extension to the committed Lady Dane Farm scheme, and there is understood to be good potential to masterplan and deliver the scheme in combination with SLA18/226. SLA18/135 is a smaller site at the northern extent of the combined scheme, and would extend an existing allocation by 240 homes (it is also important to note that the western extent of the site is an existing employment allocation - SLA18/107). SLA18/178 is an existing allocation, where the proposal is now to deliver an additional 70 homes on the southern part of the site (instead of open/greenspace), potentially enabling a link road between the A251 and SLA18/226.
	SLA18/091 Land at Lady Dane Fm		A lower growth scenario can also be envisaged involving expansion to the east only, via sites SLA18/091 and SLA18/135.
	SLA18/135 Land at Graveney Road	Yes	There is also a reason to suggest that the additional 70 homes at SLA18/178 should be assumed under this lower growth scenario; however, for the purposes of arriving at growth scenarios, it is assumed that the primary justification for the additional 70 homes is to enable delivery of the link road to SLA18/226.
	SLA18/178 Preston Fields		Finally, it is considered important to note the possibility of a higher growth scenario involving comprehensive planning for the entire land parcel bounded by: Faversham Creek to the northwest (to include site SLA18/062); the flood zone / local wildlife sites / Goodnestone Conservation Area in the north; the A299 in the east; the M2 to the south; and the A251 to the southwest. Additional homes could lead to economies of scale in support of additional infrastructure, to include strategic green infrastructure to protect and buffer heritage and biodiversity assets; and the potential to 'unlock' strategic employment land in the vicinity of M2 Junction 7 might also be envisaged. See further discussion of strategic planning at landscape scales in Appendix III.
North Street	SLA18/223 Land at Ashford Road, North Street, Sheldwich	No	New settlement ruled out for the reasons given in Section 5.3.
North	SLA18/065 East of Abbey Farm	Yes	Land to the north is considered the next port of call, as there are two sites considered to be <i>relatively</i> unconstrained, in the Faversham

	SLA18/062 39 Abbey Fields	Yes	context, namely SLA18/062 and SLA18/077. Modest extensions here could more-or-less complete the expansion of Faversham north as far as the flood risk zone / zone of SPA and wider biodiversity sensitivity.
	SLA18/077 Land at Ham Road	Yes	SLA18/065 is considered the least suitable of the three sites. It would extend SLA18/062 to include an area of land that is heavily constrained in flood risk and biodiversity terms.
South (north of the A2)	SLA18/081 Land at London Road and Western Link	Yes	Both sites are quite well contained in built form terms, but the western site contributes to an attractive setting to the western edge of Faversham, in combination with the highly visible landscaped grounds of the Syndale Park Conservation Area to the south of the A2. Furthermore, the Ordnance Survey map indicates the site of a Roman burial ground, and the Kent Historic Environment suggests this as the possible site of the Roman Station (mansio) of Durolevum, noting that the A2 is a Roman road (Watling Street).
	SLA18/030 Land at Lion Field	Yes	
South (south of the A2)	SLA18/028 Land at Queen Court Farm, Faversham	Yes	As discussed, the existing Local Plan includes three allocations to the south of the A2, which essentially comprise those sites considered to be least constrained at the time of preparing that Local Plan. Uncommitted land to the south of the A2 is constrained in historic environment and landscape terms, particularly given: the Ospringe Conservation Area; the Faversham Conservation Area; a wider historic landscape associated with fruit cultivation; and impacts to important links between Faversham and the rural landscape to the south of the M2, including the Whitehill and Painters Forstall Conservation Areas and the national fruit collection at Brogdale Farm. There are also road access and air quality constraints, particularly given the Ospringe AQMA.
	SLA18/152 Land south of A2/ West of Water Lane	Yes	Also, the officers' report to the 8 th November Local Plan Panel makes the following important statement in respect of the largest of these sites (SLA18/028): " <i>Site promoters have been unable to demonstrate collaboration with the land available to the west and north west that might provide an opportunity for a link road from the A2 at Ospringe to the A251 Ashford, meaning that the site would most likely be developed in isolation rather than as a more cohesive approach that could potentially yield the benefit of a bypass that could relieve traffic on the A2 and better walking and cycling links with the town centre.</i> "
	SLA18/068/235 Land at Perry Court Farm	Yes	
West	SLA18/167 West of Western Link	Yes	Both sites are constrained in landscape terms, with the western edge of Faversham defined by the Syndale Valley local landscape designation. Additionally, the larger site would impact on the setting of Syndale Conservation Area, and the smaller site mostly falls in flood risk zone 2.
	SLA18/108 Land at Brett House	Yes	

Other sites supported by the SHLAA but not discussed above are committed (SLA18/149, SLA18/174, SLA18/194).

Figure B: Potential growth locations taken forward at Faversham

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support strategic growth to the east / southeast, delivering around 3,400 homes in total (3,250 in the plan period). There is a need to explore scenarios involving smaller scale urban extensions, in place of strategic growth to the east / southeast, which in practice means exploring lower growth scenarios. Higher growth could feasibly be achieved by more comprehensive expansion to the east; however, the land in question was not considered through the SHLAA and is not known to be available, so this option is ruled out on delivery grounds.

Focusing on lower growth scenarios, five urban extension options have been identified that are judged to perform relatively well, for the purposes of arriving at growth scenarios, namely sites 18/030, 18/062, 18/077, 18/091 and 18/135. The combined yield of these sites, according to the figures presented in the report to the 8th October Local Plan Panel meeting, is 1,065 homes; however, it is considered appropriate to round this figure down to 1,000 homes. This is **lower growth scenario 1**.

Other lower growth scenarios can obviously be envisaged that would involve a selection of the five urban extension options that feature in lower growth scenario 1. One possible scenario, of note, would involve allocating only the three smaller urban extensions to the north and south, with further expansion to the east resisted, including due to concerns around 'urban sprawl'. However, expansion to the east would comprise a mixed use scheme, to include at least 10 ha of new employment land, which is an important consideration in light of the employment land targets set by the ELR (2018). Furthermore, there is a need to recall the 2020 decision by Cabinet, in respect of focusing growth at Faversham through the LPR.

In conclusion, **two growth scenarios** should be taken forward to the reasonable growth scenarios. N.B. additionally c225 homes are expected to be delivered through the Faversham Neighbourhood Plan.

West Sheppey

Sheerness is a tier 2 settlement in the settlement hierarchy, whilst Minster/Halfway and Queenborough/Rushenden together comprise tier 3 of the hierarchy. Together, these settlements comprise the 'West Sheppey Triangle'. The adopted Local Plan makes a series of housing allocations at Minster/Halfway, with Barton Hill Drive by far the

largest scheme (now with permission for 700 homes). There are also three very small allocations at Queenborough/Rushenden, and much of area is designated as an area of regeneration, as part of which there is support for significant housing growth. There are no allocations at Sheerness, but the Port of Sheerness area is designated as an area of regeneration, with a focus on safeguarding the port function and encouraging investment.

A shortlist of potential growth locations and site options are discussed in Table C, with Figure D presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus ruled out.

Table C: Potential growth locations and site options in the West Sheppey Triangle

Potential growth location	Supported by SHLAA?	Discussion
Sheerness	N/a	There is support for housing growth in Sheerness, and this could form part of plans for regeneration of the Port area; however, the safe option (at the current time) is not to assume any supply.
Queenborough / Rush'den	SLA18/113 Land at Port of S'ness, Rushdenden	No
	SLA18/199	
	SLA18/207	
	SLA18/214	
	SLA18/220	Yes
East and Southeast of Minster	SLA18/038 East of Scocles Road	Yes
	SLA18/067 Land off Elm Lane	Yes

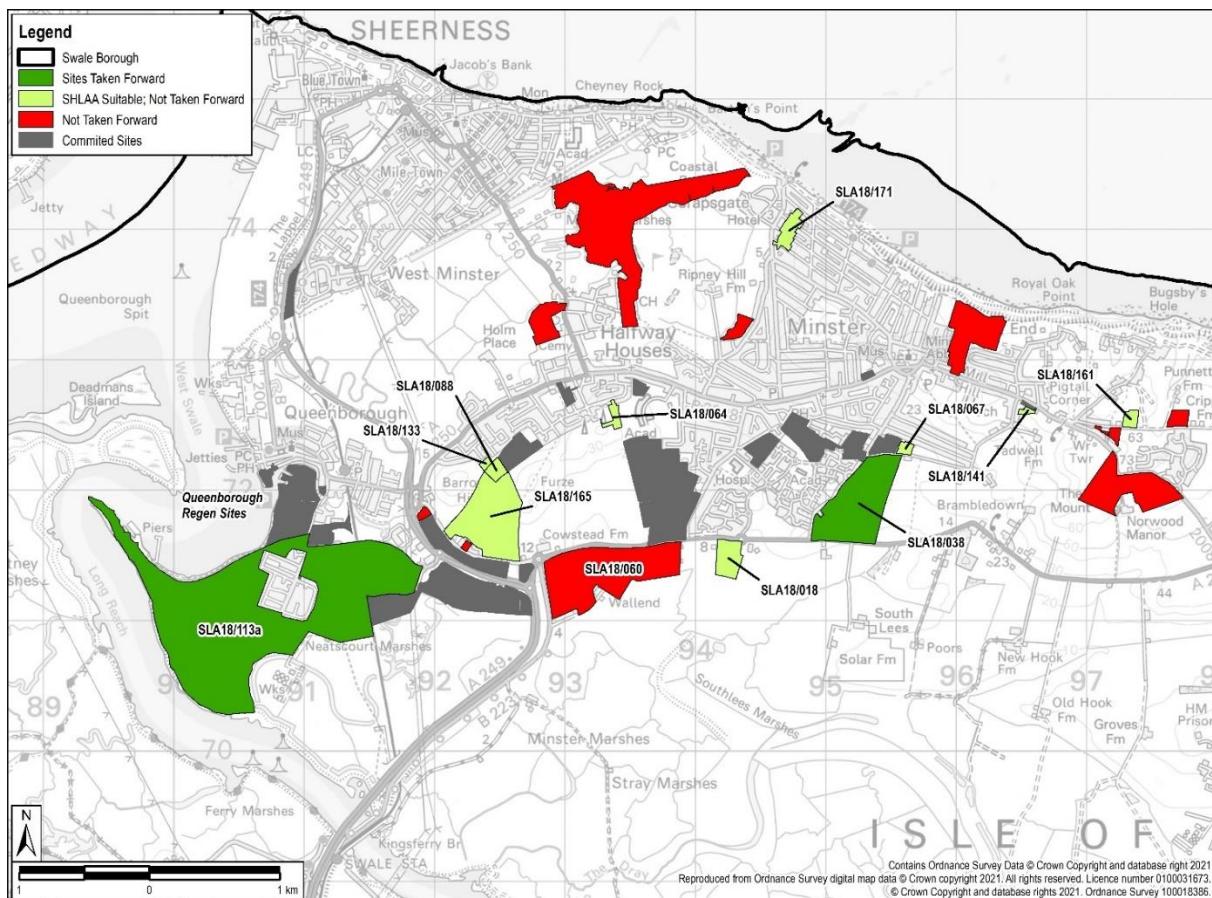
⁹³ The Swale Landscape Sensitivity Assessment (2020) identifies all land surrounding Minster as having moderate-high sensitivity to housing growth, with inherent sensitivities associated with the raised rolling landscape of Sheppey's clay "backbone". However, the study also discusses important spatial variation. Firstly, it is important to note that the landscape parcel directly to the southeast of Minster Abbey is judged to have 'high' sensitivity to employment development (i.e. taller/bulkier buildings); and, secondly, the following is an important quote describing spatial variation in landscape sensitivity within the broad landscape parcel (MR2) that falls between the southern edge of Minster/Halfway and the A2500 Lower Road: "Key spatial variations are the distinctive landforms of Barrows Hill and Furze Hill to the west which have higher sensitivity, the retention of an open rural setting along the A2500 and the relationship to the adjacent marshes, plus the role of the slopes as a rural setting to Minster Abbey, notably in the area south of Woottons Farm rising from the A2500, which are especially sensitive..."

	SLA18/165 Land East of Queenborough	Yes	There is merit to growth in this area – west of Minster / south of Halfway / west of Queenborough / north of the Lower Road (or the flood risk zone) – including as it is relatively well-connected in the Sheppey context. This is reflected in four adopted Local Plan allocations, including Barton Hill Drive, which now has permission.
	SLA18/088 Land South West of Belgrave Road	Yes	There could be merit to taking a strategic / comprehensive approach to further growth in this area, including with a view to addressing landscape and other environmental constraints and opportunities, and maximising infrastructure delivery benefits. This could mean avoiding development of raised land (Barrows Hill and Furze Hill; see footnote discussion, below), which could offer an opportunity to deliver new strategic green infrastructure, and also land to the south of the Lower Road (site SLA18/060), across which there are long ranging views to Sittingbourne.
West of Minster / south of Halfway	SLA18/064 Land at Highfield Road	Yes	This could mean avoiding development of raised land (Barrows Hill and Furze Hill; see footnote discussion, below), which could offer an opportunity to deliver new strategic green infrastructure, and also land to the south of the Lower Road (site SLA18/060), across which there are long ranging views to Sittingbourne.
	SLA18/133 Land at Bartletts Close, Halfway	Yes	However, all of the sites supported by the SHLAA would involve piecemeal growth. SLA18/165 is notable as a large site, but would involve development of land rising towards Barrows Hill.
	SLA18/060 Land at Wallend, Lower Road	No	N.B. it is noted that a more comprehensive scheme for Barton Hill Drive (1,400 homes, rather than the committed 700 home scheme) is now being promoted, to include additional infrastructure delivery and low carbon measures ('net zero' is proposed); however, this was not submitted in time to be considered through the SHLAA.
Park homes (also relevant to the Leysdown area)	An "Interim Policy Statement on "Use of caravans/chalets as permanent residences" was presented to the Local Plans Panel on 7th May 2020. This proposed a shift in approach, specifically support for: " <i>Proposals for the conversion/redevelopment of holiday accommodation on holiday parks in the Borough to permanent residence (12 months of the year) will be granted provided that all of the following criteria are met...</i> " There is support for taking forward this interim policy through the LPR, which could lead to a significant supply of new homes on the Isle of Sheppey. There are good reasons for seeking to enable conversion/redevelopment to permanent residence, including because such sites can often be suited to the over 55s looking to downsize from family-sized housing. However, there is a need to apply caution, as given the location of some existing park homes sites (e.g. risk of flooding; accessibility to services and facilities) and constraints to ensuring good living standards onsite.		
Other sites supported by the SHLAA but not discussed in the rows above are: SLA18/171 (a constrained greenfield site within the settlement confines of Minster, potentially suited to Local Greenspace designation); SLA18/141 (a small site on the eastern edge of Minster); SLA18/018 (proposed for non-residential uses, discussed in detail in the officers' report to the 8 th October Local Plan Panel); and sites that are committed (SLA18/131, SLA18/176, SLA18/177, SLA18/179, SLA18/180, SLA18/186, SLA18/193, SLA18/198, SLA18/209).			

Figure C: Aerial image of Minster/Halfway from 1990, prior to Thistle Hill development (Source: Google Earth)



Figure D: Potential growth locations taken forward in the West Sheppey triangle



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate site 18/113 for 850 homes. This site has the potential to support regeneration objectives for Queenborough/Rushenden, but is subject to a range of constraints and delivery challenges. As such, there is a need to explore scenarios involving non-allocation of this site.

One other site has been identified as performing relatively well, for the purposes of arriving at growth scenarios, namely site 18/038, to the southeast of Minster. The capacity of this site is c.650 homes, hence allocation of this site in place of site 18/113 would involve modestly lower growth directed to West Sheppey (but there are also options for allocations in the eastern part of the Island, as discussed below). This is **lower growth scenario 1**.

Additionally, there is the option of nil allocations, particularly given concerns regarding capacity on the A249 and at junction 5 of the M2 under scenarios where there is also higher growth in the Sittingbourne area. This is **lower growth scenario 2**.

In conclusion, **three growth scenarios** should be taken forward to the reasonable growth scenarios. N.B. additionally c225 homes are expected to be delivered through a permissive policy on Park Homes, which in practice will be focused on Sheppey, both in the West Sheppey area and the rural east of the Island.

Teynham

Teynham is one of six tier four settlements in the Borough. It benefits from a range of services and facilities and good connectivity to Sittingbourne and Faversham by road and rail, although AQMAs are a significant constraint.

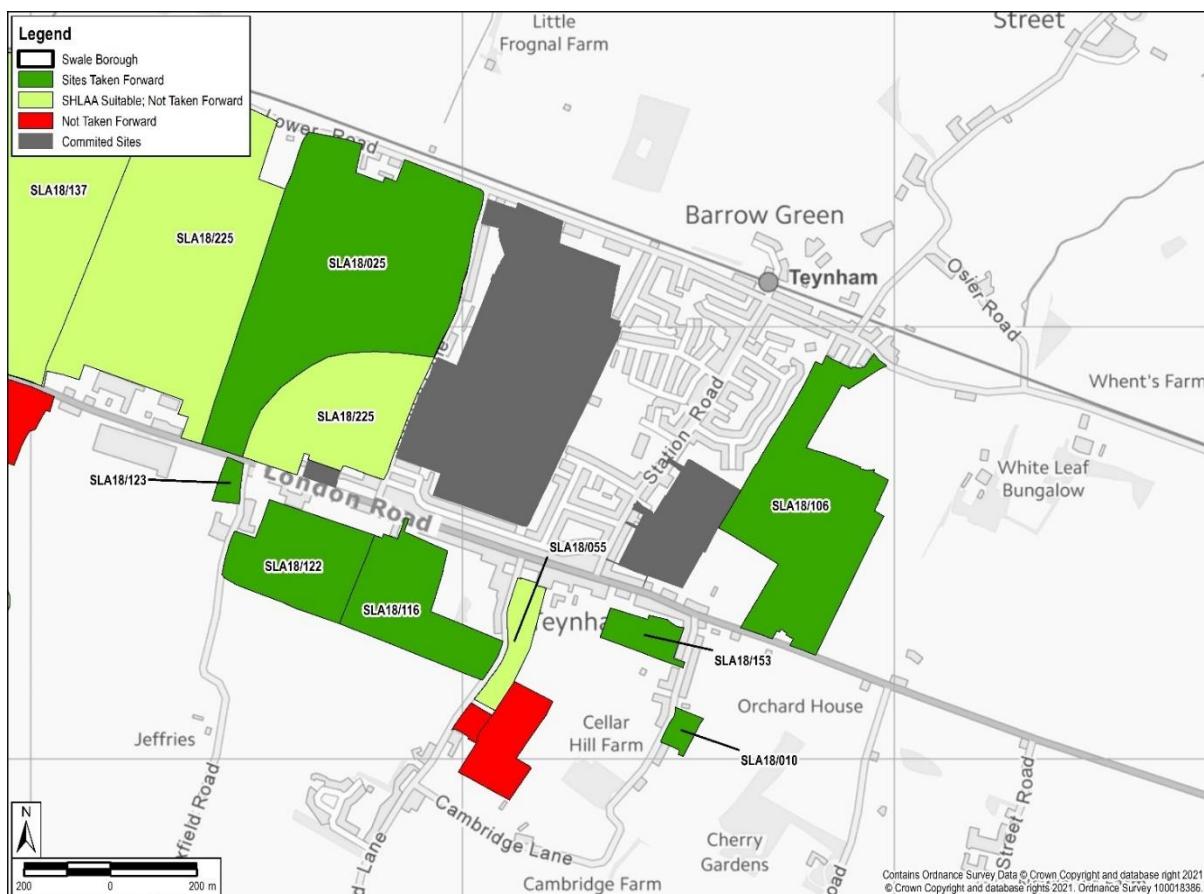
The adopted Local Plan allocates four sites to deliver a total of around 410 homes, with 260 proposed at a mixed use extension of the village to the west. This is notably more than the 115 homes directed to Newington, which is a similar settlement.

As a final introductory point, it is important to note that all agricultural land surrounding the village is shown by the nationally available (low resolution) dataset to be of grade 1 quality (although much of the land has been surveyed in detail, which shows there to be some grade 2 quality land).

A shortlist of potential growth locations and site options are discussed in Table D, with Figure E presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus ruled out.

Table D: Potential growth locations and site options at Teynham

Potential growth location	Supported by SHLAA?	Discussion
Northwest	SLA18/025 Land West of Frogna Lane	Yes This site would extend the 260 home mixed use scheme that is an allocation in the adopted Local Plan. There would be good accessibility to the rail station (there is a footpath along Lower Road, west of Frogna Lane); however, there is heritage constraint, in the form of two listed buildings (one grade 2*), and new homes would, to some extent, be separated from the rest of the village by the committed employment area, sports pitches and open space. There is also a need to consider the landscape gap to Bapchild and Sittingbourne.
	SLA18/225 SE Sittingbourne	Yes It is important to note the extensive SE Sittingbourne site extends to include site SLA18/025 and the committed area of open space to the west of Frogna Lane (south of SLA18/025). However, the latest proposals for SLA18/225 appear to leave the open space undeveloped.
Northeast	SLA18/106 Land at Barrow Green Farm, London Rd	Yes This site would extend and link the two existing modest allocations to the east of the village, and would benefit from very good accessibility to the rail station. The assumption is that only the western part of the site would be developed for c.100 homes. This is an important consideration given a ridgeline running north/south through the centre of the site, associated with public footpaths.
Southeast (Lynsted Lane)	SLA18/055 Land at Lynsted Lane	Yes Lynsted Lane is understood to be constrained by its problematic junction with the A2, which is located in the centre of the village, with the AQMA covering that part of the A2 immediately to the east. This is understood to be a key issue, with the officers' report presented to the October 8 th LP Panel making clear that this is the least suitable of the sites judged to be suitable through the SHLAA.
Southeast (Cellar Hill)	SLA18/010 Land at Cellar Hill	Yes
	SLA18/153 Land south of Dover Castle Inn, A2/Cellarhill	Yes Cellar Hill is covered by the conservation area, although the officers' report presented to the October 8 th Local Plan Panel highlights that there could be potential for sensitive development nonetheless.
Southwest	SLA18/116 Land South of London Road/West of Lynsted Lane	Yes Land between Claxfield Road and Lynstead Lane is judged to have relatively low landscape sensitivity in the borough-wide context, according to the Landscape Sensitivity Assessment (2020); however, there is a degree of sensitivity, given views across this land from footpaths and Claxfield Road, which is designated as a rural lane. There is also heritage constraint, with a grade 2* listed farmhouse adjacent to the west of SLA18/122, and further listed buildings to the south.
	SLA18/122 Land at Claxfield Road (Site 1)	Yes Focusing on adjacent sites 116 and 122, the proposal is to deliver modest housing growth abutting the village, with both sites gaining access onto Claxfield Road (as opposed to Lynsted Lane). However, there is limited potential to make use of existing field boundaries, hence the possibility of further expansion south over time can be foreseen.
	SLA18/123 Land at Claxfield Road (Site 2)	Yes
Other sites supported by the SHLAA but not discussed in the rows above are committed (SLA18/183, SLA18/190, SLA18/213).		

Figure E: Potential growth locations taken forward at Teynham

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support an 'area of opportunity' at Teynham, expected to deliver around 1,100 homes. As explained in the officers report to the 8th November Local Plan Panel: "*To maximise opportunities for more comprehensive placemaking, the sites have... been considered as a whole with a view to identifying and considering their potential cumulative effect and what infrastructure provision should form part of any allocations to support existing and new communities in this location.*"

There is also a need to explore scenarios involving one or more discrete allocations, in place of an area of opportunity, which in practice means exploring lower growth scenarios. On balance, it is suggested that growth to the northeast and southwest should be the first port of call; however, this is marginal, as the site to the northwest (Site 18/025) and the two sites to the southeast (SLA18/153 and SLA18/010) may also be suitable. The combined yield of the sites to the northeast and southwest is c.350 homes. This is **lower growth scenario 1**.

Additionally, there is the option of nil allocations, given: committed growth; A2 traffic and air quality issues; and few clear growth related opportunities short of delivering a bypass. This is **lower growth scenario 2**.

In conclusion, **three growth scenarios** should be taken forward to the reasonable growth scenarios.

Newington

Newington is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities and good connectivity to Sittingbourne and the Medway towns by road and rail, although AQMAs are a constraint.

The adopted Local Plan allocates one site to deliver 115 homes. This is notably fewer than the 410 homes (plus employment land) directed to Teynham, which is a similar settlement.

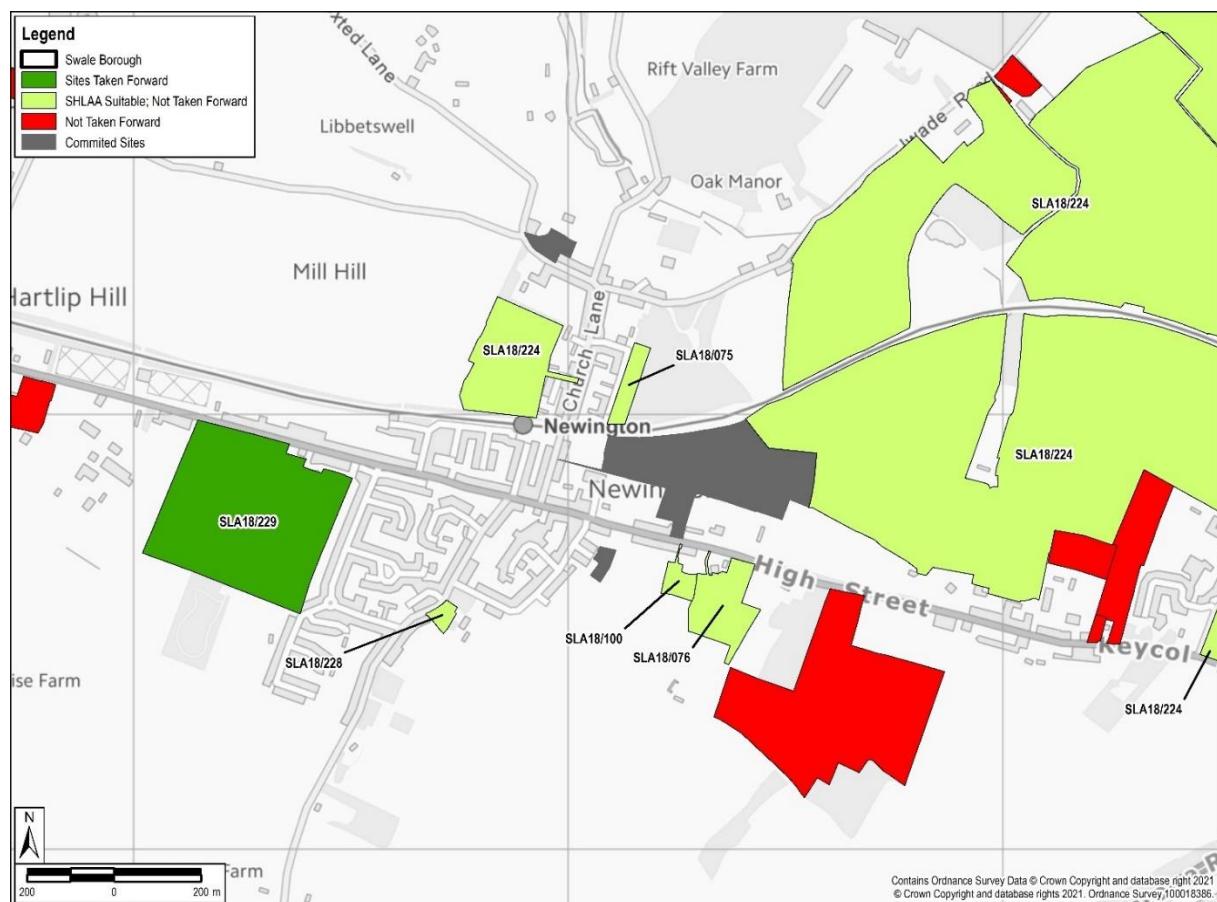
As a final introductory point, it is important to note that all agricultural land surrounding the village is shown by the nationally available (low resolution) dataset to be of grade 1 quality.

A shortlist of potential growth locations and site options are discussed in Table E, with Figure F presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table E: Potential growth locations and site options at Newington

Potential growth location		Supported by SHLAA?	Discussion
North	SLA18/075 Land at St Mary's View	Yes	Land to the north of the railway line is constrained in landscape and heritage terms, with the land rising to the north, towards the conservation area and grade 1 listed church. Road accessibility is a constraint, with Church Lane a narrow road meeting the A2 within an AQMA.
	SLA18/224 / 224a Land at Bobbing ⁹⁴	Caveated support	SLA18/224 is a western outpost of the very large site originally submitted by the promoters of a new garden community at Bobbing; however, there has subsequently been no discussion of bringing forward this land. It benefits from being well contained, potentially with limited landscape sensitivity, but the Church Lane constraint applies, and there is currently no access to the rail station from the north.
Southwest	SLA18/229 Land at Pond Farm	Yes	An application for 140 homes (plus a care facility) on this site was dismissed at appeal in 2017, primarily on air quality and landscape grounds. However, it is considered appropriate to explore the option of allocation through the LPR, given that: air quality is improving (or, at least, set to improve); and the Swale Landscape Sensitivity Assessment (2020) identifies land to the south of Newington as relatively unconstrained, in the borough-wide context. There could also be the possibility of delivering an element of planning gain, with the scheme dismissed at appeal in 2017 having proposed to make land available for a healthcare facility, and noting the village recreation ground adjacent to the south. Latest understanding is that a scheme for around 200 homes is being proposed. This amounts to 15 dwellings per hectare on average, suggesting good potential to deliver onsite green infrastructure, including in order to buffer the listed building to the northeast of the site. There is also now a committed minerals extraction site adjacent to the west / southwest.
Southeast	SLA18/076 Land at Ellen's Place	Yes	There could be potential for expansion of the village in this direction, noting that the Landscape Sensitivity Assessment (2020) identifies land south of the A2 as relatively unconstrained, in the borough-wide context. Options for strategic expansion can be envisaged, utilising existing landscape features and avoiding encroachment on rising ground towards Keycol. However, the two sites in question would represent piecemeal growth, and would not relate well to the existing built form. It is not clear that they could be delivered effectively in combination (they appear to be separated by a mature hedgerow), hence the western site would seemingly require access onto the A2 within the AQMA. Also, this site (SLA18/100) was dismissed on appeal in 2018 on grounds of harm to the open, rural character and appearance of the countryside.
	SLA18/100 148 High Street	Yes	Other sites supported by the SHLAA but not discussed in the rows above are committed SLA18/228 (as small site in the conservation area) and SLA18/124 (which is committed).

⁹⁴ The larger site was submitted through the SHLAA and the smaller site as part of subsequent work to explore strategic site options.

Figure F: Potential growth locations taken forward at Newington

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There is a need to explore higher growth scenarios, recognising that Newington is a tier 4 settlement that is well connected by road and has a rail station.

One site option has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site18/229, which would deliver around 200 homes. This is **higher growth scenario 1**. The next port of call would be land to the southeast, and at least one of the sites in question appears to be subject to limited constraint, but allocation would represent piecemeal growth and the site does not relate well to the existing built form of the village.

In conclusion, **two growth scenarios** should be taken forward to the reasonable growth scenarios.

Eastchurch

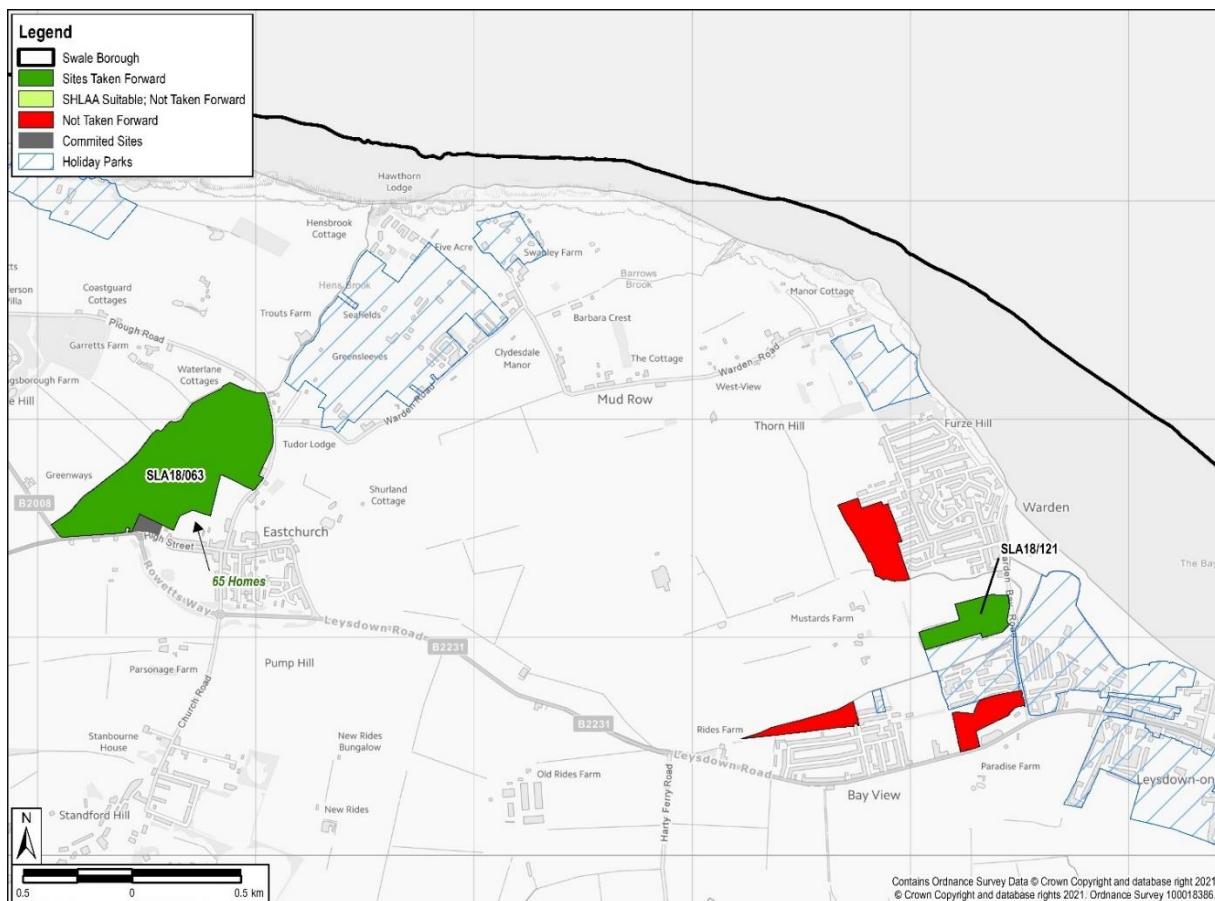
Eastchurch is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, but is not very well connected to higher order centres, given its location towards the east of the Isle of Sheppey, a limited bus service and traffic issues on the island, particularly in the summer tourism season. The adopted Local Plan allocates one site to deliver 15 homes.

There is only one SHLAA site at Eastchurch, namely SLA18/063 (Land North of Eastchurch). This is a large site that could feasibly more than double the size of the village; however, a smaller scheme is now being promoted, for 65 homes. Any scheme here would not relate very well to the existing village, and would give rise to landscape concerns given topography, limited potential landscape features to bound expansion and 'moderate-high' landscape sensitivity. There is also a need to consider the setting of the small historic village core, which includes a grade 1 listed church.

Other than land to the north, the only other potential direction of growth would appear to be land to the east, given designated local greenspace to the west and the visual prominence of Pump Hill to the south. However, the large field to the east of the village is not available, and also has moderate-high landscape sensitivity, with the Landscape Sensitivity Assessment explaining: “*The area east of Eastchurch is particularly sensitive in relation to the setting of the historic area at Shurland.*”

Figure G presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Figure G: Potential growth locations taken forward at Eastchurch and Leysdown



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Eastchurch, recognising its relatively isolated location on the Isle of Sheppey; however, as a tier 4 settlement there is a need to remain open to the option of allocation, should sites be available and suitable.

One site option has been identified that is potentially suitable for allocation (for the purposes of arriving at growth scenarios), namely site 18/063, which would yield c.65 homes. This is **higher growth scenario 1**.

In conclusion, **two growth scenarios** should be taken forward to the reasonable growth scenarios.

Leysdown

Leysdown is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, but is not very well connected to higher order centres, given its location towards the east of the Isle of Sheppey, a limited bus service and traffic issues on the island, particularly in the summer tourism season. Leysdown is heavily associated with tourism, as is evident from the extent of holiday parks (shown on the adopted Local Plan policies map). The adopted Local Plan allocates one site to deliver 10 homes.

Leysdown is of note as its current position in the hierarchy is somewhat marginal; specifically, there is an argument for moving Leysdown to tier 5. On one hand this could indicate a need to restrain growth to a level below that which might otherwise be considered appropriate for a tier 4 settlement; however, on the other hand, there is an argument for seeking to support investment in the town via housing growth, such that its tier 4 status is reinforced. The Settlement Hierarchy Study (2020) explains: "*Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services.*"

There is only one site at Leysdown supported by the SHLAA, namely SLA18/121 (Seaview Park, Warden Bay Road). One other site is also available, but comprises designated Local Greenspace.

Focusing on SLA18/121, the site currently comprises a holiday park, such that it includes a strong element of brownfield land. A housing scheme would not adjoin an existing settlement boundary, but would occupy a potentially suitable location between the existing settlement confines of Leysdown, Warden and Bay View.

Finally, there is a need to consider the possibility of further housing growth through conversion of park homes (see discussion in Table C, above); however, on balance this is not considered to be a reasonable option to take forward.

Figure G, above, presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Leysdown, as per Eastchurch; however, there is an argument for housing growth in support of village vitality objectives, e.g. with a view to supporting shops and services outside of the tourism season.

One site option has been identified that is potentially suitable for allocation (for the purposes of arriving at growth scenarios), namely site 18/121. The SHLAA records the yield of this site as 135 homes; however, parts of the site are constrained by flood risk, hence it is considered appropriate to assume a lower yield of c.100 homes. This is **higher growth scenario 1**.

In conclusion, **two growth scenarios** should be taken forward to the reasonable growth scenarios.

Boughton

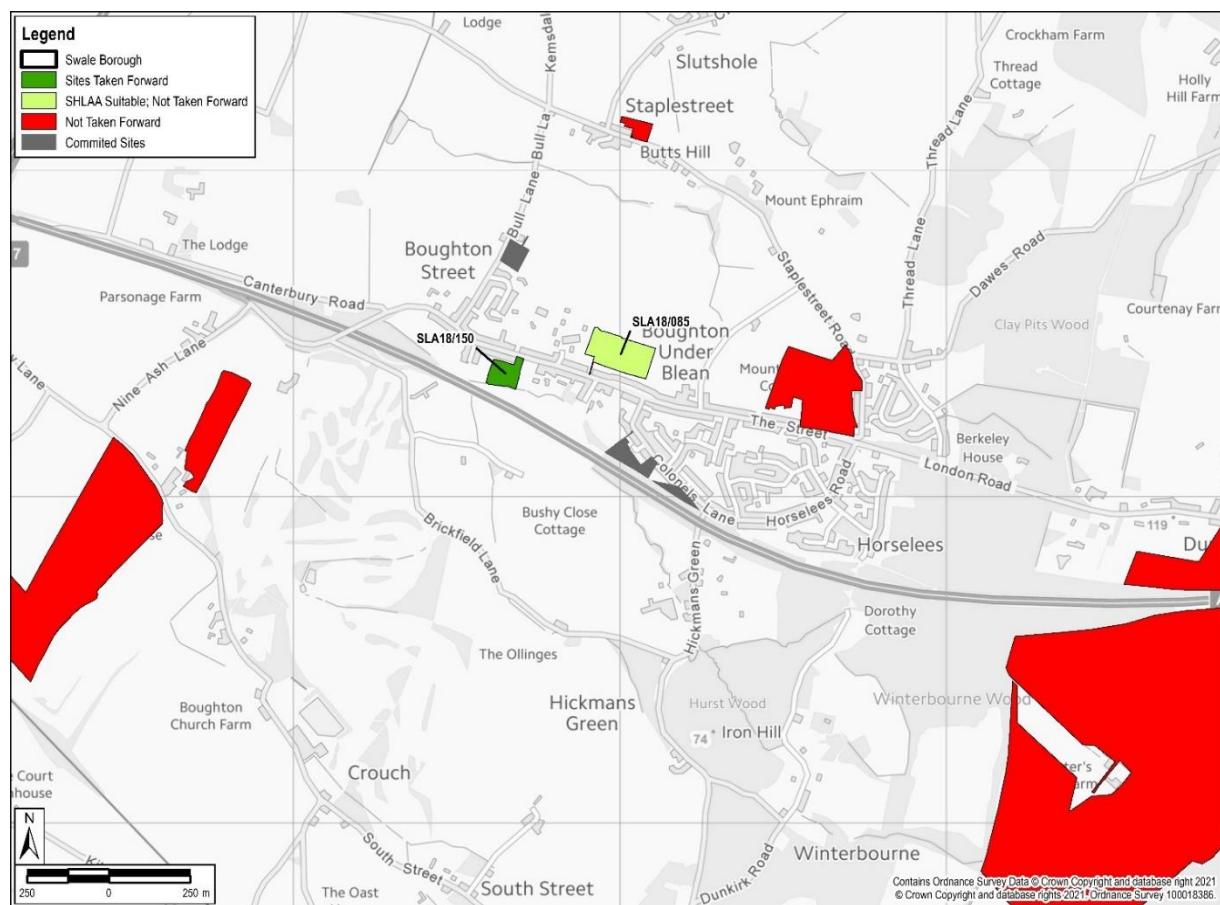
Boughton is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, and is quite well connected by road and bus to Faversham and Canterbury. It also relates closely to Dunkirk, which is a tier 5 settlement a short distance to the east. However, it is subject to heritage, biodiversity and landscape constraint, with the Landscape Sensitivity Assessment (2020) notably finding all four landscape parcels surrounding the village to have 'high' sensitivity. The adopted Local Plan allocates three sites to deliver 37 homes.

The SHLAA supports two sites, one of which (SLA18/150, the Former Garden Hotel) is now proposed for allocation (20 homes). The site falls within the conservation area and includes a grade 2 listed building, with several others in close proximity; however, the site includes an element of brownfield land, and there is understood to be good potential to bring forward a scheme that is sympathetic to the clear heritage sensitivities. Also, as noted by the SHLAA, there is a history of unimplemented planning permissions.

The other site supported by the SHLAA - 18/085 (Land Rear of 142-146 The Street) – also includes an element of brownfield land, but is considered to be notably less suitable, given the landscape and heritage sensitivities (noting the location of public rights of way), and question-marks regarding safe vehicular access. It is also important to note that a Neighbourhood Plan is in preparation, which could consider allocation of this site.

Of the sites not supported by the SHLAA, SLA18/082 (Land North of The Street/Canterbury Road) is of note as a larger site, where development could serve to round-off the built form. However, the site is sensitive in landscape terms noting reference in the Landscape Sensitivity Assessment (2020) to "*a strongly rural and scenic backdrop and immediate setting to Boughton, which is apparent in views from... Boughton Street, with rolling orchards adjoining these routes*". The site is also visible from Staple Street, which is a route leading to Staplestreet Conservation Area and Mount Ephraim (house and gardens), which is grade 2 listed on the national register of parks and gardens, and a visitor destination. It is also noted that the conservation area extends south to include an oast house located a short distance from the northern edge of the site, and seemingly visible across the site.

Figure H presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Figure H: Potential growth locations taken forward at Boughton

Conclusion

The **emerging preferred growth scenario** is to allocate one site for 20 homes. This site that is quite firmly supported, hence there is no reasonable need to explore scenarios involving non-allocation of this site.

As for possible higher growth scenarios, there is only one site highlighted by the SHLAA as potentially in contention; however, on balance it is not considered appropriate to explore a higher growth option involving additional allocation of this site given that: there are limited strategic arguments for growth at Boughton; a Neighbourhood Plan is in preparation (which could consider allocation of this site); and there are question-marks regarding the site in landscape, heritage and access terms.

In conclusion, **one growth scenario** should be taken forward to the reasonable growth scenarios.

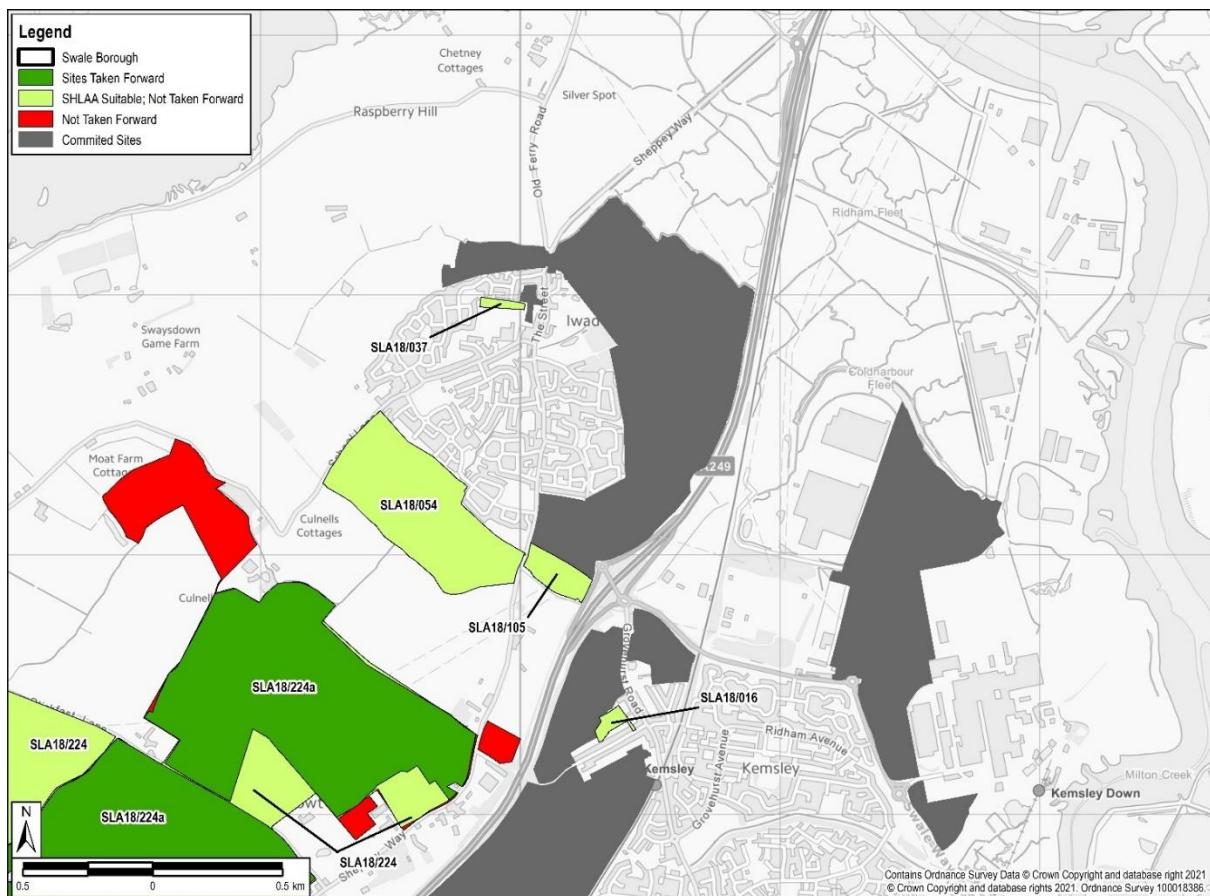
Iwade

Iwade is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, and is quite well connected by road, bus and cycle routes to Sittingbourne.

Iwade has undergone major expansion over the past 20 years with significant further development planned through existing unimplemented allocations. Another important consideration is the Grovehurst junction to the A249, where committed improvements are only likely to support the level of development that is currently planned.

The SHLAA supports three sites, including a large site to the southwest of the village. However, there are strong strategic arguments for not directing further growth to Iwade at the current time, given the scale of committed growth. Also, there is a need to consider the possibility of strategic planning for growth to the south of Iwade in combination with growth at Bobbing.

Figure I presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Figure 1: Potential growth locations taken forward at Iwade

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. Three sites at Iwade are identified as potentially suitable for allocation by the SHLAA; however, there is considered to be a strong case for non-allocation at Iwade through the LPR, on the basis that Iwade is set to see significant growth through committed sites.

In conclusion, **one growth scenario** should be taken forward to the reasonable growth scenarios.

Tier 5 settlements and the rural area

There are arguments for supporting growth at villages, with a view to meeting locally arising housing needs and supporting village vitality; however, tier 5 and smaller villages are suited to only modest growth, such that Neighbourhood Plans are well placed to allocate sites. Whilst interest in Neighbourhood Planning amongst parish councils in the Borough is currently limited, there is a good chance that Neighbourhood Plans will come forward in the plan period to deliver housing in rural areas.

A number of tier 5 settlements have already been discussed above, including Borden and Bapchild, which are associated with Sittingbourne. Of the remaining tier 5 settlements, the Settlement Hierarchy Study (2020) serves to highlight the range of services and facilities available locally varies considerably, with a relatively good offer at:

- Bredgar – notable for being associated with three large available sites (3 to 7 ha); however, all sites at Bredgar are judged to be unsuitable by the SHLAA, including because Bredgar is located within the AONB.
- Selling – there are two adjacent small sites, which seemingly could be delivered in combination; however, both are judged to be unsuitable by the SHLAA, including because Selling is located within the AONB.
- Upchurch – has comfortably the best offer of local services and facilities of the tier 5 settlements, plus there is a (limited) bus service, including to nearby (c.4km) Rainham Station. The SHLAA supports one site - SLA18/119 (Land at Long Field) – however, the site does not relate very well to the built form of the village, and a footpath crosses the site.

The next port of call is SLA18/154 (Lamberhurst Farm), as this is a large site judged to be suitable by the SHLAA. Located on the border with Canterbury, it is now proposed as an employment allocation, following the Cabinet decision of 28th October; however, it is being promoted as a mixed use scheme involving 300 homes. It is noted that there was some support for a mixed use scheme at the 8th October Local Plan Panel meeting; however, on balance this option is not taken forward. The site sits in a gap between locally important landscapes, and there is potentially an opportunity to deliver community infrastructure to the benefit of Dargatem, Highstreet and Yorklets (there is notably no primary school in this area); however, a 300 home scheme would not be likely to deliver new community infrastructure of any significance. Also, the site is adjacent to common land (Victory Wood, a Woodland Trust nature reserve) and in close proximity to the Blean Woodlands SAC.

There is only one other site in the rural area judged to be suitable through the SHLAA, namely SLA18/161 (Plough Leisure Caravan Park), which is located adjacent to the recent Kingsborough Manor development, between Minster and Eastchurch (see Figure D, above); however, this site is being promoted for park homes, i.e. a specific consideration not suited to being explored through the appraisal of growth scenarios.

Having considered all of the better served tier 5 settlements, and all of the sites supported by the SHLAA, the next port of call is Neames Forstal (see Figure B, above). This is because the village benefits from a rail station; however, the offer of local services and facilities is very limited, and the western edge of the village falls within the AONB. Three adjacent sites are being promoted for a combined scheme, which would also deliver a new footpath link to Selling (c. 1.5km to the west), where there is a primary school and other facilities. The SHLAA judges these sites to be unsuitable, including due to the AONB constraint; however, the emerging proposal, following the Cabinet decision of 28th October, is to deliver a combined scheme of 90 homes that responds to the AONB constraint. As explained within the officers report to the 8th November Local Plan Panel, the two sites adjacent to the AONB are not considered likely to contribute significantly to the setting of the AONB, whilst the site within the AONB would only be developed in part, so as to round-off the village edge.

Finally, there is a need to note SLA18/156 (Foresters Lodge Farm). A new settlement is being promoted (see www.winterbournefields.com), however, the site is constrained in a number of respects, perhaps most notably in terms of landscape and biodiversity, as discussed within the officers' report to the 8th October Local Plan Panel.

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate three adjacent sites at Neames Forstal to deliver 90 homes in total. These sites were not supported by the SHLAA, and there remain question-marks regarding suitability for allocation; however, there would be relatively little to be gained through exploring non-allocation further through the appraisal of borough-wide growth scenarios. As such, and on balance, there is not considered to be a reasonable need to take forward scenarios involving non-allocation of any of these sites. It is noted that a proposal to remove the Neames Forstal sites from the plan was put to the Full Council meeting on 3rd February 2021; however, the proposal received little support.

With regards to higher growth scenarios, attention focuses on the possibility of additionally allocating one of the sites identified as potentially suitable for allocation by the SHLAA.⁹⁵ However, on balance, it is not considered appropriate to explore a higher growth scenario involving additional allocation of one or more of these sites, given that: there are limited strategic arguments for growth at any of the lower order settlements in question; there are question-marks regarding the suitability of certain of these sites; and there is the potential to allocate sites at lower order settlements through Neighbourhood Plans.

Finally, there is a need to give special mention to site 18/154 (Lamberhurst Farm), which is proposed as an employment allocation, following the Cabinet decision of 28th October, but which is being promoted as a mixed use scheme involving 300 homes. It is noted that there was some support for a mixed use scheme at the 8th October meeting; however, on balance it is not considered necessary or appropriate to take forward the option of a mixed-use scheme to reasonable growth scenarios.

In conclusion, **one growth scenario** should be taken forward to the reasonable growth scenarios. N.B. additional homes are anticipated through a permissive policy on park homes (discussed above, under West Sheppey).

Conclusion on sub-area scenarios

Figure J presents a summary of those sites that feature in the sub-area scenarios and are therefore 'taken forward' to borough-wide reasonable growth scenarios. Table F presents a summary of the sub-area scenarios.

⁹⁵ In summary, SHLAA suitable sites in the rural area are found at: Bobbing (discussed under Sittingbourne), Bapchild (discussed under Sittingbourne), Borden (discussed under Sittingbourne), Kinsborough Manor (Sheppey), Lamberhurst Farm and Upchurch.

In summary, the decision was to take forward the emerging preferred scenario plus:

- one or more **higher growth** scenarios for Sittingbourne, Newington, Eastchurch and Leysdown; and
- one or more **lower growth** scenarios for Faversham, West Sheppey and Teynham.

Figure J: Summary of sites taken forward to borough-wide reasonable growth scenarios

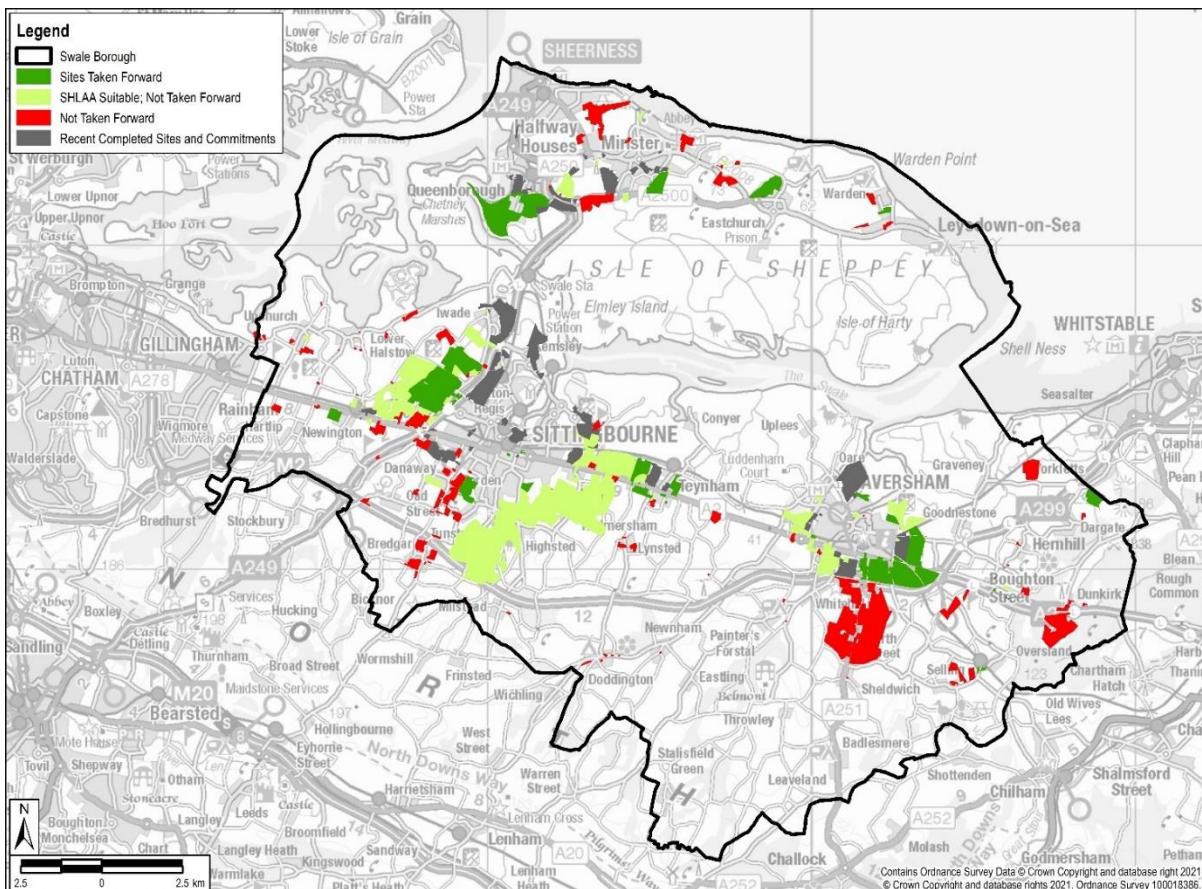


Table F: Summary of sub-area scenarios (# homes in the plan period; emerging preferred scenario in highlighted)

Sub-area	Sub area scenarios taken forward to the borough-wide growth scenarios		
Sittingbourne	850	1,350	3,350
Faversham	1,000	3,250	-
West Sheppey	0	650	850
Teynham	0	350	1,100
Newington	0	200	-
Eastchurch	0	65	-
Leysdown	0	100	-
Boughton	20	-	-
Iwade	0	-	-
Tier 5 settlements	90	-	-

Appendix VII: Growth scenarios

Introduction

The aim of this appendix is to present the appraisal of reasonable growth scenarios, supplementing the summary appraisal findings presented in Section 6. The reasonable growth scenarios are presented in detail in Section 5 (see Table 5.7 and the subsequent maps), and are presented here in summary – see Table A.

Table A: Summary of the reasonable growth scenarios

Scenario	Description	Housing requirement
1	The emerging preferred scenario	LHN
2	Scenario 1 but with higher growth at Sittingbourne (Bobbing) and lower growth at Faversham (four urban extensions in place of strategic growth to the E/SE)	
3	Scenario 1 but with lower risk urban extensions (UEs) replacing higher growth strategies for Teynham and Rushenden	
4	Both strategic growth locations; lower growth scenarios elsewhere	
5	Scenario 1 plus lower risk UEs	Above LHN?

Appraisal methodology

Appraisal findings are set out under 12 separate headings, with each heading dealing with a specific sustainability topic (see Section 3). A final section then presents summary findings and conclusions.

Each of the topic-specific discussions begins with a table that seeks to both categorised the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁹⁶ and rank the reasonable growth scenarios in order of preference.

Further points on methodology are as follows:

- Significant effects – the aim is to identify, describe and evaluate significant effects in respect of each element of the established appraisal framework in turn.⁹⁷ A final concluding section considers significant effects ‘in the round’, but does not aim to reach an overall conclusion on the sustainability of each of the growth scenarios, or place them in an overall order of preference. Any attempt to do so necessitates assigning weight to each element of the appraisal framework, which is outside of the scope of SA (it is a task for the decision-maker, *informed by* SA findings).
- Methodology – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance. This is not an exact science, given the nature of the scenarios under consideration, but rather involves making assumptions and applying professional judgement. Appraisal ‘workings out’ are presented only to a limited extent, with a view to ensuring an appraisal narrative that is relatively concise and accessible.
- Evidence – it is not possible to list all of the evidence sources that are drawn-upon as part of the appraisal; however, it is appropriate to highlight that extensive use has been made of: the evidence-base studies commissioned by the Council since 2017; materials submitted and made available (on websites) by strategic site promoters; and two reports prepared by Stantec in 2019, namely *Assessment of Submissions* (Feb 2019)³⁵ and *Assessment of Stage 2 Submissions* (Oct 2019).³⁶

⁹⁶ **Red** indicates a significant negative effect; **amber** a negative effect that is of note but with limited or uncertain significance; **light green** a positive that is of note but with limited or uncertain significance; and **green** a significant positive effect.

⁹⁷ The appraisal framework was established mindful of the list of topics suggested as potentially appropriate to include within the scope of SA at paragraph 6 of Schedule 2 within the SEA Regulations. In this way paragraph 6 of Schedule 2 has ‘fed in’.

A key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and 'planning gain' (e.g. affordable housing). The Stantec work is notable for exploring site specific proposals in detail, and there is certainly a need to take site specific proposals into consideration here; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

A note on constants

As can be seen from Table 5.7 (within Section 5), certain allocations are a constant across the reasonable growth scenarios, namely: Sittingbourne town centre (850 homes), Sheerness (0 homes), Boughton (20 homes), Iwade (0 homes), Neames Forstal (90 homes) and other tier 5 and smaller settlements (0 homes). Allocation of Lamberhurst Farm for employment is also a constant across the growth scenarios.

Allocations that are a constant across the scenarios are not a focus of the appraisal, given the need to focus on differentiating the scenarios. However, account is taken of the 'constants' when reaching a conclusion on significant effects for each scenario, and all proposed allocations are a focus of the plan appraisal in Part 2.

Appraisal findings

The appraisal of reasonable growth scenarios is presented below under 12 headings.

Air quality

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario 5 Preferred scenario Low risk UEs
1	3	2	2	4

Discussion

Air quality is currently a widespread issue along the A2, given the number of homes and other 'sensitive receptors' located in proximity to this busy road, with AQMAs designated at Rainham (to the west of Swale), Newington, Keycol (declared in December 2020), Sittingbourne, Teynham and Ospringe, and other sensitive locations (typically junctions) highlighted by the Swale Air Quality Modelling Report (2020). Another AQMA is located along the B2006 (St. Pauls Street) in Sittingbourne, where HGV traffic is a particular issue, and the Air Quality Modelling Report (2020) also highlights the A251 (which links to Ashford) as problematic. Nitrogen dioxide is a key air pollutant, and emissions are set to decrease rapidly due to the switch-over of electric vehicles (EVs). Particulate matters (PMs) are the other key air pollutant, and are also set to decrease due to the EV switch-over, although issues will remain, given particulates from tyre wear, braking and road dust. The A2 Clean Air Zone Feasibility Study (2020) concluded that: *"Air quality along the A2 is expected to improve significantly... to 2022 as the vehicle fleet renews and the proportion of vehicles of the latest Euro emission standard increases significantly. As such by 2022 a standard reference forecast suggests the annual average NO2 limit values will be achieved. However, there is... a risk of remaining exceedances especially in the St Pauls Street AQMA."*

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, from an air quality perspective, including because there would be: two motorway junctions in close proximity; delivery of services, facilities and employment onsite that supports trip internalisation; good potential to walk or cycle to Faversham railway station, including via new walking/cycling infrastructure; and some potential to walk/cycle to the town centre (beyond the rail station), albeit it would be somewhat distant, at greater than 2km from certain points of the site (noting barriers, including the railway line).

However, a higher growth strategy for Teynham gives rise to a cause for concern, given Teynham's distance from a motorway junction and, in turn, its reliance on the A2 for journeys to higher order settlements that will inevitably involve passing through at least one AQMA. The aspiration is for higher growth to support delivery of a village bypass, which is much needed from a perspective of wishing to address traffic and air pollution within the village centre, including within the designated AQMA; however, the potential for growth to 'unlock' land to deliver a bypass is far from clear, given the constraints that exist, including the conservation area.

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from an air quality perspective. This is particularly the case because Bobbing gives rise to concerns regarding increased traffic along the problematic B2006, which would be a primary route for accessing Sittingbourne town centre. The AQMA here was recently (December 2020) amended to include particulate matter (PM10) after the monitoring stations registered an increase in pollution levels. Also, there is a need to consider the AQMA at Newington and the recently (December 2020) designated AQMA at Keycol Hill, on the A2. Some traffic from Sittingbourne and Bobbing seeking to access the Medway Towns will take the A2 route, rather than the longer route via the M2.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver c.1,000 homes under this scenario, these give rise to limited cause for concern, although: the modest urban extension to the south would presumably involve a new junction onto the A2 very close (near adjacent) to the Ospringe AQMA; and the new community at the circa 840 home expansion to the east would be at least 1.5km distant from the town centre, with the railway a barrier to movement. The cycling route would likely be via the B2040, which is distant from the southern part of the site, and along which there is no cycle path/lane.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne (also Bobbing), Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – the two urban extensions are fairly well-located, in terms of supporting access to the town centre and other key destinations by walking, cycling and public transport, and avoiding increased traffic through the AQMAs and other known air pollution hotspots. Bobbing is constrained, as discussed above; however, the quantum of homes assumed under this scenario is modest.
 - Newington – the site in question, known as Pond Farm, has been closely scrutinised in the past in respect of the potential for development to lead to unacceptable air quality impacts. The access point onto the A2 would presumably avoid the Newington AQMA, and the rail station would be within walking distance (under 800m); however, traffic bound for higher order centres would pass through at least one AQMA. It is recognised that air quality in some locations may have improved since the appealed planning application was dismissed in 2016/17, and the site promoters have presumably explored ways to mitigate concerns; however, equally, the Keycol Hill AQMA was designated only in December 2020.
 - Teynham – the assumption here is that urban extensions to the village would deliver 350 homes (over and above existing committed sites) and that it would not be possible to deliver a village bypass. Development along Lynsted Lane would be avoided, recognising that the junction of Lynsted Lane and the A2 is highly problematic; however, concerns regarding increased traffic within and through AQMAs would remain.
- Scenario 4 (E/SE Faversham + Bobbing) – there is little reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in-combination impact on any air pollution hotspot.

The assumption, under this scenario, is that support for two strategic growth locations would be accompanied by a lower growth strategy at other locations, including at Teynham (where the assumption is that there would be nil LPR allocations). This approach is supported, on balance, from an air quality perspective.

- Scenario 5 (Preferred scenario + low risk UEs) – assuming that the effect of this scenario is to provide for genuine higher growth (as opposed to seeking to provide for LHN with a large supply buffer, and thereby minimise the risk of problematic windfall schemes), then this scenario gives rise to an inherent concern, on the basis that Swale is a constrained Borough. Equally, the specifics of this high growth strategy give rise to cause for concern. In particular, a higher growth strategy for the Isle of Sheppey (allocations totalling 1,665 homes) in combination with allocations for 500 homes at Sittingbourne (plus town centre regeneration) and higher growth strategies for Newington and Teynham could well give rise to in-combination impacts on one or more air pollution hotspots in the west of the Borough.

In **conclusion**, Scenario 1 (the emerging preferred scenario), is judged to perform best on balance, although it is a challenge to differentiate this scenario from Scenarios 3 and 4, which also have merit in certain respects.

With regards to significant effects, it is appropriate to flag a notable degree of risk under all scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period; however, air pollution is currently a priority issue for the Council.⁹⁸

⁹⁸ See <https://swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/keycol-hill-aqma-approved>

Biodiversity

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	3	1 	1 	2

Discussion

A key issue is avoiding impacts to the Swale and Medway Special Protection Area (SPA) / Ramsar sites ("North Kent Estuaries European sites"), including via increased recreational pressure, development of land that is functionally linked to the European sites (e.g. fields used for foraging or roosting by significant wildfowl or wading bird populations) and/or coastal squeeze, i.e. a situation whereby coastal habitats are not able to retreat inland in response to sea level rise. However, growth options in problematic locations are quite limited (more so than was the case when preparing the adopted Local Plan). Aside from the internationally designated sites, nationally designated SSSIs are a limited constraint to growth at locations potentially in contention for allocation; however, locally important habitats are a widespread constraint, and there is also a need to recognise landscape-scale constraints and opportunities. The recent Biodiversity Baseline Study (2020) notably identifies a spatial framework of landscape-scale 'Priority Areas', which will be taken forward through a Local Nature Recovery Strategy.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is supported, from biodiversity perspective. This land is notably unconstrained in biodiversity terms, with very limited onsite priority habitat and limited designated land in close proximity. However, the northern extent of the scheme (beyond the Graveney Road) gives rise to a degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields Local Wildlife Site (LWS); the walking route to the SPA would be c.2.25km and the driving route to the SPA could be attractive to dog walkers, via Goodnestone. A further consideration is the likelihood of growth leading to a degree of increased recreational pressure on the Blean Woodlands SAC to the east, potentially in combination with growth in Canterbury District; however, the part of the SAC in closest proximity is managed as a National Nature Reserve, and the car park is on the eastern edge, well over 10 km distant.

N.B. other sites that form part of Scenario 1 are discussed below.

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a biodiversity perspective. This is for two reasons. Firstly, the site is slightly closer to the SPA, and whilst it is not clear that this is a particularly accessible or sensitive part of the SPA, there is a need to consider in-combination impacts given committed growth at Iwade and Northwest Sittingbourne (also the potential for the Bobbing scheme to expand in the future). Secondly, the proposal is for development to largely envelop a small ancient woodland (Rook Wood). Whilst the proposal includes large areas of greenspace, within which it will be possible to deliver targeted habitat creation, there is a need to consider the possibility that having to compensate for impacts to Rook Wood could lead to a challenge in respect of achieving an overall (and sufficient) biodiversity net gain at an appropriate landscape scale.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, there is a degree of concern associated with: expansion to the east (particularly land north of Graveney Road, see discussion above); and the two assumed modest urban extensions to the north of the town, which would more-or-less complete the northern expansion of the town as far as the flood risk zone and/or land locally designated for its biodiversity value. This land is well connected to the SPA/Ramsar by public right of way, and the fact that adjacent land is either known to be of local importance for biodiversity (Abbey Fields LWS), or managed for biodiversity (Oare Gravel Works), could potentially suggest a likelihood of the land being functionally linked to the SPA/Ramsar.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – land to the south of Sittingbourne, broadly speaking, is associated with a high density of small dispersed habitat patches (including traditional orchard habitat, which is a priority) that may function as one or more ecological networks. However, the two urban extensions assumed here are thought to give rise to limited concerns. Both are in fairly close proximity to existing woodland or traditional orchard habitat

patches, and both are thought to be currently used for fruit growing; however, it is not possible to suggest that land used for intensive fruit growing is likely to contribute to landscape scale ecological connectivity.

Finally, with regards to Bobbing, the areas that would come into contention for modest growth are unconstrained in strategic biodiversity terms, with very limited priority habitat in this area.

- Isle of Sheppey – replacing site SLA18/113 at Rushenden (850 homes plus employment land) with site 18/038 to the southeast of Minster (650 homes) is quite strongly supported, from a biodiversity perspective. Site SLA18/113 is shown by the nationally available dataset to include significant priority wetland habitat and is adjacent to the SPA (indeed, the SPA intersects the site, to a small extent), which gives rise to a significant concern.⁹⁹ Detailed work has been undertaken by the site promoters, and through the LPR Habitats Regulations Assessment (HRA) process, to understand the potential to bring the site forward without impacting the SPA or functionally linked areas, and the HRA is able to conclude the likelihood of being able to avoid significant adverse effects to the SPA, on the assumption that prescribed steps are taken through the planning application process. However, concerns do naturally remain, in light of the need to follow the mitigation hierarchy, i.e. seek to avoid effects ahead of relying on mitigation, where possible. A key concern to emerge, through the HRA process, is the potential for development to result in coastal squeeze, noting that the medium to long term strategy for this land set out in the Medway and Swale Shoreline Management Plan (SMP)¹⁰⁰ is managed realignment, and thus enabling habitats to shift in accordance with sea level rise and climate change. In addition, the Medway Estuary and Swale Flood and Coast Management Strategy¹⁰¹ identifies that the current through to 2118 management policy for BA8.5: Rushenden Marshes is “No Active Intervention”, i.e. current sea defences will not be maintained. However, the situation is not clear, as the majority of the frontage is not currently defended, and is artificially raised as the land has been historically used to deposit dredged material. The HRA recommends that managed realignment options should be explored within the site boundary alongside development, and so there is a possibility that development could support maintenance and creation of habitat, i.e. a long term net gain.
- Teynham and Newington – both villages are historically very strongly associated with fruit growing, and there remain remnant patches of traditional orchard priority habitat, most notably at Teynham. However, a strategic approach to growth at Teynham could support a strategic approach to achieving biodiversity net gain at an appropriate landscape scale, whilst site 18/229 at Newington appears to be quite unconstrained (it is currently used for intensive fruit growing), and would likely deliver significant onsite green infrastructure (the assumed yield amounts to 15 dwellings per hectare). The possibility of delivering new onsite habitat to buffer the adjacent woodland (which is about 20 years old) and recreation ground might be envisaged.
- Eastchurch and Leysdown – both settlements are thought to be relatively unconstrained. The Sheppey Cliffs and Foreshore SSSI is nearby, but is assumed to have limited sensitivity to modest housing growth.
- Scenario 4 (E/SE Faversham + Bobbing) – there is little reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in combination biodiversity impact. Importantly, the assumption is that support for two strategic growth locations would be accompanied by a lower growth strategy at other locations, including at Rushenden (i.e. site SLA18/113 would not be allocated).
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy does not necessarily give rise to a cause for concern, as additional growth might not lead to increased risk of in-combination impacts (there would be a need to investigate SPA concerns associated with a higher growth strategy for Sheppey) and as there would be flexibility to assist with meeting any unmet needs arising from elsewhere in a constrained sub-region.

In conclusion, Scenarios 3 and 4 are judged to perform best, as allocation of site SLA18/113 at Rushenden would be avoided (albeit it is recognised that detailed work has been completed, and further work remains underway, to understand the potential to avoid and mitigate biodiversity concerns associated with the site, and there could be options that would achieve an overall biodiversity net gain). Scenario 2 performs poorly, on the basis that strategic growth to the east and southeast of Faversham is judged to be preferable to strategic growth at Bobbing.

With regards to significant effects, it is appropriate to flag a notable degree of risk in respect of the three worst performing scenarios (Scenarios 1, 2 and 5). It is recognised that the best performing scenarios (Scenarios 3 and 4) could lead to significant positive effects, particularly given the potential for strategic growth locations to support achievement of biodiversity net gain; however, there is no certainty at the current time, given the available evidence.

⁹⁹ The Biodiversity Baseline Study (2020) states: “This entire site falls within the Swale Nature Recovery Priority Area. A large portion of the site is classified as Open Mosaic Habitat on Previously Developed Land, Floodplain Wetland Mosaic and coastal saltmarsh priority habitats. The portion of the site not classified as priority habitat is of high strategic significant for connecting areas of priority habitat and should be prioritised for habitat restoration through [biodiversity net gain] projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver [biodiversity net gain].”

¹⁰⁰ See <https://se-coastalgroup.org.uk/shoreline-management-plans/medway-estuary-to-swale/>

¹⁰¹ See <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy>

Climate change mitigation

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
	2	2		2

Discussion

A detailed introduction to climate change mitigation / decarbonisation issues and objectives of relevance to spatial-making in the Swale LPR context is presented in Section 9.4 of this report, and is not repeated here, for brevity.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, given the inherent opportunities associated with strategic growth locations, and because the site is well-related to a higher order settlement with a rail station, and noting the commitment to deliver a good mix of uses onsite and ensure a focus on walking/cycling infrastructure. However, concerns and questions remain:
 - Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (albeit potentially supportive of rapid bus services to Canterbury, Whitstable/Herne Bay and other locations to the east);
 - There is uncertainty regarding potential to deliver growth to the south of the A2 in combination with growth to north of the A2, as a combined strategic scheme that leads to additional economies of scale and potential to deliver sustainable transport and LZC infrastructure, and other climate change focused measures; and
 - There is a degree of uncertainty regarding the extent to which the masterplanning and design ethos of the scheme is supportive of minimising emissions (see discussion below, under 'Communities').
- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a climate change mitigation perspective, as this location is thought to be less suited to minimising transport emissions. Sittingbourne town centre and rail station would be over 2.5 km distant via the problematic B2006), and whilst the Stantec *Assessment of Stage 2 submissions* (2019)³⁶ states that the latest proposal “refocuses its emphasis on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus”, this is not entirely evident from the latest proposals on the scheme website, with the ‘Connectivity Plan’ focusing only on links within this site (N.B. recent discussions with the site promoter have served to highlight that the scheme is now looking to ‘look toward’ Sittingbourne, rather than Newington, as per the original proposal). Whilst the possibility of growth at Bobbing and Rushenden (also noting committed growth at Iwade, NW Sittingbourne and SW Sittingbourne) supporting ‘sustainable transport’ interventions along the A249 corridor might be envisaged, no particular opportunities have been highlighted.
- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. In respect of build environment emissions, it is fair to highlight that more piecemeal growth could result in some opportunities missed (although the site at Rushenden is subject to delivery and viability challenges, such that funds available for low carbon measures could be limited).

With regards to transport emissions, it is difficult to draw strong conclusions. On hand additional growth at Sittingbourne is potentially supported; however, on the other hand:

- Growth at Minster, Eastchurch and Leysdown, in place of growth at Rushenden could lead to additional transport emissions. Queenborough has a rail station, and is thought to be quite well connected to Sheerness and Sittingbourne by bus and cycle routes (and/or there is good potential for enhancement). Also, Queenborough/Rushenden is an employment growth and regeneration area, such that the potential to reach destinations by walking/cycling is set to improve over time. The site at Minster would relate closely to the recent Thistle Hill development, which has come forward alongside community infrastructure; however, the site is not particularly well connected to Minster or higher order settlements, including noting that there is no footpath or cycle lane along either Scoccles Road or Lower Road (which suffers from problematic traffic, likely to discourage cycling). Finally, Eastchurch and Leydown are associated with very limited potential to access a higher order centre by bus or cycling.

- Lower growth at Teynham is not supported, on balance, from a transport emissions perspective, given the rail station (albeit there would also be additional growth at Newington under this scenario, which also has a rail station). Also, there is a possibility – albeit highly uncertain - of strategic growth at Teynham supporting the aspiration of delivering a cycling link between Sittingbourne and Faversham.
- Scenario 4 (E/SE Faversham + Bobbing) – a focus of growth at two strategic sites is supported, from a perspective of seeking to minimise built environment emissions, albeit neither of these strategic schemes have, to date, demonstrated that any particular locational opportunities exist, nor demonstrated a particular ambition. There is little reason to suggest that decarbonisation would be masterplanning / design / funding priority.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy does not necessarily give rise to an inherent concern, given that the focus must be on *per capita* emissions more so than total emissions (albeit the 2030 net zero target relates to total borough-wide emissions). However, the assumption is that additional growth would be achieved through additional allocation of small or modest-sized urban extensions, which would be unlikely to deliver strategic low carbon infrastructure (e.g. a heat network), and might not be well-suited to achieving building-level emissions standards over-and-above Building Regulations. Furthermore, certain of the urban extensions in question give rise to concerns from a transport emissions perspective, as discussed. However, having said this, there is a strong possibility that a high growth strategy for the Isle of Sheppey (allocations totalling 1,665 homes) could support strategic investment in transport infrastructure in support of improved bus services, greater opportunities for cycling, electric vehicle charging and more.

In **conclusion**, it is inherently challenging to differentiate the reasonable growth scenarios, including because there are tensions between objectives around minimising built environment emissions on the one hand and, on the other hand, minimising transport emissions. In the absence of modelling or other detailed analysis, there is a need to weigh-up competing objectives on the basis of professional judgement, in order to arrive at an overall conclusion.

On this basis, Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) are judged to be joint best performing. It is not possible to differentiate the other scenarios with any confidence.

With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect on the baseline, with the fact that there is a highly ambitious local net zero target in place. On balance, it is considered appropriate to flag a concern with all scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor influencing spatial strategy, site selection and development of site-specific proposals.

Communities

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
	3	3	3	2

Discussion

There is a need for growth to avoid creating or exacerbating issues around community infrastructure capacity, and support growth strategies that would deliver new or upgraded community infrastructure, both to 'consume the smoke' of new communities and in response to any existing known issues or opportunities.

Beyond this, there is a need to support *high quality* community infrastructure provision; for example, there is a focus nationally on masterplanning and designing new communities with health and wellbeing as a central consideration, including via access to gardens, sports facilities, greenspace and countryside.¹⁰²

Beyond the matter of ensuring access to high quality community infrastructure, there are also wide ranging other 'communities' considerations, for example, supporting regeneration in the Thames Gateway part of the Borough. Also, traffic congestion is often a key issue for many communities. However, it is considered appropriate for this section to focus primarily on matters relating to capacity of / access to community infrastructure.

¹⁰²E.g. see england.nhs.uk/ourwork/innovation/healthy-new-towns; and tcpa.org.uk/guidance-for-delivering-new-garden-cities

In light of the above points, perhaps the key consideration relates to support for growth via strategic sites well suited to delivering new and upgraded community infrastructure, as opposed to growth via more ‘piecemeal’ urban extensions, where opportunities can be missed, despite mechanisms for gathering funds for infrastructure.¹⁰³

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is supported, from a ‘communities’ perspective, particularly as the scheme would certainly enable delivery of a new secondary school (specifically, serviced land in an appropriate location would be made available). Following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, given limited surplus capacity at the two existing secondary schools (one grammar and one non-selective), limited potential for expansion (particularly the grammar school, which is in a constrained central location) and committed growth (noting that catchment areas stretch to include Canterbury District). KCC has been actively exploring potential locations for a new secondary school, but options are limited. Latest understanding is that the secondary school would come forward at the site directly to the east of Faversham.

Another important consideration, in respect of strategic growth to the E/SE of Faversham, relates to engagement, joint working and stewardship. Focusing on Southeast Faversham, the Stantec *Assessment of Stage 2 submissions* (2019) finds: “*The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail... As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards... Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust, which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues.*”

This finding of the Stantec work is in many ways encouraging; however, there is perhaps a concern regarding an early focus on detailed design to the detriment of effective planning to realise strategic infrastructure, environmental and socio-economic objectives, including at the Faversham scale and wider scales. It is also noted that no updated proposals or evidence has been made publicly available to update the August 2018 submission following the Garden Communities Prospectus (although the promoter did engage well with Stantec as part of the ‘assessment of submissions’ process). There is no website for this scheme, unlike Bobbing.

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a ‘communities’ perspective. The proposed scheme is notably smaller, with no secondary school proposed (although the committed school at NW Sittingbourne would be in close proximity, and presumably would have capacity over-and-above that needed to meet committed housing growth at Sittingbourne and Iwade), and there is a need to factor-in the possibility of the scheme expanding in the future. Also, relative viability challenges in this part of the Borough could constrain potential to deliver new high quality community infrastructure, relative to E/SE Faversham.

Also Bobbing - a historic village (six listed buildings, including a grade 1 listed church) with a primary school - would be largely enveloped by the scheme, although development would deliver a bypass of the village, serving to greatly reduce traffic through the village, along Sheppey Way.

Also, the package of urban extensions at Faversham under this scenario (c.1,000 in total) gives rise to a significant concern, given the secondary school capacity constraint. There would be significant growth to the east under this scenario, as per Scenario 1; however, it is not clear (and considered unlikely) that land would be made available for a secondary school (unlike under Scenario 1) given reduced economies of scale.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:

¹⁰³ All new development is expected to contribute towards the cost of new infrastructure. Infrastructure funding by developers is most often secured through planning obligations (either through a Section 106 agreement or Section 278 Highway agreement with Kent County Council) or the Community Infrastructure Levy (CIL); however, there is no CIL in place for Swale. On-site infrastructure will be secured based on the needs of each proposal and delivered directly by the developer or through financial contributions and/or the provision of land. Off-site infrastructure will be secured through developer contributions.

- Rushenden – the aim is for a major mixed use development here to support regeneration at Queenborough/Rushenden, which is a well-established regeneration priority area (Policy Regen 2 of the adopted Local Plan). In addition to new high quality homes and employment opportunities, growth at this scale (850 homes) would typically enable delivery of targeted new community infrastructure (e.g. a primary school for Rushenden), and there is also an opportunity around new green/blue infrastructure delivery, as understood from the Green and Blue Infrastructure Strategy (2020), and recognising the coastal location. However, details of the proposed scheme are not known at the current time, and are subject to change given the need for further work to address constraints and delivery challenges. There is also a need to consider the risk – albeit entirely uncertain – of an allocation here affecting the viability and deliverability of housing growth aspirations in the established Queenborough and Rushenden regeneration masterplan area.
- Teynham – as discussed, the aspiration to deliver a village bypass, to the benefit of the village centre, would not be realised under this scenario, and there might be lower likelihood of delivering a new A2 cycle link. More generally, there is a need to consider the possibility of achieving a critical mass of housing growth at Teynham alongside new employment land (in particular, the committed new employment land at Frogna Land) and improvements to the village centre. The Settlement Hierarchy Study (2020) serves to suggest that Teynham is already the best served of the tier 4 settlements (see the Settlement Audit Matrix), and the possibility of Teynham moving up a tier in the hierarchy can be envisaged.
- Sittingbourne – there is an anecdotal concern that recent and committed growth at Sittingbourne is putting pressure on infrastructure; however, it is difficult to pin-point specific issues. There are four secondary schools to the south of the A2 (two grammar schools and two non-selective schools), which is the part of Sittingbourne that would likely be a focus of growth, and the NW Sittingbourne strategic allocation is set to deliver a new secondary school (although not in the short term).
- Leysdown – there is an argument for housing growth in support of village vitality objectives, e.g. with a view to supporting shops and services outside of the tourism season. The Settlement Hierarchy Study (2020) explains: *“Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services.”*
- Minster – it is not clear what community infrastructure would be delivered by the 650 home scheme assumed under this scenario. The site is notably adjacent to Thistle Hill, which is a new community that has come forward over the past thirty years (near completion) alongside new community infrastructure.
- Scenario 4 (E/SE Faversham + Bobbing) – on one hand, a focus of growth at two strategic sites is supported, from a perspective of seeking to bring forward new strategic community infrastructure to ‘consume the smoke’ of new housing/communities. However, on the other hand, growth related opportunities elsewhere would be missed, e.g. Rushenden and Leysdown.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy potentially gives rise to a degree of concern, as additional growth could lead to increased risk of in-combination impacts (pressures on community infrastructure), particularly at Sittingbourne and on the Isle of Sheppey. However, it is not possible to pinpoint specific concerns.

In **conclusion**, Scenario 1 is judged to perform most strongly, as strategic growth at Faversham would deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including an up-to-date masterplan.

Scenarios 2 - 4 perform poorly, as there would either be problematic piecemeal expansion at Faversham (Scenario 2) or a missed opportunity at Queenborough/Rushenden (Scenarios 3 and 4). There is also a concern regarding growth locations impacting on existing community infrastructure capacity in combination under Scenario 5.

With regards to the significance of effects, it is appropriate to highlight Scenario 1 as performing significantly better than the other scenarios. Scenario 1 is clearly designed to ensure that housing growth brings with it community benefits. The only stand-out concern is in respect of the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. Three adjacent sites are being promoted as a combined scheme that would also deliver a new footpath link to Selling (c. 1.5km to the west), where there is a primary school and other facilities; however, there is a need for further work to confirm deliverability of the footpath link (which will be within the AONB).

The other scenarios would all lead to mixed effects.

Economy and employment

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
1	3	4	4	2

Discussion

The Employment Land Review (ELR) sets out the amount of new employment land that must be delivered through allocations in the LPR (having factored-in existing committed supply and likely future losses of existing employment land, e.g. loss to housing), breaks down the overall requirement according to a series of employment land types and indicates where in the Borough delivery of each type of employment land should be focused. The headline recommendation of the ELR is as follows:

"A) Up to 40ha of new land for industrial uses is allocated. This should be in the West of the Borough (Sittingbourne, Isle of Sheppey) on sites that are market attractive for larger warehouses.

B) Up to 15 of new land for offices and light industrial uses is allocated. This should be focused to the east of the Borough in or around Faversham on one or more sites."

However, it is important to note that there is a considerable range that underpins recommendation (A). Specifically, the figure decreases if a lower "5-year 'margin'" is assumed, meaning an assumption that future losses of industrial land will not follow past trends. There is a strong argument for assuming a lower 5-year margin, because past trends (see Table 5.2 of the ELR) are skewed by an abnormally large loss in 2011 (Sittingbourne Paper Mill). Furthermore, the ELR is clear that if the margin does need to be provided for, then it "*does not necessarily need to be provided today because the logic of the margin is that it may only be needed towards the end of the plan period*". The ELR is also clear that, given that the need is not in the early years of the plan period, the LPR should not rush to allocate sites to meet the need, because the effect could be to allocate sub-optimal sites.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - there is good potential to bring forward new employment land as part of a strategic urban extension to the E/SE of Faversham. Specifically, there is the potential to deliver c.10ha of new industrial land to the east of Faversham and another c.10ha to the southeast (adjacent to M2 J7), as well as smaller scale 'pockets' of employment throughout the scheme (this aligns with the emerging design ethos). On this basis, ELR recommendations in respect of locally arising demand for offices, light industrial and industrial land would be met; however, opportunities to deliver large-scale new industrial land in well-connected locations in the west of the Borough, with a view to providing for the long term needs of footloose strategic warehousing and distribution operators serving London and the Southeast, could be missed. The new industrial land at E/SE of Faversham (in particular the 10ha employment area adjacent to M2 J7) could prove attractive to strategic warehousing and distribution uses; however, this is unclear. The ELR explains:

"Although Faversham is an untested market for larger unit demand (which fuels the need for additional land) such a highly accessible area is likely to be in demand. The part of the area (closest to the motorway junction) would be particularly attractive to strategic warehouse operators (min area 10 ha), because of the excellent access to the M2. But should areas in the west of the Borough come forward these are likely to be preferable given they are closer to the M25 and benefit from better north / south access (A429)."

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from an 'economy and employment' perspective, as it could be challenging to meet borough-wide employment land targets. Whilst there is merit to the location of the site in the west of the Borough in theory (given recommendation A of the ELR), the current scheme proposal includes limited new employment land, and would certainly not support warehousing. Specifically, the current proposal is to deliver a fairly modest area of "flexible employment space" at the southeast corner of the site. There might feasibly be potential for additional employment land, should it be required (see further discussion in Box 6.1).

There is also a need to factor-in concerns regarding traffic at the A249 junctions with the B2006 and M2, with the concern being that traffic could affect the functioning of existing, committed and potential future employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, it is fair to assume that expansion to the east would deliver 10 ha of new employment land, as per Scenario 1; however, there is some uncertainty.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. This approach is not supported, because the Rushenden scheme, as currently proposed, would deliver significant new employment land (complimenting the existing/committed employment area at Neats Court), and there is also the potential for new employment land to come forward alongside new housing at Teynham (potentially complimentary to the committed new employment area). It is not thought likely that the ‘replacement’ urban extensions would deliver significant new employment.
- Scenario 4 (E/SE Faversham + Bobbing) – as discussed, meeting the employment land targets set out in the ELR could prove challenging, because the potential to deliver new employment land as part of a strategic scheme at Bobbing is seemingly lower than as part of a mixed use scheme at Rushenden.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy is not supported, on balance. The additional growth locations in question would deliver limited new employment land, but would give rise to concerns regarding traffic congestion in the west of the Borough.

In conclusion, Scenario 1 performs most strongly. New employment land supply would be delivered such that the ELR targets would be met in part. Relative to Scenario 1: Scenarios 2 and 4 perform less well, as there would be a loss of 10 ha of employment land at either Faversham or Rushenden, with the resulting shortfall only partly addressed by strategic growth at Bobbing; Scenario 3 performs least well, because there would be a loss of 10ha of supply at Rushenden (also potentially some missed opportunity at Teynham). However, in practice, there would be the potential to allocate one or more additional employment sites (see discussion in Box 6.1).

With regards to significant effects, it is appropriate to flag a degree of risk under all scenarios, and predict that the worst performing scenario (Scenario 3) would lead to significant negative effects. These conclusions are reached in light of the headline targets set out in the ELR, albeit some targets are a range and require careful interpretation. It is also important to consider that the national and regional situation may have moved-on since the ELR

Flood risk

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	2	1	1	2

Discussion

Large parts of the Borough are constrained by flood risk, as set out within the Strategic Flood Risk Assessment (SFRA, 2019); however, most potential growth locations suitably avoid the flood risk zones.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE Faversham gives rise to limited concerns, from a flood risk perspective. Perhaps the key point to note is that Preston Fields - an existing Local Plan allocation that would see intensification of development as part of the E/SE Faversham scheme - is associated with a shallow valley, within which there is a band of surface water flood risk associated with ‘pools’ to the north of the site (due to linear infrastructure in the form of the A2 and railway), and which becomes an area of fluvial flood risk further to the north (i.e. downhill), affecting the Cyprus Road area of Faversham.

However, this scenario also sees an allocation for 850 homes at Rushenden, where flood risk is a significant constraint, as it is for much of the western part of Sheppey, with the notable exceptions of Rushenden itself and the historic core of Queenborough, where the land is slightly raised. Some parts of the site are somewhat raised; however, this is due to past use as a landfill, which could be a constraint to housing.

A detailed discussion of the flood risk constraint affecting this site is presented in **Section 9.7** of this report, and is not repeated here, for reasons of brevity and clarity (avoiding the risk of inconstancies in the analysis). However, suffice to say, for the purposes of this appraisal of reasonable growth scenarios, that the site is considered to be subject to a significant constraint.

- Scenario 2 (Bobbing + Faversham UEs) – with regards to strategic growth at Bobbing, a key consideration is the northern extent of the site, where a shallow valley is associated with surface water flood risk channel, which then becomes a fluvial flood risk channel at the northern extent of the site, and then affects a significant number of existing homes downstream in Iwade. The emerging masterplan shows areas of greenspace and SuDS at the northern extent of the site, in response to the flood risk issue; however, there is also a proposed housing area, which possibly gives rise for a cause for concern around growth leading to increased surface water runoff and, in turn, increased flood risk downstream. The Swale Level 1 SFRA (2019) explains:

"The Iwade catchment is an area identified by Kent County Council where the effective implementation of SuDS features is likely to be key to enabling future development. There is a history of flooding in Iwade that is exacerbated by large areas of flow paths being culverted, with future development likely to have a reasonably significant impact on flood risk. As such, it is important that SuDS features and landscaping in potential developments are designed to attenuate surface water before it enters the Iwade Stream. Potential development in the Iwade catchment will only be permitted if it is demonstrable that betterment of runoff rates will be achieved."

With regards to the package of urban extensions at Faversham, the sites in question would encroach very close to the flood risk zone that constrains land to the north of Faversham (also an area of SPA, wider biodiversity and landscape sensitivity), and there is a need to consider the risk of flood risk zones extending under climate change scenarios; however, on balance there would appear to be the potential for limited further northward expansion of Faversham, from a flood risk perspective.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. The site in question at Leysdown partially intersects the fluvial flood risk zone, but there would appear to be good potential to leave areas at risk as greenspace. With regards to surface water flood risk, there are notable channels flowing from south to north at both Newington and Teynham, and at both settlements there appear to be issues around surface water pooling where its flow is hindered by infrastructure (namely the A2 and the railway); however, at all of the sites in question there should be good potential to deliver green and blue infrastructure within site boundaries in response to any flood risk that is found to exist, following detailed assessment at the planning application stage.
- Scenario 4 (E/SE Faversham + Bobbing) – there is no reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in-combination flood risk impact.

The assumption under this scenario is that support for two strategic growth locations would be accompanied by a lower growth strategy elsewhere, including at Rushenden (i.e. site SLA18/113 would not be allocated)..

- Scenario 5 (Preferred scenario + low risk UEs) – this higher growth strategy does not give rise to any particular concern, over-and-above any site specific concerns (discussed above). There would not be any additional risk of sites acting in combination to worsen flood risk. Higher growth strategies can sometimes be supportive of investment in interventions to manage flood risk, for example new strategic flood storage areas; however, it is not possible to highlight any particular opportunities in this instance.

In **conclusion**, the key consideration is in respect of site SLA18/113 at Rushenden. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/Rushenden; however, at the current time it is appropriate to 'flag' a significant risk.

Heritage

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	3	3	1	3

Discussion

A key consideration is the risk of development being directed to parts of the Borough associated with one or more conservation areas or clusters of listed buildings indicating historic settlement, with a need to take into account the grade of listed buildings and also the extent of their setting, for example parish churches are often in prominent

locations, and rural farmsteads can also have an extensive setting. Furthermore, there is a need to consider ways in which designated assets relate to one another as part of historic landscapes.

Other important designated heritage and historic environment assets in the Borough include scheduled monuments and registered parks/gardens, and both can be associated with extensive settings or clear positions within historic (or ancient) landscapes; however, these assets tend to be located in parts of the Borough unlikely to come into contention for growth.

Another important consideration for planning is the location of non-designated assets and archaeology, as understood from the Kent Historic Environment Record; however, it is difficult to use this dataset for strategic planning at this (very high) level, because the dataset shows a very large number of assets and does not categorise assets according to significance.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, from heritage perspective. Faversham is highly sensitive to growth, with the Swale Heritage Strategy (2020) explaining: *"It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough"*. However, in this context, there is potentially merit to a strategic urban extension to the E/SE of the town, as the effect should be to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the E/SE of Faversham is relatively unconstrained in historic environment terms, given 20th and 21st Century expansion focused in this direction (although it is important to recognise the presence of the small Preston-next-Faversham Conservation Area, at the junction of Salter's Lane and the A2). Also, there could be good potential to deliver a new community that supports Faversham as a thriving market town and visitor/tourist destination. However, there are other risks and uncertainties, including around:
 - Traffic (including through the Ospringe Conservation Area);
 - A new retail offer competing with Faversham town centre;
 - Impacts to the historic agricultural and horticultural landscape setting of the town, including as experienced by motorists approaching along the A2 from the east, with the Swale Landscape Sensitivity (2020) explaining: *"The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area."*
 - Impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. Key considerations include views from footpaths and cycle routes, and the rural landscape setting of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone. One of the farmsteads is associated with a grade 2* listed building and another associated with two grade 2 listed buildings. The third farmstead is not associated with any listed buildings, but is visible on the pre-1900 OS map.
- Scenario 2 (Bobbing + Faversham UEs) – strategic growth at Bobbing is thought to give rise to relatively limited concerns, from a heritage or historic environment perspective. The new settlement would envelop the string of ten listed buildings that stretches between Bobbing in the south (where there is a grade 1 listed church) and Howt Green in the north; however, there is no designated conservation area; the historic character of this area is presumably somewhat affected by the nearby A429; and development would deliver a bypass of Bobbing. Development would envelop only one historic farmstead (with one grade II listed building), although the possibility of further expansion (in the future) encroaching upon two further farmsteads can be envisaged.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, the two sites to the north would abut the extensive Faversham Conservation Area but are likely to have relatively limited visual connectivity. However, sensitivities do exist, particularly given extensive views across flat, marshland-edge landscapes that potentially hold historic environment value, including views from public rights of way. The Swale Landscape Sensitivity (2020) states the following in respect of one of the locations in question: *"The wider views and visual relationship with the surrounding marshland and tidal creek (including a boat yard) and the local landmark of St. Mary's Church, Faversham on the skyline provide a relatively strong sense of place. The disused 19th century sewage pumping station and brick works buildings also have some historic and visual interest, the small surviving chimney of which forms a local landmark and contributes to the sense of past industry around the tidal creek area."*

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – the southern-most urban extension would be in close proximity to the series of conservation areas associated with the parishes of Borden and Tunstall, and the possibility of a southern access point at the edge of the Tunstall Conservation Area is potentially a cause for concern. The site appears to be currently in use for fruit growing, which is the traditional land use of this area, with the Landscape Sensitivity Assessment (2019) explaining that the ‘time-depth’ of the broad landscape to the south of Sittingbourne *“relates predominantly to the continuity of agriculture and fruit cultivation within the area [and other factors].”* The site relates quite well to the existing urban edge in built form terms; however, footpaths surround the site, and the existing urban edge appears suitably ‘soft’, in that it mostly comprises mature back gardens.
 - Minster – site SLA18/038 likely contributes to the setting of grade II listed Scoccles Court, which was associated with an extensive rural setting prior to development of Thistle Hill, over the past decade or so. There is also a need to consider the possibility of long distance of views across this site, across historic landscapes, including towards Minster, which is associated with raised ground to the north.
 - Newington – the historic core of Newington is located approximately 300m to the east; however, there is a grade 2 listed farmhouse adjacent to the site. There would be potential to mitigate impacts through masterplanning and design measures; however, the farmhouse might currently serve to mark a transition between village and countryside (albeit noting 20th Century frontage housing on the opposite side of the A2, and other development along the A2 to the west). The site appears to be currently in use for fruit growing, which is the traditional land use of this area, with the Landscape Sensitivity Assessment (2019) explaining that the ‘time-depth’ of the broad landscape to the southwest of Newington *“relates predominantly to the continuity of fruit cultivation within the area [and other factors].”*
 - Eastchurch – an extension to the village to the northwest could well have an effect on the setting of the small historic village core, which is nearby (within 200m) and includes a grade 1 listed church.
 - Leysdown – the site in question has little or no historic environment sensitivity.
 - Rushenden – the site in question appears to have limited sensitivity (although there are landscape sensitivities), and regeneration of Queenborough/Rushenden is supported from a heritage perspective. The Queenborough Conservation Area is the only conservation area on Sheppey outside of Sheerness, with the Swale Heritage Strategy describing Queenborough as a ‘planned medieval town’ with a castle (the castle mound is a scheduled monument). The Strategy also describes Sheerness and Queenborough as *“beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey”*.
 - Teynham – the lower growth strategy under this scenario is potentially supported, as there would be reduced risk of impacts to the conservation area. Under a higher growth scenario (Scenarios 1, 2 and 5) there could be modest housing growth within the conservation area, plus there would be a risk of impacts from a village bypass (although a bypass might also reduce traffic in that part of the conservation area associated with the A2). There are also two grade 2* listed buildings, to the west of the village (outside of the conservation area), that are adjacent to potential development sites, one of which is assumed to come forward under this lower growth scenario. It is noted, however, that the sites in question are not currently used for fruit growing.
- Scenario 4 (E/SE Faversham + Bobbing) – there is no reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in-combination historic environment impact.

The assumption under this scenario is that support for two strategic growth locations would be accompanied by a lower growth strategy at other locations, including at Teynham (where the assumption is that there would be nil LPR allocations). This approach is potentially supported, given that most potential growth locations are constrained either by the conservation area or one of the two grade 2* listed buildings to the west of the village.

- Scenario 5 (Preferred scenario + low risk UEs) – this higher growth strategy gives rise to limited concerns over-and-above the site specific concerns discussed above. Higher growth to the west of the Borough could mean increased traffic impacting on conservation areas along the A2, but the significance of any such effect is unclear.

In conclusion, Scenario 4 performs best as it would involve a focus at two strategic growth locations with limited historic environment sensitivity. There has already been work undertaken to understand and respond to the historic environment sensitivities at the two strategic sites in question (see Appendix C of the October 2019 Stantec Assessment of Stage 2 Submissions)³⁶ and, moving forward, there would be good potential to avoid and mitigate impacts through masterplanning, design and other measures (e.g. interpretation), working with Historic England.

Scenario 1 also performs well on a similar basis, i.e. there would be a focus of growth at strategic sites. However, there is a concern around constraints at Teynham being a barrier to strategic growth.

Scenarios 2, 3 and 5 perform poorly as there would be a need to allocate a number of urban and village extensions with historic environment sensitivities. It is a challenge to differentiate these scenarios, for example weighing up the cumulative impacts of extensions to Faversham under Scenario 2 versus a package of dispersed extensions under Scenarios 3 and 5 (plus there is a need to factor-in the growth-related opportunity at Rushenden).

With regard to significant effects, it is appropriate to take a precautionary approach, and flag a notable degree of risk under Scenario 1, and the strong possibility of significant negative effects under Scenarios 2, 3 and 5. There would be a need to engage Historic England prior to allocating a number of the urban/village extensions in question.

Housing

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
3	2	2	2	★1

Discussion

All five of the reasonable growth scenarios would involve a total housing land supply in excess of Local Housing Need (LHN), with the buffer ranging between 6% and 15%. A ‘supply buffer’ is important given the risk of unforeseen delays to supply, i.e. the risk of sites not coming forward for development as anticipated and/or not delivering homes at the rate anticipated. The size of buffer required is dependent on the ‘riskiness’ of the sites that make-up the supply, with strategic sites tending to be at relatively high-risk of delay, due to the range and complexity of the issues involved, for example around delivering required infrastructure upgrades.

Also, in addition to the question of how many homes are provided for over the plan period, there is a need to ensure a steady (or otherwise acceptable) trajectory of housing delivery across the plan period, including in the early years of the plan period. This necessitates a supply comprising a good mix of sites, both in terms of size/complexity and geographic location. In this respect, it is important to recall that there is a very good mix of committed sites following the adopted Local Plan (and windfall sites that have come forward since the adopted Local Plan). As discussed in Section 5, committed sites are expected to deliver around c.9,700 homes in the LPR plan period, and whilst there is a degree of uncertainty associated with this figure, the general message is that supply from existing committed sites (plus certain new allocations, e.g. Neames Forstal, which is a constant across the growth scenarios) will mean that there is a strong supply / low risk of under-delivery against the requirement (LHN) in the early part / first half of the plan period, which is an important consideration in light of NPPF paragraph 67.

On one hand it is difficult to conclude that delivery risk is a ‘housing’ consideration for this assessment, as the NPPF puts in place mechanisms to redress unanticipated shortfalls in housing delivery (the presumption in favour of sustainable development); however, on the other hand, delivery risk is an important issue in Swale, with a desire to resist windfall schemes in unplanned locations. As stated within the officer’s report to the 29th October 2018 Local Plan Panel (which reported back on the *Looking Ahead* consultation):¹⁰⁴ “*Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations.*” Viability need not necessarily constrain delivery if development costs are kept low, but this can lead to tensions with wider objectives, for example affordable housing.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) – there would be a focus of allocations at sites with delivery risks and uncertainties; however, a supply buffer of 6%, and the nature of committed supply, reduces concerns.

Furthermore, E/SE of Faversham is thought to be associated with relatively low risk, for a strategic growth location of this scale. The Stantec Assessment of Stage 2 Submissions (2019) drew the following conclusion in respect of Southeast Faversham: “*Of the four schemes promoted this is clearly the lowest ‘risk’. It is essentially an extension to Faversham and is more developed than the other three schemes, with fewer significant barriers to delivery within a short timetable. It has also been shown to be viable. There has been a*

¹⁰⁴ See <https://services.swale.gov.uk/meetings/iListDocuments.aspx?CId=216&MId=2094>

commitment to accelerate the delivery rate which means the pace of delivery is more in line with the Council's objectives. However, there remains uncertainty about Junction 7..."

- Scenario 2 (Bobbing + Faversham UEs) – strategic growth at Bobbing also gives rise to relatively limited delivery concerns, for a strategic growth location, with Stantec (2019) finding: *"This site is reasonably low risk and is very viable, its landscape impact can be mitigated, and it has the potential to come forward quickly."*

Under this scenario there would also be a package of urban extensions to Faversham that are assumed to be associated with low delivery risk, and potentially able to deliver in the early part of the plan period.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban/village extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. This approach is quite strongly supported, from a housing perspective, as the urban/village extensions in question are thought likely to be associated with low delivery risk, relative to Rushenden and the Teynham opportunity area.

Also, the Rushenden scheme is expected to deliver only around 10% affordable housing, and whilst viability is also a challenge to delivering housing elsewhere on Sheppey (notably Leysdown), it is possible that more than 10% affordable housing could be achieved.¹⁰⁵

- Scenario 4 (E/SE Faversham + Bobbing) – there would be a larger supply buffer (LHN plus 10%) and both strategic sites have proposed to deliver 40% affordable housing (unconfirmed). However, there would still be significant delivery risk given reliance on two strategic growth locations, albeit both are relatively low risk strategic sites, and the two sites are distant from one another. Further considerations are:

- Risks and uncertainties - there is a need for considerable further work ahead of bringing forward both strategic sites, meaning that additional development costs could emerge leading to a need to reconsider the mix of housing, including affordable housing (and the mix of affordable housing), that can be delivered. At Bobbing there is notable uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme; whilst at E/SE Faversham there remains uncertainty ahead of further detailed work in respect of masterplanning, infrastructure delivery and viability, taking account of local market conditions (there will be a need to deliver housing at a pace that avoids any concerns around local saturation).
- Growth beyond the plan period - one or both of the strategic sites could be expanded further so as to deliver additional housing beyond the plan period, with this having been discussed as an option for Bobbing. However, it is difficult to suggest this is a notable 'positive', from a housing perspective, as housing needs beyond the plan period can be met through a future Local Plan Review.
- Specialist accommodation - there can be good potential to integrate specialist accommodation, including Gypsy and Traveller Pitches (for which there is a need locally), as part of strategic development schemes; however, neither of the strategic sites are known to have made any firm proposals.

- Scenario 5 (Preferred scenario + low risk UEs) – supply would amount to LHN plus 15%, and there would be a good mix of sites, both in terms of the size/complexity and geographic spread. As such, there would be flexibility to either: A) set the housing requirement at LHN, with a large supply buffer; or B) set a housing requirement in excess of LHN (e.g. LHN plus 5%, leaving a supply buffer of 10%).

Approach (A) would lead to a very low risk of the housing requirement not being met at any point in the plan period, i.e. a situation whereby the presumption in favour of sustainable development could apply and there is a need to allow windfall schemes in unplanned and potentially problematic locations.

Approach (B) could help to address any unmet needs arising from the wider sub-region (specifically, locations that are suitably well connected to Swale); however, current understanding is that there are no such unmet needs (see discussion in Section 5.2). Alternatively, a higher growth strategy could be supported with the aim of delivering additional affordable housing, and thereby ensuring that the borough-wide 28% target is met.

In **conclusion**, it is appropriate to highlight Scenario 5 as best performing, as it is a higher growth scenario comprising a good mix of sites. Scenarios 2, 3 and 4 all also perform well on the basis that there would be a good mix of sites (including sites assumed to be associated with relatively low delivery risk, and certain sites thought likely to be able to deliver early in the plan period) and/or a good sized supply buffer. Scenario 3 also benefits from a focus on sites thought to have good potential to deliver affordable housing. Scenario 1 performs least well, as it is associated with both a lower supply buffer and a focus on sites with delivery risks.

¹⁰⁵ Variations in development viability are reflected in Policy DM8 (Affordable Housing) of the adopted Local Plan, which requires 0% affordable housing on Sheppey and 10% affordable housing at Sittingbourne, in comparison to 35% affordable housing at Faversham and 40% affordable housing in the rural area. The situation is thought to have improved, and the LPR will adjust the affordable housing policy accordingly; however, there will still be a need to account for variations in viability.

With regards to significant effects, it is certainly fair to highlight Scenario 5 as representing a highly proactive approach to responding to delivery challenges and risks; there would be very high confidence in respect of meeting market and affordable housing needs locally, and potentially some flexibility to provide for any unmet needs that might arise (N.B. Swale has not been asked to provide for unmet needs). Supply under the other scenarios would likely be sufficient to meet LHN over the course of the plan period, although there are uncertainties, particularly in respect of Scenario 1. Finally, it is important to note that any concerns are allayed by an understanding that supply, under all scenarios, would be strong in the early part / first half of the plan period because of committed sites from the adopted Local Plan building-out (plus certain new allocations, e.g. Neames Forstal, which is a constant across the growth scenarios). This is an important consideration in light of NPPF para 67.

Land

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
			2	3

Discussion

A key consideration is the need to avoid loss of best and most versatile (BMV) **agricultural land**, particularly that which is of the highest quality nationally, namely grade 1 land. Swale has an extensive resource of grade 1 land.

The belt of grade 1 agricultural land in the Borough – known as the fruit belt – is centred on the A2 corridor, hence it is very challenging to deliver growth whilst avoiding loss of BMV land, including that which is grade 1. Sheppey is relatively unconstrained, with low-lying land shown by the nationally available dataset as being non-BMV (grade 4) and higher ground shown as grade 3 (which may or may not be BMV); however, there are barriers to growth.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE Faversham would result in the loss of high quality agricultural land, with the national low resolution dataset indicating that virtually all of the land is likely to be of grade 1 quality. None of the land has been surveyed in detail, other than the committed Preston Fields part of the site (it is typically the case that detailed survey work is undertaken as part of planning applications, but it can be undertaken to inform Local Plans), which was found to mostly comprise grade 1 land.
- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is marginally supported, as the low resolution national dataset shows a small proportion of the site to comprise land of either grade 2 (still BMV) or grade 3 (potentially BMV) quality. Also, a portion of the site has been surveyed in detail and found to be of grade 3b quality (non-BMV).

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, all are currently farmed and likely to comprise BMV quality land. Two sites have been surveyed in detail, showing one to comprise grade 1 quality land (the low resolution national dataset indicates that it is urban land) and the other to comprise grade 3a land (the national dataset indicates grade 1).

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – the national dataset indicates a swath of grade 2 land to the south of Sittingbourne; however, the urban extension to the south of Sittingbourne assumed under this scenario has been partly surveyed in detail and been found to comprise grade 1 quality land (it is currently used for fruit growing). As for the other urban extension assumed under this scenario, which is to the southeast of Sittingbourne, this has been surveyed in detail and found to comprise a mixture of grade 1 (BMV) and grade 3b (non-BMV) quality land. It is currently used in part for fruit growing.
 - Bobbing – the assumption under this scenario is that one or more modest sites would be allocated, potentially through a Neighbourhood Plan. The entire area in question is likely to comprise grade 1 land.
 - Minster – whilst the site in question has not been surveyed in detail, much of the adjacent land at Thistle Hill was surveyed in detail prior to development and found to be of grade 3b quality.

- Teynham and Newington – both villages are strongly associated with grade 1 quality land (although detailed survey work at Teynham has found there to be some grade 2 quality land) and historical imagery (available for 1940 and 1960)¹⁰⁶ shows near ubiquitous fruit growing; however, of the sites in contention for allocation, it appears that only the site at Newington is currently used for fruit growing.
- Eastchurch and Leysdown – the national dataset indicates grade 3 quality land. The Eastchurch site has been surveyed in detail and found to comprise grade 3a quality land (i.e. BMV).
- Rushenden – the national dataset indicates that the site is a mixture of grade 4 and grade 5 quality land. Part of the site comprises a former landfill (dredged materials, as opposed to waste), hence development could enable remediation and therefore represent a good use of despoiled or contaminated land.
- Scenario 4 (E/SE Faversham + Bobbing) – as discussed, both sites would involve significant loss of BMV agricultural land. Further considerations relate to the assumed nil growth Teynham (extensive BMV land) and Rushenden (extensive non-BMV land).
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy for Swale naturally gives rise to a cause for concern, given the sensitivity of Swale in the regional and national context; however, higher growth would be partly achieved allocation of additional sites on the Island of Sheppey, which is less sensitive.

In **conclusion**, it is appropriate to conclude that all of the reasonable growth scenarios would lead to significant negative effects, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. On balance, it is appropriate to place the scenarios in an order of preference according to the total quantum of growth supported.

N.B. a further consideration is the extent of minerals safeguarding areas across the Borough;¹⁰⁷ however, these are very extensive, covering the majority of land along the A2 corridor. The Isle of Sheppey is less constrained; however, it is difficult to confidently and meaningfully differentiate the growth scenarios in respect of impacts to minerals safeguarding areas. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract minerals prior to development.¹⁰⁸

Landscape

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	3	3	1	4

Discussion

There is a wide range of evidence to take into account, when considering the landscape merits of Swale LPR growth scenarios. In addition to avoiding impacts to the Kent Downs AONB, and its setting, there is a need to avoid impacts to locally designated landscapes and countryside gaps, as understood from the Landscape Designation Review (2018) and the Important Local Countryside Gaps study (2020). Additionally, the Landscape Sensitivity Assessment (2019) examines the sensitivity of all landscape parcels surrounding the main settlements. More broadly, there is a need to consider topography across the Borough, historic landscape character and important views, including from roads and public rights of way. There is also a need to be mindful of wide ranging ecosystem services delivered by landscape units (see discussion in Appendix III).

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is supported, from a landscape perspective, in light of the Landscape Sensitivity Assessment (2019), which finds the entire site to fall within a parcel of moderate sensitivity (parcel FM1), which equates to relatively limited sensitivity in the context of the Borough and, in particular, Faversham. The assessment notes that the “presence of major road infrastructure and heavy traffic” has a significant impact on “the sense of rurality and tranquillity”. Despite this, however, the assessment also finds that the area “retains a strongly agricultural character” and that this character together with the “visual exposure of the area” results in a degree of sensitivity.

¹⁰⁶ See <https://webapps.kent.gov.uk/KCC.KLIS.Web.Sites.Public/Default.aspx> or Google Earth

¹⁰⁷ See kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

¹⁰⁸ See further discussion at: mineralproducts.org/19-release20.htm

It is important to recognise that development would breach a longstanding settlement boundary feature to the southeast of the town, namely the A2 which has historically marked the limit of the southern extent of the town (with the town centre focused on the creek, more so than the road and railway); however, existing Local Plan allocations have already breached the boundary of the A2 to the south of the town. Furthermore, expansion to the southeast has the benefit of being able to draw upon the M2 (with the AONB beyond) as a new strong/defensible long-term boundary. Having said this, the current proposal falls short of comprehensively planning for land as far as similarly defensible boundaries to the east (either the A299 or, should employment be a suitable use surrounding the motorway junction, the need to maintain a landscape buffer to Boughton) and the northeast (flood risk and heritage including farmsteads and the Goodnestone Conservation Area).

- Scenario 2 (Bobbing + Faversham UEs) – strategic growth at Bobbing is also supported, from a landscape perspective. The site is distant from the AONB and associated with broad landscape units assigned ‘moderate’ and ‘low-moderate’ sensitivity scores by the Landscape Sensitivity Assessment. The southern part of the site is more sensitive, given existing narrow settlement gaps; however, the current proposal is for development to extend only as far south as the railway line, meaning that, whilst the Bobbing settlement gap would be eroded or lost, the gap(s) between Sittingbourne and Newington would not be affected. In this respect, it is important to note that an earlier masterplan proposed a large area of parkland to the south of the railway. Finally, it is important to note that the Stantec *Assessment of Stage 2 Submissions* (2019) identifies the potential for the scheme to expand beyond its current ‘red line boundary’ (see page 15 of the report). There is an argument for comprehensive long-term planning for this part of the Borough, rather than piecemeal growth. The possibility of comprehensively planning for the entire area of land between the A249 in the east, the A2 in the south, the Lower Halstow – Iwade Ridge in the west and Iwade in the north might be envisaged, with a view to securing infrastructure, environmental protection/enhancement and employment land.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, it is thought likely that it would be possible to avoid impacts to the most sensitive landscapes around the town. Two modest extensions to the north would impact on expansive views across marshland-edge landscapes, including from public rights of way, but there would be little or no further risk of further urban creep in the future, given the extent of flood risk zones. The modest urban extension to the south would be well contained in the landscape, but is still associated with a degree of sensitivity as this is a ‘gateway’ location on the approach to Faversham from the west. Further expansion to the east would be into a landscape with relatively low sensitivity, in the Faversham context, but ‘urban sprawl’ might be a concern.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:

- Sittingbourne – both of the urban extensions assumed under this scenario fall within landscape parcel SE4, which extends across much of the southern edge of Sittingbourne, and is judged to have overall moderate-high sensitivity, with a key conclusion: *“The landscape has a distinctive dry valley in the east, evidenced by its local landscape designation, and a rolling and undulating landform in the centre and west. There is a strong rural character through much of the area, and a resource of valued natural features and semi-natural habitats. There are high levels of enclosure and a well-defined urban edge to Sittingbourne. It is in close proximity and partially visible from the AONB which lies to the south of the M2.”* The site to the southeast is potentially most sensitive, as it is located on the edge/crest of the Rodmersham dry valley, which is a locally designated landscape, with a bridleway passing along the edge of the site, from which there might well be an appreciation of the valley and the fruit growing heritage of the area. Sensitivities in respect of the site to the south have already been discussed above, under ‘heritage’.
- Bobbing – the assumption under this scenario is that one or more modest sites would be allocated, potentially through a Neighbourhood Plan. There are certain sites that are quite well contained in the landscape, and it is considered likely that modest expansion of the village could occur without problematic expansion uphill towards Keycol / Keycol Hill.
- Minster - the Landscape Sensitivity Assessment (2020) identifies all land surrounding Minster as having moderate-high sensitivity to housing growth, with inherent sensitivities associated with the raised rolling landscape of Sheppey’s clay “backbone”. The site in question is not one of the more sensitive parts of the wider landscape parcel; however, there are still likely to be sensitive views across the site, both north towards Minster on higher ground, and south across the Swale. There could be merit to strategic planning for the broad area south of Minster/Halfway, drawing on lessons learned from Thistle Hill, and avoiding piecemeal expansion that could lead to environmental and socio-economic opportunities missed.

- Newington and Teynham – sensitivities associated with the villages have already been discussed above, including associated with their fruit growing heritage; however, the Landscape Sensitivity Assessment (2019) serves to indicate that, in the Borough context, there is a degree of relative landscape capacity at both villages. There is a notable concern associated with further expansion of Teynham to the east; however, the assumption is that any further expansion would not break the prominent north/south ridgeline (associated with public footpaths). There are also challenges associated with expansion of Teynham to the west, given the need to maintain a settlement gap to Bapchild (this is explored within the Local Countryside Gaps study, 2020), and the possibility of delivering the final section of the Sittingbourne Northern Relief Road is a related consideration. With regards to expansion to the SW of Teynham, there is a degree of sensitivity, given views across this land from footpaths and Claxfield Road, which is designated as a rural lane. In contrast, views across the potential village extension to the SW of Newington may be more limited, and it is also noted that a minerals scheme is now coming forward adjacent to the west of the site.
- Eastchurch – the proposed site does not relate very well to the existing village, and would give rise to landscape concerns given topography, limited landscape features to bound expansion and ‘moderate-high’ landscape sensitivity.
- Leysdown – has low-moderate landscape sensitivity and the site in question is in use as a holiday park.
- Rushenden – despite partly comprising a former landfill, the site is thought to be associated with considerable landscape sensitivity, as it forms the western extent of the North Swale (Sheppey) Marshes locally designated landscape. Furthermore, there is a likelihood of a mixed use scheme, and the Landscape Sensitivity Assessment identifies this area as having a *high* sensitivity to employment development.
- Scenario 4 (E/SE Faversham + Bobbing) – as discussed, both strategic sites are supported, from a landscape perspective, and support for two strategic sites would enable lower growth elsewhere, including at Rushenden.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy does give rise to concerns, given sensitivities associated with the sites that would come into contention for additional allocation (over-and-above Scenario 1). Whilst the AONB is not likely to be a constraint to higher growth, there would be concerns around impacts to locally designated landscapes, important settlement gaps, landscapes judged to have moderate-high sensitivity by the Landscape Sensitivity Assessment and other landscapes with a degree of sensitivity, including in light of historic landscape character. However, under this scenario the effect could be to prevent a situation whereby there is a need to accept windfall development in sensitive locations and/or the effect could be to reduce pressure for growth in sensitive locations in neighbouring authorities. It is recognised that other neighbouring authorities in the sub-region equally face landscape constraints, for example undeveloped land around the edge of the Medway Towns is likely to be associated with inherent sensitivity.

In **conclusion**, Scenario 4 is judged to perform best. Scenario 1 performs second best, although there are concerns associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Scenarios 2 and 3 are judged to perform on a par, with certain of the urban/village extensions in question giving rise to a degree of concern. Scenario 5 gives rise to a concern, as a higher growth option, although the effect could be to prevent a situation whereby there is a need to accept windfall development in sensitive locations and/or the effect could be to reduce pressure for growth in sensitive locations in neighbouring authorities.

With regards to significant effects, it is appropriate to flag a risk under all but the best performing scenario, including on the basis of the need to allocate at least one site within a locally designated landscape.

Transport

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
1	2	2	2	3

Discussion

Transport connectivity and traffic congestion is a key issue in Swale, given the inherent constraints that exist. The Borough is very well connected by rail; however, main settlements and potential growth locations feed onto a limited number of strategic road corridors, including the A2 which passes through the centre of settlements (the only bypasses are at Sittingbourne town centre and Boughton). Enabling longer distance trips via the M2 rather than the A2 is an important objective, but there are junction constraints, and just three junctions serving the Borough, which contrasts to four serving Medway BC.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, from transport perspective. Key statements made by the Stantec Assessment of Stage 2 Submissions (2019) include:
 - *"The primary issue is the M2 J7 [Brenley Corner] which currently operates above capacity. Greater detail is required to understand the impact and mitigation... it is recognised that because the Duchy own the land there is the opportunity to address issues at J7, although this is not currently proposed as part of the scheme."*
 - *"The proposal appears to rely on the upgrades to Brenley Corner, however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated..."*
 - *"While there is mention of the Preston Fields link [to M2 J6], which has the potential to mitigate some impact on the A2/A251 junction, it has not yet been evaluated or agreed with the Private Finance developer."*
 - *"The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any 'calming' may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved and secured as part of this scheme."*

Further detailed discussion of the proposed E/ SE Faversham scheme is presented in Section 9.12, reaching the conclusion: "In summary, there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding M2 J7, a concern regarding the potential to achieve a link to M2 J6, a degree of uncertainty regarding the A2 Mitigation Strategy and a degree of uncertainty around whether opportunities to enhance bus connectivity are set to be realised. Concerns remain broadly as per those raised by Stantec in 2019, and it is unclear whether the evolution of the scheme since that time (specifically, addition of land to the east of Faversham) serves to increase or decrease concerns. As a final point, it is thought fair to conclude that the April 2020 re-run of the Swale Transport Model (discussed in Appendix I) served to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I); however, the forthcoming model re-run will provide a more accurate picture."

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a transport. Stantec conclude: "*There is a risk of a 'showstopping' highways issue here – associated with the local network, A249 and the not fully funded J5 improvements.*"¹⁰⁹ The latest situation is that M2 J5 improvements are expected to commence in 2021; however, the question of headroom is uncertain, and other concerns remain.¹¹⁰ Stantec suggest that: "*The proposal refocuses its emphasis on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus.*" However, there is no discussion of links to Newington Station on the scheme website (latest understanding is that the scheme has now refocused its emphasis on Sittingbourne, as per the original proposal).

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, these are all broadly supported, although expansion to the east would not be particularly well linked to the town centre, as has been discussed above.

¹⁰⁹ It is recognised that the letter received from KCC Highways, which is presented at Appendix D of the Stantec Report, does not use the term 'showstopper'. However, it does flag concerns, stating: "*Understanding that the applicant has responded to the Borough Councils requests, our initial impression is that it is not feasible to deliver the appropriate mitigation likely to be required... The above statement is concluded from the initial evidence of our own modelling that included similar levels of development being proposed in this area. That evidence would suggest that the A249 would require three lanes in each direction and significant changes to the A249 junctions at key Street, Bobbing and Grovehurst, additional to that being proposed in the HIF applications. The mitigation being put forward for the current local plan should provide mitigation for its impact but leaves very little scope for further enhancement, particularly at the A249 junctions and local routes to the West of Sittingbourne.*" It is recognised that the 'initial modelling' relied upon by the County Council has now been taken forward by the site promoter; however, the outcomes of more recent modelling are not available to inform this current appraisal.

¹¹⁰ The LPR IDP (2020) states the following in respect of the Bobbing A249 junction: "[T]he junction currently experiences significant congestion during the peak hours. An improvement scheme for this junction to increase capacity forms part of the planning application(s) for the development of the North West Sittingbourne mixed use allocation. Transport assessment work in connection with the planning application indicates that 100 dwellings could be completed before the requirement for an interim mitigation scheme with full mitigation required before occupation of the 450th dwelling."

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. A detailed discussion is presented above, under climate change mitigation, although it is difficult to draw an overall conclusion as to whether this approach is supported.
- Scenario 4 (E/SE Faversham + Bobbing) – a focus at strategic sites is supported in theory, as strategic concentrations of growth can support investment in road infrastructure and sustainable transport measures, plus there is greatest potential to deliver mixed use schemes that lead to a degree of self-containment / trip internalisation. However, as discussed, there are concerns regarding the proposed Bobbing scheme.
- Scenario 5 (Preferred scenario + low risk UEs) – assuming that the effect of this scenario is to provide for genuine higher growth (as opposed to seeking to provide for LHN with a large supply buffer, and thereby minimising the risk of problematic windfall schemes), then this scenario potentially gives rise to an inherent concern, on the basis that Swale is a constrained Borough. Equally, the specifics of this high growth strategy give rise to cause for concern. In particular, a higher growth strategy for the Isle of Sheppey (allocations totalling 1,665 homes) in combination with allocations for 500 homes at Sittingbourne (plus town centre regeneration) and higher growth strategies for Newington and Teynham could well impact in-combination on problematic junctions on the strategic road network, in particular M2 J5 (A249),¹¹¹ the A249 junctions (in particular the Bobbing junction) and junctions along the A2500 Lower Road on Sheppey (although a higher growth strategy for Sheppey could assist with securing funds for strategic upgrades). If the Swale LPR were to make any provision for unmet needs arising from elsewhere there would also be a need to give careful consideration to where the needs are arising from, so as to avoid risk of problematic long distance travel by car.

In **conclusion**, Scenario 1 is judged to perform best, followed by those scenarios involving strategic growth at Bobbing, and then followed by Scenario 3, which would involve more dispersed growth. Scenario 5 (higher growth) is judged to perform poorly, although there could be some potential for growth locations along transport corridors (e.g. the Lower Road on the Isle of Sheppey) to pool funding to deliver strategic transport upgrades, for example junction upgrades, cycle routes and improved bus services.

With regards to significant effects, emerging transport modelling work is serving to suggest that Scenario 1 will not lead to severe impacts on the strategic road network, but it is appropriate to flag a degree of risk for the other scenarios, and flag a particular risk under Scenario 5, given known constraints in the west of the Borough.

Water

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
1	1	2	1	3

Discussion

An important strategic consideration is waste-water treatment capacity. The latest Stantec report includes a section on utilities capacity, which overall highlights very limited concerns, concluding: *"There are no significant abnormal issues that have been identified that cannot be overcome. Although there is a capacity issue with Water Treatment works in the area, which applies equally to all proposals and has to be addressed as part of the water companies statutory duty."*

¹¹¹ The adopted Local Plan (2017) explains: *"The main strategic risk to the plan overall relates to any significant deferral in the improvement to Junction 5 of the M2".* Highways England consulted on upgrade options in 2017 (see highwaysengland.citizenspace.com/he/m2-junction-5-improvements) and identified a preferred option. The September 2019 Stantec report explained that the scheme was still "not fully funded", and discussions have continued through 2020. The LPR IDP (2020) explains the latest situation, in respect of M2 J5, as follows: *"Highways England have proposals to undertake improvements to the A249 Stockbury Roundabout at J5... The necessary Orders for the improvement scheme were published in June 2019 and the Public Inquiry into the Orders opened on the 9th November and closed on the 3rd December 2020. On the assumption that it is consented, the approximate scheme opening date is 2023... The scheme is identified in the national Road Investment Strategy 2 (RIS2) as a committed scheme for the period 2020/21 to 2024/25... Following scheme completion, J5 will have capacity to support the delivery of growth planned in the adopted Local Plan but further assessment will be required to determine how much, if any, of the further growth now planned could be accommodated."* There is also a need to consider the possibility that the M2 may see increase traffic following the Lower Thames Crossing and potentially given an increase in traffic to/from ports, in light of emerging national ports strategy.

However, there is a need to apply caution, in the sense that there is a need to minimise any residual risk of capacity breaches (in respect of either treated or untreated effluent), with resultant water quality impacts.¹¹² In turn, there are arguments for directing growth to locations where there is existing capacity at the receiving Wastewater Treatment Works (WwTW), as opposed to relying on timely capacity upgrades. This point is made in the knowledge that Southern Water recently accepted 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events between 2010 and 2015, and it is understood that another investigation by the Environment Agency is under way that covers pollution incidents after 2015.¹¹³

There is evidence that capacity at Faversham WwTW is an issue. In particular, the Kent Water Sustainable Growth Study (2017) noted that headroom capacity would be exceeded by planned growth to 2031, hence there would be a need for upgrades. However, as part of the assessment of the SE Faversham strategic site option, the Stantec Assessment of Stage 2 Submissions (2019) explains: “*The Sewage Treatment Works (STW) in Faversham is currently operating above its allowable discharge. However, there are solutions available to address the absence of capacity in the interim. The sewage discharge from the site can be temporarily pumped, for up to 2 years by the Water company, before the STW has been upgraded to sufficient capacity. We understand that this is an issue but can be managed. Further details of... costs, options and works duration [are being discussed].*”

Further considerations are as follows:

- Bobbing - it is unclear whether there is a need for a new pumping station, though the promoter has suggested that costs of any network reinforcement that may be required would not be borne by Southern Water.
- Rushenden – the site in question is near adjacent to the large Queenborough WwTW (although potentially with capacity issues / a need for upgrade ahead of receiving additional wastewater from nearby growth);
- Teynham and Eastchurch have a WwTW, whilst it appears (from the Ordnance Survey map) that Newington and Leysdown do not. In the case of Newington, whilst details of sewage treatment are not known, the location of the village could serve to suggest that wastewater treatment could be a constraint to growth.

As for other ‘water’ considerations:

- Pollution to surface water in the vicinity of growth locations – whilst there may be variation in water quality across the Borough’s surface water bodies, it is inherently difficult to differentiate the growth scenarios, because there is very good potential to deal with water pollution arising from development schemes through Sustainable Drainage Systems (SuDS). Water pollution from breaches of capacity at WwTWs is considered to be a much more important strategic consideration for the LPR.
- Pollution to groundwater in the vicinity of growth locations – groundwater source protection zones are associated with the parts of the Borough with chalk geology, with Sheppey, Bobbing, and most land at Faversham (bar land directly to the south) falling outside of a source protection zone (SPZ). However, it is again the case that there is very good potential to suitably avoid/mitigate impacts through development management. SPZs are a particular constraint for polluting developments (e.g. heavy industry, petrol stations).
- Water resources – water scarcity is an issue that applies across the Borough as a whole, hence it is a challenge to differentiate the growth scenarios. It would not be appropriate to highlight a concern with scenario 5 on the basis that it is a higher growth strategy, as genuine higher growth (as opposed to aiming to provide for LHN by supporting a strategy that involves a large supply buffer) would only be supported if there are unmet needs arising from elsewhere within the sub-region where water scarcity is equally an issue.

In conclusion, there would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events (breaches of discharge permits); however, it is not possible to highlight concerns with any particular sites, or parts of the Borough, on the basis of the available evidence. It is therefore appropriate to flag a concern with Scenario 5, as a higher growth scenario, and also Scenario 3 which involves a degree of dispersal to locations distant from a WwTW.

With regards to effect significance, it is not possible to predict significant negative effects, because there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth; however, given the uncertainties at the current time, it is appropriate to flag a degree of risk under all growth scenarios. It will be for the Environment Agency and Southern Water to comment further.

¹¹² N.B. as discussed within the Swale LPR Habitats Regulations Assessment (HRA) report, there are relatively limited concerns around sewage effluent impacting the North Kent Estuaries European sites from treated sewage effluent. This is because these estuaries have a high sediment load, low water temperatures and high wave action. As such, smothering macroalgal growth, which has caused issues for European sites on the south coast, is not considered a threat to achievement of conservation objectives for these European sites.

¹¹³ See kentononline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/

Appraisal summary (also presented in Section 6)

Scenario	Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario 5 Preferred scenario Low risk UEs
SA topic	Rank of preference and categorisation of effects				
Air quality	1	3	2	2	4
Biodiversity	2	3	1	1	2
Climate change mitigation	1	2	2	1	2
Communities	1	3	3	3	2
Economy & employment	1	3	4	4	2
Flood risk	2	2	1	1	2
Heritage	2	3	3	1	3
Housing	3	2	2	2	1
Land	1	1	1	2	3
Landscape	2	3	3	1	4
Transport	1	2	2	2	3
Water	1	1	2	1	3
Summary discussion					
<p>It is immediately apparent that Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) perform well in a number of respects, as indicated by the number of stars and green scores assigned (particularly Scenario 1) and the relatively low number of red scores (particularly Scenario 4).</p> <p>However, it does not necessarily follow that it is a straightforward choice between Scenarios 1 and 4, when deciding which is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to housing objectives, which could mean favouring Scenario 5.</p>					

Having made these opening remarks, the following bullet points summarise the performance of the reasonable growth scenarios in respect of each element of the SA framework in turn:

- **Air quality** – higher growth is not supported given air quality constraints affecting Swale (and neighbouring authorities), particularly along the A2 corridor and along the B2006 in Sittingbourne. Scenario 1 performs well because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns. With regards to significant effects, it is appropriate to flag a notable degree of risk under all scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period (in particular NO₂, with particulates pollution likely to prove more stubborn); however, air quality is currently a priority issue for the Council.
- **Biodiversity** - Scenarios 3 and 4 are judged to perform best, as allocation of site SLA18/113 at Rushenden would be avoided (albeit it is recognised that detailed work is underway to understand the potential to avoid and mitigate biodiversity concerns associated with the site, and HRA work has concluded no likelihood of significant adverse effects to the SPA, given the potential for mitigation through policy). Scenario 2 performs poorly, on the basis that strategic growth to the east and southeast of Faversham is judged to be preferable to strategic growth at Bobbing. With regards to significant effects, it is appropriate to flag a notable degree of risk in respect of the three worst performing scenarios. It is recognised that the best performing scenarios (Scenarios 3 and 4) could lead to significant positive effects, particularly given the potential for strategic growth locations to support achievement of biodiversity net gain; however, there is no certainty at the current time, given the available evidence.
- **Climate change mitigation** – whilst it is challenging to differentiate the scenarios, on balance Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) are judged to be joint best performing. Scenario 1 may be preferable from a transport emissions perspective, whilst Scenario 4 may be preferable from a built environment emissions perspective. With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect on the baseline, with the fact that there is a highly ambitious local net zero target in place. On balance, it is considered appropriate to flag a concern with all scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor, if not *the* key driving factor, influencing spatial strategy, site selection and development of site-specific proposals.
- **Communities** - Scenario 1 is judged to perform most strongly, as strategic growth at Faversham would deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including a detailed masterplan. Scenarios 2 to 4 perform poorly, as there would either be problematic piecemeal expansion at Faversham (Scenario 2) or a missed opportunity at Queenborough/Rushenden (Scenarios 3 and 4). There is also a concern regarding growth locations in combination impacting on existing community infrastructure capacity under Scenario 5. With regards to the significance of effects, it is appropriate to highlight Scenario 1 as performing significantly better than the other scenarios. Scenario 1 is clearly designed to ensure that housing growth delivers community benefits beyond meeting housing needs. The only stand-out concern, under Scenario 1, relates to the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. The other scenarios would all lead to mixed effects.
- **Economy and employment** - Scenario 1 performs most strongly given the assumed employment land supply at the proposed mixed use allocations, albeit there is some uncertainty, notably in respect of site SLA18/113 at Rushenden. Relative to Scenario 1: Scenarios 2 and 4 perform less well, as there would be a loss of 10 ha of employment land at either Faversham or Rushenden, with the resulting shortfall only partly addressed by strategic growth at Bobbing; and Scenario 3 performs least well, because there would be a loss of 10ha of supply at Rushenden (also potentially some missed opportunity at Teynham). With regards to significant effects, it is appropriate to flag a degree of risk under all scenarios, and predict that the worst performing scenario would lead to significant negative effects. These conclusions are reached in light of the headline targets set out in the Employment Land Review (ELR, 2018), albeit certain ELR targets are a range and require careful interpretation. It is also important to consider that the national and regional situation may have moved-on since the ELR.
- **Flood risk** - the key consideration is in respect of site SLA18/113 at Rushenden. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/ Rushenden; however, at the current time, it is appropriate to 'flag' a significant risk.

- **Heritage** - Scenario 4 performs best as it would involve a focus at two strategic growth locations with relatively limited historic environment sensitivity. Scenario 1 also performs well on a similar basis, i.e. there would be a focus of growth at strategic sites; however, there is a concern regarding constraints at Teynham being a barrier to strategic growth. Scenarios 2, 3 and 5 perform poorly as there would be a need to allocate a number of urban and village extensions with historic environment sensitivities. With regard to significant effects, it is appropriate to take a precautionary approach, and flag a notable degree of risk under Scenario 1, and the strong possibility of significant negative effects under Scenarios 2, 3 and 5.
- **Housing** - it is appropriate to highlight Scenario 5 as best performing, as it is a higher growth scenario comprising a good mix of sites. Scenarios 2, 3 and 4 all also perform well on the basis that there would be a good mix of sites (including sites assumed to be associated with relatively low delivery risk, and certain sites thought likely to be able to deliver early in the plan period) and/or a good sized supply buffer. Scenario 3 also benefits from a focus on sites thought to have good potential to deliver affordable housing. Scenario 1 performs least well, as it is associated with both a lower supply buffer and a focus on sites with delivery risks. With regards to significant effects, it is certainly fair to highlight Scenario 5 as representing a highly proactive approach to responding to delivery challenges and risks; there would be very high confidence in respect of meeting market and affordable housing needs locally, and potentially some flexibility to provide for any unmet needs that might arise (N.B. Swale has not been asked to provide for unmet needs). Supply under the other scenarios would likely be sufficient to meet LHN over the course of the plan period, although there are uncertainties, particularly in respect of Scenario 1. Finally, it is important to note that any concerns are allayed by an understanding that supply, under all scenarios, would be strong in the early part / first half of the plan period because of committed sites from the adopted Local Plan building-out (plus certain new allocations, e.g. Neames Forstal, which is a constant across the growth scenarios). This is an important consideration in light of NPPF paragraph 67.
- **Land** - all of the reasonable growth scenarios would lead to significant negative effects, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. It is also likely that all would lead to loss of land that is currently used for fruit growing, or has been used for fruit growing in the recent past, which amounts to particularly high value agricultural land. On balance, it is appropriate to place the scenarios in an order of preference according to the total quantum of growth supported. N.B. a further consideration is the extent of minerals safeguarding areas across the Borough; however, these are very extensive, covering the majority of land along the A2 corridor. The Isle of Sheppey is less constrained; however, it is difficult to confidently differentiate the growth scenarios. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract prior to development.
- **Landscape** - Scenario 4 is judged to perform best. Scenario 1 performs second best, although there are concerns associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Scenarios 2 and 3 are judged to perform on a par, with certain of the urban/village extensions in question giving rise to a degree of concern. Scenario 5 gives rise to a concern, as a higher growth option, although the effect could be to prevent a situation whereby there is a need to accept windfall development in sensitive locations and/or the effect could be to reduce pressure for growth in sensitive locations in neighbouring authorities. With regards to significant effects, it is appropriate to flag a risk under all but the best performing scenario, including on the basis of the need to allocate at least one site within a locally designated landscape.
- **Transport** - Scenario 1 is judged to perform best, followed by those scenarios involving strategic growth at Bobbing, and then followed by Scenario 3, which would involve more dispersed growth. Scenario 5 (higher growth) is judged to perform least well, although there could be some potential for growth locations along shared transport corridors (e.g. the Lower Road on the Isle of Sheppey) to pool funding to deliver strategic transport upgrades, for example junction upgrades, cycle routes and improved bus services. With regards to significant effects, emerging transport modelling work is serving to suggest that Scenario 1 will not lead to severe impacts on the strategic road network, but it is appropriate to flag a degree of risk for the other scenarios, and flag a particular risk under Scenario 5, given known constraints in the west of the Borough.
- **Water** - there would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events (breaches of discharge permits); however, it is not possible to highlight concerns with any particular sites, or parts of the Borough, on the basis of the available evidence. It is therefore appropriate to flag a concern with Scenario 5, as a higher growth scenario, and also Scenario 3, which involves a degree of dispersal to locations relatively distant from a WwTW. It is not possible to predict significant negative effects, because there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth; however, given the uncertainties at the current time, it is appropriate to flag a degree of risk under all growth scenarios. It will be for the Environment Agency and Southern Water to comment further.