

Sustainability Appraisal (SA) of the Swale Local Plan Review

SA Report
Non-technical Summary

February 2021

Quality information

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Introduction

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 over the period 2022 to 2038, building on the adopted Local Plan (2017), 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.

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.

Central to the SA process is publication of an SA Report for consultation alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time the SA Report is published for consultation alongside the 'pre-submission' version of the LPR. This is the non-technical summary (NTS) of the SA Report.

The SA Report / this NTS

The SA Report is structured so as to answer three questions in turn:

1) What has plan-making / SA involved **up to this point**?

- Establishing and appraising growth scenarios

2) What are the SA findings **at this stage**?

- Appraising the draft LPR

3) What happens **next**?

Each of these questions is answered in turn below. Firstly, though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives, as well as an underpinning understanding of key issues, as established through evidence-gathering including consultation on a Scoping Report in 2018.¹

Taken together, this understanding of key topics, objectives and issues indicates the parameters of SA, and provides a methodological 'framework' for appraisal. A list of the topics and underpinning objectives is presented in Table 3.1 of the main report. In summary, the following topics form the back-bone to the framework:

- Air quality
- Biodiversity
- Climate change mitigation
- Communities
- Economy and employment
- Flood risk
- Heritage
- Housing
- Land
- Landscape
- Transport
- Water

¹ The Scoping Report is available at: swale.gov.uk/planning-and-regeneration/local-plans/local-plan-review/local-plan-review

Plan-making / SA up to this point

Introduction

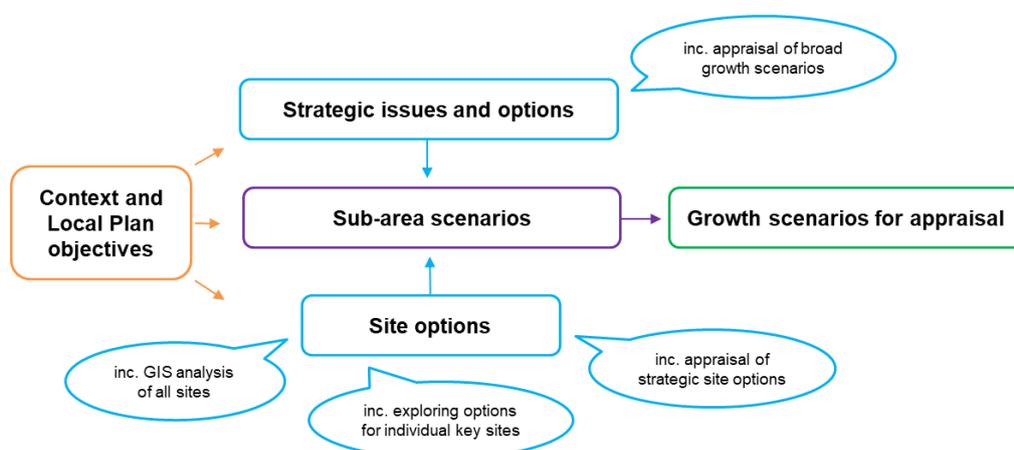
Central to the required SA process is exploring 'reasonable alternatives' with a view to informing plan-preparation. As such, Part 1 of the SA Report explains a process of establishing and appraising reasonable 'growth scenarios'. In short, the process involved:

- Establishing growth scenarios;
- Appraising growth scenarios; and then
- Feeding-back to Swale BC to inform the LPR

Establishing growth scenarios

The aim here is to explain the process of establishing reasonable growth scenarios for appraisal.

Figure A: Establishing growth scenarios – process overview



Context and Local Plan objectives

A large amount of work has been completed by the Council since commencing the LPR process in 2017. This includes: a consultation entitled Looking Ahead; publication of a Garden Communities Prospectus and subsequent detailed work to explore the four garden community options submitted by developers for consideration; an ongoing process of engagement with key stakeholder organisations; and completion of a wide range of evidence studies.

The evidence generated has fed into work to establish growth scenarios, both directly (e.g. see the review of evidence presented in Appendix II of the main report) and indirectly (in the sense that evidence has informed the establishment of LPR objectives which, in turn, feed into establishing growth scenarios). Any growth scenario that would clearly not align with the LPR objectives can be deemed 'unreasonable' and ruled out.

Strategic issues and options

There is a need to consider:

- **Quanta (how much?)** – there is strong evidence that the LPR must provide for Local Housing Need (LHN), as understood from the Government's Standard Methodology (as set out in the Planning Practice Guidance, December 2020), which is 1038 new dwellings per annum. However, there is also a need to consider the risk (albeit small) of the LPR needing to provide for higher growth in order to meet unmet housing needs arising from West Kent, where there are constraints to growth, pressures in respect of unmet needs arising from London and emerging Local Plans facing challenges; also, meeting affordable housing needs is a consideration.
- **Broad distribution (where?)** – firstly, there is a need to note that a wide range of evidence base studies have been prepared which are relevant to the question of how new development (both housing and employment), should be distributed across Swale Borough, and important evidence was also gathered through the Looking Ahead consultation (2018). Appendix II of the main report presents a review.

Secondly, an important consideration is the spatial strategy reflected in the current Local Plan, as broadly rolling this forward is an option for the LPR. The question of whether to depart from the current Local Plan spatial strategy, and if so to what extent, was explored through consideration of *broad* growth scenarios in July 2020, and an appraisal of the broad growth scenarios is presented in Appendix III of the main report.

Ultimately, the conclusion reached was that there are strong arguments for focusing LPR growth at Faversham, as a counter-balance to the strategy in the current Local Plan (this is known as Broad Growth Scenario C, and elected members provided a ‘steer’ in support of this approach in mid-2020) and, as part of this, there is support for *strategic growth* at Faversham, i.e. a strategic urban extension or a new settlement linked to the town. However, in the view of Council officers (in discussion with AECOM) there is also a need to remain open to the option of a more balanced distribution of LPR growth, and the possibility of two strategic growth locations (one at Faversham and another at Sittingbourne) cannot be ruled out.

Site options

A large number of site options have been submitted to the Council by land-owners and developers, and a process of Strategic Housing Land Availability Assessment (SHLAA) has been completed by the Council in order to identify a shortlist of sites that are available and *potentially* suitable for allocation by the LPR. The SHLAA provides an important input to the process of establishing growth scenarios (i.e. alternative packages of sites).

Within Swale Borough, as within other local authority areas, there is an important distinction to be made between strategic and non-strategic sites. In this case, strategic sites are considered to be those with a housing capacity above circa 1,000 homes, leading to economies of scale that can enable delivery of a good mix of uses (e.g. retail and employment as well as a good mix of homes including affordable) and enable delivery of new or upgraded infrastructure (e.g. new road infrastructure, community infrastructure, green infrastructure).

Taking strategic and non-strategic site options in turn:

- **Strategic site options** – four strategic site (or ‘garden community’) options were submitted to the Council following publication of a ‘Prospectus’ in 2018. These have been examined in detail since that time,² and Appendix IV of the main report presents a comparative appraisal. In light of the appraisal, Council officers (in discussion with AECOM) concluded that: one of the options is quite clearly not suitable for allocation through the LPR, namely North Street, which would involve a new settlement to the south of Faversham; another option can be ruled-out on balance, albeit recognising that the scheme could deliver transformation benefits in terms of employment land and transport infrastructure, namely Southeast Sittingbourne; and the other two options should be taken forward for detailed consideration through the appraisal of growth scenarios, namely East / southeast of Faversham and Bobbing. Further discussion is presented in Section 5.3 of the SA Report.

N.B. there is also the question of site-specific options (i.e. options for specific sites), for example alternative site ‘red line boundaries’ and alternative conceptual masterplans. See Section 5.3 of the SA Report.

- **Non-strategic site options** – the SHLAA is the main vehicle for considering the merits of non-strategic sites in isolation; however, a supplementary piece of analysis has been completed, with the findings presented within Appendix V of the main report. Specifically, Appendix V presents the findings of a quantitative GIS-based exercise, which has 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.

Sub-area scenarios

Having gone through a process of building ‘top down’ (quanta and broad distribution) and ‘bottom-up’ (strategic and non-strategic site options) understanding, the next step was to draw understanding together to establish growth scenarios for each of the Borough’s sub-areas in turn. This is the focus of Section 5.4 within the SA Report.

There is no set way of dividing the Borough into sub-areas; however, for the purposes of the task at hand, it was considered appropriate to explore growth scenarios for: Sittingbourne; Faversham; West Sheppey; Teynham; Newington; Eastchurch; Leysdown; Boughton; Iwade; and tier 5 settlements (i.e. small villages) and the rural area.

For each sub-area the aim was to arrive at a conclusion on the sub-area growth scenarios that should be taken forward to the final step in the overall process (as summarised in Figure A), which sees the sub-area growth scenarios combined into a single set of borough-wide growth scenarios.

² See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

As a further point on methodology, it is important to note that this work was undertaken *following* a decision on an emerging preferred growth scenario by the Swale Borough Cabinet on 28th October 2020. As such, the emerging preferred growth scenario for each sub-area was taken as a starting-point.

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

| Sub-area | Sub-area scenarios taken forward | | |
|--------------------|----------------------------------|-------|-------|
| 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 | - | - |

Growth scenarios for appraisal

The final task was to draw together the understanding generated in order to arrive at a single set of reasonable borough-wide growth scenarios for the LPR. In practice, this meant exploring ways of combining the **sub-area scenarios**, 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 additional homes to be delivered through a new permissive policy on **park homes**.

There are many potential combinations of the sub-area scenarios; however, it is possible to immediately rule out those combinations that would deliver too few or too many homes. Having accounted for supply from commitments, windfall sites, the Faversham Neighbourhood Plan and park homes, as well as the need for a 'supply buffer' of perhaps 5 to 10%, there is a need for combinations of sub-area scenarios to deliver **at least 5,930 homes**.³

Section 5.5 of the SA Report goes through a process of considering ways to combine the sub-area scenarios in order to deliver *at least* 5,930 homes, concluding that there are five reasonable growth scenarios.

Table B: Summary of the reasonable 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 | Above LHN? |
| 5 | Scenario 1 plus lower risk UEs | |

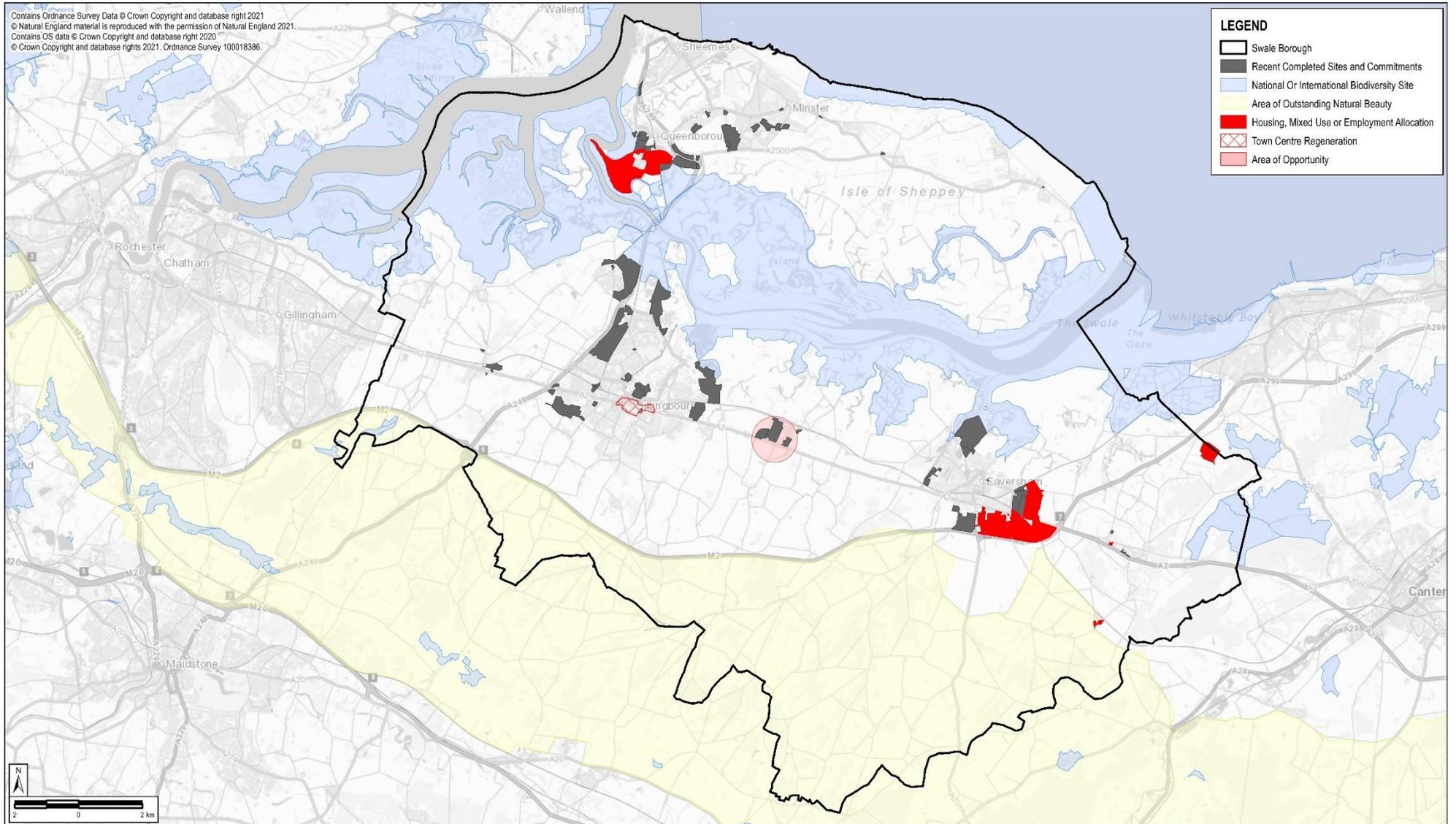
³ Calculated as: LHN (1,038 x 16 = c.16,600) + 5% buffer – (supply from commitments, windfall, FNP and park homes)

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

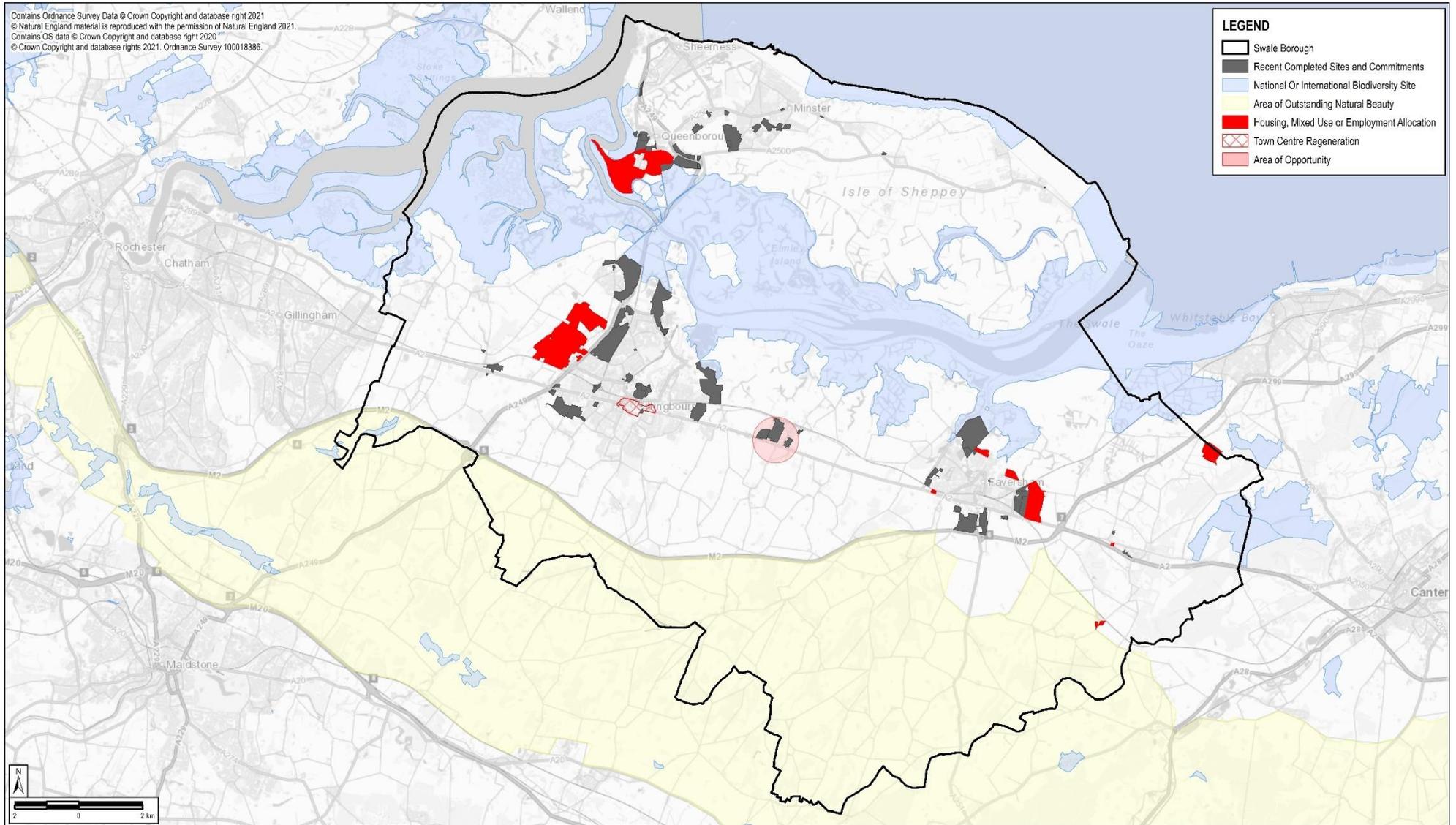
| Growth scenario | | Scenario 1 Preferred scenario | Scenario 2 Bobbing Faversham UEs | Scenario 3 E/SE Faversham Low risk UEs | Scenario 4 E/SE Faversham Bobbing | Scenario 5 Preferred scenario Low risk UEs | |
|---|-----------------------|----------------------------------|--|--|---|--|-------|
| 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 | Sittingbourne | Town centre | 850 | 850 | 850 | 850 | |
| | | Urban extensions | - | - | 500 | - | 500 |
| | | Garden comm (Bobbing) | - | 2,500 | - | 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 | - | - | 850 |
| | Tier 4 settlements | Teynham | 1,100 | 1,100 | 350 | - | 1,100 |
| | | Newington | - | - | 200 | - | 200 |
| | | Eastchurch | - | - | 65 | - | 65 |
| | | Leysdown | - | - | 100 | - | 100 |
| | | Boughton | 20 | 20 | 20 | 20 | 20 |
| | | Iwade | - | - | - | - | - |
| | Tier 5 settlements | Neames Forstal | 90 | 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

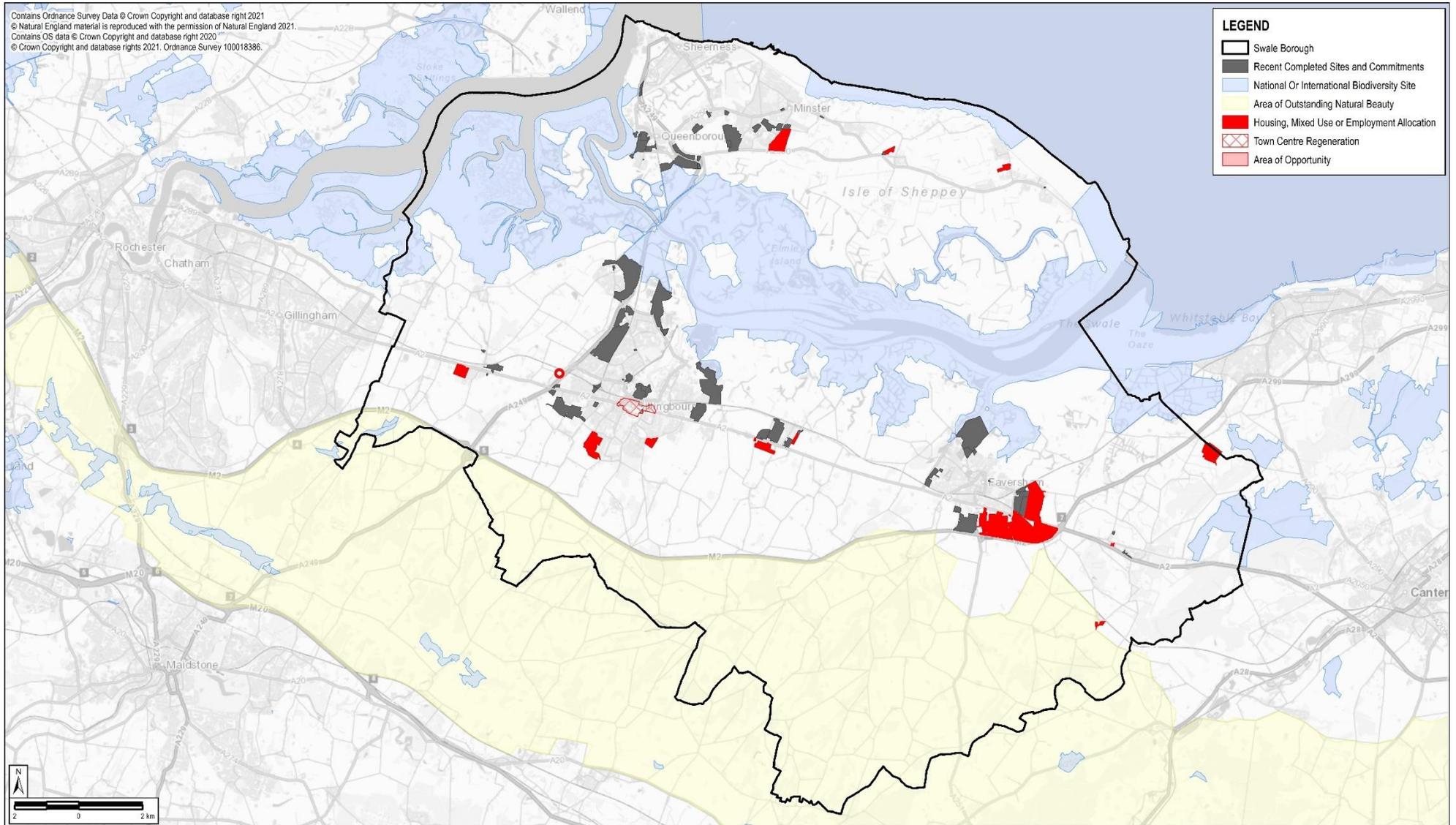
Scenario 1: The emerging preferred scenario



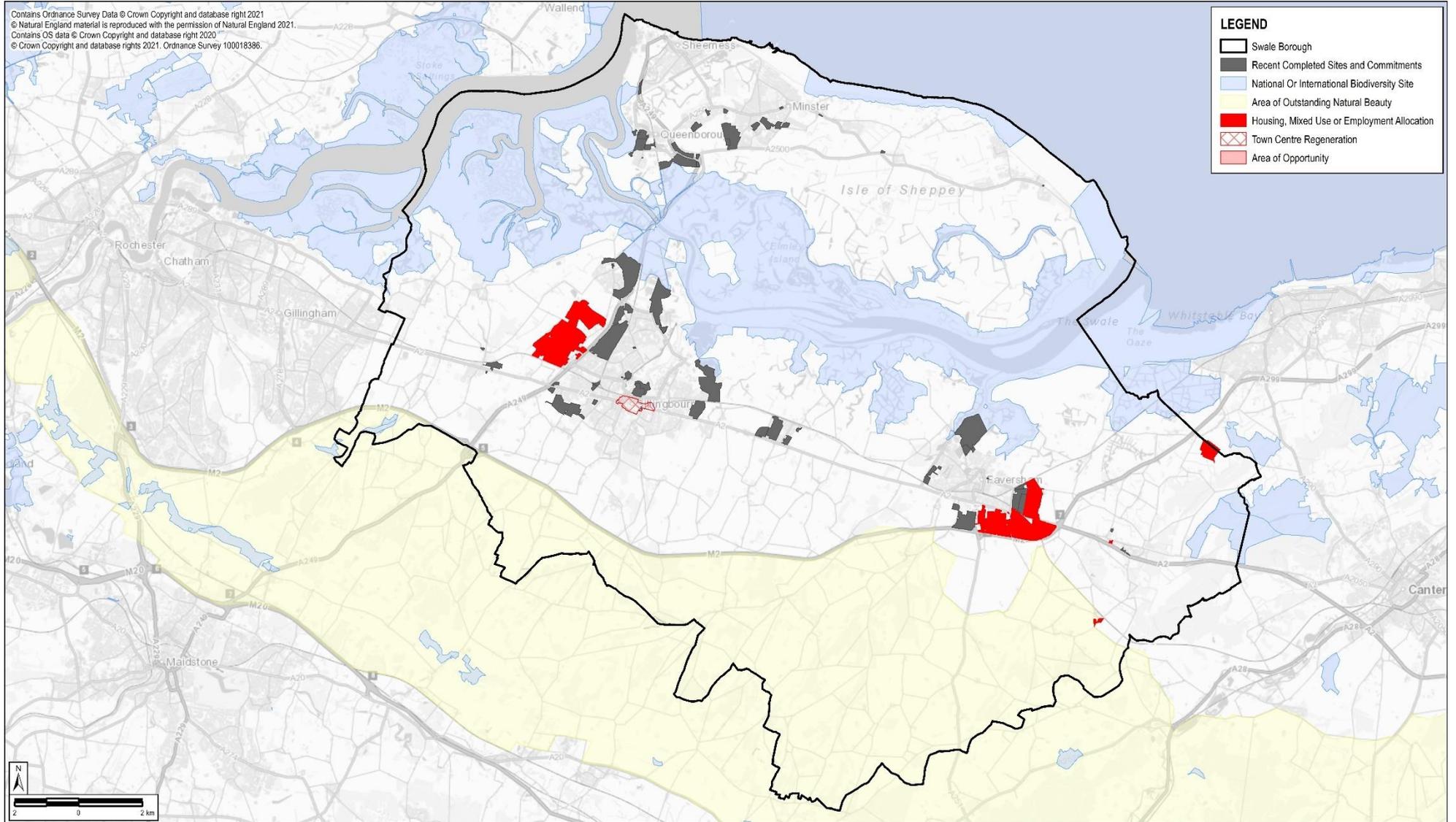
Scenario 2: Scenario 1 but with higher growth at Sittingbourne (Bobbing) / lower at Faversham



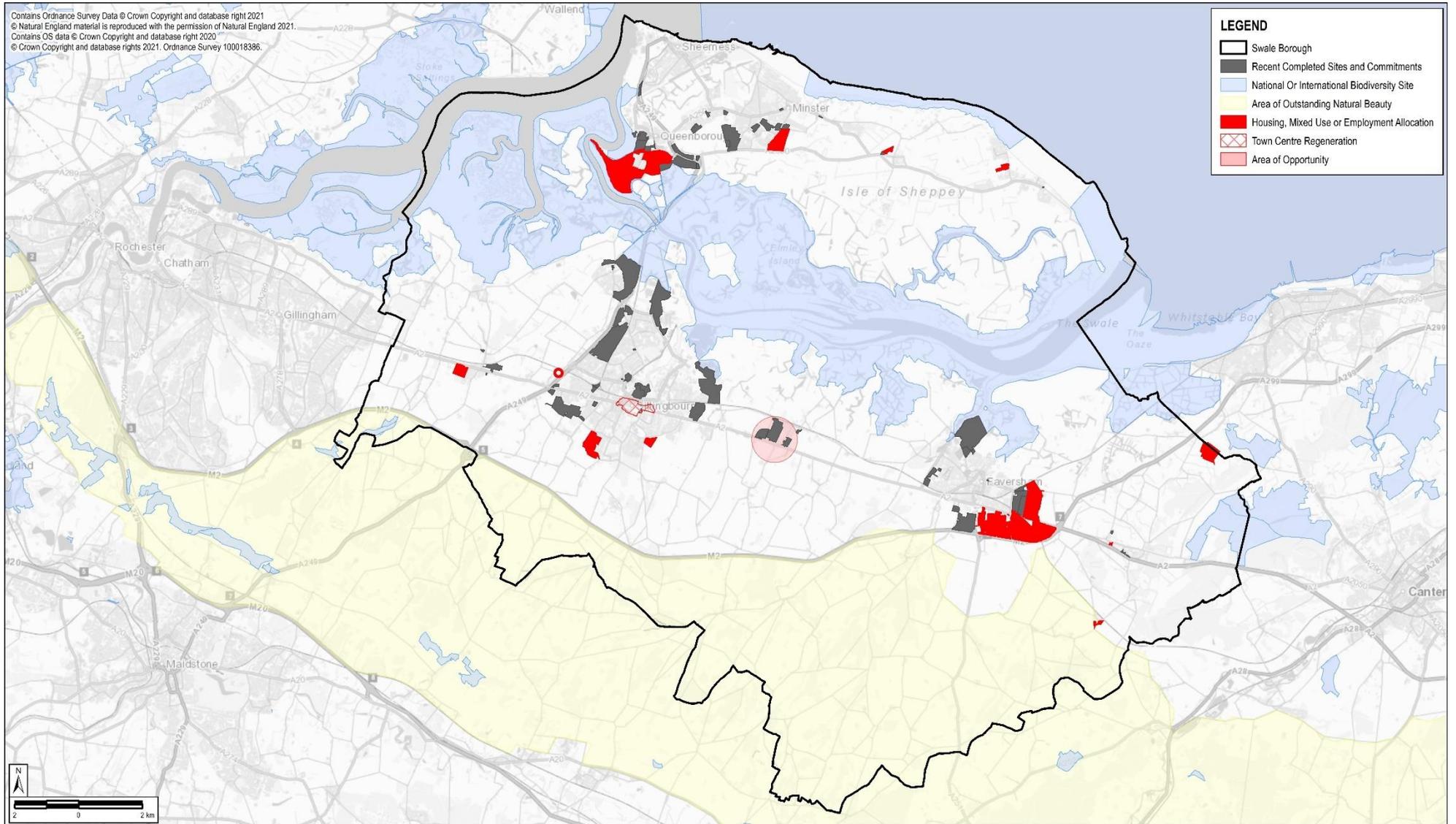
Scenario 3: Scenario 1 but with lower risk urban extensions (UEs) in place of higher risk



Scenario 4: Both strategic growth locations; lower growth scenarios elsewhere



Scenario 5: Scenario 1 plus lower risk UEs



Growth scenarios appraisal

Section 6 of the SA Report presents an appraisal of the five reasonable growth scenarios. Summary appraisal findings are presented in Table D. Within each row of the table, the performance of each of the growth scenarios is categorised in terms of significant effects (using red / amber / light green / green)⁴ and the scenarios are also ranked in order of preference (where 1 is judged best).

Table D: Summary appraisal of the reasonable growth scenarios

| 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

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).

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.

⁴ 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.

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 particulate 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 Swale 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 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 heritage 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 equates 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 areas 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 feasibly 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 works (WwTW) 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 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.

The preferred growth scenario

Section 7 of the SA Report explains officers' reasons for supporting Growth Scenario 1, in-light of the 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.*

SA findings at this stage

Part 2 of the SA Report presents an appraisal of the LPR as a whole. The following is a summary.

Air quality

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, above). 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.

Biodiversity

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.

Climate change mitigation

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. 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**.

Communities

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 opportunity at Teynham. There is also a rationale for supporting residential growth within Sittingbourne town centre. The main concern is in respect of the proposal to support growth 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**.

Economy and employment

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 A249 corridor; however, there is a degree of uncertainty regarding the extent to which the strategy aligns with the conclusions and recommendations of the Employment Land Review (ELR, 2018), 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**. 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.

Flood risk

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.

Heritage

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.

Housing

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 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**.

Land

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.

Landscape

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, above). 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.

Transport

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.

Water

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.

Overall conclusions

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 a 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 schemes with a focus on 'sustainable transport'.

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, above), but concerns are reduced after having taken account of proposed development management policy.

However, the appraisal highlights significant concerns in respect of **flood risk** and (agricultural) **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.

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 detailed policy requirements (both borough-wide and site-specific) within the appraisal presented in Section 9 of the main report.

Next Steps

The SA Report (and this non-technical summary) is published for consultation alongside the 'pre-submission' version of the LPR, under Regulation 19 of the Local Planning Regulations. 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 the SA Report.

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, the SA Report and (in all likelihood) further evidence gathered through hearings. The Inspector(s) will then either report back on the Plan's soundness or identify the need for modifications.

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 and sets out 'the measures decided concerning monitoring'.

Monitoring

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).

At the current time Appendix 1 of the LPR document proposes a monitoring framework, whilst Section 11 of the SA Report suggests way that it could feasibly be bolstered; however, it is important to recognise that monitoring is invariably associated with a cost to the Council. Section 11 makes suggestions around air quality; greenhouse gas emissions; low and zero carbon energy infrastructure; employment land requirements; flood risk; affordable housing delivery, including tenure split; water (capacity breaches at WwTWs); and loss of BMV agricultural land.

It is also suggested that there should be open forums for monitoring emerging proposals at key growth locations (East/southeast Faversham; Teynham; Rushenden South; Sittingbourne town centre) ahead of planning applications being submitted, for example to ensure that schemes are in-line with the 2030 net zero carbon target. It is noted that the proposal is to prepare Supplementary Planning Documents (SPDs) covering Sittingbourne town centre and Teynham.