

# Sustainability Appraisal (SA) of the Swale Local Plan

SA Report  
Technical Appendix

February 2021

**Quality information**

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# 1 Introduction

This is a Technical Appendix to the Swale Local Plan Review (LPR) Sustainability Appraisal (SA) Report. The aim of this Technical Appendix is to present supplementary information on:

- the appraisal of broad growth scenarios, thereby supplementing the summary appraisal findings presented in Appendix III of the SA Report;
- the appraisal of strategic site options, thereby supplementing the summary appraisal findings presented in Appendix IV of the SA Report; and
- GIS analysis of site options (both strategic and non-strategic) discussed in Appendix V of the SA Report.

This information is presented here, within a Technical Appendix, rather than within the main SA Report, because:

- there is a desire to keep the SA Report relatively short and accessible; and
- the information presented here is of relatively low importance to the overall SA process.

All of the information presented here (and within Appendices II to VI of the SA Report) feeds into Section 5 of the SA Report, which deals with “Establishing reasonable growth scenarios”, which aims to meet the legal requirement to present “an outline of the reasons for selecting the alternatives dealt with”.

The information here does not relate to Section 6 of the SA Report (“Reasonable growth scenarios appraisal”), which aims to meet the legal requirement to appraise “reasonable alternatives”.

## Structure of this Technical Appendix

This Technical Appendix comprises three sections:

- 1) Broad growth scenarios appraisal (supplementing Appendix III of the SA Report)
- 2) Strategic site options appraisal (supplementing Appendix IV of the SA Report)
- 3) Site options GIS analysis (supplementing Appendix V of the SA Report)

## 2 Broad growth scenarios appraisal

### Introduction

This section supplements Appendix III of the SA Report by presenting detailed appraisal findings in respect of the **broad** growth scenarios that were considered by the Swale Borough Council Local Plans Panel on 30<sup>th</sup> July 2020, and which are discussed in Part 1 of SA Report (Section 5.3), as part of the wider discussion of establishing reasonable growth scenarios for appraisal. Table A presents the broad growth scenarios.

*Table A: The July 2020 broad growth scenarios*

| Broad growth scenario   | Small sites <sup>1</sup>   | Strategic site(s)   |
|---|--|---|
| A <b>Roll forward Bearing Fruits (BF)</b><br>i.e. 85% focus on Thames Gateway | <ul style="list-style-type: none"> <li>• TG – very little choice</li> <li>• Fav – good choice</li> </ul>                   | <ul style="list-style-type: none"> <li>• None</li> </ul>  |
| B <b>Faversham focus</b><br>... to begin to counter-balance BF                | <ul style="list-style-type: none"> <li>• TG – little choice</li> <li>• Fav – little choice</li> </ul>                      | <ul style="list-style-type: none"> <li>• None</li> </ul>  |
| C <b>Further Faversham focus</b><br>... to mostly counter-balance BF          | <ul style="list-style-type: none"> <li>• TG – good choice</li> <li>• Fav – good choice</li> </ul>                          | <ul style="list-style-type: none"> <li>• SE of Faversham</li> </ul>   |
| D <b>Further Faversham focus still</b><br>... to fully counter-balance BF     | <ul style="list-style-type: none"> <li>• TG– very good choice</li> <li>• Fav – little choice</li> </ul>                    | <ul style="list-style-type: none"> <li>• SE of Faversham</li> </ul>   |
| E <b>Strategic sites</b>  | <ul style="list-style-type: none"> <li>• TG– good or very good choice</li> <li>• Fav – good or very good choice</li> </ul> | <ul style="list-style-type: none"> <li>• One or two out of the four options (no more than one in each planning area)</li> </ul> |

#### 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**.

<sup>1</sup> 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.

## Appraisal methodology

Appraisal findings are presented below within 12 separate tables, with each table dealing with a specific sustainability topic (see Section 3). Within each table the performance of each of the broad growth scenarios is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)<sup>2</sup> and the broad growth scenarios are also ranked 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.<sup>3</sup> 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 broad 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. 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 2018; materials submitted and made available (on websites) by strategic site promoters; and two reports prepared by Stantec in 2019, namely:
  - Assessment of Submissions (February 2019) – examined the four schemes submitted following the prospectus in turn, and recommended a range of further work;<sup>4</sup>
  - Assessment of Stage 2 Submissions (September 2019) – considered changes made to the four schemes following the earlier assessment, and reached overall conclusions on each of the four schemes.<sup>5</sup>

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 development (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 timing of the appraisal

This appraisal was completed in late 2020, prior to further work being completed to appraise reasonable alternatives (growth scenarios) and the plan as a whole. As such, some of the appraisal findings presented in this section may be somewhat out-of-date, and superseded by appraisal findings presented in Section 6 / Appendix VII (“Reasonable growth scenarios appraisal”) and Section 9 (“Pre-submission plan appraisal”) of the SA Report.

<sup>2</sup> **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.

<sup>3</sup> 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’.

<sup>4</sup> See [services.swale.gov.uk/meetings/documents/g2142/Public%20reports%20pack%2014th-Mar-2019%2019.00%20Local%20Plan%20Panel.pdf?T=10](https://services.swale.gov.uk/meetings/documents/g2142/Public%20reports%20pack%2014th-Mar-2019%2019.00%20Local%20Plan%20Panel.pdf?T=10)

<sup>5</sup> See <https://services.swale.gov.uk/meetings/documents/s13308/Appendix%201%20-%20PBA%20REPORT%202nd%20stage%20assessment%20Sept%202019.pdf>

## Appraisal findings

The tables below presents appraisal findings in relation to the July 2020 broad growth scenarios (BGS).

### Air quality

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| 2  | 4                         | 3                                    | 4  | ★1                        |

### 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 AQMA 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.”*

It is very difficult to suggest that either Sittingbourne or Faversham is more constrained in respect of air quality. However, once the location of available development site options is taken into account, there is reason to suggest that a high growth strategy for Sittingbourne (**BGS-A**) is preferable to a high growth strategy for Faversham (**BGS-D**).

This is because BGS-D could necessitate a focus of growth in the Ospringe area, and it is difficult to envisage a strategic transport solution that would avoid increased traffic impacting on the AQMA (including because the largest of the Bearing Fruits allocations to the south of Faversham (Land at Perry Court) is now building-out and providing only access roads).

Under BGS-A high growth at Sittingbourne could involve sites that are either in quite close proximity to the railway station or can access M2 J5 without passing through an air quality problem area; however, any further expansion to the east would give rise to a concern, as this area (along with Teynham) is the part of the A2 corridor most distant from an M2 junction.

As for **BGS-B**, there would be the potential to avoid the most problematic sites at Sittingbourne; however, higher growth at Faversham (without strategic growth to the east / southeast) could necessitate growth in the Ospringe area, and hence give rise to concerns of a similar magnitude to those discussed above, in respect of BGS-D.

As for **BGS-C**, this would involve a strategic growth location to the east / southeast of Faversham, which 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.

Finally, as for **BGS-E**, there is tentative support for a strategy involving a focus at one or two strategic sites. The four competing strategic site options are discussed in detail in Section 3, but in summary: Southeast Sittingbourne represents a considerable opportunity; Southeast Faversham performs well (as discussed); North Street gives rise to a degree of concern regarding air pollution impacts on sensitive receptors (homes; also school children) along the A251 and at the A251/A2 junction; whilst Bobbing gives rise to considerable concerns regarding increased traffic along the problematic B2006.

In **conclusion**, BGS-B and BGS-D perform poorly, as there is a strong likelihood of increased traffic through Ospringe, which is an air pollution hotspot. 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.

With regards to significant effects, it is appropriate to flag a notable degree of risk under all growth scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period (for example, air pollution in the Ospringe area is set to halve); however, air pollution is currently a priority issue for the Council, with a new AQMA declared at Keycol in December 2020, and the existing AQMA at St Paul's Street in Sittingbourne amended to include particulate matter (PM10) after the monitoring stations registered an increase in pollution levels.<sup>6</sup>

## Biodiversity

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| ★<br>1                                   | 2                         | ★<br>1                               | 2  | ★<br>1                    |

### Discussion

A primary consideration is the risk of expansion north of Sittingbourne or Faversham impacting on the Swale and Medway SPA/Ramsar sites ("North Kent Estuaries European sites"), including via increased recreational pressure and/or 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); however, growth opportunities in these areas are very limited. This contrasts to the adopted Local Plan, which allocated significant growth at Iwade, Northwest Sittingbourne, Northeast Sittingbourne and at Oare Gravel Works.

In particular, at Sittingbourne (high growth under **BGS-A**) there is very limited potential for further significant growth in proximity to the SPA. A potential growth location that gives rise to a notable degree of concern is east of Sittingbourne, between the A2 and the railway (this was an option put to the 29<sup>th</sup> October 2020 Local Plan Panel); however, the land is subject to wide-ranging constraints/issues (e.g. settlement coalescence; heritage) and, in any case, the land is c.800m from the SPA/Ramsar at its closest point, not well connected by public right of way (PROW), and not particularly well connected by road.<sup>7</sup>

Another consideration at Sittingbourne, aside from the SPA/Ramsar constraint, is the notable density of distinctive habitat patches to the south of the town (including traditional orchard habitat, which is a priority) that may function as one or more ecological networks. Under BGS-A there could well be pressure to allocate one or more modest sites in this area; however, it is difficult to suggest that this would necessarily give rise to a significant concern.

A final consideration, in respect of BGS-A, is that there would be a need for modestly higher growth on the Isle of Sheppey. It is difficult to confidently discuss spatial implications; however, it is important to point out that the entire western part of the Island, where growth opportunities are focused, is subject to a degree of SPA/Ramsar constraint, and that one of the sites in contention for allocation (SLA18/113) is flagged by the Biodiversity Baseline Study (2020) as notably constrained.<sup>8</sup>

At Faversham, under **BGS-B** and **BGS-D** there could well be a need to allocate one or two 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 PROW, 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.

<sup>6</sup> See <https://swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/keycol-hill-aqma-approved>

<sup>7</sup> Little Murston Nature Reserve is a short drive from Bapchild, but there does not appear to be any car parking and, whilst there is a public right of way around the perimeter, the site itself is not thought to be publicly accessible, as it is managed for wildfowling.

<sup>8</sup> The study 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 BNG projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver BNG for this proposed development and therefore alternative sites should be considered."

As for strategic growth to the east / southeast of Faversham (**BGS-C** and **BGS-D**), this land is notably unconstrained in biodiversity terms, in that there is very limited onsite priority habitat and limited designated land either in close proximity or easily accessible. However, if a strategic scheme were to extend north beyond the Graveney Road / as far as the railway line (to Whitstable), then this would give rise to 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 LWS; the walking route to the SPA would be c.2.25km and the driving route to the SPA would be 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.

Finally, as for **BGS-E**, there is a need for caution as one of the four sites in contention - Southeast of Sittingbourne - is notably constrained. This is because there would likely be a need for a focus of growth in the Highstead / Rodmersham Green area, where there is a high density of woodland (including ancient woodland) and traditional orchard priority habitat that is shown by the Biodiversity Baseline Study (2020) to comprise a northern promontory of the North Downs Priority Area (also, the study highlights connectivity between traditional orchard habitat patches as a priority). Development is not necessarily precluded within priority areas; however, taking a precautionary approach it is appropriate to flag a risk of development in this area worsening ecological connectivity between habitat patches at the landscape scale (also potentially direct impacts to habitat patches, e.g. from recreational pressure).

There is also a degree of concern associated with strategic growth to the east / southeast of Faversham if it is assumed to be the case that growth would extend north as far as the railway, as discussed above.

Bobbing is also associated with biodiversity constraint. 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.

North street is thought to be subject to lower strategic biodiversity constraint. Finally, in respect of the strategic sites, it is important to note that the summary matrix presented at page 63 of the Stantec *Assessment of Stage 2 Submissions* (2019) assigns all four proposed schemes a 'green' score in respect of potential to achieve net gain(s). However, there is a need for caution, looking beyond generic statements to question the extent to which the proposal is to direct scarce funds to biodiversity and other environmental mitigation/enhancement schemes, and also ensure a focus on inherent locational issues and opportunities, i.e. recognise that not all sites are equal in respect of potential to achieve biodiversity net gain.

In **conclusion**, 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 / southeast of Faversham extending north as far as the railway line.

## Climate change mitigation

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| 4  | 4                         | 1                                    | 3  | 2                         |

### Discussion

There is a need to consider greenhouse emissions from both transport and the built environment; however, in respect of transport there is inevitable cross-over with discussion below under the 'Air quality', 'Communities' and 'Transport' headings.

With regards to **built environment emissions**, there are strong arguments for supporting a focus of growth at one or two 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);<sup>9</sup>
- 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); and
- ‘smart energy systems’ – seen as a priority within the Energy South 2 East Local Energy Strategy (2020) and the recent Energy White Paper (2020), which includes a major focus on delivering a ‘Smart Electricity System’.

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 more ambitious approach to growth at Sittingbourne town centre, including higher densities, could feasibly help to facilitate one or more heat networks; however, there is little reason to suggest that this would be viable or achievable, with no obvious strategic heat sources to explore (the proximity of Milton Creek and associated industrial areas could feasibly represent an opportunity).

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 recent Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and a Hydrogen Strategy is due in 2021; however, opportunities remain uncertain at the current time, and are likely to be longer term.

Finally, there is a need to briefly review latest site specific proposals. The summary matrix presented at page 63 of the latest Stantec report assigns all four proposed schemes a ‘green’ score in respect of ‘green proposals’. However, there is a need for caution, looking beyond generic statements / ‘warm words’ to question the extent to which the proposal is to direct scarce funds to decarbonisation measures, and masterplan, design and build with decarbonisation as a priority (e.g. high density development in proximity to any strategic heat sources). The Stantec report potentially serves to identify Southeast Sittingbourne as standing-out, in that funds are being used to work with specialist consultants to “embrace new technology and move towards carbon neutrality”, and the scheme website makes the following encouraging statement: *“By focusing at a strategic level from the outset we can take a holistic approach to the scheme to design for a carbon neutral future. The scheme will utilise solar panels connected to home battery systems networked to central battery storage to maximise the use of renewable energy and provide for energy neutral homes when assessed across a 12-month period.*

With regards to **transport emissions**, place-specific considerations include:

- Sittingbourne - is the Borough’s highest order centre, with a good town centre and retail offer, an extensive employment offer and a very good rail service; however, certain of the available sites to the south of the town are not very well linked by public or active transport, such that it could be difficult to achieve modal shift.
- Faversham – is a second tier settlement, but there is an identified opportunity to enhance the employment offer, and there is good potential to reach Canterbury and other locations in Kent by public transport.

Maintaining a focus on Faversham, 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 (discussed further in Section 3).

- Sheppey – which would see moderately higher growth under BGS-A, is less well connected / more likely to be associated with entrenched car dependency; however, Queenborough/Rushenden (one of the locations under close consideration for growth) benefits from a rail station, and there is also a good cycle route to Sittingbourne (partly off-road).

<sup>9</sup> 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). At the current time the Government is consulting on a Future Homes Standard, which would be a national requirement set out in the Building Regulations. The Government’s proposal is that Local Plan policies would no longer be able to require levels of emissions below the Building Regulations (Future Homes Standard); however, there would still be the potential for the promoters of individual development schemes to choose take a best practice approach, including by achieving net zero regulated emissions.

- Other strategic site options (Bobbing, Southeast Sittingbourne and North Street) are all less well related to a higher order centre than is the case for East / Southeast of Faversham, with North Street potentially standing-out as performing poorly, as it is relatively poorly related to *Faversham*, i.e. a second tier settlement. Southeast Sittingbourne potentially stands-out as performing well, as residents would be able to walk/cycle to employment at an expanded Kent Science Park; however, on the other hand, there is a concern that an expanded Kent Science Park (in combination with a new motorway junction) could attract long distance commuting by car, given skills levels locally. As for Bobbing, there is a concern regarding connectivity to Sittingbourne town centre (over 3km distant, via the problematic B2006), and whilst the latest Stantec report 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.

In **conclusion**, it is inherently challenging to differentiate the broad growth 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. 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, 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 issues and uncertainties, as discussed above. 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, 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 of the broad growth 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

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus  | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|---|--|---------------------------|
| 4  | 5                         |  | 3  | 2                         |

### Discussion

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 and issues can arise, despite mechanisms for gathering and directing funds for infrastructure.<sup>10</sup>

This serves to suggest inherent concerns with **BGS-A** and **BGS-B**. More specifically:

- BGS-A** – 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. With regards to secondary school capacity, which is often a key strategic consideration, 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 North West Sittingbourne strategic allocation is set to deliver a new secondary school (although not in the short term).

Another consideration, in respect of **BGS-A**, is that there would be a degree of increased pressure for growth on the Isle of Sheppey; however, it is difficult to suggest that this necessarily gives rise to community infrastructure concerns. There are not known to be any issues or opportunities in respect of secondary school

<sup>10</sup> 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.

provision (the Oasis Academy Sheppey is split across two sites, at Sheerness and Minster), and there is a good network of primary schools and doctor's surgeries across the Island, including the rural east (Eastchurch and Leysdown). There is an identified need to support growth at Queenborough/Rushenden (as far as possible, given constraints, notably flood risk), in order to support well-established regeneration objectives; however, it is difficult to suggest that this would be more likely under BGS-A.

- BGS-B – following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough. In turn, there is clear support for **BGS-C**, which would certainly enable a new secondary school to be delivered as part of a strategic urban extension to the east / southeast of Faversham. Latest understanding is that the secondary school will come forward at the site directly to the east of Faversham, which could also form part of the growth strategy under BGS-A; however, it is assumed that it would be much more challenging to deliver a secondary school on the site under BGS-A.<sup>11</sup>

There is also considered to be a good degree of support for **BGS-D**, as this would also enable delivery of a new secondary school via a strategic urban extension to the east / southeast of Faversham, although under this scenario there would also be additional 'piecemeal' urban extensions to the town, which would deliver relatively little in the way of infrastructure.

Finally, as for **BGS-E**, a focus at strategic sites is broadly supported; however, there is considerable variation between the four strategic site options, in respect of potential to deliver new/upgraded community infrastructure, including due to variations in development viability across the Borough. In particular, viability is a constraint to growth in the Sittingbourne area, and therefore an issue for the Bobbing and Southeast Sittingbourne strategic site options. In practice, the scale of growth envisaged for Southeast Sittingbourne is such that there would be good potential to deliver new and upgraded community infrastructure (despite costs for major transport infrastructure upgrades), including a secondary school, and the possibility of delivering a further education facility for Sittingbourne has been suggested. 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.

Finally, in respect of the four competing strategic site options, the latest Stantec report serves to highlight key issues around: A) impacts to existing communities; and B) engagement, joint working and stewardship. These matters are discussed in detail in Section 3.

In **conclusion**, 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 regarding the proposed East / Southeast of Faversham strategic urban extension at the current time, in the absence of evidence, including an up-to-date masterplan.

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.

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<sup>11</sup> Under BGS-A the site in question, known as Land at Lady Dane Farm, would deliver an urban extension of c.600 homes, and would likely be planned and delivered in conjunction with a smaller site to the north (Land at Graveney Road), with the combined scheme delivering around 840 homes. However, under BGS-C these two sites would also be delivered in combination with Southeast Faversham, with the combined scheme delivering in the region of 3,340 homes. This would generate economies of scale that would, it is assumed, enable delivery of the new secondary school (or, more specifically, make it viable for the land to be made available for a new secondary school).

## Economy and employment

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites   |
|--|---------------------------|--------------------------------------|--|---|
| 4  | 3                         | 2                                    | 3  | 1  |

### Discussion

There is a need to reflect the targets set out in the Employment Land Review (ELR), although certain of the targets are in the form of a range, with this particularly the case for the matter of delivering significant new land for warehousing / distribution.

The following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – it is difficult to envisage any of the available non-strategic sites at Sittingbourne delivering significant new employment land; however, there would also be modestly increased growth on Sheppey under this scenario, where there is one available site in contention for allocation of a mixed use scheme, namely 18/113 (South of Rushenden), which is well-suited to delivering up to 10ha of new employment land (unconfirmed, given a need for further masterplanning work to reflect constraints) at a location fairly well linked to the A249. At Faversham there would be relatively low growth, under this scenario; however, one or more of the non-strategic allocations could potentially come forward as a mixed use scheme, delivering new offices and/or light industrial uses.
- **BGS-B** (Faversham focus) – broadly as per BGS-A, although there could be greater potential to bring forward employment land at Faversham at mixed-use sites. It is fair to assume that the LPR would be able to provide for new offices and light industrial land in accordance with recommendation (B) of the ELR.
- **BGS-C** (Further Faversham focus) – there is good potential to bring forward new employment land as part of a strategic urban extension to the east / southeast 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 could potentially be met, to some extent; 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 East / southeast 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).”*

- **BGS-D** (Further Faversham focus still) – performs broadly as per BGS-C, as it is difficult to assume that any of the additional small scale urban extensions to Faversham under this option would deliver significant new employment land.

N.B. there is also one notable site at the far eastern extent of the Borough (adjacent to Canterbury Borough) that is available for development as an employment only scheme, namely 18/154 (Lamberhurst Farm); however, it is difficult to assume that delivery of this site would be more likely under this broad growth scenario.

- **BGS-E** (Strategic sites) – the key point to note is that strategic growth to the **Southeast of Sittingbourne** represents a very significant opportunity, from an ‘economy and employment’ perspective. This matter is explored in detail within the ELR, as well as within the two *New Garden Communities: Assessment of submissions* reports prepared by Stantec in 2019. There would be benefits three broad respects: 1) there could be significant expansion of Kent Science Park; 2) there would be the potential to deliver new strategic warehousing and distribution uses adjacent to a (new) motorway junction in the west of the Borough, thereby fully reflecting ELR recommendations; and 3) the scheme would deliver the final (eastern) section of the Sittingbourne Northern Relief Road (SNRR) and continue the link road south, beyond the A2 as far as a new

junction 5a of the M2, thereby supporting the functioning of Eurolink industrial area and *potentially* unlocking further expansion.<sup>12</sup> Economic benefits would clearly be felt at a larger than local scale, with the site promoters suggesting that Eurolink and Kent Science Park collectively comprise the biggest business centre in Kent. There are additional considerations to factor-in, when considering the merits of strategic growth to the Southeast of Sittingbourne from an 'economy and employment' perspective, in particular around the possibility of growth here detracting from growth elsewhere in the Borough (Sittingbourne, Faversham and Sheppey) and in the neighbouring authorities of Medway and/or Maidstone (e.g. the emerging Maidstone Local Plan proposes a "prestigious business park at Junction 8 of the M20"); however, for the purposes of this appraisal, it is appropriate to flag a significant opportunity.

With regards to the final two strategic site options that would come into contention under this broad growth scenario: the current **Bobbing** proposal includes limited new employment land, and 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; the proposal for **North Street** includes notably more employment land, including a "traditional employment/ business area close to M2 on north of site", but there would be no potential to deliver strategic warehousing/distribution.

In **conclusion**, the 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 (viably) and implications for the wider Borough and elsewhere. BGS-C also performs well, as the employment land strategy could align with ELR recommendations at a good (or, at least acceptable) extent. The other broad growth scenarios do not perform poorly, as the employment land strategy could reflect ELR recommendations in part.

## Flood risk

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| 4  | 3                         | 2                                    | ★1   | ★1                        |

## Discussion

Large parts of the Borough are constrained by flood risk, as set out within the Strategic Flood Risk Assessment (SFRA, 2019); however, there would be good potential to select sites outside of flood risk zones under all of the broad growth scenarios.

The main concern relates to the increased emphasis on the Isle of Sheppey under **BGS-A**; however, it is difficult to assume that modestly higher growth would necessitate allocation of one or more sites constrained by flood risk, given available sites on the island that are unconstrained by flood risk. There are strong arguments for focusing growth at locations within the flood risk zone at Queenborough/Rushenden, in order to support regeneration; however, it is difficult to suggest that there would necessarily be an increased emphasis on growth here under BGS-A.

A second consideration relates to the likelihood of one or two small urban extensions to the north of Faversham under **BGS-B and BGS-D**. 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.

<sup>12</sup> The ELR identifies an area of search, and explains: "This area would make a logical extension to the Borough's principle employment area - for industrial / warehousing but also potentially the flexible office/light industrial units that are in demand in the area. Employment use in this location would achieve co-locational benefits from proximity to all the other industrial businesses at Eurolink, and sharing the available infrastructure. However, the road infrastructure is the major constraint, and the suitability of the area is contingent on completion of the new link road, and most probably a new access road south of the town (to the M2). We understand there are already congestion issues at Eurolink, and further expansion without solving the access constraint could hinder the efficient operation of the whole Eurolink area. For this area to be taken further the local access (northern relief road) would need to be committed (with other associated upgrades to the local network) and delivered alongside the new employment." However, there is very limited land remaining outside of the flood risk zone / area of SPA sensitivity, and there are heritage constraints associated with Tonge Parish, including the setting of the grade 1 listed parish church.

Finally, there is a need to consider sites that intersect one of the Surface Water Functional Flood Zones associated with the series of dry valleys that characterise the central and southern parts of the Borough. These flood zones are a notable constraint to strategic growth to the southeast of Sittingbourne; however, the SFRA explains:

*“This SFRA introduces the concept of Surface Water Functional Flood Zones within dry valleys where there are significant overland flow paths. For development sites located in Surface Water Functional Flood Zones, all types of development could be compatible, providing the FRA can demonstrate that the proposal will be safe from flooding for its lifetime and does not increase flood risk elsewhere.”*

In **conclusion**, 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 notable degree of concern associated with BGS-A.

## Heritage

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| 2  | 3                         | 1                                    | 3  | 1                         |

## Discussion

The following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – whilst there is little certainty, an increased focus of growth at Sittingbourne under this broad growth scenario could necessitate one or more significant allocations to the south of Sittingbourne which, broadly speaking, is a relatively sensitive area from a heritage perspective. This area comprises five parishes (also accounting for Bredgar Parish, to the south of the M2) historically associated with the fertile soils of a transitional landscape between downland to the south and Sittingbourne / the Swale to the north. Each parish has a grade 1 listed church, and there are seven conservation areas across the area as a whole, as well as several small clusters of listed buildings and historic farmsteads. It is also important to note that the nationally available dataset of priority habitat shows a high density of traditional orchard habitat patches (the great majority of which appear to still be present on the ground, as understood from aerial imagery), and the Kent Historic Environment shows numerous areas with a ‘horticulture’ historic character.

Another possibility, under BGS-A, is increased pressure for further expansion to the east of Sittingbourne, potentially expanding the town as far as Bapchild and Tonge, both historic parishes with a grade 1 listed church, although Bapchild’s character is now dominated by 20<sup>th</sup> Century housing, and only Tonge is associated is a designated conservation area.

Finally, there is a need to consider the implications of modestly increased growth on the Isle of Sheppey under this broad growth scenario. Sheppey is associated with wide ranging heritage constraints and opportunities, as explored in detail within the Swale Heritage Strategy (2020). Most of potential growth locations are thought to be of relatively limited sensitivity, on the basis that they would comprise further extensions to the extensive 20<sup>th</sup> and 21<sup>st</sup> century development; however, there is a need to consider open views across marshland landscapes, including distant views to Minster Abbey.

- **BGS-B** (Faversham focus) – under this broad growth scenario there would be decreased pressure to allocate problematic sites at Sittingbourne (and Sheppey), but there would be increased pressure to allocate non-strategic urban extensions to Faversham, which is very highly constrained from a historic environment perspective; indeed, Faversham’s heritage value is of at least regional renown, and maintaining this role is central to the vision for the Borough (as understood from the adopted Local Plan). In light of these sensitivities, there is a need to consider potential directions of growth in turn:
  - North: the possibility of one or two modest urban extensions, to more-or-less complete the expansion of Faversham as far as the flood risk zone / area of SPA constraint, potentially gives rise to *relatively* limited concerns from a historic environment perspective, with sites abutting the extensive Faversham Conservation Area but 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.”*

- East: much of the 20<sup>th</sup> and 21<sup>st</sup> Century expansion of Faversham has been to the east, hence further expansion potentially gives rise to relatively limited concerns, from a historic environment perspective (N.B. see further discussion below regarding landscape concerns, including in respect of ‘urban sprawl’). However, there is a need to consider the rural setting of Faversham, 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.”* A further consideration is encroachment of the eastern edge of the town towards historic farmsteads,<sup>13</sup> and impacts to views from cycling routes and public footpaths that link Faversham to the Goodnestone Conservation Area and the marshland walking and cycling routes beyond.
- South: Faversham historically extended between the marshes and creekside industry in the north and the A2 in the south, with Ospringe and Syndale Park – both designated conservation areas – to the south of the A2; however, the built form of the town is evolving, with the adopted Local Plan allocating two sites to the south of the A2 (either side of the A251) that will together deliver nearly 600 homes plus new employment land. Under this broad growth scenario there would be pressure for further non-strategic expansion to the south of the A2, and this pressure would most likely concentrate on the sector of land falling between Ospringe in the west and the Brogdale Road in the east. This area is clearly constrained by the Ospringe Conservation Area to the west and the Faversham Conservation Area to the north, plus there is a need to consider contribution to a historic landscape strongly associated with fruit cultivation, as well as 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.
- West: there is thought to be limited realistic potential for expansion to the west; however, there could be the possibility of a modest urban extension to the north of the A2, potentially expanding the western edge of the town in this area as far as the B2045 ‘Western Link’. There are no listed buildings in this area; however, this land (in particular the western part) contributes to an attractive rural 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).
- **BGS-C** (Further Faversham focus) – as noted by the Swale Heritage Strategy (2020): *“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”*. In this context, there is potentially merit to a strategic urban extension to the east / southeast of the town, from a historic environment perspective, in order to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the east and southeast of Faversham is relatively unconstrained in historic environment terms, and also an understanding that there would be good potential to avoid and mitigate historic environment impacts by taking a strategic approach to masterplanning, landscaping and design. There could also be good potential to deliver a new community - with associated employment, services, facilities, retail and infrastructure upgrades - that supports Faversham as a thriving market town and visitor/tourist destination. However, there are wide ranging 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 and impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. A key consideration is the integrity of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone.<sup>13</sup>

<sup>13</sup> 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.

- **BGS-D** (Further Faversham focus still) – it is fair to conclude that BGS-D performs worse than BGS-C; however, in practice it could be possible to deliver one or two modest urban extensions with limited historic environment impact.
- **BGS-E** (Strategic sites) – of the other three strategic site options (in addition to east / southeast of Faversham, which is discussed above), it is **Southeast Sittingbourne** that stands-out as most constrained. Unlike the other new settlement options, there is the potential to draw upon a valley topography to framework growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and containment); however, the corollary is growth would be in proximity to existing historic environment assets. The current proposed masterplan seeks to take a ‘landscape led approach’ and avoid impacts as far as possible, including by avoiding development in proximity to the only conservation area in the vicinity (Rodmersham Green); however, tensions remain nonetheless, most notably at the northern extent of area, where a new link road would cut through the Tonge Conservation Area, and in the central area, where development would abut the hamlet of Rodmersham, where there is a cluster of four listed buildings including a grade 1 listed church, which the Swale Landscape Sensitivity Assessment (2020) describes as “an important local landmark and skyline feature”. The further statement made by the Assessment, as part of a discussion of ‘time depth’, is also of note: *“It is evident that there have been changes in land cover in recent years, with the conversion of areas of commercial orchards to arable, and vice versa, for example along Church Street and Pitstock Road. However, this does not change the fundamental character of the landscape. The loss of some areas of traditionally managed orchards has adversely affected the historic and scenic character of the landscape, although more intensive commercial orchards remain an important feature which contributes to a distinctive sense of place”*. Finally, with regards to the other two strategic site options:
  - **North Street**: the new settlement would envelop grade 1 listed Copton Manor, as well as the cluster of six grade 2 listed buildings, and also encroach upon the historic hamlet of Newhouse Farm / Gosmere (eleven listed buildings) and the Sheldwich Conservation Area to the south, which is associated with raised ground within the Kent Downs AONB. The Swale Landscape Sensitivity Assessment (2020) explains: *“The time-depth of the landscape relates predominantly to the continuity of agriculture, fruit and hop cultivation within the area, together with the presence of many scattered historic houses, farmsteads and associated barns, oasts, stables and granaries in the Kentish vernacular styles (including timber framed, weather boarded and red brick), some with parkland containing notable mature trees, pasture and traditional orchards... Some areas of traditionally managed orchards have been lost in recent years, together with field boundaries, resulting in more open, larger fields.”* It also notes that there is evidence that the very large ‘prairie’ field in the vicinity of Copton has never been enclosed. However, there are also potential benefits from a bypass of North Street.
  - **Bobbing**: is seemingly the least constrained of the strategic site options, in historic environment terms. 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.

In **conclusion**, 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 very sensitive, in historic environment terms. It is suggested that negative effects would 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; however, under BGS-E it could be possible to focus growth at the two strategic site options subject to more limited constraint.

## Housing

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still  | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|---|---------------------------|
| 4  | 3                         | 2                                    | 1  | 5                         |

### Discussion

It is assumed that all of the broad growth scenarios would deliver the same number of new homes in the plan period, and it is not possible to suggest that housing need is particularly acute in any one part of the Borough (rural housing needs are a specific topic worthy of consideration, but outside the scope of this current appraisal). BGS-E could well involve allocating one or more sites that continue to deliver homes beyond the plan period (this would certainly be the case for Southeast Sittingbourne and North Street, and potentially 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.

In turn, it is appropriate to focus attention on differentiating the scenarios in respect of the potential to deliver a good mix of housing types, sizes and (most importantly) tenures. There are inherent uncertainties, and in many ways this is a detailed consideration for the planning application stage; however, in the Swale context it is a strategic consideration because housing mix is a factor of development **viability**, which varies significantly across the Borough.

The headline point to note is that development viability is lower at Sittingbourne and on the Isle of Sheppey (**BGS-A**) than at Faversham (**BGS-B**). However, there is also some finer-grained variation of note (as understood from the house prices 'heat map' presented in Appendix II of the SA Report). In particular, it is notable that the parishes south of Sittingbourne are associated with much higher house prices than Sittingbourne itself, and within Faversham there are areas of notably lower house prices either side of the town centre / conservation area. These 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 LPR will adjust the affordable housing policy; however, there will still be a need to account for variations in viability.

As for the four competing **strategic site options**, three are currently proposing to deliver 40% affordable housing, whilst one – Southeast Sittingbourne – is proposing to deliver 20% (having previously proposed 10-20%). The proposed approach at Southeast Sittingbourne reflects an understanding that there will be other funding priorities, in particular major transport upgrades. It is also noted that Southeast Sittingbourne is the only one of the strategic site options to include a clear commitment to delivering specialist housing ("retirement living and self-build opportunities for local people"), which is assumed to represent a development cost (i.e. these uses are thought to be less viable than market housing with affordable), but this is not entirely clear, in any case, this proposal could be subject to change.

None of the strategic site promoters have proposed making land available for Gypsy and Traveller pitches (or Travelling Showpeople plots), which is an approach that is quite common nationally, where there is an established local need.

Finally, in respect of the strategic site proposals, it is important to recognise that additional development costs could emerge leading to a need to reconsider the mix of housing, including affordable housing, that can be delivered. For example, at Bobbing there is uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme, and there is a relatively high degree of uncertainty regarding North Street because this scheme has been less fully worked-up.

A further consideration, related to viability, is **delivery risk**. It is difficult to conclude that this is a 'housing' consideration, as the NPPF puts in place mechanisms to redress unanticipated shortfalls in housing delivery (the presumption in favour of sustainable development). Furthermore, there is the potential for the LPR to proactively address delivery risk, under all scenarios, by putting in place a land supply that is perhaps 10%, 15% or 20% above the housing requirement, as a contingency for unanticipated delays to delivery ('supply buffer'). However, in the Swale context delivery risk is considered to be an important issue, which should be considered here. As stated within the officer's report to the 28th October 2018 Local Plan Panel: *"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. Having made these introductory remarks, it is appropriate to comment on variation in delivery risk between the four competing strategic site options. This is a focus of the Stantec work, from which an order of preference emerges:

- East and SE 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 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...”*
- Bobbing – *“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.”*
- North Street – *“To address the transport and landscape concerns could result in a very different scale of proposal. This is unlike the other three sites where we think, if taken forward, it is likely that a proposal similar to that proposed today could be taken forward, ie with the scale of homes promoted, the general layout and package of infrastructure.”*
- Southeast Sittingbourne – *“... remains the highest risk due to the timing, delivery and cost of the new junction 5A which all have implications on the viability and mean it can only deliver 20% affordable housing.”*

In **conclusion**, it is appropriate to highlight a notable degree of risk associated with BGS-E, given delivery risks associated with a strategy that relies on two strategic sites. Under this scenario there would still be a large supply of homes from sites that are already committed (Swale Borough is in a strong position, with commitments expected to deliver around 9,700 homes in the LPR plan period) and from future windfall sites; however, there would be an element of delivery risk nonetheless. In practice there would be good potential to manage this risk by additionally allocating a package of low risk urban / settlement extensions to deliver early in the plan period; however, for the purposes of this appraisal it is appropriate to ‘flag’ a notable risk.

BGS-A also performs relatively poorly given viability challenges in the west of the Borough; however, there is considerable uncertainty. It could well be that schemes are able deliver a good mix of housing, to include a good proportion of affordable housing, if housing objectives are prioritised above other policy requirements, for example minimising CO<sub>2</sub> emissions.

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 (with inherent associated economy of scale benefits and inherently good potential to deliver a strong housing mix) and additional smaller urban extensions assumed to be associated with low delivery risk and able to deliver early in the plan period, thereby alleviating concerns around delay to delivering the strategic site would lead to a shortfall in housing supply early in the plan period (albeit, as discussed, the NPPF puts in place mechanisms to redress shortfalls against the plan delivery trajectory); and support for a strategic site (East / southeast of Faversham) where the current proposal is to prioritise affordable housing (40% has been suggested; however, this is unconfirmed and the proposed breakdown of affordable housing tenures is not known) although there is uncertainty at the current time, ahead of further detailed work in respect of masterplanning and viability, taking account of local market conditions (there will be a need to deliver housing at a pace that avoids any concerns around saturation of the local housing market) and including detailed work to understand the costs of required infrastructure.

## Land

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| ★<br>1                                   | 2                         | 2                                    | 2  | ★<br>1                    |

## Discussion

A primary consideration is the need to avoid the loss of best and most versatile (BMV) **agricultural land**, particularly that which is of the highest quality nationally, namely grade 1 land. Swale has a very 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 identify any realistic broad growth scenario that would direct growth away from the area of agricultural land constraint. **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, BGS-A would involve only a modestly increased focus of growth at Sheppey, recognising that there are wide ranging barriers to growth on the Island.

As for the **strategic site options**, it appears to be East / Southeast Faversham that is most constrained, with the nationally available dataset showing almost all of the land to be of grade 1 quality, and in the knowledge that land in this part of the Borough has always been intensively farmed for agriculture and fruit cultivation. Southeast Sittingbourne is potentially the least constrained, as the nationally available dataset shows the southern part of the site to mostly comprise grade 2 quality land; however, it is important to recall that the dataset is very low resolution (e.g. with Teynham and Newington not recognised as comprising non-agricultural land). Only a small part of the Borough has been surveyed in detail, to establish the grade of agricultural land with certainty, and very little of the land within the strategic site options (Bobbing is a notable exception, where an area of land has been surveyed in detail and found to be of non-BMV (grade 3b) quality).

In **conclusion**, 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, given areas of lower quality agricultural land on Sheppey and within the two new settlement options at Sittingbourne; however, this is fairly marginal and uncertain, given a lack of detailed survey work having been completed.

N.B. a further consideration is the extent of **minerals safeguarding** areas across the Borough; however, these are very extensive, and cover the majority of land along the A2 corridor that comes into contention for growth (Southeast Sittingbourne potentially stands-out as being subject to relatively low constraint). As such, it is not considered appropriate to differentiate the broad 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.<sup>14</sup>

## Landscape

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| 4  | 4                         | 2                                    | 3  | 1                         |

## Discussion

There is a wide range of evidence to take into account, when considering the landscape merits of broad 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 stand-alone discussion, below).

Because there is such a wide range of evidence to take into account, the discussion here is high-level, with further detailed discussion presented within Appendices III and V.

Having made these initial points, the following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – whilst there is little certainty, an increased focus of growth at Sittingbourne under this broad growth scenario could necessitate one or more significant allocations to the south of Sittingbourne. This area (parcel SE4) 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*

<sup>14</sup> See further discussion at: [mineralproducts.org/19-release20.htm](https://mineralproducts.org/19-release20.htm)

*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.”* However, it could be the case that one or more locations for modest urban extensions can be identified that are subject to relatively little landscape constraint.

Another possibility, under this broad growth scenario, is that there could be increased pressure for further expansion to the east of Sittingbourne, likely to the north of the A2, where parcel SE1 is judged to have **moderate** sensitivity. This could involve revisiting the proposals for strategic open space and landscaping set out in the conceptual masterplans for the Stones Farm and NE Sittingbourne allocations within the adopted Local Plan, and there would be wide range constraints and issues to consider (not least Tonge Conservation Area and the grade 1 listed church to the north); however, from a purely landscape perspective, there could be a degree of opportunity around completing the expansion of the town in this direction, and then maintaining a landscape gap to Teynham (which has recently been identified as warranting designation as an important countryside gap, albeit landscape character is somewhat weak). Having said this, the Sensitivity Assessment (2020) notes: *“The area south of the railway line around Tonge has a higher sensitivity due its smaller scale, higher scenic quality and greater prevalence of valued historic and natural features.”*

Also, under this broad growth scenario, there could be moderately increased pressure for growth on the Isle of Sheppey, where all of the landscape parcels that would likely come into contention are judged to have a **moderate-high** sensitivity to housing, bar the two landscape parcels at Leysdown and Warden, which have **low-moderate** sensitivity. There could be the potential for one or more LPR allocations in the Leysdown area; however, any growth would be of a modest scale. A more likely situation is that land in the vicinity of Rushenden comes into contention for growth, given better connectivity and the need for growth to support regeneration objectives. This does give rise to concerns, from a landscape perspective, as land here 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.

- **BGS-B** (Faversham focus) – there would be decreased pressure to allocate problematic sites at Sittingbourne (and Sheppey), but there would be increased pressure to allocate non-strategic urban extensions to Faversham, which, in short, is associated with a high degree of landscape sensitivity, as evidenced by five of the seven landscape parcels surrounding the town having a **high** sensitivity rating. However, under this scenario there could be the potential to direct growth to modest urban extensions with relatively limited landscape sensitivity, in the context of a wider landscape parcel with high (or moderate-high) sensitivity. Also, the bulk of growth would likely be directed to the east of the town, where the landscape has only **moderate** sensitivity, although there are concerns in respect of built form and ‘urban sprawl’.
- **BGS-C** (Further Faversham focus) – growth would be directed to a strategic urban extension to the E/SE of the town, a strategy that is tentatively supported from a landscape perspective, as the landscape in this area has **moderate** sensitivity (in stark contrast to the high sensitivity parcels that surround most of the town). See further discussion in Section 3.
- **BGS-D** (Further Faversham focus still) – it is fair to conclude that BGS-D performs worse than BGS-C, due to the need for one or more non-strategic urban extensions in addition to strategic urban extension assumed under BGS-C; however, there could be the potential for one or more modest urban extensions to Faversham that give rise to limited concerns.
- **BGS-E** (Strategic sites) – of the other three strategic site options (in addition to E/SE of Faversham, which is discussed above), it is Bobbing that stands-out as least constrained, on the basis that it would comprise land with **moderate-low** and **moderate** sensitivity. See further discussion in Section 3.

With regards to the other two strategic site options, a detailed discussion is presented in Section 3, with the following considered to be key points:

- Southeast Sittingbourne: would likely impact on five landscape parcels to the east and southeast of Sittingbourne, including two that have **moderate-high** sensitivity and one that has **high** sensitivity, namely the Rodmersham and Milstead Dry Valley, which is a locally designated landscape. The current masterplan proposals are described as ‘landscape led’; however, it is challenging to understand what this means in practice, in the absence of detailed work to explore the relative merits of alternatives. See further discussion in Section 3.

A further discrete consideration is impacts to the AONB. The latest Stantec report states: *“The AONB Unit consider that their concerns can be mitigated and therefore do not have a strong objection.”* However, the latest situation is that that AONB Unit has updated its position, stating: *“... the proposed new motorway junction, located partially within the AONB, represents a major development that would be contrary to*

*planning policy and due to its nature, could not be satisfactorily mitigated in terms of impact on the AONB. Therefore, the Unit continues to object to the proposal.*<sup>15</sup>

- North Street: performs poorly as it entirely comprises landscape parcels identified as having **high** sensitivity. This is a locally designated landscape, with a close association to the AONB, which is adjacent on three sides.

In **conclusion**, 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. Also, there is a need to apply caution when drawing conclusions in respect of BGS-E, as there are inherent concerns associated with North Street, and also concerns associated with the current proposal for Southeast Sittingbourne, including AONB concerns.

As for the other broad growth scenarios, BGS-C is judged to perform relatively well, given the focus of growth at E/SE of Faversham, whilst those scenarios involving numerous 'piecemeal' urban extensions give rise to a cause for concern, albeit there is thought to be some capacity. Notably negative effects are highlighted for the two worst performing scenarios taking a precautionary approach, and given a general view that this would be a continuation of the spatial growth strategy seen over recent decades, which has arguably led to a significant erosion of landscape character.

## Transport

| BGS-A:<br>Roll forward Bearing Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham focus | BGS-D:<br>Further Faversham focus still | BGS-E:<br>Strategic sites |
|---------------------------------------|---------------------------|-----------------------------------|---|---------------------------|
| 4                                     | 4                         | 1                                 | 3                                       | 2                         |

## Discussion

The following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – a key consideration is junction capacity on the strategic road network, and a primary consideration is capacity at M2 J5 (A249), in respect of which 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](https://highwaysengland.citizenspace.com/he/m2-junction-5-improvements)) and identified a preferred option, but there have been funding challenges. The September 2019 Stantec report explained that the scheme was still “not fully funded”, and discussions have continued through 2020. However, latest understanding is that upgrades will commence in 2021. A planning inquiry closed on 4<sup>th</sup> December 2020; however, this is specifically in respect of one element of the proposed scheme (a flyover), as opposed to the scheme as a whole.

Additionally, there is a need to consider the three A249 junctions to the west of Sittingbourne. In particular, there are concerns regarding the Bobbing junction, given that the other two junctions have funding for upgrades in place (also, the Grovehurst junction, which serves Iwade, is not likely to serve LPR growth).

In short, there are concerns regarding junction capacity, the timing of upgrades and also the headroom that will exist following upgrades (including headroom at M2 J5, recognising 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 these points, BGS-A gives rise to notable concerns, as piecemeal growth would ‘load pressure’ onto the strategic road network. Other points, including taking account of potential growth locations, are discussed above under Air quality, Climate change mitigation and Communities.

- **BGS-B** (Faversham focus) – as discussed above, under Air Quality, BGS-B could necessitate a focus of growth in the Ospringe area, which gives rise to concerns from a transport perspective, given the likelihood of increased traffic on the A2, including through AQMAs. As discussed, it is difficult to envisage a strategic transport solution that would avoid increased traffic impacting on the Ospringe AQMA and, in any case, concerns would remain

<sup>15</sup> See [swale.gov.uk/planning-and-regeneration/local-plans/sd-options](https://swale.gov.uk/planning-and-regeneration/local-plans/sd-options)

regarding westbound traffic towards Sittingbourne impacting on AQMAs. Additionally, there is a concern regarding capacity M2 J7, discussed below.

- **BGS-C** (Further Faversham focus) – transport issues associated with strategic growth at Southeast Faversham (as opposed to E/SE of Faversham) are discussed in detail in the latest Stantec report. In short (see further discussion in Section 3), there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6. It may be that the latest proposal, which involves bringing forward a combined scheme involving growth both to the east and southeast of Faversham, leads to greater potential to deliver timely road infrastructure upgrades, but there is no certainty in this respect.
- **BGS-D** (Further Faversham focus still) – gives rise to significant concerns given that piecemeal growth, in addition to strategic growth to the east / southeast, would give rise to concerns in respect of traffic on the A2 and at M2 J7.
- **BGS-E** (Strategic sites) – a detailed discussion is presented in Section 3; however, in summary there is least concern with E/SE Faversham. As for the other sites, the Stantec Assessment of Stage 2 submissions (2019) concludes: *“... in general and subject to further modelling it is likely that appropriate mitigation could be achieved. However, there are concerns about [Southeast Sittingbourne] in relation to the costs and delivery of the junction and Highways England believe junction 5a cannot start before Junction 5 works have finished. There are concerns about the current scale of [North Street], on the A251, for which mitigation may not be agreeable or financially viable and also concerns that [Bobbing] will have significant implications on the local highway network which may not be capable of mitigation.”*

N.B. with regards to what might be learned from further modelling, one important consideration is the impact of strategic growth in Swale on junctions outside of the Borough – see discussion in Appendix I of the SA Report, which serves to highlight junctions in Ashford and Maidstone Boroughs (linked to Swale) as important considerations for the LPR.

The following quote from the latest Stantec report is also an important consideration: *“We would also note that for highways especially there is a ‘chicken and egg’ issue. Highways England (and others) are unlikely to view Swale as a priority for investment unless they can see measurable benefits of doing so.... Councils with active proposals for development in emerging plans are able to access funding not available to those who do not.”* There could be an argument to suggest that public sector funding will be more forthcoming where there is strategic growth, including because there will tend to be good potential to effectively channel developer funds to bolster public sector funds.

In **conclusion**, 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. There is limited evidence in respect of BGS-A and BGS-B; however, the latest Stantec report does explain that: *“Any and all new housing proposals, whether as small extensions, or large new communities, in Swale will run against these same constraints. As noted in the analysis above, given the local network constraints large proposals such as these may be preferable over small sites because these offer the opportunity to internalise trips and also provide more substantial off-site investment. For example, it is unlikely a new public transport link to Newington [Bobbing] would be achievable from a collection of smaller sites in the same broad area.”*

Overall, it is considered appropriate to highlight BGS-C as best performing, primarily on the basis that Stantec find Southeast of Faversham strategic site option to give rise to the fewest concerns, albeit the proposal is now to deliver a “East / southeast Faversham” scheme. Additional evidence, in respect of BGS-C, comes from the April 2020 re-run of the Swale Transport Model (discussed in Appendix I of the SA Report), which examined an approach to growth at Faversham similar to that assumed under BGS-C and serves to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I of the SA Report).

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 delivery. It is fair to highlight BGS-A and BGS-B as jointly worst performing, as there is insufficient evidence to differentiate them.

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 scenarios.

## Water

| BGS-A:<br>Roll forward Bearing<br>Fruits | BGS-B:<br>Faversham focus | BGS-C:<br>Further Faversham<br>focus | BGS-D:<br>Further Faversham<br>focus still | BGS-E:<br>Strategic sites |
|--|---------------------------|--------------------------------------|--|---------------------------|
| ?  | ?                         | ?                                    | ?  | ?                         |

### 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.”*

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.<sup>16</sup> 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.<sup>17</sup>

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].”*

In **conclusion**, 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. It can also be the case that urban extensions benefit from proximity and existing links to WwTWs.

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 broad 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.
- 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 resources – water scarcity is an issue that applies across the Borough as a whole.

<sup>16</sup> 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.

<sup>17</sup> See [kentonline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/](https://kentonline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/)

## Appraisal summary

The matrix below draws together the conclusions from the preceding twelve topic-specific appraisal tables.

|                           | BGS-A:<br>Roll forward<br>Bearing Fruits         | BGS-B:<br>Faversham focus | BGS-C:<br>Further<br>Faversham focus | BGS-D:<br>Further<br>Faversham focus<br>still | BGS-E:<br>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                     | ?  | ?                         | ?                                    | ?   | ?                         |

### Summary discussion

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 (viably) 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.

## 3 Strategic site options appraisal

### Introduction

This section supplements Appendix IV of the SA Report by presenting detailed appraisal findings in respect of four competing strategic site options that emerged following the Garden Communities Prospectus (2018), and which have been a focus of a considerable amount of work since that time.

The strategic site options are introduced in detail in Section 5.3 of the SA Report, but in summary:

- **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,<sup>18</sup> although this was reduced to 8,000 in 2019 (at the ‘Stage 2 Submissions’ stage)<sup>19</sup> and the subsequently revised upwards to 9,250 homes.<sup>20</sup> A key aspect would be a new motorway junction and M2/A2 link road.
- **Bobbing** – also proposed for circa 2,500 homes plus other uses.<sup>21</sup> Since 2018 the site boundary has evolved significantly (essentially shifting to the north); however, the proposal remains for 2,500 homes.<sup>22</sup>
- **East / Southeast Faversham** – a smaller site proposed for circa 2,500 homes plus other uses was submitted in 2018 and examined in 2019;<sup>23</sup> 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 (c.3,250 in the plan period).<sup>24</sup>
- **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.<sup>25</sup> This site is notable for limited work having been progressed / presented to the Council by the site promoter since 2019.

### Appraisal methodology

Appraisal findings are presented below within 12 separate tables, with each table dealing with a specific sustainability topic (see Section 3). Within each table the performance of each of the strategic site options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)<sup>26</sup> and the strategic site options are also ranked in order of preference.

Other points on methodology discussed in above, in respect of the appraisal of broad growth scenarios (Section 2) also apply to the appraisal of strategic site options.

#### A note on timing of the appraisal

This appraisal was completed in late 2020, prior to further work being completed to appraise reasonable alternatives (growth scenarios) and the plan as a whole. As such, some of the appraisal findings presented in this section may be somewhat out-of-date, and superseded by appraisal findings presented in Section 6 / Appendix VII (“Reasonable growth scenarios appraisal”) and Section 9 (“Pre-submission plan appraisal”) of the SA Report.

### Appraisal findings

The tables below presents appraisal findings in relation to the strategic site options.

<sup>18</sup> See [services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Sittingbourne-Prospectus-Submission.pdf](https://services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Sittingbourne-Prospectus-Submission.pdf)

<sup>19</sup> See discussion at: [swale.gov.uk/planning-and-regeneration/local-plans/sd-options](https://swale.gov.uk/planning-and-regeneration/local-plans/sd-options)

<sup>20</sup> See [highstedpark.co.uk/](https://highstedpark.co.uk/)

<sup>21</sup> See [services.swale.gov.uk/assets/planning-general/prospectus-submissions/Bobbing-Prospectus-Submission.pdf](https://services.swale.gov.uk/assets/planning-general/prospectus-submissions/Bobbing-Prospectus-Submission.pdf)

<sup>22</sup> See [bobbingplans.uk/masterplan](https://bobbingplans.uk/masterplan)

<sup>23</sup> See [services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Faversham-Prospectus-Submission.pdf](https://services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Faversham-Prospectus-Submission.pdf)

<sup>24</sup> See [services.swale.gov.uk/meetings/documents/s15712/LPR%20site%20selection.pdf](https://services.swale.gov.uk/meetings/documents/s15712/LPR%20site%20selection.pdf)

<sup>25</sup> See [services.swale.gov.uk/assets/planning-general/prospectus-submissions/North-Street-Sheldwich-Faversham-Prospectus-Submission.pdf](https://services.swale.gov.uk/assets/planning-general/prospectus-submissions/North-Street-Sheldwich-Faversham-Prospectus-Submission.pdf)

<sup>26</sup> **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.

## Air quality

| Option 1<br>Southeast Sittingbourne   | Option 2<br>Bobbing | Option 3<br>East and SE Faversham   | Option 4<br>North Street |
|---|---------------------|---|--------------------------|
|  | <b>3</b>            |  | <b>2</b>                 |

### Discussion

Despite all options being in proximity to problematic A2 corridor, they are likely to have different degrees of dependency upon it. The northern extent of **Option 1** (Southeast Sittingbourne) is adjacent to the A2 and would likely facilitate direct access to it. However, Option 1 would also have potential to deliver a new junction to the M2 which runs adjacent to the site's southern extent, which would likely provide primary east-west connectivity for non-local traffic generated from new development at the site. This could have the effect of minimising the overall level of traffic using the A2 for journeys other than to local destinations, which would help limit adverse effects on AQMAs at Sittingbourne, Teynham and Ospringe. There could be potential to provide or enhance sustainable transport connections to services at central Sittingbourne, and the scale of the site suggests that local services would likely be provided within the site, helping minimise the need to travel to meet day-to-day needs.

Similarly, the eastern extent of **Option 3** (East and SE Faversham) is adjacent to junction 7 of the M2, which could also provide the primary east-west axis for traffic generated by development on site, minimising the level of traffic funnelled along the A2 corridor through the Ospringe, Teynham and Sittingbourne AQMAs. Additionally, the option's close proximity to services at central Faversham could present opportunities to ensure residents can access these services by modes other than the car, helping minimise additional emissions from local travel within Faversham.

**Option 4** (North Street) would be served by junction 6 of the M2, again suggesting that the majority of east-west traffic would be unlikely to flow to the A2 and impact the AQMAs. However, the option's greater distance from existing services and facilities at central Faversham serves to suggest that many needs would continue to be met by private car, potentially loading new vehicle movements onto the local road network in central Faversham. In particular, there could be potential for heightened pollution from queuing traffic at the junction of the A251 and the A2, as traffic from Option 4 would pass through this junction to access the town centre. Whilst this is not an AQMA, it is a not air pollution problem area, given the nearby school.

**Option 2** (Bobbing) appears to have greatest potential to directly increase traffic flows through one or more AQMAs. Specifically, traffic travelling eastwards into central Sittingbourne or westwards towards Newington and Rainham would flow towards the AQMAs at St Paul's Street, Newington High Street and Rainham respectively. Whilst this would be mitigated to an extent by provision of public transport, it is unlikely that the B2006 would provide an attractive option for walking or cycling to town centre services at Sittingbourne and so a degree of car dependency is likely to remain for access to some.

It is recognised that the promoter of Option 1 suggests development at the option will "impact positively" on air quality at the Borough's AQMAs. The rationale behind this centres on the same argument as has been discussed above, namely facilitating travel via the M2, rather than the A2, and by delivering a good degree of self-containment / trip internalisation. The promoter of Option 2 says that air quality issues arising from new development could be mitigated via provision of enhanced public transport facilities in relation to travel to both Sittingbourne and Rainham. No specific discussion of air quality is presented by the promoters of Options 3 or 4.

In **conclusion**, it is considered that by virtue of their potential to support walking and cycling to local services and to direct longer distance car journeys away from the Borough's AQMAs, Options 1 and 3 perform most strongly in relation to air quality. Option 4 performs less strongly, as although it is unlikely to directly generate traffic which flows through one or more AQMAs, its location is considered likely to embed a degree of dependency on emissions-generating transport modes.

Option 2 is found to perform least strongly, as it is considered unlikely to support walking and cycling to higher tier services and whilst there could be potential to expand existing bus services to serve the option, it is likely that accessing many services would be most conveniently achieved via car, generating traffic which would flow through AQMAs to both the east and the west. However, significant negative effects are not predicted, given good potential for mitigation, and also noting that 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<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| 3                                   | 2                   | 1                                 | 1                        |

### Discussion

With regards to internationally designated sites:

- Option 1 (Southeast Sittingbourne) – the current proposal is to deliver significant growth to the north of the A2, where the SPA would be in relative proximity, although it is not clear that there would be good connectivity by road or PROW.
- Option 2 (Bobbing) – the northern extent of the site would be around 2km from 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).
- Option 3 (E/SE Faversham) - the walking route to the SPA would be c2.25km; and the driving route to the SPA would be 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.
- Option 4 (North Street) – is also within driving distance of the Blean Woodlands. The site promoters of Option 4 highlight the potential to “provide a mitigation package” for the Blean Complex SAC, though details are not provided.

The Borough has several nationally important Sites of Special Scientific Interest (**SSSIs**), though the four options are mostly fairly distant. This is again on the basis that the majority of the Borough’s SSSIs, and those in neighbouring areas, are clustered along the coastline. The Church Woods, Blean SSSI – and the National Nature Reserve at the same location – are the principal exceptions to this, though it is considered that recreational pressure is less significant in relation to these designations than in relation to the Blean Complex SAC.

In terms of effects on lower-tier designations, **Option 1** (Southeast Sittingbourne) stands out as having potential for adverse effects as the expansive scale of the site means it envelops a number of local sites. First, development under Option 1 would likely include a focus of growth at the Highstead / Rodmersham Green area, where there is a high density of woodland, including the ancient woodlands of Highstead Wood, Box Wood and Cromer’s Wood. This could lead to degradation of the ancient woodland itself, as well as its role in sustaining the wider habitat network.

Option 1 also includes the Highstead Quarries Local Wildlife Site (LWS) - which is adjacent to the existing built area of Sittingbourne - and the option also nearly encircles the Cromer’s Wood LWS at Woodstock to the south. The uneven (and potentially unstable) nature of the land around the former quarry suggests that development is unlikely to come forward in the immediate vicinity of this LWS, though the Cromer’s Wood LWS has a largely open and undeveloped periphery, and it may be important to retain this as far as possible through the development process to maintain habitat connectivity.

The Biodiversity Baseline Study (2020) identifies that broad areas of traditional orchard priority habitat within Option 1 are a strategic priority at the borough-scale, and there is understood to have been significant loss of this habitat over recent decades. Therefore, whilst there could be potential adverse effects to habitat connectivity at a landscape scale from strategic growth at Option 1, there could equally be an opportunity to seek to deliver habitat enhancement. The Biodiversity Baseline Study notes that these opportunities could include providing habitat linkages between Highstead Wood and Cromer’s Wood.

Areas of ancient woodland are also evident within and adjacent to **Option 2** (Bobbing) and adjacent to Option 4 (North Street). At Option 2, it could be feasible to incorporate an appropriate development buffer around the Rooks Wood ancient woodland at its centre, though it is appropriate to highlight the potential for harm to the woodland itself from activities such as trampling underfoot, and of harm to its wider habitat connectivity which could be severed by encircling development.

At **Option 4** (North Street), a small area of the Badgin Wood ancient woodland is adjacent to the site's south west boundary, though in practice it is considered that the southern extent of the site would likely incorporate a landscape or natural buffer as proposed by the site promoter, which would provide appropriate mitigation. The Biodiversity Baseline Study notes in relation to land at Option 4 that "onsite Biodiversity Net Gain provision should seek to increase the extent of deciduous woodland and other key habitats" suggesting that although the site has a range of sensitivities, there could be opportunities to deliver positive effects through the development process via habitat enhancement.

**Option 3** (East and SE Faversham) appears to have very limited sensitivity in relation to lower tier designations, as there are no designated sites within or adjacent to it. Very small, localised areas of priority habitat are evident at two separate areas of deciduous woodland near the A2. In this context there could be good opportunities to seek a biodiversity net gain through Option 3, and it is noted that the site promoter has proposed "ecological enhancements" on site to establish new habitats.

In **conclusion**, Option 1 stands out as having potential for adverse effects on habitats of at least local significance, including several areas of ancient woodland. The theoretical potential for seeking a net gain in biodiversity through the development process must be balanced against the potential for adverse effects of significant urbanisation on the area's habitat networks and individual biodiversity assets, and it is considered that on balance Option 1 could give rise to adverse effects overall.

Option 3 and 4 both have limited sensitivity in relation to biodiversity designations, and could offer opportunities to deliver a net gain in biodiversity through the development process through on and off site habitat creation. Option 2 includes the Rooks Wood area of ancient woodland near its centre, and whilst this could be protected through buffering, its role in the wider habitat network may be at risk of harm through the urbanisation of its surrounding area.

On balance therefore, it is considered the Option 1 performs poorly in relation to biodiversity, whilst Options 3 and 4 perform most strongly and broadly on a par with one another. Option 2 is found to perform less strongly than Options 3 and 4.

Significant negative effects are not predicted, recognising that strategic sites can and should be masterplanned so as to deliver extensive and high-quality on-site green infrastructure, and can also potentially direct funds to targeted offsite habitat enhancement or creation initiatives, in support of strategic / landscape scale objectives.

All of the schemes in question 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

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| 1                                   | 2                   | 1                                 | 2                        |

### Discussion

As discussed in Appendix II, whilst strategic growth can give rise to a range of opportunities in respect of delivering measures in support of **built environment** decarbonisation, there is limited evidence to suggest that any of the sites in question are associated with particular locational opportunity, and limited evidence of scheme proposals being developed with decarbonisation as a priority objective (Southeast Sittingbourne stands-out as performing relatively well in this respect, as discussed in Section 2).

With regards to **transport emissions**:

- Option 3 (East and SE Faversham) - 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.
- Other options (Bobbing, Southeast Sittingbourne and North Street) are all less well related to a higher order centre than is the case for E/SE of Faversham, with North Street potentially standing-out as performing poorly, as it is relatively poorly related to *Faversham*, i.e. a second tier settlement. Southeast Sittingbourne potentially stands-out as performing well, as residents would be able to walk/cycle to employment at an expanded Kent

Science Park; however, on the other hand, there is a concern that an expanded Kent Science Park (in combination with a new motorway junction) could attract long distance commuting by car, given skills levels locally. As for Bobbing, there is a concern regarding connectivity to Sittingbourne town centre (over 3km distant, via the problematic B2006), and whilst the latest Stantec report 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 (and latest understanding is that the proposal is now to refocus on Sittingbourne).

In **conclusion**, it is inherently challenging to differentiate the strategic site options, 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. 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, it is considered appropriate to highlight two options as joint best performing:

- Option 1 (Southeast Sittingbourne) – the scheme proposals are encouraging, but are nonetheless high-level and potentially subject to change, recalling that scheme viability is challenging, as understood from the proposal to deliver only 20% affordable housing; also, there are certain question-marks regarding potential to minimise per capita transport emissions.
- Option 3 (East and SE of Faversham) would involve a strategic urban extension to a higher order settlement. 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’).

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 strategic site options, even that which is best performing. 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 development of site-specific proposals.

## Communities

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| 2                                   | 3                   | 1                                 | 4                        |

### Discussion

As discussed in Section 2, a key consideration is in respect of delivering, or supporting delivery of targeted upgrades to community infrastructure, particularly **strategic community infrastructure**, with secondary school capacity discussed as a key matter.<sup>27</sup> As discussed in Section 2, there is considerable variation between the competing strategic site options:

- Option 1 (Southeast Sittingbourne) - viability is a constraint to growth in the Sittingbourne area; however, the scale of growth envisaged for Southeast Sittingbourne is such that there would be good potential to deliver new and upgraded community infrastructure (despite costs for major transport infrastructure upgrades), including a secondary school, and the possibility of delivering a further education facility for Sittingbourne has been suggested.
- Option 2 (Bobbing) - is significantly smaller, with no secondary school proposed (although the committed new school at Northwest Sittingbourne would be in close proximity, and presumably would have headroom capacity, i.e. capacity over-and-above that needed to meet committed housing growth at Sittingbourne and Iwade).

<sup>27</sup> A typical approach is to make services land available or the school, as opposed to building the school.

- Option 3 (East and SE Faversham) - would certainly enable delivery of a new secondary school. Following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, as discussed in Section 2.
- Options 4 (North Street) – proposes delivery of a secondary school; however, latest understanding is that any scheme would need to be smaller than that proposed by the site promoters, in order to reflect constraints, which could have a bearing on viability and, in turn, potential to deliver (make land available for) a secondary school.

Beyond the matter of strategic community infrastructure delivery, the latest Stantec report serves to highlight the following:

- **Impacts to existing communities** – there is greatest concern in respect of the envelopment of Bobbing, which is a historic village (six listed buildings, including a grade 1 listed church) with a primary school, although development would deliver a bypass of the village, serving to greatly reduce traffic through the village, along Sheppey Way). There are also similar concerns in respect of North Street, which is a settlement not much smaller than Bobbing (if at all), but which has no church or any other community facilities (there are, however, six listed buildings). Development would deliver a bypass of the village; however, there are concerns regarding traffic through Sheldwich, to the south. With regards to Southeast Sittingbourne, the current proposal is to avoid growth in proximity to the main rural community at Highstead / Rodmersham Green (notably larger than Bobbing), and the secondary school plus sports facilities would be located nearby; however, development would encroach on the small historic hamlet of Rodmersham (with a grade 1 listed church), plus there is a need to consider Bapchild and Tonge (both historic parishes) at the northern extent of the scheme; furthermore, there are concerns regarding ‘rat running’ to Sittingbourne town centre through villages and residential areas. Finally, East and SE Faversham gives rise to relatively limited concerns, regarding impacts to existing communities.
- **Engagement, joint working and stewardship** – this is another matter that is a focus of the Stantec work, with the summary risk matrix at paragraph 9.19 of the most recent report serving to highlight that East and SE Faversham stands-out as performing well. There is a need to exercise a degree of caution, as the points made by Stantec relate specifically to Southeast Faversham (i.e. the scheme promoted by the Duchy of Cornwall); however, as explained by Stantec:

*“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 is in many ways encouraging, from a ‘communities’ perspective. However, there is a concern regarding an early ‘inward’ 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 (e.g. landscape scales), and with a long-term perspective. It is also noted that no updated proposals or evidence has been made publicly available to update the August 2018 submission (see [swale.gov.uk/planning-and-regeneration/local-plans/sd-options](http://swale.gov.uk/planning-and-regeneration/local-plans/sd-options)), although the Duchy of Cornwall did engage well with Stantec through 2019 ‘assessment of submissions’ process. There is no website for this scheme, unlike Southeast Sittingbourne and Bobbing.

In **conclusion**, 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 support Option 3 (East and SE Faversham). However, there is a degree of uncertainty regarding the scheme at the current time, in the absence of evidence, including an up-to-date masterplan.

It is also appropriate to flag a degree of opportunity associated with the other options, in particular Southeast Sittingbourne.

## Economy and employment

| Option 1<br>Southeast Sittingbourne   | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|---|---------------------|-----------------------------------|--------------------------|
|  | <b>4</b>            | <b>2</b>                          | <b>3</b>                 |

### Discussion

There is a need to reflect the targets set out in the Employment Land Review (ELR), although certain of the targets are in the form of a range, with this particularly the case for the matter of delivering significant new land for warehousing / distribution.

In light of the ELR, **Option 1** (Southeast Sittingbourne) represents a very significant opportunity, from an ‘economy and employment’ perspective. This matter is explored in detail within the ELR, as well as within the two New Garden Communities: Assessment of submissions reports prepared by Stantec in 2019. There would be benefits three broad respects: 1) there could be significant expansion of Kent Science Park; 2) there would be the potential to deliver new strategic warehousing and distribution uses adjacent to a (new) motorway junction in the west of the Borough, thereby fully reflecting ELR recommendations; and 3) the scheme would deliver the final (eastern) section of the Sittingbourne Northern Relief Road (SNRR) *and* continue the link road south, beyond the A2 as far as a new junction 5a of the M2, thereby supporting the functioning of Eurolink industrial area and potentially unlocking further expansion.<sup>12</sup> Economic benefits would clearly be felt at a larger than local scale, with the site promoters suggesting that Eurolink and Kent Science Park collectively comprise the biggest business centre in Kent.

However, there are additional considerations to factor-in, when considering the merits of strategic growth to the Southeast of Sittingbourne from an ‘economy and employment’ perspective, in particular around the possibility of growth here detracting from growth elsewhere in the Borough (Sittingbourne, Faversham and Sheppey) and in the neighbouring authorities of Medway and/or Maidstone (e.g. the emerging Maidstone Local Plan proposes a “prestigious business park at Junction 8 of the M20”); however, for the purposes of this appraisal, it is appropriate to flag a significant opportunity.

There are also highly significant employment land proposals as part of **Option 3** (East and SE Faversham). 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). This could contribute significantly to meeting ELR targets; however, opportunities to deliver large-scale new industrial or warehousing land in well-connected locations in the west of the Borough, with a view to providing for the long term needs of footloose distribution operators serving London and the Southeast, could be missed. The new industrial land at East / southeast of Faversham (in particular the 10ha employment area adjacent to M2 J7) could prove attractive to strategic warehousing and distribution uses; however, there 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).”*

**Option 4** (North Street) includes proposals for “medium/high density office” space, along with a “traditional employment/ business area close to M2 on north of site”, as well as a range of E-class employment uses in the form of mixed-use development at local centres within the site. Another consideration is the potential to support the economic role of Faversham town centre and other existing employment locations in the town, with Option 3 potentially preferable to Option 4 in this respect, given greater potential to walk and cycle to destinations within Faversham.

Development proposed under **Option 2** (Bobbing) includes more limited new employment land proposals, with seemingly limited or no potential to address the ELR’s recommendation in respect of delivering new warehousing space in the west of the Borough. 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 generated at Option 2 could affect the functioning of existing, committed and potential future employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey.

In **conclusion**, it is considered that Option 1 (Southeast Sittingbourne) stands out as strongest performing, with significant positive effects predicted; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viably) and implications for the wider Borough and elsewhere. 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 ELR targets and recommendations.

## Flood risk

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street  |
|-------------------------------------|---------------------|-----------------------------------|---|
| 2                                   | 2                   | 2                                 | 1  |

### Discussion

Although large parts of the Borough as a whole are constrained by flood risk, it is apparent that none of the strategic site options are substantially affected by **fluvial flood risk**. Fluvial flood risk affects Option 1 (Southeast Sittingbourne) and Option 2 (Bobbing; to a small extent); however, this is in the form of one or more narrow channels, with good potential to incorporate flood zones into areas of open space. For example, the Southeast Sittingbourne site promoter proposes that *“flood areas will be incorporated within the masterplan such that they will not impact the existing flood risk regime”*.

In terms of **surface water flood risk**, all options are affected by corridors of risk, some of which is ‘high’, i.e. an annual chance of flooding of greater than 3.3%. However, none of the options appear affected by widespread areas of risk, rather the areas of risk are either narrow channels or isolated pockets. This suggests that the affected areas could either be incorporated into open space or mitigated through measures such as SuDS (where possible).

In terms of the proportion of total site area affected by surface water flood risk, Option 3 (East and SE Faversham) is considered to perform most strongly on the basis that it appears to have the smallest proportion affected overall. The affected areas under Option 3 are discrete and could be comfortably accommodated within the final site layout. Option 4 (North Street) is considered to have the next strongest performance, as the main area affected comprises a narrow corridor through the centre of the site in a north-south alignment. Although this is a prominent alignment within the site, the size and shape of the affected area would be unlikely to present a technical or design obstacle and could be feasibly incorporated into the future site layout. Option 2 (Bobbing) is considered to perform least strongly in relation to surface water flood risk, as widespread areas of risk, not just narrow channels, are evident within the site itself and at its periphery. Most notably, a large expanse of the site’s west is within an area of high surface water flood risk, with further areas of medium and lower risk extending beyond. A channel of high risk runs throughout the site in a north east-south west alignment, whilst a substantial ‘pool’ of high risk is evident north of Parsonage Lane in the site’s east. Other isolated areas of high risk are pepper-potted throughout the site, contributing to its weaker relative performance.

A further consideration is the matter of avoiding increased flows of water leading to increased risk of **down-stream flood risk**:

- Option 1 (Southeast Sittingbourne) - there are parts of east Sittingbourne downstream fall within the fluvial flood risk zone, but there is good potential to buffer the flood risk zone within the site, given that the flood risk zone is associated with the valley which, in turn, is associated with landscape constraint.
- Option 2 (Bobbing) - 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.”*

- Option 3 (East and SE Faversham) - perhaps the key point to note is that intensification of development (specifically, an additional 70 homes and potentially also a new link road) within the existing Preston Fields allocation (located at the southwest extent of the proposed East and SE Faversham scheme, between Salters Lane and the A251) is associated with a shallow valley within which there is a band of surface water flood risk which is associated with 'pools' to the north of the site (due to linear infrastructure in the form of the A2 and railway) and becomes an area of fluvial flood risk further downstream, affecting the Cyprus Road area of Faversham.

A final consideration relates to the potential to deliver strategic flood risk attenuation measures, potentially in the form of strategic **Flood Storage Areas** (FSAs), such that the effect of development is to reduce existing flood risk. However, it is not clear that any strategic opportunities present themselves (opportunities might typically exist where there is the potential to deliver new open space of the scale of a country park, leading to wide-ranging benefits / value creation beyond flood risk). As discussed, the masterplan proposals for Bobbing include significant areas of new accessible open space in that part of the site that is sensitive from a flood risk perspective, but there is little reason to suggest that the effect will be to significantly reduce downstream flood risk affecting Iwade.

In **conclusion**, 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<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| 3                                   | 1                   | 2                                 | 3                        |

## Discussion

Section 2 presents a detailed discussion of heritage issues and impacts, highlighting the following:

- **Option 1** (Southeast Sittingbourne) - unlike the other new settlement options, there is the potential to draw upon a valley topography to framework growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and containment); however, the corollary is growth would be in proximity to existing historic environment assets. The current proposed masterplan seeks to take a 'landscape led approach' and avoid impacts as far as possible, including by avoiding development in proximity to the only conservation area in the vicinity (Rodmersham Green); however, tensions remain nonetheless, most notably at the northern extent of area, where a new link road would cut through the Tonge Conservation Area, and in the central area, where development would abut the hamlet of Rodmersham, where there is a cluster of four listed buildings including a grade 1 listed church, which the Swale Landscape Sensitivity Assessment (2020) describes as "an important local landmark and skyline feature". The further statement made by the Assessment, as part of a discussion of 'time depth', is also of note: "*It is evident that there have been changes in land cover in recent years, with the conversion of areas of commercial orchards to arable, and vice versa, for example along Church Street and Pitstock Road. However, this does not change the fundamental character of the landscape. The loss of some areas of traditionally managed orchards has adversely affected the historic and scenic character of the landscape, although more intensive commercial orchards remain an important feature which contributes to a distinctive sense of place.*"
- **Option 2** (Bobbing) - is seemingly the least constrained of the strategic site options, in historic environment terms. 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.
- **Option 3** (East and SE Faversham) - as noted by the Swale Heritage Strategy (2020): "*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.*" In this context, there is potentially merit to a strategic urban extension to the east / southeast of the town, from a historic environment perspective, in order to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the

east and southeast of Faversham is relatively unconstrained in historic environment terms, and also an understanding that there would be good potential to avoid and mitigate historic environment impacts by taking a strategic approach to masterplanning, landscaping and design. There could also be good potential to deliver a new community - with associated employment, services, facilities, retail and infrastructure upgrades - that supports Faversham as a thriving market town and visitor/tourist destination. However, there are wide ranging 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 and impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. A key consideration is the integrity of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone.<sup>13</sup>

- **Option 4 (North Street)** - the new settlement would envelop grade 1 listed Copton Manor, as well as the cluster of six grade 2 listed buildings, and also encroach upon the historic hamlet of Newhouse Farm / Gosmere (eleven listed buildings) and the Sheldwich Conservation Area to the south, which is associated with raised ground within the Kent Downs AONB, as well as the Grade II listed Lees Court Registered Park and Garden. The Swale Landscape Sensitivity Assessment (2020) explains: *“The time-depth of the landscape relates predominantly to the continuity of agriculture, fruit and hop cultivation within the area, together with the presence of many scattered historic houses, farmsteads and associated barns, oasts, stables and granaries in the Kentish vernacular styles (including timber framed, weather boarded and red brick), some with parkland containing notable mature trees, pasture and traditional orchards... Some areas of traditionally managed orchards have been lost in recent years, together with field boundaries, resulting in more open, larger fields.”* It also notes that there is evidence that the very large ‘prairie’ field in the vicinity of Copton has never been enclosed. However, there are also potential benefits from a bypass of North Street.

In **conclusion**, Option 1 (Southeast of Sittingbourne) and Option 4 (North Street) give rise to the greatest concern, whilst Option 2 (Bobbing) gives rise to the least concerns (potentially of a very similar magnitude to Option 3). Significant negative effects are not predicted at this stage; given good potential to respond to the historic environment constraints through sensitive masterplanning and design; however, there is considerable uncertainty ahead of receiving the views of Historic England.

## Housing

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham   | Option 4<br>North Street |
|-------------------------------------|---------------------|---|--------------------------|
| 4                                   | 2                   |  1 | 3                        |

## Discussion

As discussed in Section 2, a key consideration is variation in respect of proposals around **affordable housing** delivery. At the current time, three of the strategic site options have proposed to deliver 40% affordable housing, whilst one – Southeast Sittingbourne – is now proposing to deliver 20% (having previously proposed 10-20%).

The proposed approach at Southeast Sittingbourne reflects viability constraints and an understanding that there will be other funding priorities, in particular major transport upgrades. It is also noted that Southeast Sittingbourne is the only one of the strategic site options to include a clear commitment to delivering specialist housing (“retirement living and self-build opportunities for local people”), which is assumed to represent a development cost (i.e. these uses are thought to be less viable than market housing with affordable), but this is not entirely clear, in any case, this proposal could be subject to change.

None of the strategic site promoters have proposed making land available for Gypsy and Traveller pitches (or Travelling Showpeople plots), which is an approach that is quite common nationally, where there is an established local need.

Section 2 also goes on to discuss variation in **delivery risk**, drawing on work completed by Stantec in 2019, on the basis of which an order of preference emerges:

- East and SE 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 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...*

- Bobbing – *“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.”*
- North Street – *“To address the transport and landscape concerns could result in a very different scale of proposal. This is unlike the other three sites where we think, if taken forward, it is likely that a proposal similar to that proposed today could be taken forward, ie with the scale of homes promoted, the general layout and package of infrastructure.”*
- Southeast Sittingbourne – *“... remains the highest risk due to the timing, delivery and cost of the new junction 5A which all have implications on the viability and mean it can only deliver 20% affordable housing.”*

In **conclusion**, it is appropriate to place the strategic site options in an overall order of preference as per the bullet points above. Option 3 (East and SE Faversham) performs well, both in the sense that there has been a proposal to deliver 40% affordable housing (unconfirmed, and the breakdown of affordable housing tenures is not known) 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, taking account of local market conditions (there will be a need to deliver housing at a pace that avoids any concerns around saturation of the local housing market) and including detailed work to understand the costs of required infrastructure.

N.B. it is important to recognise that any of the strategic site options could be subject to unforeseen costs that affect viability. For example, at Bobbing there is uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme, and there is a high degree of uncertainty regarding North Street because this scheme is less fully worked-up.

## Land

| Option 1<br>Southeast Sittingbourne   | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|---|---------------------|-----------------------------------|--------------------------|
|  | 2                   | 3                                 | 2                        |

## Discussion

A key consideration in the context of Swale is to minimise and avoid where possible the loss of **‘best and most versatile’ (BMV) agricultural land**. In light of this, it is important to recognise that only a fraction of the Borough's agricultural land quality has been surveyed in detail, to establish the grade of agricultural land with certainty, and very little of the land within the strategic site options (Bobbing is a notable exception, where an area of land has been surveyed in detail and found to be of non-BMV (grade 3b) quality).

Nevertheless, Swale is within Kent's ‘fruit belt’ and the quality and productiveness of its soils is reflected at a lower resolution in the nationally available dataset. This dataset shows a band of grade 1 and grade 2 land, i.e. the very highest quality BMV land, which runs laterally east-west through the centre of the Borough, underlying many of the Borough's key settlements.

Therefore, it is notable that all four of the strategic site options are located near settlements in this central corridor, as all are substantially underlain by grade 1 land and all are predominantly in productive agricultural use. This gives rise to significant potential for the loss of BMV land through the development process at all four of the options. There is no meaningful opportunity to mitigate against the effects of losing high quality soils.

Differences between the strategic site options are fairly marginal, but it appears to be East / SE Faversham that is potentially most constrained, with the nationally available dataset showing almost all of the land to be of grade 1 quality. Southeast Sittingbourne is potentially the least constrained, as the nationally available dataset shows the southern part of the site to mostly comprise grade 2 quality land; however, it is important to recall that the dataset is very low resolution (e.g. with Teynham and Newington not recognised as comprising non-agricultural land).

In **conclusion**, all four options are considered likely to give rise to significant adverse effects in relation to the 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.

N.B. a further consideration is the extent of **minerals safeguarding** areas across the Borough; however, these are very extensive, and cover the majority of land along the A2 corridor (Southeast Sittingbourne potentially stands-out as being subject to relatively low constraint). As such, it is not considered appropriate to differentiate the broad 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.<sup>14</sup>

## Landscape

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| 2                                   | 1                   | 1                                 | 3                        |

### Discussion

Beginning with **Option 1** (Southeast Sittingbourne) there are wide-ranging considerations:

- A primary consideration is impacts to the AONB. The latest Stantec report states: “*The AONB Unit consider that their concerns can be mitigated and therefore do not have a strong objection.*” However, the latest situation is that that AONB Unit has updated its position, stating: “*... the proposed new motorway junction, located partially within the AONB, represents a major development that would be contrary to planning policy and due to its nature, could not be satisfactorily mitigated in terms of impact on the AONB. Therefore, the Unit continues to object to the proposal.*”<sup>28</sup>
- It is the largest of the strategic site options, and its location at fringe of Sittingbourne ensures that it makes a considerable contribution to the landscape setting of Sittingbourne and several distinct smaller settlements at the Sittingbourne fringe. The site falls within a designated Important Local Countryside Gap (ILCG), the purposes of which is “to retain the individual character and setting of settlements”. Although it is noted that the site promoter has proposed retain some degree of landscape buffering between the areas of new development and the existing settlements to help preserve their identity, it is considered likely that urbanisation of the area would erode the perceived and actual gap between settlements.
- Similarly, the site partially intersects the recently proposed ILCG between Teynham and Bapchild, as per the Swale Important Local Countryside Gaps report (2020). The report proposes a new ILCG designation “to avoid the coalescence of Teynham and Bapchild” and safeguard “the essential gap south of the A2”.
- The Rodmersham, Milstead and Highstead Dry Valley locally designated landscape constrains the southern half of the site. The ‘statement of significance’ (2020) notes that the area is “a topographically distinct landscape with a strong sense of place and rural character”, but that “the quality has deteriorated notable on the edge of Sittingbourne”. There could be opportunities to restore this landscape quality where it has deteriorated in order to strengthen the integrity of the landscape as a whole; though in practice it is considered that strategic scale of development under Option 1, even where it results in piecemeal enhancements, would be unlikely to lead to a higher quality cohesive natural landscape overall.
- The Swale Landscape Sensitivity Assessment (2019) finds that the landscape parcels within Option 1 (parcels SE2 and SE3 of the study) have ‘moderate high’ and ‘high’ sensitivity in the landscape respectively. This finding is on the basis that “much of the landscape” has “a high degree of visual prominence, and provides a rural landscape providing separation between Sittingbourne and Bapchild”. This adds further weight to the notion that development under Option 1 would have significant potential to alter the established pattern of development at the south eastern periphery of Sittingbourne, with adverse effects on the landscape setting – and individual identity of – a range of smaller settlements.
- The current masterplan proposals are described as ‘landscape led’, and it is recognised that the scheme has evolved considerably and repeatedly over recent years, with the latest Stantec report explaining that efforts have been made to avoid the valley and valley slopes, and that proposals have “*move[d] way from a necklace approach*”. However, there is a need to understand the pros and cons of achieving the required scale of growth whilst containing growth west of a line that runs between Bapchild, Rodmersham, Rodmersham Green and Kent Science Park, thereby achieving a scheme that is more contained in landscape terms, in that it remains ‘facing’ Sittingbourne and avoids ‘breaking over’ into the valley to the east. Under the current proposal there

<sup>28</sup> See [swale.gov.uk/planning-and-regeneration/local-plans/sd-options](https://swale.gov.uk/planning-and-regeneration/local-plans/sd-options)

could be a concern regarding long term sprawl at the edge of Sittingbourne and also in the Teynham/Lynstead area, which might be argued for as involving 'infilling' or 'rounding off'.

It is apparent that **Option 4** (North Street) also has significant sensitivity within the landscape, with the site occupying a 'notch' into the Kent Downs Area of Outstanding Beauty (AONB). This is a relatively low-lying part of the AONB, with high points in the AONB some way distant to the south (this contrasts with the situation south of the M2 at Sittingbourne); however, there is little doubt that the site contributes to the setting of the AONB. For example, the south western boundary of the site is marked by Plumford Road, a rural lane associated with quite expansive countryside views, and it seems quite clear that the landscape north of the road (within the site) is contiguous with the landscape to the south (within the AONB). Similar landscape contiguity is evident either side of Newhouse Lane which marks the south eastern boundary of the site. It is noted that the site promoter's prospectus response proposes softening the southern boundary via planted screening and by incorporating sports pitches rather than built development at the southern extent. However, this would still represent a substantial departure from the prevailing rural character inherent in the landscape at present.

This is underscored by the Swale Landscape Sensitivity Assessment (2019) which finds that Option 4 falls within two separate parcels (i.e. FM2 and FM3), both of which are concluded to be of 'High' sensitivity to development, the highest rating of the five tier sensitivity scale. The study highlights sensitivity in relation to the AONB, concluding that there are "many open and visually exposed areas that have a visual relationship with the AONB" and reinforces the notion that sensitivity is widespread within the parcels, noting that "there are no notable variations in overall sensitivity" within the area.

Option 4 is also notable for being located entirely within the proposed Local Landscape Area (LLA) of Kent Downs – North Street Dip Slope. The LLA 'statement of significance' (2020) again reiterates that the area of Option 4 has inherent landscape value and sensitivity, finding that the area provides part of the "visual setting and the rural context for the AONB" and noting that the landscape "is relatively open", which "allows long views". The LLA suggest that the key requirement is "to conserve and enhance landscape quality and condition". This again suggests that development on a strategic scale would run counter to such a requirement and would give rise to significant negative effects in relation to landscape.

By contrast, **Option 2** (Bobbing) 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 **Option 3** (East and SE Faversham), 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).

In **conclusion**, it is appropriate to flag a risk of significant negative effects under Option 1 and Option 4. By contrast, Options 2 and 3 are found to have relatively limited potential for adverse effects in relation to landscape. However, both Option 2 and Option 3 would bring forward development which breaches an existing natural

settlement boundary (i.e. the A249 at Bobbing and the A2 at Faversham), and there could be a need for further work to ensure that opportunities for long-term strategic planning for landscape units are realised.

## Transport

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| ★<br>1                              | 3                   | ★<br>1                            | 2                        |

### Discussion

There is good potential to differentiate the strategic site options on the basis of the analysis set out in *New Garden Communities: Assessment of Stage 2 submissions* (Stantec, 2019).

- **Option 1** (Southeast Sittingbourne) – as has been discussed, there is a major opportunity, with Stantec concluding that: “*Kent County Council’s initial impression is that as a completed development, through delivery of the SSRR and SNRR, there are likely to be significant transport benefits, both in journey times and removing congestion on the A249 corridor and through Sittingbourne Town Centre.*” However, Stantec strike a major note of caution, with the primary issue being delivery of Junction 5a. Whilst the proposal to fund the junction without reliance on public funds is strongly supported, and the scheme promoters are to be commended for having provided details of the private funding arrangements, it is nonetheless the case that there is “*uncertainty around the junction timing, funding and delivery. Should the J5a costs increase, there is limited viability in the proposals to absorb these.*” Stantec also discuss several other matters:

*“The new Southern and Northern Relief Roads are very significant pieces of infrastructure and modelling evidence is required to understand the implications for traffic flows. It is recognised that these could be a ‘game-changer’, but it is necessary to clearly demonstrate the evidence for the level of development and corresponding infrastructure.”*

*“There is significant concern about the impact on the rural lanes surrounding the development and their use as cut throughs to reach Sittingbourne Town Centre. The model will need to demonstrate how this is to be prevented. The promoters are actively looking at ways to address this.”*

*“... we are aware that here has been pressure from Highways England for a more extensive improvement to the highways network – including a possible new local road to the south of Sittingbourne to relieve the M2 of local traffic. Should this be required then the impact on the AONB may be very different.”*

- **Option 2** (Bobbing) - Stantec conclude that: “*There is a risk of a ‘showstopping’ highways issue here – associated with the local network, A249 and the not fully funded J5 improvements.*”<sup>29</sup> 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.<sup>30</sup> 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).
- **Option 3** (East and SE Faversham) – key statements made within the Stantec report 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*

<sup>29</sup> 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.

<sup>30</sup> 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.”

*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.”*

In short, there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6. It may be that the latest proposal, which involves bringing forward a combined scheme involving growth both to the east and southeast of Faversham, leads to greater potential to deliver timely road infrastructure upgrades, but there is no certainty in this respect. N.B. see further detailed discussion in the SA Report.

- **Option 4 (North Street)** - there are a range of issues, including:
  - *“The Highways Authority have significant concerns about the impact of this proposal and consider that it is too great in scale. They suggest a smaller new village approach in the north western side would be more appropriate.”*
  - *“The realignment of the A251 causes a number of potential issues, specifically how its role as a primary distributor route is retained and reconciled with its diversion through a new residential settlement.”*
  - *“There are potential significant impacts on the local road network, and specifically the relationship between the rural roads and AONB.”* In this respect, the possibility of rural ‘rat running’ towards Canterbury can be envisaged.
  - The M2 is a significant barrier to walking, with none of the north/south routes (Salters Lane, Selling Road and Brogdale Road) having pavements or being suitable for cycling.
  - There are also concerns about the northern section of the A251, including the M2 J6 interchange and the A2 junction.
  - On the plus side, there would be good potential for the development to be served by high frequency bus services operating between Faversham and Ashford (indeed, the site is potentially best performing in this respect).

The Stantec report (2019) also makes the following overarching statement:

*“... in general and subject to further modelling it is likely that appropriate mitigation could be achieved. However, there are concerns about [Southeast Sittingbourne] in relation to the costs and delivery of the junction and Highways England believe junction 5a cannot start before Junction 5 works have finished. There are concerns about the current scale of [North Street], on the A251, for which mitigation may not be agreeable or financially viable and also concerns that [Bobbing] will have significant implications on the local highway network which may not be capable of mitigation.”*

In short, Stantec find Southeast of Sittingbourne strategic site option to give rise to the fewest concerns, albeit the proposal is now to deliver an “East and SE Faversham” scheme. Additional evidence, in respect of East and SE Faversham, comes from the April 2020 re-run of the Swale Transport Model (discussed in Appendix I of the SA Report), which serves to highlight limited concerns regarding the capacity at junctions in the area.

In **conclusion**, it is considered appropriate to highlight Southeast of Sittingbourne as performing as well as East and SE Faversham, given the potential to deliver transformational transport benefits, albeit there is considerable uncertainty regarding deliverability. Mindful of the alternative to strategic growth, which is a strategy involving piecemeal urban extensions, it is considered appropriate to conclude a degree of opportunity associated with the two best performing options. It is also appropriate to flag a degree of risk associated with the worst performing option.

## Water

| Option 1<br>Southeast Sittingbourne | Option 2<br>Bobbing | Option 3<br>East and SE Faversham | Option 4<br>North Street |
|-------------------------------------|---------------------|-----------------------------------|--------------------------|
| ?                                   | ?                   | ?                                 | ?                        |

### 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.”*

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.<sup>31</sup> 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.<sup>32</sup>

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].”*

Further considerations are as follows:

- Southeast Sittingbourne – there have been “extensive discussions” with Southern Water about the provision of a new pumping station to connect with the existing network and carry flows to Sittingbourne WwTW.
- 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.
- East and Southeast Faversham - the site promoters recognise that “development is likely to require the upgrading of the Faversham WwTW”.
- North Street - the need for WwTW upgrades at Faversham is again acknowledged, and a “collaborative approach with Southern Water” is proposed in order to model likely demand and devise a “programme of investment” to be carried out.

In **conclusion**, it is considered appropriate to highlight uncertain negative effects for options. Whilst there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, and it is noted that Option 4 (North Street) is some distance from Faversham WwTW, which could present challenges, it is not possible to differentiate the strategic site options with certainty, on the basis of the evidence available.

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 strategic site options,

<sup>31</sup> 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.

<sup>32</sup> See [kentonline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/](https://kentonline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/)

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.

- 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, which serves to constrain Southeast Sittingbourne and North Street. 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 resources – water scarcity is an issue that applies across the Borough as a whole.

## Appraisal summary

The matrix below draws together the conclusions from the preceding twelve topic-specific appraisal tables.

|                           | Option 1<br>Southeast<br>Sittingbourne           | Option 2<br>Bobbing | Option 3<br>East and SE<br>Faversham | Option 4<br>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                     | ?  | ?                   | ?                                    | ?                        |

### Summary discussion

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 (viably) 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 is to deliver 40% affordable housing 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.

# 4 Site options GIS analysis

## Introduction

The aim of this appendix is to present GIS analysis of all site options. As discussed in Section 5.3 of the SA Report, this was one element of work that fed into the establishment of reasonable alternatives ('growth scenarios') for appraisal.

## Methodology

This is 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.

Given available data it has been possible to meaningfully differentiate the site options in respect of 17 criteria. Each criterion is discussed in turn below, and then each criterion is assigned a column in Table A, which aims to communicate the performance of each site option in respect of each criterion.

In Table A it is not possible to report the performance of each site option in precise quantitative terms (i.e. distance in metres; or percentage intersect), hence performance is differentiated on a **red / amber / green** scale, where red indicates a greater degree of constraint and green indicates a lower degree of constraint. The general approach taken is to assign a RAG shading on the basis of relative performance, i.e. a RAG shading is applied to any given site on the basis of how it *ranks relative to other sites*. This is easily done using the "conditional formatting" function in Excel. However, established distance thresholds are also applied where appropriate, i.e. where the distance threshold is: A) suitably robust / agreed; and B) helpful, in that the effect is to helpfully differentiate sites. The approach to RAG shading is discussed further below.

### Limitations

All relevant and available spatial data sets have been used; however, there are data limitations. For example, on the basis of the available datasets, there is limited or no potential to appraise the 'climate change mitigation' merits of the site options. Also, it is generally the case that, on the basis of the available datasets, there is more limited potential to appraise the merits of site options in terms of socio-economic objectives, relative to environmental objectives.

It is also important to state that the analysis is inherently limited on the basis that proximity / percentage intersect is often (i.e. for many objectives) a crude indicator of constraint or opportunity. For example, whilst percentage intersect with a flood risk zone is a strong indicator of actual flood risk constraint, proximity to a designated biodiversity feature is less robust as an indicator of biodiversity constraint.

In short, the limitations are significant. The implication is that the role of this GIS analysis in the overall plan-making / SA process must be limited.

### Potential for further work

There is much potential for further work to analyse the data in more detail, essentially examining the spread of data for each of the 17 criteria / column in Table A (plus proforma can be created for each site option / row in Table A). The spread of data can be communicated across maps and graphs (histograms), and there is much potential to compare and contrast the average performance of sub-sets of sites, e.g. sites at Settlement A versus sites at Settlement B, and proposed allocations versus omission sites that feature in the reasonable alternatives versus other omission sites. The approach taken below is a light touch analysis, with the aim of relative brevity.

## Findings of the analysis

The headings below consider each of the 17 criteria in turn. The aim is to give a brief insight into the spread of data shown in Table A.

### Agricultural land

Of the 214 site options, 150 (70%) intersect either grade 1 or grade 2 agricultural land. It is appropriate to shade these sites **red** in Table A. Some of these sites only intersect by a small amount; however, it is appropriate to take a precautionary approach, recognising that the dataset is of very low resolution.

A further 36 sites intersect grade 3 land (which may or may not be 'best and most versatile') and are shaded **amber**. The remaining 36 sites are shaded **green**.

Other notable points:

- 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)

Nine SHLAA sites are beyond 10km from an AQMA, at which distance it is reasonable to suggest that proximity to an AQMA is a non-issue. As such, these sites are shaded **green** in Table A. Also, nine sites are within 50m of an AQMA, at which distance it is reasonable to suggest that proximity to an AQMA is a significant constraint. As such, these sites are shaded **red** in Table A. The remaining 196 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from an AQMA.

Other notable points:

- 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)

23 SHLAA sites are within 400m, which is an established distance threshold. As such, these sites are shaded **red** in Table A. The remaining 191 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from an SPA.

Other notable points:

- 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)

Only one SHLAA sites is within 400m, which is an established distance threshold. This site is shaded **red** in Table A. Also, 45 sites are beyond 10km from an SAC, at which distance there is little potential for the SAC to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 169 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from an SAC.

Other notable points:

- 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)

20 SHLAA sites are within 200m, at which distance it is fair to say that proximity to a SSSI is a significant constraint. These sites are shaded **red** in Table A. Also, 12 sites are beyond 5km from a SSSI, at which distance there is little potential for the SSSI to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 182 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a SSSI.

Other notable points:

- 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 29<sup>th</sup> October Local Plan Panel meeting; however, it was not progressed any further in the plan-making / SA process.

### GP Surgery

41 SHLAA sites are within 400m, which is a relatively easy walking distance for many people. These sites are shaded **green** in Table A. Also, two sites are more than 5km from a GP surgery, at which distance it is fair to say that distance to a GP surgery is certainly an issue. These sites are shaded **red** in Table A. The remaining 171 SHLAA sites are shaded on a **green-amber-red** scale on the basis of relative distance from a GP surgery.

Other notable points:

- 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

84 SHLAA sites are within 400m, which is a relatively easy walking distance for many people. These sites are shaded **green** in Table A. The site most distant from a primary school is located 2.6km distant, at which distance it is difficult to conclude that proximity to a primary school is a significant constraint. As such, the 153 site options located more than 400m from a primary school are shaded on a **green-amber-red** scale on the basis of relative distance from a primary school.

Other notable points:

- 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

47 SHLAA sites are within 800m, which is a relatively easy walking distance for many school children. These sites are shaded **green** in Table A. Also, 31 sites are more than 5km from a secondary school, at which distance it is fair to say that distance to a secondary school is certainly an issue. These sites are shaded **red** in Table A. The remaining 159 SHLAA sites are shaded on a **green -amber-red** scale on the basis of relative distance from a secondary school.

Other notable points:

- 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

107 SHLAA sites are within 1.5km of a train station, which is a distance at which many commuters would choose to walk or cycle. Also, one site is more than 10km from a train station, at which distance it is fair to say that distance to a train station is certainly an issue. These sites are shaded **red** in Table A. The remaining 129 SHLAA sites are shaded on a **green -amber-red** scale on the basis of relative distance from a train station.

Other notable points:

- 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

177 SHLAA sites do not intersect either flood zone 2 or 3, and are shaded **green** in Table A. The remaining 60 sites are shaded on a **green -amber-red** scale on the basis of relative percentage intersect.

Other notable points:

- 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

65 SHLAA sites are within 50m, at which distance it is fair to say that proximity to a Conservation Area (CA) is a significant constraint. These sites are shaded **red** in Table A. Also, 8 sites are beyond 5km from a CA, at which distance there is little potential for the CA to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 182 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a CA.

Other notable points:

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

### Grade 1 listed building

18 SHLAA sites are within 100m, at which distance it is fair to say that proximity to a grade 1 listed building is a significant constraint. These sites are shaded **red** in Table A. Also, 34 sites are beyond 2km from a grade 1 listed building, at which distance there is little potential for the listed building to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 163 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a grade 1 listed building.

Other notable points:

- 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

11 SHLAA sites are within 50m, at which distance it is fair to say that proximity to a grade 2\* listed building is a significant constraint. These sites are shaded **red** in Table A. Also, 33 sites are beyond 2km from a grade 2\* listed building, at which distance there is little potential for the listed building to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 171 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a grade 2\* listed building.

Other notable points:

- 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

54 SHLAA sites are within 25m, at which distance it is fair to say that proximity to a grade 2 listed building is a significant constraint. These sites are shaded **red** in Table A. Also, 2 sites are beyond 1km from a grade 2 listed building, at which distance there is little potential for the listed building to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 159 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a grade 2 listed building.

Other notable points:

- 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

2 SHLAA sites are within 100m, at which distance it is fair to say that proximity to a registered park or garden is a significant constraint. These sites are shaded **red** in Table A. Also, 140 SHLAA sites are beyond 5km of a registered park or garden, at which distance there is little potential for the nearest registered park or garden to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 73 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a registered park or garden.

Other notable points:

- 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

5 SHLAA sites are within 100m, at which distance it is fair to say that proximity to a scheduled monument is a significant constraint. These sites are shaded **red** in Table A. Also, 8 SHLAA sites are beyond 5km of a scheduled monument, at which distance there is little potential for the nearest scheduled monument to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 202 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from a scheduled monument.

Other notable points:

- 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 29<sup>th</sup> 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 29<sup>th</sup> October Local Plan Panel; not progressed any further in the plan-making / SA process.

#### Kent Downs AONB

47 SHLAA sites are within 1km, at which distance it is fair to say that proximity to the AONB is a significant constraint. These sites are shaded **red** in Table A. Also, 55 SHLAA sites are beyond 5km of the AONB, at which distance there is little potential for the AONB to act as a significant constraint. These sites are shaded **green** in Table A. The remaining 113 SHLAA sites are shaded on a **red-amber-green** scale on the basis of relative distance from the AONB.

Other notable points:

- 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.

Summary analysis

The table below presents an analysis of all SHLAA sites, grouped by location. Additionally:

- Committed sites are highlighted **dark green**
- Proposed allocations are highlighted **light green**
- Other sites that feature in the reasonable growth scenarios are highlighted **amber**

Table A: GIS analysis of SHLAA sites

| SHLAA ref. | Name / address                             | Location       | Hectares | Agricultural land | Air quality management area | Special Protection Area | Special Area of Conservation | SSSI        | GP Surgery  | Primary school | Secondary school | Train station | Flood zone 2 | Conservation area | Grade 1 listed building | Grade 2* listed building | Grade 2 listed building | Registered park or garden | Scheduled monument | Kent Downs AONB |
|------------|--|----------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|-------------|-------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/138  | Land at Fox Hill/School Lane               | Bapchild       | 6        | Dark Green        | Amber                       | Amber                   | Light Green                  | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Light Green              | Light Green             | Light Green               | Light Green        | Light Green     |
| SLA18/097  | Tonge Country Park, Hempstead Lane         | Bapchild       | 6        | Dark Green        | Amber                       | Amber                   | Light Green                  | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Light Green              | Light Green             | Light Green               | Light Green        | Light Green     |
| SLA18/005  | Land Rear of The Street and Hempstead Lane | Bapchild       | 4        | Dark Green        | Amber                       | Amber                   | Light Green                  | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Light Green              | Light Green             | Light Green               | Light Green        | Light Green     |
| SLA18/026  | Land off Hempstead Lane                    | Bapchild       | 2        | Dark Green        | Amber                       | Amber                   | Light Green                  | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Light Green              | Light Green             | Light Green               | Light Green        | Light Green     |
| SLA18/159  | Land West of Mustards Road                 | Bay View       | 3        | Amber             | Light Green                 | Amber                   | Light Green                  | Amber       | Light Green | Light Green    | Dark Green       | Dark Green    | Dark Green   | Light Green       | Light Green             | Light Green              | Light Green             | Light Green               | Light Green        | Light Green     |
| SLA18/146  | Lime Kiln Shaw, Lime Kiln Road             | Bexon/Milstead | 0        | Amber             | Light Green                 | Light Green             | Light Green                  | Light Green | Amber       | Amber          | Amber            | Amber         | Light Green  | Light Green       | Light Green             | Light Green              | Light Green             | Light Green               | Light Green        | Dark Green      |
| SLA18/224  | Land at Bobbing                            | Bobbing        | 418      | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/224a | Land at Bobbing                            | Bobbing        | 203      | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/101  | Land at Hill Farm                          | Bobbing        | 18       | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/001  | Land West of Sheppey Way                   | Bobbing        | 4        | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/009  | Church Farm, Sheppey Way                   | Bobbing        | 1        | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/007  | Land East of Sheppey Way                   | Bobbing        | 1        | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/069  | Land Adjacent 8 Bobbing Hill, Key Street   | Bobbing        | 0        | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/144  | Land at Starveacre Lane and Hearts Delight | Borden         | 26       | Dark Green        | Dark Green                  | Amber                   | Amber                        | Amber       | Light Green | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |
| SLA18/143  | Land at Home Farm                          | Borden         | 12       | Dark Green        | Amber                       | Light Green             | Amber                        | Light Green | Amber       | Light Green    | Light Green      | Light Green   | Light Green  | Amber             | Dark Green              | Dark Green               | Dark Green              | Dark Green                | Dark Green         | Dark Green      |

| SHLAA ref. | Name / address                               | Location          | Hectares | Agricultural land | Air quality management area | Special Protection Area | Special Area of Conservation | SSSI   | GP Surgery | Primary school | Secondary school | Train station | Flood zone 2 | Conservation area | Grade 1 listed building | Grade 2* listed building | Grade 2 listed building | Registered park or garden | Scheduled monument | Kent Downs AONB |
|------------|--|-------------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/053  | Blue House Field, Rear of Mountview          | Borden            | 5        | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Orange         | Green            | Yellow        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Orange          |
| SLA18/118  | Land North of/Adjacent to 124 Borden Lane    | Borden            | 1        | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Orange         | Green            | Yellow        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Orange          |
| SLA18/047  | Land at Street Farm, Pond Farm Road          | Borden            | 1        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Green            | Yellow        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Orange          |
| SLA18/142  | Land at The Nurseries, Pond Farm Road        | Borden/Oad Street | 3        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Green            | Yellow        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Orange          |
| SLA18/158  | Wellbrook Farm (site B)                      | Boughton          | 17       | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Green            | Yellow        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Orange          |
| SLA18/082  | Land North of The Street/Canterbury Road     | Boughton          | 5        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Orange         | Red              | Yellow        | Green        | Red               | Yellow                  | Yellow                   | Yellow                  | Red                       | Orange             | Orange          |
| SLA18/157  | Wellbrook Farm (Site A)                      | Boughton          | 3        | Yellow            | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Yellow           | Yellow        | Green        | Red               | Red                     | Red                      | Red                     | Yellow                    | Green              | Orange          |
| SLA18/085  | Land Rear of 142-146 The Street              | Boughton          | 2        | Red               | Yellow                      | Green                   | Orange                       | Yellow | Green      | Green          | Red              | Yellow        | Green        | Red               | Yellow                  | Red                      | Red                     | Red                       | Orange             | Orange          |
| SLA18/150  | The Former Garden Hotel (no 169), The Street | Boughton          | 1        | Red               | Yellow                      | Green                   | Orange                       | Yellow | Green      | Green          | Red              | Yellow        | Green        | Red               | Yellow                  | Red                      | Red                     | Red                       | Yellow             | Orange          |
| SLA18/002  | Land West of Kaine Farm House, Breach Lane   | Breach            | 1        | Red               | Orange                      | Yellow                  | Orange                       | Yellow | Orange     | Orange         | Red              | Green         | Yellow       | Yellow            | Green                   | Yellow                   | Yellow                  | Green                     | Red                | Orange          |
| SLA18/073  | Land West of The Street                      | Bredgar           | 11       | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Red                     | Green                     | Green              | Red             |
| SLA18/110  | Land West of Bredgar, Wrens Road             | Bredgar           | 10       | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Red                     | Green                     | Green              | Red             |
| SLA18/084  | Land at Gibbens Farm, The Street             | Bredgar           | 7        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Red                     | Green                     | Green              | Red             |
| SLA18/048  | Land Opposite Rookery Close, Primrose Lane   | Bredgar           | 2        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Yellow                  | Yellow                   | Yellow                  | Green                     | Green              | Red             |
| SLA18/117  | Land Adjacent Westfield, Swanton Street      | Bredgar           | 2        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Red             |
| SLA18/074  | Land North of Bexon Lane                     | Bredgar           | 1        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Red             |
| SLA18/049  | Firs Farm, Deans Hill Road                   | Bredgar           | 0        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Yellow         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Red                     | Green                     | Green              | Red             |
| SLA18/066  | Land at Parsonage Farm, The Street           | Bredgar           | 0        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Orange           | Orange        | Green        | Red               | Red                     | Red                      | Yellow                  | Green                     | Green              | Red             |
| SLA18/050  | Land at Danaway, Maidstone Road              | Danaway           | 1        | Red               | Orange                      | Green                   | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Red          | Yellow            | Green                   | Yellow                   | Yellow                  | Green                     | Green              | Orange          |
| SLA18/083  | Land off Dargate Road                        | Dargate           | 2        | Red               | Yellow                      | Green                   | Orange                       | Orange | Orange     | Red            | Orange           | Orange        | Green        | Red               | Green                   | Yellow                   | Yellow                  | Orange                    | Orange             | Green           |
| SLA18/104  | Land at The Street                           | Doddington        | 2        | Yellow            | Yellow                      | Green                   | Green                        | Green  | Red        | Yellow         | Red              | Orange        | Green        | Red               | Orange                  | Green                    | Red                     | Red                       | Green              | Red             |
| SLA18/072  | Former Doddington Primary School, The Street | Doddington        | 1        | Yellow            | Yellow                      | Green                   | Green                        | Green  | Red        | Green          | Red              | Orange        | Green        | Red               | Orange                  | Orange                   | Red                     | Red                       | Green              | Red             |
| SLA18/012  | Land at Hopes Hill                           | Doddington        | 1        | Yellow            | Yellow                      | Green                   | Green                        | Green  | Red        | Green          | Red              | Orange        | Green        | Red               | Orange                  | Orange                   | Red                     | Red                       | Green              | Red             |

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|------------|---|------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|-------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/089  | Land at Home Farm,, The Street                  | Doddington | 0        | Yellow            | Light Green                 | Green                   | Red                          | Red    | Red         | Red            | Red              | Orange        | Green        | Red               | Red                     | Yellow                   | Orange                  | Red                       | Green              | Red             |
| SLA18/090  | Land at Former Gas Yard, The Street             | Doddington | 0        | Yellow            | Light Green                 | Green                   | Red                          | Red    | Red         | Red            | Red              | Orange        | Green        | Red               | Red                     | Yellow                   | Orange                  | Red                       | Green              | Red             |
| SLA18/156  | Foresters Lodge Farm                            | Dunkirk    | 69       | Green             | Light Green                 | Green                   | Red                          | Red    | Yellow      | Orange         | Red              | Orange        | Green        | Yellow            | Green                   | Green                    | Yellow                  | Red                       | Red                | Orange          |
| SLA18/155  | Land off of Canterbury Road                     | Dunkirk    | 5        | Green             | Light Green                 | Green                   | Red                          | Red    | Yellow      | Orange         | Red              | Orange        | Green        | Yellow            | Green                   | Green                    | Yellow                  | Red                       | Red                | Yellow          |
| SLA18/136  | Land North of Canterbury Road                   | Dunkirk    | 1        | Green             | Light Green                 | Green                   | Red                          | Red    | Yellow      | Orange         | Red              | Orange        | Green        | Yellow            | Green                   | Green                    | Yellow                  | Red                       | Red                | Yellow          |
| SLA18/162  | Bossenden Farm Frontage Land                    | Dunkirk    | 1        | Green             | Light Green                 | Green                   | Red                          | Red    | Yellow      | Orange         | Red              | Orange        | Green        | Yellow            | Green                   | Green                    | Yellow                  | Red                       | Red                | Yellow          |
| SLA18/163  | Oakside Park, London Road                       | Dunkirk    | 0        | Green             | Light Green                 | Green                   | Red                          | Red    | Yellow      | Orange         | Red              | Orange        | Green        | Yellow            | Green                   | Green                    | Yellow                  | Red                       | Red                | Yellow          |
| SLA18/063  | Land North of Eastchurch                        | Eastchurch | 35       | Yellow            | Light Green                 | Orange                  | Green                        | Orange | Green       | Green          | Red              | Orange        | Green        | Red               | Red                     | Yellow                   | Orange                  | Red                       | Red                | Green           |
| SLA18/189  | Land nth of High Street, Eastchurch             | Eastchurch | 1        | Yellow            | Light Green                 | Orange                  | Green                        | Orange | Green       | Green          | Red              | Orange        | Green        | Red               | Red                     | Yellow                   | Orange                  | Red                       | Red                | Green           |
| SLA18/223  | Land at Ashford Road, North Street, Sheldwich   | Faversham  | 310      | Red               | Orange                      | Yellow                  | Orange                       | Yellow | Light Green | Orange         | Green            | Green         | Green        | Red               | Red                     | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/226  | South East Faversham                            | Faversham  | 131      | Red               | Orange                      | Yellow                  | Orange                       | Yellow | Light Green | Orange         | Green            | Green         | Green        | Red               | Red                     | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/065  | Land East of Abbey Farm                         | Faversham  | 53       | Red               | Orange                      | Yellow                  | Orange                       | Yellow | Light Green | Orange         | Green            | Green         | Green        | Red               | Red                     | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/028  | Land at Queen Court Farm, Faversham             | Faversham  | 44       | Red               | Orange                      | Yellow                  | Light Green                  | Yellow | Green       | Green          | Green            | Green         | Green        | Red               | Yellow                  | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/091  | Land at Lady Dane Farm                          | Faversham  | 43       | Red               | Yellow                      | Orange                  | Orange                       | Orange | Light Green | Orange         | Green            | Green         | Green        | Red               | Yellow                  | Red                      | Light Green             | Orange                    | Red                | Red             |
| SLA18/167  | Land West of Western Link                       | Faversham  | 36       | Red               | Orange                      | Yellow                  | Light Green                  | Yellow | Green       | Green          | Green            | Yellow        | Green        | Red               | Yellow                  | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/178  | Preston Fields, Canterbury Road, Faversham      | Faversham  | 14       | Red               | Orange                      | Yellow                  | Orange                       | Yellow | Light Green | Orange         | Green            | Green         | Green        | Red               | Red                     | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/221  | Land at Lady Dane Farm, Love Lane               | Faversham  | 11       | Red               | Yellow                      | Orange                  | Orange                       | Orange | Light Green | Orange         | Green            | Green         | Green        | Red               | Yellow                  | Red                      | Light Green             | Orange                    | Red                | Red             |
| SLA18/135  | Land at Graveney Road, East of Faversham        | Faversham  | 8        | Red               | Yellow                      | Orange                  | Orange                       | Orange | Light Green | Orange         | Green            | Green         | Green        | Red               | Yellow                  | Red                      | Light Green             | Orange                    | Red                | Red             |
| SLA18/152  | Land south of A2 London Road/West of Water Lane | Faversham  | 8        | Red               | Orange                      | Yellow                  | Light Green                  | Yellow | Light Green | Orange         | Green            | Green         | Yellow       | Red               | Light Green             | Red                      | Red                     | Red                       | Orange             | Red             |
| SLA18/062  | 39 Abbey Fields                                 | Faversham  | 8        | Red               | Orange                      | Yellow                  | Orange                       | Red    | Light Green | Orange         | Green            | Green         | Green        | Red               | Red                     | Red                      | Yellow                  | Red                       | Red                | Orange          |
| SLA18/077  | Land at Ham Road                                | Faversham  | 6        | Red               | Orange                      | Yellow                  | Orange                       | Red    | Light Green | Orange         | Green            | Green         | Green        | Red               | Red                     | Red                      | Red                     | Yellow                    | Red                | Yellow          |
| SLA18/149  | Land at Oare Gravel Works, Ham Road             | Faversham  | 5        | Red               | Orange                      | Yellow                  | Light Green                  | Red    | Light Green | Orange         | Green            | Green         | Yellow       | Red               | Red                     | Red                      | Light Green             | Orange                    | Red                | Yellow          |
| SLA18/019  | Syndale Park, London Road                       | Faversham  | 4        | Red               | Orange                      | Yellow                  | Light Green                  | Yellow | Light Green | Orange         | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Light Green             | Orange                    | Red                | Red             |

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|------------|---|-----------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/081  | Land at London Road and Western Link                    | Faversham | 3        | Red               | Red                         | Yellow                  | Green                        | Yellow | Green      | Green          | Green            | Green         | Green        | Red               | Yellow                  | Yellow                   | Yellow                  | Yellow                    | Red                | Red             |
| SLA18/114  | Land at Brent Road                                      | Faversham | 3        | Green             | Red                         | Yellow                  | Yellow                       | Red    | Green      | Green          | Green            | Green         | Red          | Red               | Red                     | Red                      | Red                     | Yellow                    | Red                | Red             |
| SLA18/108  | Land at Brett House, Bysing Wood Road                   | Faversham | 3        | Red               | Red                         | Yellow                  | Green                        | Red    | Yellow     | Green          | Green            | Yellow        | Red          | Yellow            | Yellow                  | Yellow                   | Green                   | Yellow                    | Red                | Red             |
| SLA18/068  | Land at Perry Court Farmhouse, Brogdale Road            | Faversham | 3        | Red               | Red                         | Yellow                  | Yellow                       | Yellow | Green      | Green          | Green            | Green         | Green        | Red               | Yellow                  | Yellow                   | Red                     | Red                       | Red                | Red             |
| SLA18/107  | Land East of Faversham Industrial Estate, Graveney Road | Faversham | 2        | Red               | Yellow                      | Red                     | Yellow                       | Red    | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Red                       | Red                | Red             |
| SLA18/235  | Land at Perry Court Farm, London Road, Faversham        | Faversham | 2        | Red               | Red                         | Yellow                  | Yellow                       | Yellow | Green      | Green          | Green            | Green         | Green        | Red               | Yellow                  | Yellow                   | Red                     | Red                       | Red                | Red             |
| SLA18/079  | Queens Court Farm Yard, Water Lane                      | Faversham | 2        | Red               | Red                         | Yellow                  | Green                        | Yellow | Green      | Green          | Green            | Green         | Red          | Red               | Yellow                  | Red                      | Red                     | Red                       | Red                | Red             |
| SLA18/030  | Land at Lion Field, London Road                         | Faversham | 1        | Green             | Red                         | Yellow                  | Green                        | Yellow | Green      | Green          | Green            | Green         | Green        | Red               | Yellow                  | Yellow                   | Yellow                  | Yellow                    | Red                | Red             |
| SLA18/174  | Land at Ham Farm, Ham Road                              | Faversham | 1        | Red               | Red                         | Yellow                  | Yellow                       | Red    | Yellow     | Green          | Green            | Green         | Green        | Red               | Red                     | Red                      | Red                     | Yellow                    | Red                | Yellow          |
| SLA18/194  | Bysingwood Primary School, Hazebrouck Road              | Faversham | 1        | Red               | Red                         | Yellow                  | Green                        | Red    | Green      | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Yellow                    | Red                | Red             |
| SLA18/078  | Lady Dane Farm Buildings, Love Lane                     | Faversham | 1        | Red               | Red                         | Yellow                  | Yellow                       | Red    | Yellow     | Green          | Green            | Green         | Green        | Red               | Yellow                  | Yellow                   | Yellow                  | Yellow                    | Red                | Red             |
| SLA18/169  | 97-103 Ashford Road                                     | Faversham | 1        | Red               | Red                         | Yellow                  | Yellow                       | Yellow | Green      | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Yellow                  | Yellow                    | Red                | Red             |
| SLA18/029  | Swan Quay, Belvedere Road                               | Faversham | 0        | Green             | Red                         | Yellow                  | Red                          | Red    | Green      | Green          | Green            | Green         | Red          | Red               | Red                     | Red                      | Red                     | Yellow                    | Red                | Red             |
| SLA18/060  | Land at Wallend, Lower Road                             | Halfway   | 36       | Yellow            | Green                       | Red                     | Green                        | Red    | Yellow     | Green          | Green            | Yellow        | Red          | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/165  | Land East of Queenborough                               | Halfway   | 27       | Yellow            | Green                       | Red                     | Green                        | Red    | Yellow     | Green          | Green            | Green         | Yellow       | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/080  | Land at Halfway Road, Halfway Houses                    | Halfway   | 6        | Green             | Green                       | Yellow                  | Yellow                       | Yellow | Green      | Green          | Green            | Yellow        | Red          | Yellow            | Green                   | Green                    | Red                     | Red                       | Red                | Green           |
| SLA18/176  | Land at Belgrave Road                                   | Halfway   | 5        | Yellow            | Green                       | Red                     | Green                        | Red    | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/088  | Land South West of Belgrave Road                        | Halfway   | 2        | Yellow            | Green                       | Red                     | Green                        | Red    | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/064  | Land at Highfield Road                                  | Halfway   | 2        | Yellow            | Green                       | Red                     | Green                        | Yellow | Green      | Green          | Green            | Yellow        | Green        | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/186  | Halfway Houses Primary School, Southdown Rd             | Halfway   | 2        | Green             | Green                       | Yellow                  | Green                        | Yellow | Green      | Green          | Green            | Green         | Green        | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/209  | Land at Minster Academy, Admiral Walkm Minster          | Halfway   | 1        | Green             | Green                       | Yellow                  | Green                        | Yellow | Green      | Green          | Green            | Yellow        | Green        | Yellow            | Green                   | Green                    | Yellow                  | Green                     | Yellow             | Green           |
| SLA18/133  | Land at Bartletts Close, Halfway                        | Halfway   | 1        | Yellow            | Green                       | Red                     | Green                        | Red    | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/111  | Hartlip Industrial Estate                               | Hartlip   | 6        | Red               | Red                         | Yellow                  | Red                          | Yellow | Red        | Yellow         | Red              | Yellow        | Green        | Yellow            | Yellow                  | Yellow                   | Yellow                  | Yellow                    | Yellow             | Red             |

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| SLA18/003  | Gardening World, Lower Hartlip Road               | Hartlip Hill    | 2        | Red               | Red                         | Green                   | Red                          | Green | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/057  | Church Farm, Kays Lane                            | Hernhill        | 1        | Red               | Green                       | Green                   | Red                          | Green | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/154  | Land at Lamberhurst Farm                          | Highstreet      | 23       | Yellow            | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/232  | Land at Stickfast Lane                            | Howt Green      | 115      | Red               | Green                       | Red                     | Red                          | Green | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/004  | Land at Pheasant Farm (West), Sheppey Way         | Howt Green      | 2        | Red               | Green                       | Red                     | Red                          | Green | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/219  | Land East of Iwade                                | Iwade           | 67       | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/054  | Land South and South-West of Iwade                | Iwade           | 25       | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/105  | Halfway Egg Farm, Featherbed Lane                 | Iwade           | 3        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/037  | Land South of Dunlin Walk                         | Iwade           | 1        | Yellow            | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/187  | Iwade fruit & produce                             | Iwade           | 0        | Yellow            | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/188  | Iwade Village Centre II                           | Iwade           | 0        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/129  | Keycol Farm, Keycol Hill                          | Keycol          | 7        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/166  | Land rear of Solna, Keycol Hill                   | Keycol          | 3        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/109  | Land Adjacent St Clements School, Leysdown Road   | Leysdown        | 4        | Yellow            | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/181  | Shellness Rd & Park Avenue                        | Leysdown        | 0        | Yellow            | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/121  | Seaview Park, Warden Bay Road                     | Leysdown/Warden | 5        | Yellow            | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/173  | Former Funton Brickworks                          | Lower Halstow   | 7        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/140  | Callum Park, Basser Hill                          | Lower Halstow   | 2        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/008  | Land South of School Lane                         | Lower Halstow   | 1        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/036  | Southfield, Wardwell Lane                         | Lower Halstow   | 0        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/126  | Southern Plot opp Westfield Cottages, Breach Lane | Lower Halstow   | 0        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/145  | Church House, Church Path                         | Lower Halstow   | 0        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |
| SLA18/130  | Land North of The Valance                         | Lynsted         | 4        | Red               | Green                       | Red                     | Red                          | Red   | Green      | Green          | Green            | Green         | Green        | Green             | Green                   | Green                    | Green                   | Green                     | Green              | Green           |

| SHLAA ref. | Name / address                                      | Location           | Hectares | Agricultural land | Air quality management area | Special Protection Area | Special Area of Conservation | SSSI   | GP Surgery | Primary school | Secondary school | Train station | Flood zone 2 | Conservation area | Grade 1 listed building | Grade 2* listed building | Grade 2 listed building | Registered park or garden | Scheduled monument | Kent Downs AONB |
|------------|---|--------------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/034  | Land West of The Street                             | Lynsted            | 3        | Red               | Orange                      | Green                   | Green                        | Green  | Orange     | Green          | Orange           | Orange        | Green        | Red               | Red                     | Yellow                   | Red                     | Orange                    | Green              | Orange          |
| SLA18/132  | Medlar House, Lynsted Lane                          | Lynsted            | 1        | Red               | Orange                      | Green                   | Green                        | Green  | Orange     | Green          | Orange           | Orange        | Green        | Red               | Red                     | Yellow                   | Red                     | Orange                    | Green              | Orange          |
| SLA18/102  | Milstead Manor Farm, Manor Road                     | Milstead           | 1        | Yellow            | Green                       | Green                   | Green                        | Green  | Orange     | Yellow         | Orange           | Orange        | Green        | Red               | Green                   | Red                      | Orange                  | Orange                    | Green              | Red             |
| SLA18/177  | Land at Cowstead Farm, Lower Road (was also SW/184) | Minster            | 30       | Yellow            | Green                       | Red                     | Orange                       | Orange | Yellow     | Green          | Orange           | Orange        | Green        | Green             | Green                   | Green                    | Red                     | Orange                    | Yellow             | Green           |
| SLA18/038  | Land East of Scocles Road                           | Minster            | 27       | Yellow            | Green                       | Orange                  | Green                        | Orange | Green      | Green          | Orange           | Orange        | Green        | Green             | Orange                  | Green                    | Red                     | Orange                    | Orange             | Green           |
| SLA18/059  | Land Adjacent to Kingsborough Farm, Eastchurch Road | Minster            | 17       | Red               | Green                       | Orange                  | Green                        | Orange | Yellow     | Orange         | Orange           | Orange        | Green        | Green             | Yellow                  | Green                    | Green                   | Yellow                    | Green              | Green           |
| SLA18/033  | Windy Gap, Chequers Road                            | Minster            | 13       | Yellow            | Green                       | Red                     | Green                        | Red    | Yellow     | Green          | Yellow           | Orange        | Green        | Green             | Red                     | Green                    | Orange                  | Green                     | Red                | Green           |
| SLA18/018  | Land off Lower Road                                 | Minster            | 5        | Yellow            | Green                       | Red                     | Green                        | Orange | Yellow     | Green          | Orange           | Orange        | Green        | Green             | Green                   | Green                    | Green                   | Yellow                    | Yellow             | Green           |
| SLA18/198  | Plover Road (Thistle Hill), Minster                 | Minster            | 4        | Yellow            | Green                       | Yellow                  | Green                        | Yellow | Green      | Green          | Orange           | Orange        | Green        | Green             | Yellow                  | Green                    | Green                   | Green                     | Orange             | Green           |
| SLA18/171  | Between 11 & Sunset, Southsea Avenue                | Minster            | 3        | Green             | Green                       | Red                     | Yellow                       | Orange | Yellow     | Orange         | Green            | Orange        | Red          | Green             | Yellow                  | Green                    | Green                   | Orange                    | Orange             | Green           |
| SLA18/131  | Land adj. Allocation A12                            | Minster            | 3        | Yellow            | Green                       | Red                     | Green                        | Orange | Yellow     | Orange         | Green            | Orange        | Green        | Green             | Green                   | Green                    | Green                   | Yellow                    | Yellow             | Green           |
| SLA18/011  | Land Rear of 66 Scrapsgate Road                     | Minster            | 2        | Green             | Green                       | Orange                  | Green                        | Yellow | Green      | Green          | Orange           | Orange        | Red          | Green             | Yellow                  | Green                    | Green                   | Orange                    | Orange             | Green           |
| SLA18/234  | Land at Plough Road, Minster, ME12 4JF              | Minster            | 2        | Red               | Green                       | Orange                  | Green                        | Red    | Orange     | Orange         | Orange           | Orange        | Green        | Green             | Green                   | Green                    | Green                   | Yellow                    | Yellow             | Green           |
| SLA18/031  | Land at Plough Road                                 | Minster            | 1        | Red               | Green                       | Orange                  | Green                        | Orange | Yellow     | Orange         | Orange           | Orange        | Green        | Green             | Green                   | Green                    | Green                   | Yellow                    | Yellow             | Green           |
| SLA18/067  | Land off Elm Lane                                   | Minster            | 1        | Yellow            | Green                       | Yellow                  | Green                        | Orange | Yellow     | Green          | Orange           | Orange        | Green        | Green             | Orange                  | Green                    | Green                   | Orange                    | Orange             | Green           |
| SLA18/141  | Land West of Martindale, Elm Lane                   | Minster            | 1        | Red               | Green                       | Orange                  | Green                        | Orange | Yellow     | Orange         | Orange           | Orange        | Green        | Green             | Yellow                  | Green                    | Yellow                  | Green                     | Orange             | Green           |
| SLA18/193  | Land at Minster County Primary School, Minster Road | Minster            | 0        | Green             | Green                       | Orange                  | Green                        | Orange | Green      | Green          | Orange           | Orange        | Green        | Green             | Red                     | Green                    | Green                   | Green                     | Red                | Green           |
| SLA18/161  | Plough Leisure Caravan Park                         | Minster/eastchurch | 1        | Red               | Green                       | Orange                  | Green                        | Orange | Orange     | Orange         | Orange           | Orange        | Green        | Green             | Green                   | Green                    | Green                   | Yellow                    | Yellow             | Green           |
| SLA18/093  | Land Adjacent Monica Close                          | Neames Forstall    | 1        | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Orange         | Red              | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Orange                    | Green              | Red             |
| SLA18/096  | Land East of Selling Road (2)                       | Neames Forstall    | 1        | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Orange         | Red              | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Orange                    | Green              | Red             |
| SLA18/094  | Land East of Selling Road                           | Neames Forstall    | 1        | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Orange         | Red              | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Orange                    | Green              | Red             |
| SLA18/229  | Land at Pond Farm, Newington                        | Newington          | 13       | Red               | Red                         | Yellow                  | Red                          | Yellow | Orange     | Yellow         | Orange           | Green         | Green        | Orange            | Orange                  | Orange                   | Red                     | Green                     | Orange             | Orange          |
| SLA18/076  | Land at Ellen's Place, High Street                  | Newington          | 2        | Red               | Red                         | Yellow                  | Red                          | Yellow | Orange     | Yellow         | Orange           | Green         | Green        | Orange            | Orange                  | Orange                   | Red                     | Green                     | Yellow             | Orange          |

| SHLAA ref. | Name / address                                    | Location           | Hectares | Agricultural land | Air quality management area | Special Protection Area | Special Area of Conservation | SSSI   | GP Surgery | Primary school | Secondary school | Train station | Flood zone 2 | Conservation area | Grade 1 listed building | Grade 2* listed building | Grade 2 listed building | Registered park or garden | Scheduled monument | Kent Downs AONB |
|------------|---|--------------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/075  | Land at St Mary's View                            | Newington          | 1        | Red               | Red                         | Yellow                  | Orange                       | Green  | Orange     | Green          | Yellow           | Green         | Green        | Red               | Red                     | Yellow                   | Yellow                  | Green                     | Orange             | Orange          |
| SLA18/103  | Land South of Oak Hill                            | Newington          | 1        | Red               | Orange                      | Yellow                  | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Yellow            | Orange                  | Green                    | Green                   | Green                     | Orange             | Green           |
| SLA18/015  | High Oak Hill Farm, High Oak Hill, Iwade Road     | Newington          | 1        | Red               | Red                         | Yellow                  | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Yellow            | Orange                  | Green                    | Green                   | Green                     | Orange             | Green           |
| SLA18/100  | 148 High Street                                   | Newington          | 1        | Red               | Red                         | Yellow                  | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Red               | Orange                  | Orange                   | Orange                  | Green                     | Yellow             | Orange          |
| SLA18/228  | Land adj Newington Manor, Bull Lane               | Newington          | 0        | Red               | Red                         | Yellow                  | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Yellow            | Orange                  | Red                      | Yellow                  | Green                     | Orange             | Orange          |
| SLA18/124  | Land at The Tracies                               | Newington          | 0        | Red               | Red                         | Yellow                  | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Red               | Orange                  | Orange                   | Orange                  | Green                     | Yellow             | Orange          |
| SLA18/127  | Land SW of Boyse's Hill Farm                      | Newington/Keycol   | 12       | Red               | Red                         | Yellow                  | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Yellow            | Orange                  | Orange                   | Orange                  | Green                     | Orange             | Orange          |
| SLA18/115  | Land at 18 The Courtyard, Seed Road               | Newnham            | 0        | Yellow            | Green                       | Green                   | Green                        | Green  | Red        | Orange         | Red              | Orange        | Green        | Red               | Orange                  | Orange                   | Orange                  | Red                       | Green              | Red             |
| SLA18/160  | Land at Norton Ash Garden Centre                  | Norton Ash         | 9        | Red               | Orange                      | Orange                  | Green                        | Yellow | Orange     | Orange         | Yellow           | Green         | Green        | Red               | Orange                  | Yellow                   | Yellow                  | Orange                    | Yellow             | Orange          |
| SLA18/023  | Bowl Reed, Oad Street                             | Oad Street         | 2        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Yellow            | Green                   | Orange                   | Green                   | Green                     | Orange             | Red             |
| SLA18/024  | Land Adjacent to Bowl Reed, Oad Street            | Oad Street         | 2        | Red               | Yellow                      | Green                   | Orange                       | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Yellow            | Green                   | Orange                   | Green                   | Green                     | Orange             | Red             |
| SLA18/035  | Land East of Painters Farm, Painters Forstal Road | Painter's Forstall | 1        | Red               | Orange                      | Yellow                  | Green                        | Green  | Orange     | Orange         | Yellow           | Green         | Green        | Red               | Green                   | Green                    | Red                     | Orange                    | Yellow             | Red             |
| SLA18/086  | Churchmans Farm, Stalisfield Road                 | Painter's Forstall | 0        | Yellow            | Yellow                      | Green                   | Green                        | Green  | Orange     | Red            | Orange           | Orange        | Green        | Yellow            | Green                   | Green                    | Red                     | Orange                    | Green              | Red             |
| SLA18/113* | Land at The Port of Sheerness, Rushdenden Road    | Queenborough/Rush  | 80       | Green             | Green                       | Red                     | Green                        | Red    | Yellow     | Orange         | Orange           | Green         | Red          | Yellow            | Green                   | Green                    | Green                   | Green                     | Orange             | Green           |
| SLA18/220  | West of Rushenden Road                            | Queenborough/Rush  | 11       | Green             | Green                       | Red                     | Green                        | Red    | Green      | Yellow         | Orange           | Green         | Red          | Yellow            | Green                   | Orange                   | Yellow                  | Green                     | Red                | Green           |
| SLA18/207  | South of Queenborough Creek                       | Queenborough/Rush  | 7        | Green             | Green                       | Red                     | Green                        | Red    | Green      | Yellow         | Orange           | Green         | Red          | Yellow            | Green                   | Orange                   | Yellow                  | Green                     | Red                | Green           |
| SLA18/214  | Former Istil site Rushenden Road/Thomsett Way     | Queenborough/Rush  | 4        | Green             | Green                       | Red                     | Green                        | Red    | Green      | Green          | Yellow           | Green         | Red          | Yellow            | Green                   | Orange                   | Green                   | Green                     | Red                | Green           |
| SLA18/199  | West Street, Queenborough                         | Queenborough/Rush  | 1        | Green             | Green                       | Red                     | Green                        | Red    | Green      | Orange         | Orange           | Green         | Red          | Yellow            | Green                   | Orange                   | Red                     | Green                     | Red                | Green           |
| SLA18/180  | Nil Desperandum Rushenden Hill                    | Queenborough/Rush  | 1        | Green             | Green                       | Red                     | Green                        | Red    | Green      | Orange         | Orange           | Green         | Red          | Yellow            | Green                   | Yellow                   | Green                   | Green                     | Orange             | Green           |
| SLA18/061  | Land at Queenborough Road                         | Queenborough/Rush  | 1        | Yellow            | Green                       | Red                     | Green                        | Red    | Green      | Green          | Yellow           | Green         | Red          | Yellow            | Green                   | Green                    | Green                   | Orange                    | Orange             | Green           |
| SLA18/032  | Neats Court, Queenborough Road                    | Queenborough/Rush  | 0        | Yellow            | Green                       | Red                     | Green                        | Red    | Green      | Green          | Yellow           | Green         | Red          | Yellow            | Green                   | Green                    | Red                     | Green                     | Orange             | Green           |
| SLA18/179  | The Foundary, Rushenden Road                      | Queenborough/Rush  | 0        | Green             | Green                       | Red                     | Green                        | Red    | Green      | Yellow         | Orange           | Green         | Red          | Yellow            | Green                   | Orange                   | Yellow                  | Green                     | Red                | Green           |
| SLA18/027  | Land at Radfield Farm, London Road                | Radfield           | 3        | Red               | Orange                      | Yellow                  | Green                        | Yellow | Yellow     | Yellow         | Yellow           | Green         | Yellow       | Yellow            | Orange                  | Orange                   | Red                     | Yellow                    | Green              | Green           |

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|------------|---|----------------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/172  | Otterham Quay, Otterham Quay Lane                   | Rainham              | 4        | Red               | Orange                      | Red                     | Orange                       | Red    | Yellow     | Orange         | Red              | Green         | Red          | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/098  | Land at Otterham Quay Lane                          | Rainham              | 2        | Red               | Orange                      | Red                     | Orange                       | Red    | Yellow     | Orange         | Red              | Green         | Yellow       | Yellow            | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/052  | Rushett Farm Buildings, Rushett Lane                | Rushett              | 0        | Red               | Yellow                      | Green                   | Green                        | Green  | Orange     | Red            | Red              | Orange        | Green        | Yellow            | Yellow                  | Yellow                   | Yellow                  | Orange                    | Green              | Red             |
| SLA18/147  | Land at Forstal Farm (West), Selling Road           | Selling              | 11       | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Green          | Red              | Green         | Green        | Orange            | Orange                  | Green                    | Orange                  | Orange                    | Green              | Red             |
| SLA18/095  | Norham Farm, Selling Road                           | Selling              | 2        | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Green          | Red              | Green         | Green        | Orange            | Green                   | Green                    | Red                     | Orange                    | Green              | Red             |
| SLA18/092  | Land West of Norham Farm, Selling Road              | Selling              | 1        | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Green          | Red              | Green         | Green        | Orange            | Green                   | Yellow                   | Orange                  | Orange                    | Green              | Red             |
| SLA18/148  | Land at Forstal Farm (East), Selling Road           | Selling/Neames Forst | 7        | Red               | Green                       | Green                   | Orange                       | Green  | Orange     | Green          | Red              | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Orange                    | Green              | Red             |
| SLA18/014  | Danley Farm, Drove Road                             | Sheerness            | 51       | Green             | Green                       | Red                     | Yellow                       | Yellow | Green      | Green          | Green            | Green         | Red          | Yellow            | Green                   | Green                    | Yellow                  | Green                     | Red                | Green           |
| SLA18/134  | Stocks Paddock                                      | Sheldwich            | 0        | Red               | Yellow                      | Green                   | Green                        | Green  | Orange     | Green          | Orange           | Orange        | Green        | Red               | Yellow                  | Red                      | Red                     | Red                       | Green              | Red             |
| SLA18/225  | South East Sittingbourne                            | Sittingbourne        | 804      | Red               | Red                         | Red                     | Orange                       | Red    | Green      | Green          | Green            | Green         | Yellow       | Red               | Red                     | Red                      | Red                     | Orange                    | Orange             | Red             |
| SLA18/137  | Land between A2 Bapchild and Northern Relief Road   | Sittingbourne        | 92       | Red               | Red                         | Red                     | Green                        | Red    | Green      | Green          | Green            | Green         | Yellow       | Red               | Red                     | Red                      | Red                     | Yellow                    | Orange             | Green           |
| SLA18/182  | Land North of Quinton Road (See SW/022)             | Sittingbourne        | 61       | Red               | Red                         | Red                     | Orange                       | Orange | Green      | Green          | Green            | Green         | Yellow       | Red               | Orange                  | Red                      | Red                     | Green                     | Orange             | Red             |
| SLA18/218  | North East Sittingbourne                            | Sittingbourne        | 51       | Red               | Orange                      | Red                     | Green                        | Red    | Yellow     | Yellow         | Yellow           | Yellow        | Orange       | Red               | Red                     | Yellow                   | Red                     | Green                     | Red                | Green           |
| SLA18/217  | Land West of Wises Lane (see also SW/437)           | Sittingbourne        | 34       | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Red               | Orange                  | Red                      | Red                     | Green                     | Green              | Orange          |
| SLA18/017  | Land at Ufton Court Farm, Starveacre Lane           | Sittingbourne        | 27       | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Red               | Red                     | Yellow                   | Red                     | Green                     | Green              | Orange          |
| SLA18/139  | Land at South-West Sittingbourne                    | Sittingbourne        | 12       | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Red                      | Yellow                  | Green                     | Green              | Orange          |
| SLA18/184  | Land At Pheasant Farm, East Of Sheppey Way, Bobbing | Sittingbourne        | 10       | Red               | Orange                      | Orange                  | Yellow                       | Orange | Green      | Yellow         | Yellow           | Green         | Green        | Yellow            | Yellow                  | Green                    | Red                     | Green                     | Orange             | Green           |
| SLA18/215  | Crown Quay Lane                                     | Sittingbourne        | 8        | Green             | Red                         | Orange                  | Yellow                       | Yellow | Green      | Green          | Green            | Green         | Red          | Orange            | Yellow                  | Orange                   | Yellow                  | Green                     | Orange             | Green           |
| SLA18/021  | Chilton Manor Farm, Highsted Road                   | Sittingbourne        | 7        | Red               | Orange                      | Green                   | Green                        | Green  | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Yellow                  | Yellow                    | Yellow             | Yellow          |
| SLA18/112  | Land at Sittingbourne Golf Centre, Church Road      | Sittingbourne        | 6        | Red               | Orange                      | Red                     | Green                        | Red    | Orange     | Orange         | Orange           | Yellow        | Red          | Yellow            | Red                     | Red                      | Red                     | Green                     | Orange             | Green           |
| SLA18/185  | Land at Great Grovehurst Farm                       | Sittingbourne        | 5        | Red               | Orange                      | Orange                  | Yellow                       | Orange | Green      | Green          | Orange           | Green         | Green        | Yellow            | Yellow                  | Green                    | Red                     | Green                     | Orange             | Green           |
| SLA18/233  | Land adjacent to Cryalls Lane, Sittingbourne        | Sittingbourne        | 4        | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Yellow                  | Green                     | Green              | Orange          |
| SLA18/222  | Land at Manor Farm, Key Street                      | Sittingbourne        | 2        | Red               | Orange                      | Green                   | Orange                       | Green  | Yellow     | Yellow         | Green            | Yellow        | Green        | Yellow            | Orange                  | Yellow                   | Yellow                  | Green                     | Green              | Orange          |

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|------------|---|------------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/195  | 152 Staplehurst Road                                      | Sittingbourne    | 2        | Red               | Red                         | Green                   | Yellow                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Green                     | Green              | Green           |
| SLA18/175  | Land north of Key Street, Sittingbourne                   | Sittingbourne    | 2        | Red               | Red                         | Green                   | Yellow                       | Green  | Yellow     | Green          | Green            | Green         | Orange       | Yellow            | Yellow                  | Yellow                   | Green                   | Green                     | Green              | Yellow          |
| SLA18/208  | Former McDonald's Mailing Centre, Staplehurst Road        | Sittingbourne    | 2        | Red               | Red                         | Green                   | Yellow                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Yellow                   | Green                   | Green                     | Green              | Green           |
| SLA18/016  | Land Rear of Bramblefield Lane and Grovehurst Road        | Sittingbourne    | 1        | Red               | Red                         | Green                   | Yellow                       | Orange | Green      | Yellow         | Yellow           | Green         | Green        | Yellow            | Yellow                  | Green                    | Yellow                  | Orange                    | Green              | Green           |
| SLA18/230  | Sittingbourne Adult education , College Rd                | Sittingbourne    | 1        | Green             | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Yellow            | Yellow                  | Green                    | Red                     | Green                     | Green              | Orange          |
| SLA18/227  | 45 Key Street   | Sittingbourne    | 0        | Red               | Red                         | Green                   | Yellow                       | Green  | Yellow     | Green          | Green            | Green         | Red          | Yellow            | Yellow                  | Yellow                   | Green                   | Green                     | Green              | Yellow          |
| SLA18/196  | 35, High Street, Milton Regis                             | Sittingbourne    | 0        | Green             | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Yellow                  | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/201  | Central Avenue  | Sittingbourne TC | 1        | Green             | Red                         | Green                   | Yellow                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Red               | Green                   | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/216  | Bell House, Bell Road                                     | Sittingbourne TC | 1        | Green             | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/200  | Swale House and environs                                  | Sittingbourne TC | 1        | Green             | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/170  | Former Bus Depot, East Street                             | Sittingbourne TC | 0        | Green             | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Yellow       | Red               | Green                   | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/056  | Land West of Mount Farm Cottages, Staplestreet            | Staplestreet     | 0        | Red               | Green                       | Green                   | Yellow                       | Green  | Yellow     | Green          | Green            | Green         | Green        | Red               | Orange                  | Yellow                   | Red                     | Red                       | Green              | Green           |
| SLA18/183  | Land at Frognal Lane                                      | Teynham          | 31       | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/025  | Land West of Frognal Lane                                 | Teynham          | 24       | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Red                      | Red                     | Green                     | Green              | Green           |
| SLA18/106  | Land at Barrow Green Farm, London Raod                    | Teynham          | 13       | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Red                     | Green                     | Green              | Green           |
| SLA18/116  | Land South of London Road/West of Lynsted Lane            | Teynham          | 6        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Red                     | Green                     | Green              | Green           |
| SLA18/122  | Land at Claxfield Road (Site 1)                           | Teynham          | 6        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Red                     | Green                     | Green              | Green           |
| SLA18/190  | Land East of Station Road                                 | Teynham          | 4        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Red                     | Green                     | Green              | Green           |
| SLA18/236  | Land to the north of Vigo Cottage, Lynsted Lane, Teynham  | Teynham          | 3        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Red                     | Green                     | Green              | Green           |
| SLA18/055  | Land at Lynsted Lane                                      | Teynham          | 2        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Yellow                   | Red                     | Green                     | Green              | Green           |
| SLA18/153  | Land south of Dover Castle Inn, A2 London Road/Cellarhill | Teynham          | 1        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Orange                   | Red                     | Green                     | Green              | Green           |
| SLA18/213  | BarrowGreen Farm, Barrow Green, Teynham                   | Teynham          | 1        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Yellow            | Green                   | Yellow                   | Green                   | Green                     | Green              | Green           |
| SLA18/010  | Land at Cellar Hill                                       | Teynham          | 1        | Red               | Red                         | Green                   | Yellow                       | Green  | Green      | Green          | Green            | Green         | Green        | Red               | Green                   | Orange                   | Red                     | Green                     | Green              | Green           |

| SHLAA ref. | Name / address   | Location        | Hectares | Agricultural land | Air quality management area | Special Protection Area | Special Area of Conservation | SSSI   | GP Surgery | Primary school | Secondary school | Train station | Flood zone 2 | Conservation area | Grade 1 listed building | Grade 2* listed building | Grade 2 listed building | Registered park or garden | Scheduled monument | Kent Downs AONB |
|------------|--|-----------------|----------|-------------------|-----------------------------|-------------------------|------------------------------|--------|------------|----------------|------------------|---------------|--------------|-------------------|-------------------------|--------------------------|-------------------------|---------------------------|--------------------|-----------------|
| SLA18/123  | Land at Claxfield Road (Site 2)                          | Teynham         | 1        | Red               | Red                         | Yellow                  | Green                        | Yellow | Green      | Orange         | Orange           | Green         | Green        | Yellow            | Green                   | Red                      | Red                     | Yellow                    | Green              | Green           |
| SLA18/237  | Land to the north of Vigo Cottage, Lynsted Lane, Teynham | Teynham         | 0        | Red               | Red                         | Yellow                  | Green                        | Yellow | Green      | Orange         | Orange           | Green         | Green        | Yellow            | Green                   | Red                      | Yellow                  | Orange                    | Green              | Yellow          |
| SLA18/022  | Land at Hearts Delight Road                              | Tunstall        | 7        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Red                     | Green                    | Red                     | Green                     | Green              | Red             |
| SLA18/044  | Land adj Filmer House, Wren's Rd and Hearts Delight Rd   | Tunstall/Borden | 8        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Orange                   | Red                     | Green                     | Green              | Red             |
| SLA18/164  | Land South of Hearts Delight, Hearts Delight Road        | Tunstall/Borden | 5        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Green                    | Red                     | Green                     | Green              | Red             |
| SLA18/046  | Land South of Hearts Delight, Hearts Delight Road        | Tunstall/Borden | 2        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Yellow                   | Green                   | Green                     | Green              | Red             |
| SLA18/045  | Land Opposite Uplands, Hearts Delight Road               | Tunstall/Borden | 1        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Yellow                   | Red                     | Green                     | Green              | Red             |
| SLA18/043  | Land Adjacent Sunnyside, Wren's Road                     | Tunstall/Borden | 1        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Yellow                   | Red                     | Green                     | Green              | Red             |
| SLA18/042  | Land Adjacent Wren's Oast, Sutton Baron Road             | Tunstall/Borden | 1        | Red               | Yellow                      | Green                   | Orange                       | Green  | Yellow     | Green          | Green            | Yellow        | Green        | Red               | Orange                  | Yellow                   | Red                     | Green                     | Green              | Red             |
| SLA18/013  | Land East of Chaffes Lane                                | Upchurch        | 6        | Red               | Yellow                      | Red                     | Orange                       | Red    | Green      | Yellow         | Red              | Yellow        | Green        | Yellow            | Orange                  | Red                      | Green                   | Green                     | Orange             | Yellow          |
| SLA18/119  | Land at Long Field                                       | Upchurch        | 2        | Red               | Yellow                      | Red                     | Orange                       | Red    | Green      | Green          | Red              | Yellow        | Green        | Yellow            | Orange                  | Red                      | Green                   | Green                     | Orange             | Yellow          |
| SLA18/087  | Land Adjoining/Rear of Jubilee Fields                    | Upchurch        | 2        | Red               | Yellow                      | Red                     | Orange                       | Red    | Green      | Yellow         | Red              | Yellow        | Green        | Yellow            | Orange                  | Red                      | Green                   | Green                     | Orange             | Yellow          |
| SLA18/099  | Land South of 93 Chaffes Lane                            | Upchurch        | 1        | Red               | Yellow                      | Red                     | Orange                       | Red    | Green      | Yellow         | Red              | Yellow        | Green        | Yellow            | Orange                  | Red                      | Green                   | Green                     | Orange             | Yellow          |
| SLA18/051  | Land at Wetham Green                                     | Upchurch        | 1        | Red               | Yellow                      | Red                     | Orange                       | Red    | Yellow     | Green          | Red              | Yellow        | Yellow       | Orange            | Green                   | Green                    | Green                   | Green                     | Red                | Green           |
| SLA18/151  | Land at Warden, South of Knoll Way                       | Warden          | 7        | Yellow            | Green                       | Red                     | Green                        | Red    | Green      | Orange         | Red              | Red           | Yellow       | Green             | Green                   | Green                    | Green                   | Green                     | Yellow             | Green           |
| SLA18/020  | Monkshill Farm, Monkshill Road                           | Waterham        | 27       | Yellow            | Green                       | Red                     | Red                          | Red    | Orange     | Orange         | Red              | Orange        | Yellow       | Yellow            | Green                   | Yellow                   | Orange                  | Red                       | Red                | Green           |

\* The version of SLA18/113 is as per the version in the SHLAA