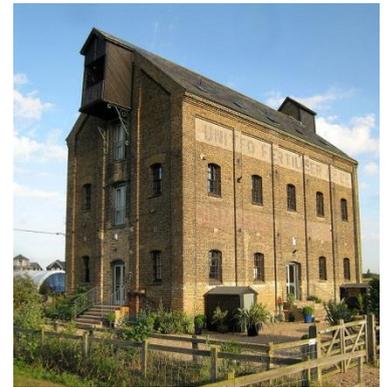


Strategic Environmental Assessment (SEA) of the Faversham Creek Neighbourhood Plan



Environmental Report

June 2015

REVISION SCHEDULE

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Cover images

Top left: Faversham Creek (Gareth Williams)

To right: Oyster Bay House, Faversham Creek (Robert Cutts)

Bottom right: Belvedere Wharf, Faversham Creek (Gareth Williams)

Bottom left: The Albion public house, Faversham Creek (Gareth Williams)

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM has been commissioned by Swale Borough Council (SBC) to undertake Strategic Environmental Assessment (SEA) in support of the emerging Faversham Creek Neighbourhood Plan (NP).
- 1.1.2 The Faversham Creek NP is being drawn up using the powers in the Localism Act 2011. The NP is being prepared by the Faversham Town Council which was recognised by SBC as the 'relevant body' for the Faversham Creek NP area. The Faversham Creek NP, if adopted, would present planning policy and guidance for the neighbourhood area. Alongside the Swale Local Plan, it will provide a framework for determining planning applications.
- 1.1.3 SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse environmental effects and maximising the positives. It has been determined by SBC that SEA is required.¹

2 SEA EXPLAINED

- 2.1.1 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the European SEA Directive.²
- 2.1.2 In accordance with the SEA Regulations, a report (the 'Environmental Report') must be published for consultation alongside the draft plan that essentially presents information on the likely significant effects of implementing the plan, and reasonable alternatives.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

3 THIS ENVIRONMENTAL REPORT

- 3.1.1 This document is the Environmental Report for the Faversham Creek NP and hence must provide certain specified information. Essentially, there is a need to answer four questions:
1. What is the scope of the SEA?
 - Parameters for the SEA were established through 'scoping' work at the outset of the process. Scoping involves: review of the environmental context and baseline; analysis of key environmental issues / objectives; and consultation with designated agencies.
 2. What has plan-making / SEA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SEA iteration. 'Reasonable alternatives' must have been assessed.
 3. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?
- 3.1.2 Each of the questions is answered in turn below. Table 1.1 explains more about the regulatory basis for answering these questions.

¹ SEA is not an automatic requirement for neighbourhood plans. Rather, SEA is a requirement where an initial 'screening' assessment identifies the potential for the neighbourhood plan to result in significant environmental effects.

² Directive 2001/42/EC

³ Schedule 2 of the Regulations lists the information that must be presented in the Environmental Report.

Table 1.1: Questions answered by the Environmental Report, in accordance with regulatory⁴ requirements

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

N.B. The right-hand column of Table 1.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

PART 1:

WHAT IS THE SCOPE OF THE SEA?

4 INTRODUCTION TO PART 1

4.1.1 Part 1 of this report aims to introduce the reader to the scope of the SEA. In particular, and as required by the Regulations, the following chapters answer the series of questions below.

- What is the plan seeking to achieve?
- What is the context?
- What is the baseline?
- What are the key issues and objectives that should be a focus of SEA?

4.1.2 **Chapter 5** answers the first question by listing the objectives of the Faversham Creek NP. The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 15 sustainability topics:

- | | |
|-------------------------|-------------------------------|
| • Air | • Landscape |
| • Biodiversity | • Local economy |
| • Climate change | • Population |
| • Cultural heritage | • Soil |
| • Crime and safety | • Transport and accessibility |
| • Employment and skills | • Waste |
| • Health | • Water |
| • Housing | |

4.1.3 Rather than focusing strictly on the environment, the topics cover all three dimensions of sustainable development, i.e. the environmental, social and economic pillars. This is appropriate given that sustainable development is a stated objective for neighbourhood plans.⁵ Extending the scope of an SEA in this way does not mean that environmental issues are less likely to achieve prominence in plan-making.

4.2 Consultation on the scope

4.2.1 The Regulations require that “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁶

4.2.2 These authorities were consulted on the SEA scope in 2008. Specifically, the authorities were presented with a Sustainability Appraisal (SA) Scoping Report, which presented scoping information relevant to the emerging Faversham Creek Area Action Plan.⁷ Whilst scoping work undertaken in 2008 related to the Area Action Plan SA process, it is entirely relevant to the current Neighbourhood Plan SEA process. The Faversham Creek AAP covered the same area as the current Faversham Creek NP.

⁵ At Examination all neighbourhood plans must demonstrate that they meet the ‘basic condition’ of contributing to sustainable development.

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

⁷ See

www2.swale.gov.uk/media/adobepdf/1%2Fg%2FScoping_report_addendum_1_Faversham_AAP_v2_December_08_without_App.pdf

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The Environmental Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

5.1.1 The purpose of the Faversham Creek NP is to provide a strategic and long-term plan for the area that reflects the values of those living and working in the area. While the NP recognises the need for sustainable development, it also acknowledges the distinctive nature of the area, particularly its heritage and townscape value.

5.1.2 The NP's vision for the area is that:

*Faversham Creek is a place where we can celebrate the town's rich history and attractive appearance; where we can enjoy spending time, both on and off the water; where boats, residents and visitors want to be; where developments integrate the needs of people and nature; and where there is a distinctive character and identity, rooted in traditional industries and enriched by new businesses and uses.*⁸

5.1.3 The NP is being developed in-line with 16 objectives, including:

- The sluicing/flushing functions of the creek;
- Managing the flood risk in the area;
- Reinforcing the area's importance (both historic and contemporary) for maritime activity;
- Providing sustainable futures for important local buildings;
- Avoiding significant harm to areas of ecological importance;
- Creating a diversity and vibrancy of land uses;
- Maintaining and enhancing the surrounding townscape; and
- Pedestrian and cycle links.

5.2 What the plan is not seeking to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the development management process). The strategic nature of the plan is reflected in the scope of the SEA.

⁸ Faversham Town Council (2014) Faversham Creek Neighbourhood Plan- Submission version [online] available at: <http://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Faversham-Creek/119Q141106Submission-Plan.pdf> (Accessed 13 January 2015).

6 WHAT IS THE CONTEXT?

The Environmental Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate scope of an SEA involves reviewing context messages in relation to: broad problems / issues; and objectives, i.e. 'things that are aimed at or sought'. Messages from the review are presented below under the topic headings introduced above. Specific consideration is given to international and national context messages, in-line with requirements.⁹ National context messages are established first and foremost by the National Planning Policy Framework (NPPF).¹⁰

6.2 Air

6.2.1 The NPPF makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants; and states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account air quality management areas (AQMAs) and cumulative impacts on air quality.

6.3 Biodiversity

6.3.1 The NPPF and other policy documents emphasise the need to protect important sites, plan for green infrastructure and plan for ecological networks at 'landscape scales' taking account the anticipated effects of climate change. National policy reflects the commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

6.4 Climate change

6.4.1 In its 2007 strategy on climate change, the European Commission recommends a package of measures to limit global warming to 2°C. On energy, the Commission recommends that the share of renewable energy grows to 20% by 2020 against the 1990 baseline. In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020. The NPPF emphasises the key role for planning in securing radical reductions in greenhouse gas emissions, including in terms of meeting the targets set out in the Climate Change Act 2008. Plan-making should, for example, support efforts to:

- Reduce transport emissions, by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport.
- Deliver infrastructure such as low-carbon district heating networks.
- Increase energy efficiency in the built environment.

6.4.2 The NPPF also requires local plans to take account of the effects of climate change in the long term, taking into account factors such as 'flood risk, coastal change, water supply and changes to biodiversity and landscape. Planning authorities are encouraged to 'adopt proactive strategies' to adaptation.

⁹ Schedule II(e)

¹⁰ DCLG (2012) National Planning Policy Framework [online] available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

6.5 Cultural heritage

- 6.5.1 There is a need to set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

6.6 Crime and safety

- 6.6.1 The NPPF highlights the importance of crime and safety in relation to good design and in the promotions of healthy communities. The emphasis is that good design should create safe accessible environments where 'crime and disorder, and the fear of crime' are decreased and do not impact upon the quality of life or sense of community within a place. Transport infrastructure should provide safe options for all road users and enable minimal conflict between road users especially traffic and cyclists or pedestrians.

6.7 Employment and skills

- 6.7.1 The NPPF highlights the importance of considering market and economic signals and understanding business needs, including in terms of skills. Employment opportunities in rural areas should be supported, including through support for tourism where appropriate.

6.8 Health

- 6.8.1 Planning for good health is high on the agenda, in light of the 'Marmot Review' of health inequalities in England, which concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'. Planning for good health can complement planning for biodiversity (green infrastructure) and climate change mitigation (walking/cycling).

6.9 Housing

- 6.9.1 Local planning authorities should significantly boost the supply of housing and seek to ensure that 'full, objectively assessed needs for market and affordable housing' are met. With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes. Meeting housing needs in rural areas and 'rural exception sites' can be necessary.
- 6.9.2 Planning policy for traveller sites (2012) sets out the government's planning policy for traveller sites and should be used in conjunction with the NPPF. It aims to ensure travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites - using a robust evidence base and effective engagement with stakeholder groups and other local authorities – and to allocate sites accordingly. The government's aims include:
- Ensuring that local plans include, fair, realistic and inclusive policies;
 - Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
 - Having due regard for the protection of local amenity and environment.

6.10 Landscape

- 6.10.1 The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines landscape as: “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.” It recognises that the quality of all landscapes matters – not just those designated as ‘best’ or ‘most valued’. The NPPF refers to the need to protect and enhance valued landscapes and identifies that major development should be avoided in designated areas, unless in the public interest.
- 6.10.2 In relation to the coast, the NPPF states that local planning authorities should maintain the character of such areas by ‘protecting and enhancing distinctive landscapes’, including in those areas that have been defined as Heritage Coast. Authorities should also look to improve ‘public access to and enjoyment of the coast’.

6.11 Local economy

- 6.11.1 The planning system can make a contribution to building a strong, responsive economy by ‘ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’. The NPPF also emphasises the need to:
- Capitalise on ‘inherent strengths’, and meet the ‘twin challenges of global competition and of a low carbon future’.
 - Support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.
 - Support competitive town centre environments, and only consider edge of town developments where they have good access and there will not be detrimental impact to town centre viability in the long term.
- 6.11.2 Furthermore, the NPPF states that local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.

6.12 Population

- 6.12.1 A core planning principle is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’. The NPPF also emphasises the need to: facilitate social interaction and creating healthy, inclusive communities; promote retention and development of community services / facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres.
- 6.12.2 Planning policy for traveller sites (2012) should be read in conjunction with the NPPF and emphasises the need to provide for travellers in local plans. The size of the traveller population should be used to decide upon the number of pitches and/or plots required within a specific area. Policies created must be fair and facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

6.13 Soil

- 6.13.1 There is a need to encourage the effective use of land through the reuse of land which has been previously developed, provided that this is not of high environmental value. The NPPF requires an approach to housing density that reflects local circumstances.
- 6.13.2 The NPPF calls upon the planning system to protect and enhance soils. It expects planning authorities ‘to take into account the economic and other benefits of the best and most versatile agricultural land. Where development on agricultural land is necessary, planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.’

- 6.13.3 Also, new or existing development should also be prevented from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land’.

6.14 Transport and accessibility

- 6.14.1 The NPPF notes that transport and travel policies will have an important role in ‘contributing to wider sustainability and health objectives’. It calls for the transport system to be balanced ‘in favour of sustainable transport’, with developments to be located and designed to facilitate these modes of travel. In order to minimise journey lengths for employment, shopping, leisure and other activities, the NPPF calls for planning policies that aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

6.15 Waste

- 6.15.1 National Planning Policy for Waste was recently published, and it is the intention that it should be read in conjunction with the NPPF, the National Waste Management Plan for England and national policy statements for waste water and hazardous waste. All local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management. The National Policy emphasises: by driving waste management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport; providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste; helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and ensuring the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

6.16 Water

- 6.16.1 In terms of flooding, the NPPF calls for development to be directed away from areas highest at risk, with development ‘not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere. The NPPF also states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk from coastal change.
- 6.16.2 The Flood and Water Management Act 2010 highlights that alternatives to traditional engineering approaches to flood risk management include: Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings); Sustainable drainage systems (SuDS); Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; and Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion.
- 6.16.3 Within the Thames River Basin District, urban growth can have ‘a wide range of impacts on virtually all aspects’ of the water environment. Badly managed growth could cancel out positive achievements; however, development can also enable improvements to the water environment. Sustainable Drainage Systems (SuDS) are encouraged.
- 6.16.4 In relation to water resources, the NPPF states that local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.

7 WHAT IS THE SUSTAINABILITY BASELINE?

The Environmental Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan;
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review expands on the consideration of problems/issues identified through context review so that they are locally specific. Once the baseline has been established, it becomes possible to assess the likelihood of a proposal resulting in significant effects.

7.2 Air

7.2.1 The NPPF makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants; and states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account air quality management areas (AQMA) and cumulative impacts on air quality.

7.2.2 Transport and industry are the borough's main air pollution emitters with four AQMA declared between 2009 and 2013 in Newington, Ospringe and Sittingbourne.¹¹

7.2.3 While there is not an AQMA designated in Faversham, traffic congestion within and around Faversham town centre does contribute to reduced air quality.

7.3 Biodiversity

7.3.1 The Swale and Faversham Creek area includes the largest remaining areas of freshwater grazing marsh in Kent and is representative of the estuarine habitats found on the north Kent coast. The marsh habitats comprise mainly of mudflats, salt marsh and shell beaches. Faversham Creek supports the most extensive area of salt marsh in the South Swale.

7.3.2 The marshes are particularly notable for the internationally important numbers of wintering and passage wildfowl and waders, and there are also important breeding populations of a number of bird species. There are also outstanding groupings of plants and invertebrates across the marshes.

7.3.3 The Swale, including most of the creek beyond Iron Wharf/Brents Boatyard is within the designated Site of Special Scientific Interest (SSSI). This is also designated a Ramsar site and a Special Protection Area (SPA) under the EC Directive 79/409.

7.3.4 Faversham Creek also passes through urban environments of Faversham which contain individual nature conservation areas of importance. The creek is used for feeding by waders and wildfowl. The salt marsh and grazing marsh are used by birds as roost and nesting sites.

¹¹ Swale Borough Council (2014) Bearing Fruits 2031: The Swale Borough Local Draft Plan Part 1 [online] available at: http://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/Swale-Borough-Local-Plan-Publication-Version-December-2014-updated-221214-Chapter-7-optimised.pdf?bcsi_scan_E956BCBE8ADBC89F=1 (accessed on 01/15)

7.4 Climate change

- 7.4.1 Over the past century, average temperature has risen by 0.5°C and summer rainfall has decreased. Around the South East region the coastline the sea level is rising, threatening important coastal habitats and increasing the risk of flooding.
- 7.4.2 Figures from the Department of Energy and Climate Change (DECC) show that national greenhouse gas emissions are reducing. Nationally, greenhouse gas emissions have decreased by 26% since 1990¹². Between 2005 and 2012, carbon dioxide (CO₂) emissions in Kent have decreased by 13.2% while in Swale borough they have decrease by 19.5% over the same period.¹³
- 7.4.3 Within Swale there is a high dependence on lorry movements on the borough's roads due to the location of depot's within the borough, Sheerness Docks and the close proximity to the Port of Dover / the Channel Tunnel. 23% of the industrial and commercial carbon emissions for Kent are in Swale borough (945 kt per year). The poor public transport system across the borough also creates a high level of car dependency.
- 7.4.4 The borough, and particularly Sheppey and the coastline are affected by sea level change. Historic maps show how the coastline has changed over many years. These illustrate areas of land in the west of the borough north of the Barksore Marshes, e.g. Millford Hope Marsh and Greenborough Marsh, as part of the mainland. Whilst these were unsettled they were crossed by trackways and were probably used for summer grazing. Now they are either remnants of saltmarsh or lost to the mudflats and only visible at low tide. On the northern and eastern coasts of Sheppey the effects of coastal erosion are particularly apparent at Warden Point where the clay coastline is slipping into the sea.

7.5 Cultural heritage

- 7.5.1 Faversham Creek is a historically important location and is the reason for the existence of the town of Faversham. Historical records have identified Romano-British occupation down by the Stonebridge, the Syndale area of Faversham and in other parts of the town. There is documentary evidence of Saxon activity along the creek and Faversham appears to have been a royal estate centre, as well as the rich Jutish burial ground just southwest of the creek. In the 12th century the creek was overlooked by a great royal abbey on the east and a priory on the west bank. The 16th century saw was a period when Faversham Port was used to ship much of London's grain to other countries. During the 17th and 18th centuries the creek was also lined with wharfs, warehouses and workshops, and busy with shipping activity for oyster fishing, gunpowder manufacturing and brewing.
- 7.5.2 The early modern period brought the advent of the railways, replacing shipping as the primary mode of transport. This decreased shipping traffic along the creek. The creek was continued to be used for bulky goods such as bricks. During this period the creekside became dominated by industries such as cement brewing and gas works. However over time these industries faced decline as the centre of attention of industry focused on the railway and the A2.
- 7.5.3 Over time the route and boundary of the creek has changed. The creek would have once been a lot wider, such as evidence suggests that where the former gasworks site was (now a Morrisons supermarket and the Shepherd Neame brewery) the original creek boundary was well back from the current position, probably following the line of North Lane / Conduit Street.

¹² Department of Energy & Climate Change (2014) Greenhouse Gas Inventory overview factsheet [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/319485/Overview_2012.pdf (accessed 01/2015).

¹³ Department of Energy & Climate Change (2014) Emissions within the scope of influence of Local Authorities for 2005-12 [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates> (accessed 01/2015).

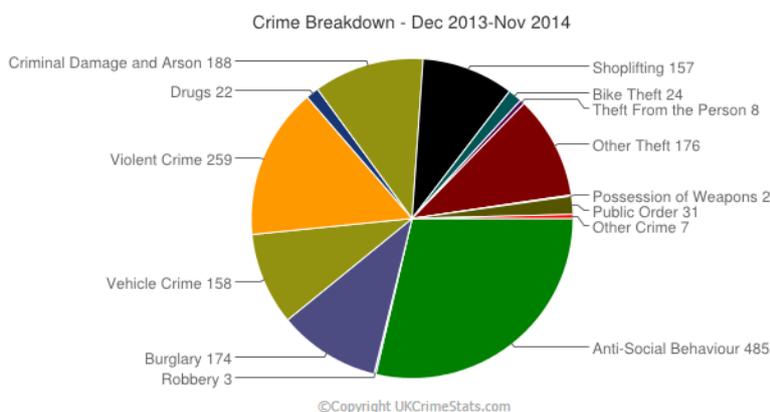
- 7.5.4 Downstream of the swing bridge, it is thought that the medieval creek side was well back from the current position, at the break of slope at the gardens of west side Abbey Street houses. From Iron Side Wharf to the junction with Oare Creek there is evidence that the ground has been significantly drained in the last 200 years. It is at the point where Thorn Creek enters the main creek that evidence suggests the presence of the Saxon wharf.
- 7.5.5 At the site of Faversham Abbey on the south-eastern bank of the creek, remains survive of the Faversham Abbey including two timber-framed barns at the farmstead (Abbey Farm) and remains of an Iron Age farmstead. These are one of the best surviving medieval farmsteads in the country, an “outstanding historical sequence of vernacular agricultural building forms, methods and materials”.
- 7.5.6 A number of listed buildings are present within the NP area, these include:
- Faversham Chandlery
 - Provender Mill
 - Oyster Bay warehouse
 - Standard Quay buildings
 - TS Hazard
- 7.5.7 The banks of the creek contain remains of old disused jetties and moorings. Numerous wrecks are recorded between the mouth of the creek and the Swale. Most of these are the remains of barges, there is a high potential for wrecks to exist in the silts dating back to historic times. At Standard Quay and Iron Wharf activities associated with the running of boats and barges continues, albeit in association with recreational boating rather than commercial. Here, the town’s traditional character is maintained.
- 7.5.8 Iron Wharf adjoins Standard Quay to the north and alongside Iron Wharf is Chambers Dock where the course of Cooksditch Stream has been deepened and widened as it adjoins the creek.
- 7.5.9 The NP area lies within the boundary of the Faversham Conservation Area, designated in September 2004. A detailed appraisal of the conservation area has been undertaken and informed its designation. The conservation area appraisal states that despite the history of the waterside activity of the creek, the legacy of historical buildings is relatively thin. Standard Quay is today the town’s only traditional working waterside environment where spritsail barges, once common place on the Thames and Medway estuaries, still visit. On the quay, 18th and 19th century weatherboard warehouses-cum-workshops still stand, distinctive for their gables, loft and loading doors, and battered looking corrugated iron roofs. There is also a 17th century warehouse on the eastern edge of the quay. An Article 4(2) Direction is in place across the conservation area.¹⁴

¹⁴ Direction made under the Town and Country Planning (General Permitted Development) Order 1995.

7.6 Crime and safety

7.6.1 Swale is a relatively safe borough, with crime having decreased in recent years. The highest crime type for Swale was criminal damage, with violence against a person the next most common type of crime.

7.6.2 Crime statistics have decreased from 2011 to 2014 for Faversham, with the chart below illustrating the crime breakdown for 2014.



7.6.3 The highest crime deprivation in the borough is in Sheerness, Leysdown, Kemsley, Milton Regis, Murston, the rural area around Teynham, part of the St. Ann’s ward and part of the Abbey ward in Faversham.¹⁵

7.7 Employment and skills

7.7.1 Within the Faversham and Swale East area there is currently a substantial shortfall in jobs relative to the resident workforce, generating a heavy reliance on out-commuting for employment. Employment growth over recent years has been minimal and Faversham’s economic development is hindered by an inability to deliver ‘market ready’ sites and premises. This in turn is contributing to a poor market image as a business location, despite being well positioned on the transport network and offering high quality built and natural environments.

7.7.2 Economic Development Strategy for Swale states that the role of Faversham as a market town and employment centre “[will provide] a real choice for local people to live and work locally”.

7.7.3 Faversham is a key area where the Council wishes to significantly enhance the role as a market town and employment centre to provide a choice for people to live and work locally as currently there is a high reliance on out-commuting for employment. 56% of the borough’s workforce working outside Swale. Currently in Faversham there is a substantial shortfall in jobs relative to the resident workforce.

7.7.4 A key employment area for Faversham, although outside of the NP area boundary, is the Whitstable Road Business Park, reported strong demand. Faversham also has a range of small-scale industrial and distribution activities, and includes the Shepherd Neame brewery. Given its location and proximity to other tourist centres at Canterbury, Whitstable and Herne Bay, Faversham has strong potential to diversify its economy around tourism, especially its food based offer.

¹⁵ Swale BC (2014) Bearing Fruits 2031: The consultation draft Swale Borough Local Plan Part 1: August 2013

- 7.7.5 Within the Faversham wards of Davington Priory, St. Ann's, and Abbey¹⁶ there are significantly more residents economically active than the borough, county or national averages. Values across the wards are largely in line with regional averages. There are significantly more people economically active in the ward of Abbey (73%) than in Davington Priory (63%).¹⁷
- 7.7.6 The number of self-employed residents is lower than the county, regional and national averages, however it is largely in line with borough averages. Again there are significantly more residents self-employed in the wards of Abbey and St. Ann's than in Davington Priory.
- 7.7.7 The level of economically inactive people collectively within Davington Priory, St. Ann's, and Abbey is lower than the borough, county and national position, this is explained through the high number of people in employment. The level of economically inactive residents however is higher than regional values. Again the level of economic inactivity is significantly higher in Davington Priory than the other two wards.
- 7.7.8 The student population of these three wards is significantly lower than the national situation however it reflects the borough position, and the situation that there is no university within Swale or further and higher education facilities. The level of retired residents across the three wards is similar to the borough and county averages, but higher than regional and national values. However, in Abbey ward the level of retired people is lowest.
- 7.7.9 The occupation profile¹⁸ of each ward varies quite considerably, within a significant proportion of Davington Priory's working population employed in elementary occupations (17.6%). This value is significantly higher than borough, county, regional and national values. A higher proportion of residents in the wards of Abbey and St. Ann's are employed in professional occupations (19%), which is line with regional values but higher than all other comparators.

7.8 Health

- 7.8.1 The health of people in Swale is mixed compared with the England average – the early death rate from heart disease and stroke is similar to the England average, whereas estimated levels of adult obesity are worse than the England average.
- 7.8.2 The proportion of people who state that they are in bad or very bad health is significantly higher in Davington Priory than in the wards of St. Ann and Abbey. Davington Priory bad health averages are also significantly higher than borough, regional and national values. Conversely, bad health averages for St. Ann's are significantly lower than all comparators, while values for Abbey ward are largely in line with borough averages.¹⁹ Likewise, 9.5% and 10.5% of residents in the ward of Abbey and Davington Priory respectively are limited a lot with day-to-day activities. These values are significantly higher than borough (8.6%), regional (6.9%) and national (8.3%). The number of residents in St. Ann's ward limited a lot (6.6%) is significantly lower than all comparators.²⁰
- 7.8.3 The 20% most deprived wards in Swale, are mainly on the Isle of Sheppey. There are also several areas of Sittingbourne that fall into the worst 20%; parts of Murston, Milton Regis and Kemsley. A small concentration of relative deprivation is also found in Davington Priory ward in Faversham. The life expectancy for those living in the most deprived areas of Swale is about eight years lower for men, and approximately five years lower for women, than for those living in the least deprived areas.

¹⁶ The NDP area is within the three wards of Davington Priory, St. Ann's, and Abbey but does not cover the entire area of each ward. Reference to these wards is representative of the plan area, giving an overview of the immediate area of Faversham Creek.

¹⁷ ONS (2011) Economic Activity, 2011 (QS601EW).

¹⁸ ONS (2011) Occupation, 2011 (KS608EW).

¹⁹ ONS (2011) General Health, 2011 (QS302EW).

²⁰ ONS (2011) Long-Term Health Problem or Disability, 2011 (QS303EW).

7.9 Housing

- 7.9.1 The household structure in Abbey ward shows a dominance of one person households (35.8%), when compared to borough, regional and national values. St. Ann's and Davington Priory largely reflects the national picture for one person households, with a higher proportion of married couple households with no dependent children largely in line with county and regional values. Across all three wards, Swale and nationally the third greatest proportion of households are married with dependent children.²¹
- 7.9.2 Home ownership with a mortgage is the dominant housing tenure as reflected across the borough and nationally. There is however a significant lower rate of ownership with a mortgage in Davington Priory (27.5%). Within Abbey and St. Ann's wards the second greatest tenure is owned outright, but at a significantly lower rate than borough, regional and national averages. In Davington Priory the second greatest proportion is socially rented (31.2%).

7.10 Landscape

- 7.10.1 The NP area lies within the Greater Thames Estuary and the North Kent Plains Character Areas as identified by Natural England and described in detail in the main Scoping Report. The North Kent Downs lie to the south of Faversham. At the county level Kent County Council have further refined and subdivided these character areas. The NP area falls within the East Swale Marshes designation. This is defined by:
- Open, flat grazing land with broad skies, few landscape features and a strong sense of remoteness, wildness and exposure;
 - Extensive areas of traditional grazing marsh characterised by rough grassland; and
 - Complex system of natural and man-made drainage dykes, pools and fleets.
- 7.10.2 The Council has undertaken a borough-wide landscape assessment, as described in the borough Scoping Report for the Core Strategy, 42 landscape character areas have been identified. The NP area overlaps with landscape character areas 28, 42 and 39:
- Landscape Character Area 28 – Stone Arable Farmlands – lies to the north-west of the NP area and is characterised by a rolling arable landscape with enlarged fields of irregular shape. This is described as a moderately sensitive landscape.
 - Landscape Character Area 42 – Ham Marshes – lies to the north-east of the NP area. It is characterised by extensive unimproved flat freshwater grazing marshes and is described as a highly sensitive landscape.
 - Landscape Character Area 39 – Goodnestone Grasslands – east of Faversham Creek, it lies to the south and east of the NP area. It is a highly sensitive and locally distinct landscape, characterised by grasslands primarily used for grazing sheep. It extends from the northern edge of Faversham and has a “tranquil and unspoilt” character.
- 7.10.3 Faversham's built up environment complements the landscape and natural environment. The creek is surrounded by higher land forming a frame to the creek, reflecting the importance of the urban townscape of Faversham in relation to the creekside environment. Stonebridge Ponds provides an attractive setting for the area, adjacent to the allotments.
- 7.10.4 A Special Landscape Area north of the urban area of the creek is designated.

²¹ ONS (2011) Household Type, 2011 (QS116EW)

7.11 Local economy

- 7.11.1 In Swale which is also reflected in Faversham there is a narrow economic base which is still shaped by traditional industry and, hence, lower skilled (and lower paid) jobs. Increasingly, these are under threat from international competition. There is also a lack of employment in knowledge-driven sectors which are considered crucial to national economic growth.
- 7.11.2 The rural economy has historically been dominated by land-based sector and is still an important part of the borough's economy. However it has long been in decline in employment terms and has been affected in recent years by national agricultural trends. The Employment Land Review (2010) states that there is a significant demand and development interest in the rural area, spread across many small locations.
- 7.11.3 A review of employment sites in 2012 identifies potential development of commercial (employment) space in Faversham at two key sites based on the delivery of a set quantum of housing units needed to support proposals, namely Land adjoining Western Link, Faversham (12,800 m² of employment space and 100 residential units (according to the SHLAA information) and Land at Lady Dane Farm, Love Lane, Faversham (20,000 m² of employment space and 140 dwellings).²²
- 7.11.4 Faversham town centre contains a number of existing employment sites. The largest is the BMM Weston site on the northern side of Faversham Creek. This long-established single-occupier site comprises office and factory premises. The former Frank and Whittome site consists of a number of historic creekside industrial and warehouse buildings, fronting onto Faversham Creek. A former oil depot and bus garage site lies adjacent to Faversham Creek. It previously accommodated an oil storage depot and a small works site for storage/repair of buses and other vehicles and a small office building. The empty site is identified to have limited prospect of new employment development in the future other than any specific demand for creek-side activities.
- 7.11.5 Faversham is identified to contain 12% of the borough's available employment land, which space for more to become available. Faversham has an identified space for offices to meet the small scale needs of businesses.
- 7.11.6 The Faversham Enterprise Partnership (FEP) was set up to promote the economic vitality of Faversham and the surrounding rural area by working with and for the area's business community. Distinctive, varied shopping has long been a hallmark of the Faversham area where small, quirky traders offering diverse products compete alongside the town's full complement of national retailers. That unique offer is still in place today and is getting deeper and wider with a range of excellent shopping in, around and out of the town.
- 7.11.7 Faversham is a popular tourist destination with a multitude of attractions on offer, however the Town has over time turned its back on the creek and visitors are no longer viewing the creek (at the town end) as an attraction.
- 7.11.8 The following tourist attractions are located within Faversham town centre:
- Brewery tours
 - Chart gunpowder mills
 - Faversham pools
 - Museum
 - Shrine of St. Jude
- 7.11.9 Although outside of the NP area boundary, they bring visitors to the area and regeneration of

²² CBRE (2012) Review of employment sites.

the creek through this NP will increase visitors.

- 7.11.10 Faversham’s independent food outlets generate an estimated £2.8 million turnover from local food, comparable with other market towns studied in this project. Yet customer numbers are much lower, as is the number of businesses in the supply chain.²³

7.12 Population

- 7.12.1 There is evidence of an aging population, the three wards of Davington Priory, St. Ann’s and Abbey collectively have 8.6% of their populations aged over 75 years, which is higher than the borough wide proportion of 7.4%. The 45-59 age group contains the largest proportion of residents within the three wards (20%), which is in line with borough averages.²⁴
- 7.12.2 The greatest proportions of the population of the three wards are White British (93.7%), which is higher than the borough average (92.9%).²⁵
- 7.12.3 A significantly greater proportion of the residents within the three wards are female (52%) than male (48%), largely reflecting the borough wide and national picture.²⁶
- 7.12.4 A significantly higher proportion of households in the ward of Davington Priory are deprived in one (34.8%), two (23.5%) and three (8.4%) dimensions when compared to all other comparators.

7.13 Soil

- 7.13.1 At Faversham lie low intervals of Thanet sands with brick earth separated by shallow valleys that have been cut down through the chalk. The town itself is situated on a ridge of chalk overlain by brickearth. No specific contaminated sites have been identified. However, future redevelopment may uncover instances of contamination due to the historic industrial use of some of the creekside wharves.

7.14 Transport and accessibility

- 7.14.1 Transport issues are less acute in Faversham than across much of the rest of the borough. Faversham is only 800 m from the M2, the A2 skirts the fringes of Faversham and the M20 is a 20 minute drive away. Faversham has direct train links to London and domestic services available on High Speed 1 (HS1). Trains from London to the Medway towns and Faversham also leave the high speed rail line at Ebbsfleet and continue via the North Kent Line and Chatham Main Line.
- 7.14.2 The proportion of households within the three wards of Davington Priory, St. Ann’s and Abbey that that have one car or van available is significantly higher than borough, county, regional and national averages. Multiple car or van availability in households across the three wards is significantly lower than all comparators.
- 7.14.3 The Faversham Creek Streetscape Strategy (2012) highlights that the creekside has poor legibility and signage with the town centre with regard to walking routes and visibility, lack of continuity in routes, hazardous routes, indirect or poorly aligned routes, poor or badly maintained unattractive surfacing, unattractive surfacing, and street furniture in poor condition or non-existent.²⁷
- 7.14.4 The swing bridge the connecting route to the town centre is not suitable for large vehicles.

²³ CPRE (2012) From field to fork: FAVERSHAM, Mapping the local food web.

²⁴ ONS (2011) Age Structure, 2011 (KS102EW).

²⁵ ONS (2011) Ethnic Group, 2011 (KS201EW)

²⁶ ONS (2011) Usual Resident Population, 2011 (KS101EW)

²⁷ Faversham Enterprise Partnership (2012) Faversham Creek Streetscape Strategy.

- 7.14.5 Faversham and the creek have a multitude of walks, although access directly along the creek at some points is restricted due to some of the new Creekside housing developments. The Saxon Shore Way is the designated footpath along both sides of the creek, meeting the Swale Heritage Trail in Faversham town centre. Pedestrian routes leading to the creek from the town centre are reported to be poorly signed and there are no visible creekside landmarks from the town that people can use as guide points. These pedestrian routes are also restrictive in places for people with mobility problems and mothers with pushchairs due to narrow paths, uneven paving and a lack of drop curbs.
- 7.14.6 Navigation of the creek is very restricted closer to Faversham town centre due to silting up of the creek greatly restricting viability for vessels.

7.15 Waste

- 7.15.1 Information regarding waste arisings and waste management is not available on an individual ward or town scale. Therefore for baseline data relating to waste please refer to the main Core Strategy SA Scoping report. However, what is known is that potential future dredging practices to improve the navigability of the creek, dredged material will require disposal in accordance with the waste hierarchy.

7.16 Water

- 7.16.1 The Faversham Creek navigation study has identified that the creek is silting up, in terms of its width (about 0.3 m per year) but also in terms of its depth (about 2 cm to 3 cm per year). This silting up is occurring despite flushing which has been undertaken almost continuously though with decreasing effectiveness as the basin has silted up and leakage from the gates have substantially reduced the volume of water available.
- 7.16.2 However, the mudflats at Faversham Creek (like Milton Creek) support many internationally and nationally important bird species associated with the Swale SPA. The creek also flows into the Swale channel, which contains designated shellfish waters. In December 2001, the Environment Agency surveyed the impacts of discharges on the Habitat Directive sites in the Swale. The survey found that the main contaminants in the area were polyaromatic hydrocarbons. Thus, if sediment were removed from the site it would likely require disposal at a landfill licensed to accept such contaminants. Also, any dredging or flushing is likely to mobilise these contaminants which could negatively impact the nearby SPA and designated shellfish waters.
- 7.16.3 Faversham Creek is fed by Ospringle Stream. The NP area falls within Flood Zone 3a, as identified by the Environment Agency. The primary source of flooding is due to surge tides and the possibility of their overtopping the existing flood defences. A Strategic Flood Risk Assessment (2010) for Faversham Creek provides guidance on the change of use or redevelopment of previously developed land within the 1:20 year flood risk area of Faversham Creek and has been produced in consultation with the Environment Agency. Given the previously developed nature of these areas, and the prevailing convention to remove built-up areas from functional floodplain, a special designation is given to those previously developed areas which are located within the 1:20 year flood risk zone (Flood Zone 3a(i)), removing strict policy restrictions associated with functional floodplain (Flood Zone 3b).
- 7.16.4 A detailed Flood Risk Assessment (FRA) which demonstrates where change of use of an existing building is proposed that proposals for the ground floor are no more vulnerable than the current use and exclude residential development, and that upper floors are designed to be safe and that there is safe access and egress in accordance with paragraph 4.52 onwards of Planning Policy Statement 25 Practice Guide.

- 7.16.5 Ground water abstraction has resulted in reduced flows in the streams which feed the creek. Not only is ground water abstracted for public consumption, but also for use at the Shepherd Neame brewery, and water has been abstracted here from the artificial water course since it was built in 1546 to feed the water mill. The Environment Agency acknowledges that due to ground water abstraction, the water table has been low since 1989 and that this would inevitably affect flows in the stream. This has resulted in silting up of the creek and consequently poor functioning and sluicing of the main traffic bridge.
- 7.16.6 The Environment Agency is responsible for monitoring the water quality of the creek. It is recorded that nutrient concentrations are raised within the creek at the monitoring stations but this is not considered to be a problem because of the large amount of tidal flushing. Biological oxygen demand (BOD) is elevated both in the upper creek and upstream of the tidal limit, this demand is met naturally and is not a problem.
- 7.16.7 There are no consented industrial effluent discharges to the creek. Sewage discharges occur directly into the creek at:
- Faversham Waste Water Treatment Works
 - CSO Abbey Street
 - CSO Abbey Fields
 - CSO Cyprus Road/Whitstable Road
 - Brent Industrial Estate (sewage effluent)
 - Oyster Bay House (sewage effluent)
 - Nagden Holiday Cottages
 - North Lane (surface water)
- 7.16.8 There are a number of storm outfalls along the creek. The Environment Agency holds no fisheries data for the creek, however, it is envisaged that the creek is an important nursery and feeding area for many fish species, including those of commercial, recreation and conservation importance such as sea bass, eel and mullet. The creek is currently restricted in flow by the sluice gates at Stonebridge Pond. The pond is well-established, having originally been associated with the mill and gunpowder factory.

8 WHAT ARE THE KEY ISSUES / OBJECTIVES THAT SHOULD BE A FOCUS OF SEA?

8.1.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report (2008) was able to identify a concise list of sustainability ‘objectives’ for each of the 15 sustainability topics used as the basis for scoping.

8.1.2 The sustainability objectives are listed in Table 8.1, which also presents a range of decision-making prompts alongside each objective. These objectives and decision-making prompts provide a methodological framework to guide the appraisal of alternatives / the draft plan.

Table 8.1: SEA framework

Topic	Sustainability objective	Will the policy...
Air	<ul style="list-style-type: none"> Reduce air pollution and ensure air quality continues to improve across the borough 	<ul style="list-style-type: none"> Contribute to reductions in air quality monitoring pollutants at monitoring locations across the borough?
Biodiversity	<ul style="list-style-type: none"> Conserve and enhance biodiversity and the natural environment 	<ul style="list-style-type: none"> Maintain and enhance relevant habitats and species e.g. mudflats or protected bird species? Protect and enhance habitat corridors and linking routes? Continue the protection of the internationally, nationally, European and regionally designated areas and appropriate propose appropriate enhancement? Conserve and enhance the BAP priority habitats? Conserve and enhance the populations of protected and/or BAP priority species within the borough? Allow for the creation of new areas of BAP priority habitats? Meet the principles of decision making on biodiversity in the good practice guide? Create opportunities to link to and create the green grid network? Allow for the permeability of new development for biodiversity?

Topic	Sustainability objective	Will the policy...
Climate change	<ul style="list-style-type: none"> Minimise the need for energy, increase energy efficiency and to increase the use of renewable energy; Encourage sustainable construction materials and methods 	<ul style="list-style-type: none"> Limit the emissions of greenhouse gases? Ensure the borough is prepared for the effects of climate change (in particular sea level rise and temperature changes)? Increase the energy efficiency of the borough's housing stock and all other buildings? Increase the proportion of energy generated from renewables? Identify opportunities for wildlife corridors, networks and stepping stones?
Crime and safety	<ul style="list-style-type: none"> Reduce crime and anti-social behaviour and the fear of these 	<ul style="list-style-type: none"> Help reduce the fear of crime? Reduce crime rates especially in areas where crime is highest? Incorporate designing out crime measures into new development?
Cultural heritage	<ul style="list-style-type: none"> Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage 	<ul style="list-style-type: none"> Protect archaeological sites, historic buildings, conservation areas and other culturally important features?
Employment and skills	<ul style="list-style-type: none"> Ensure high and stable levels of employment in accessible locations Raise the educational achievement levels across the borough and help people to acquire the skills needed to find and remain in employment 	<ul style="list-style-type: none"> Increase the numbers of knowledge based and higher paid jobs? Create new employment opportunities to meet the needs of the residents? Ensure employment locations are sustainable and accessible by public transport, walking and bicycle? Contribute to increased learning opportunities across the borough?
Health	<ul style="list-style-type: none"> Improve health and well-being and reduce inequalities in health 	<ul style="list-style-type: none"> Improve access to health services? Contribute to fuel poverty reductions? Improve access to recreation and open spaces? Mitigate against negative air quality and pollution impacts?

Topic	Sustainability objective	Will the policy...
Housing	<ul style="list-style-type: none"> • Provide affordable and decent housing adaptable to future needs of the community 	<ul style="list-style-type: none"> • Deliver on objectively assessed housing needs? • Deliver the appropriate mix of housing to deliver the long term regeneration schemes for the borough? • Reduce the number of people homeless or in temporary accommodation? • Contribute to the provision of affordable, social and key-worker housing? • Reduce the number of unfit housing and those falling below the decent homes standards? • Deliver adaptable housing to meet the lifelong needs of the population? • Reduce the experiences of fuel poverty?
Landscape	<ul style="list-style-type: none"> • Protect and enhance the valued landscape and townscape of Swale 	<ul style="list-style-type: none"> • Preserve and enhance the nationally important landscape within the Kent Downs AONB? • Contribute positively to the borough's established high quality landscape? • Provide for new open spaces, allotments? • Contribute to the establishment of the green grid network?
Local economy	<ul style="list-style-type: none"> • Sustain economic growth and competitiveness 	<ul style="list-style-type: none"> • Contribute the development of eco-tourism industry? • Provide for opportunities to attract new businesses to the borough? • Contribute to infrastructure improvements?
Population	<ul style="list-style-type: none"> • Meet the challenges of a growing and ageing population • Reduce poverty and social exclusion • Improve accessibility for all to key services and facilities 	<ul style="list-style-type: none"> • Assist with regeneration of deprived areas in the borough? • Improve access to key services? • Improve access to recreation, amenity and community facilities?

Topic	Sustainability objective	Will the policy...
Soil	<ul style="list-style-type: none"> Protect and enhance soil quality and reduce contamination 	<ul style="list-style-type: none"> Reduce contaminated sites and increase remediation of redundant industrial land? Reduce or improve the quality of agricultural land? Improve the quality of the borough's land overall? Protect an identified brownfield site with conservation value or which provides a strategic link within the green grid network? Affect high grade agricultural land? Cause soil pollution/contamination?
Transport and accessibility	<ul style="list-style-type: none"> Promote traffic reduction and encourage more sustainable alternative forms of transport 	<ul style="list-style-type: none"> Provide improvements and new routes for cyclists and pedestrians? Reduce to need to travel by car? Lead to adverse impacts on the Strategic Road Network, particularly junction 5 and 7 of the M2 which cannot be mitigated acceptably?
Waste	<ul style="list-style-type: none"> Achieve the sustainable management of waste 	<ul style="list-style-type: none"> Reduce waste arisings? Increase the re-use of materials? Increase the rates of recycling and composting and/or recovery of energy from waste? Ensure disposal of waste material (where required) in accordance with the waste hierarchy?
Water	<ul style="list-style-type: none"> Manage and reduce the risk of flooding Maintain and enhance water quality (ground and surface) and make efficient use of water 	<ul style="list-style-type: none"> Improve the quality of water within the borough? Reduce the demand for water (water efficiency measures)? Ensure that development does not increase the borough's vulnerability to flooding? Conserve adequate water supply to maintain healthy populations and rich biodiversity and ensure that water bodies are enhanced to increase biodiversity and ecosystems? Affect groundwater resources? Impact on surface water quality? Provide SuDS and other flood prevention systems to attract biodiversity, and to ensure that such systems are integrated into the wider green grid network?

PART 2:

WHAT HAS PLAN-MAKING / SEA INVOLVED UP TO THIS POINT?

9 INTRODUCTION TO PART 2

The Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives assessment (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

9.1.1 The 'story' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this part of the report explains how preparation of the draft plan has been informed by the assessment of alternatives.

What has been the focus of alternatives assessment?

9.1.2 Ever since development of the plan got under way in May 2012, it has been recognised that the land use mix is the key issue that gives rise to a need to consider alternatives. The first exhibition held by the Steering Group (5 May 2012 at the Alexander Centre) offered a choice of three strategies (housing, business use or mixed use) for each of the twelve identified sites. Subsequently, the Illustrations Exhibition held in June 2013 presented options on some sites.

Structure of this part of the report

9.1.3 This part of the report is structured as follows:

- | | |
|------------|--|
| Chapter 10 | Introduces the alternatives that have been a focus of assessment (with a view to demonstrating 'reasonableness'). |
| Chapter 11 | Presents alternatives assessment findings. |
| Chapter 12 | Explains the reasons for developing the preferred approach (i.e. draft plan) in-light of alternatives assessment findings. |

9.1.4 This structure reflects the regulatory requirement to present an appraisal of 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with'.

10 REASONS FOR SELECTING THE ALTERNATIVES²⁸

Introduction

10.1.1 The issue of land use is significant in the Faversham Creek NP area given the regeneration aspirations of the plan alongside the high heritage values associated with the area.

10.1.2 The following alternatives were subjected to assessment:

- Option 1 - Employment only
- Option 2 - Housing only
- Option 3 - Mixed use
- Option 4 - Maximising housing and employment numbers

10.1.3 It is considered that these are ‘the reasonable alternatives’ in relation to the issue of land use. Testing these alternative approaches enables consideration of the wider sustainability considerations around the issue of land use mix.

10.1.4 The alternatives are introduced in turn, below.

Option 1 - Employment only

10.1.5 This option would result in allocations or the granting of planning permission for employment uses only (including traditional marine related employment uses). Under this option planning permission would not be granted for any proposals on the sites identified within the NP that would result in the loss of land or buildings suitable for employment uses.

10.1.6 Government policy as set out in the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose (paragraph 22). At Faversham, whilst some new employment land has been provided in recent years, other sites, including 12 within the Faversham Creek NP area that were identified as suitable for employment uses within the Swale Borough Local Plan 2008 have not yet come forward. Whilst the Council’s ELR (2010) found that the majority of these sites continue to be suitable for employment purposes, the report recommends that new, relatively small scale industrial site(s), be identified to provide for 5 ha of business, industry, warehousing and office floorspace (‘B’ class uses) as these are more likely to come forward and are more in demand than larger employment sites.

Option 2 - Housing only

10.1.7 This option would result in allocations or the granting of planning permission for residential development only. Under this option planning permission would not be granted for any proposals on the sites identified within the NP that would result in the loss of land or building suitable for residential uses, even on existing employment sites. This would apply to all 12 potential development sites (as all sites except Sites 11 and 12 have been tested through the Strategic Housing Land Availability Assessment (SHLAA) for their suitability for housing.

10.1.8 With this option it should be noted that the Iron Wharf area is located outside of the built up area boundary of Faversham.

10.1.9 Government policy as set out within the NPPF states that local planning authorities should plan for local housing needs. This option would meet that policy requirement.

²⁸ Work to establish alternatives – as described in this chapter - was undertaken by Swale Borough Council in March 2013.

Option 3 - Mixed use

- 10.1.10 This option would result in each site either being allocated or granted planning permission (if applied for) for either employment use, residential use, or for a mixture of uses.
- 10.1.11 The NPPF explains that plan makers should encourage mixed use developments stating that plan makers should “encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).”
- 10.1.12 This option would be compliant with the overall aims of the NPPF.

Option 4 - Maximising housing and employment numbers

- 10.1.13 This option would result in each site either being allocated or granted planning permission (if applied for) for either residential use, employment use or a mix of the two, but with higher yield employment figures (4,900 m²) and additional housing numbers beyond those proposed in options 1 and 2. This option would involve maximum growth in the area resulting in the emerging NP ability to maximise the regeneration of the Faversham Creek.
- 10.1.14 The NPPF states that “The government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”

11 ALTERNATIVES ASSESSMENT FINDINGS²⁹

11.1 Introduction

11.1.1 Each option has advantages and disadvantages, but broadly the scoring shows that the most sustainable option for Faversham Creek is to plan for a mix of uses on the identified sites. This chapter describes each option's advantages and disadvantages.

11.1.2 Summary assessment findings are presented first, in graphical form, and then a more detailed discussion is presented.

11.2 Summary assessment findings

11.2.1 **Table 10.1** presents summary assessment findings in relation to the alternatives, drawing on the objectives established through scoping (see Part 1) as a methodological framework.

²⁹ Work to assess alternatives – as described in this chapter - was undertaken by Swale Borough Council in March 2013.

Table 10.1: Summary assessment of land use mix alternatives

↑	Potentially positive effects
↔	Potentially neutral effects
↓	Potentially negative effects
?	Uncertain effects

SEA Objective	Option 1 Employment only	Option 2 Housing only	Option 3 Mixed use	Option 4 Maximise housing and employment targets
Reduce air pollution at identified and ensure air quality continues to improve across the borough.	?	?	?	↓
Conserve and enhance biodiversity and the natural environment.	↔	↔	↔	↓
Ensure that Faversham meets the challenges of climate change and climate adaptation (through increased renewable energy and energy efficiency measures, sustainable construction methods and ecology and biodiversity good practice).	↑	↑	↑	?
Reduce crime and anti-social behaviour and the fear of these.	↓	↓	↑	↑

SEA Objective	Option 1 Employment only	Option 2 Housing only	Option 3 Mixed use	Option 4 Maximise housing and employment targets
Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage of Faversham.	↑	↓	↑	↓
Ensure high and stable levels of employment in accessible locations.	?	↓	↑	↑
Raise the educational achievement levels across the borough and in particular Faversham and help people to acquire the skills needed to find and remain in employment.	?	↓	?	?
Improve the health and well-being and reduce inequalities in health.	↔	↔	↔	↔
Provide affordable and decent housing adaptable to future needs of the community.	↓	?	↑	↑
Protect and enhance the valued landscape and townscape of Faversham and contribute to borough wide enhancement and conservation.	↑	↓	↑	↓
Sustain economic growth and competitiveness.	↑	↓	↑	↑

SEA Objective	Option 1 Employment only	Option 2 Housing only	Option 3 Mixed use	Option 4 Maximise housing and employment targets
Meet the challenges of a growing and ageing population.	↔	↑	↑	↑
Reduce poverty and social exclusion.	↑	↓	↑	↑
Improve accessibility for all to key services and facilities.	↓	↓	↑	↑
Protect and enhance soil quality and reduce contamination.	?	↑	?	?
Promote traffic reduction and encourage more sustainable alternative forms of transport.	↓	↓	↑	↑
Achieve the sustainable management of waste.	↑	?	?	?
Manage and reduce the risk of flooding.	↑	↓	↑	↓
Maintain and enhance water quality (ground and surface) and make efficient use of water.	?	↑	?	?

11.3 Detailed assessment findings

Option 1 - Employment only

- 11.3.1 Option 1 has led to mixed results. This approach would result in uncertain effects in terms of the environmental sustainability objectives such as reducing air pollution, protecting and enhancing soil quality and reducing contamination and maintaining and enhancing water quality. These objectives could potentially be undermined if an employment only approach was chosen, as this could result in industrial employment uses involving potentially polluting materials substances. However, it is possible that alternative employment uses on the site would have negligible impact on these objectives.
- 11.3.2 Option 1 did however, score favourably in terms of reinforcing local distinctiveness through the conservation and enhancement of the built and cultural heritage of Faversham as historically the creek area has been characterised by employment uses, particularly marine based employment uses. This approach would reinforce that character. This option could also allow for meeting the challenges of climate change and achieving sustainable management of waste through encouraging businesses incorporate the latest environmentally friendly building and running methods. It may also result in helping to meet the challenges of a growing and ageing population and to reduce poverty as an employment led approach would ensure necessary jobs to support the needs of the population and help to restore the imbalance within Faversham.
- 11.3.3 This option would, however, fail in the sustainability objective of improve accessibility to key services and facilities, as the employment use approach would result in jobs and services being separates from other uses.

Option 2 - Housing only

- 11.3.4 Option 2 has resulted in a large number of failed sustainability objectives.
- 11.3.5 It fails in the sustainability objective of reinforcing local distinctiveness, which is particularly important in achieving the aims of the NP. Faversham Creek throughout history has been characterised by traditional marine related employment uses, with housing slightly beyond the immediate Creek area. The creek and its industry are completely inter-related forming its special character. The two co-exist and exist because of their dependent relationship. This option would completely alter the historic character and feel of the area, and fail to address its rich cultural heritage. This in turn would also affect the valued landscape and townscape of Faversham.
- 11.3.6 In addition, a housing only approach would likely fail in terms sustainability on flooding grounds as a housing only approach would be difficult to design safely. This approach would also fail to adequately deal with the challenge of a growing and ageing population, as adequate employment as well as housing is required to sustain that population, as well as providing the necessary income for the younger generation to support the ageing population and would separate services from housing. This in turn would result in the population relying more on transport and reducing the ability for people to be able to access facilities quickly and sustainably by foot.
- 11.3.7 However, whilst this option fails on a majority of sustainability criteria, it would not fail on all. For example, a housing only option could help to maintain and enhance water quality and prevent contamination of land compared to some employment uses which historically have failed to achieve this in the creek area.

Option 3 - Mixed use

- 11.3.8 Option 3 scores well on a majority of the sustainability criteria. If schemes were planned well, it would achieve the sustainability criteria of reinforcing local distinctiveness and protecting the landscape, assuming enough emphasis was given to the traditional employment uses and residential buildings were designed sympathetically to fit with the character of the creek area. A mixed use approach would particularly work well in achieving meeting the challenges of a growing and ageing population and improving accessibility to key facilities/ services and in reducing anti-social behaviour. A mixed use approach would ensure that the growing and ageing population has access to jobs and homes, within easy access of services and ensure an active area, both day and night to prevent crime and anti-social behaviour. It would also help to reduce traffic movements, encouraging more people to work, live and access services within the same area. This approach could also be quite beneficial in terms of reducing the risk of flooding, as residential uses could be put on sites at least risk of flooding or on higher levels within a mixed use building.
- 11.3.9 A mixed use approach would have more uncertain effects in terms of impact on the environment, particularly in terms of reducing air pollution, protecting soil quality and reducing contamination.
- 11.3.10 This option did not result in the failure of any of the sustainability objectives.

Option 4 - Maximising employment and housing targets

- 11.3.11 Option 4 has also led to mixed results. Whilst it scores well in terms of achieving social sustainability criteria, such as meeting the challenges of a growing and ageing population, improving accessibility to key services/ facilities and reducing crime and anti-social behaviour, it fails on some environmental criteria. This approach would not be likely to result in achieving the objective of reducing air pollution, failing to protect the landscape and failing to conserve and enhance biodiversity.

11.4 Conclusion

- 11.4.1 It is concluded that Option 3 (Mixed use) is not only the most viable, but also the most sustainable option of the four assessed.

12 REASONS FOR SELECTING THE PREFERRED APPROACH

12.1 Introduction

12.1.1 This section sets out the Faversham Town Council's reasons for selecting/developing the preferred approach to 'land use mix' subsequent to and in light of alternatives assessment.

12.2 Reasons

12.2.1 The Town Council chose the preferred approach as a result of public consultation and in response to earlier Sustainability Appraisals and other evidence base documents. The preferred mixed use approach was chosen as it was felt to perform well against many of the sustainability objectives, such as employment and skills, housing, landscape, local economy, and cultural heritage.

12.2.2 The Town Council acknowledges that there is a significant level of public opinion that wants very little or no residential development at all in the creek area. However, they recognise that the NP must constitute sustainable development and therefore this approach would not be acceptable.

12.2.3 It also appeared through public consultation that there is a strong desire locally to see land and buildings set aside for specific types of maritime trades and activities, namely those related to heritage boat building and repair. The Town Council appreciate and respect these views, and concluded that if the neighbourhood plan were to be drafted in such a precise and restrictive way, it would not create the type of welcoming and balanced mixed use place that is required for the long term regeneration of the creek area. The creek needs to be a thriving living and working environment, both night and day, and the plan needs to allow for a mix of uses to be developed over the plan period.

12.2.4 When considered as an integrated whole, the redevelopment opportunities to be found in the creek area are varied and extensive. The Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area and that both the built and natural environment of the area were preserved and enhanced.

12.2.5 The Town Council believes that a neighbourhood plan that defines the type of industrial activity very narrowly (e.g. boat repair and/or building) and excludes residential uses completely will not be sustainable in the terms of the NPPF.

PART 3:

WHAT ARE THE SEA FINDINGS AT THIS STAGE?

13 INTRODUCTION TO PART 3

The Environmental Report must include...

- The likely significant effects associated with the draft plan approach; and
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach.

13.1.1 The aim of this part of the report is to present an assessment of the draft plan.

14 METHODOLOGY

14.1.1 The assessment identifies and evaluates 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability topics, objectives and issues identified through scoping (see Part 1) as a methodological framework. To reiterate, the sustainability topics considered are as follows:

- | | |
|-------------------------|-------------------------------|
| • Air | • Landscape |
| • Biodiversity | • Local economy |
| • Climate change | • Population |
| • Cultural heritage | • Soil |
| • Crime and safety | • Transport and accessibility |
| • Employment and skills | • Waste |
| • Health | • Water |
| • Housing | |

14.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.³⁰ Because of the uncertainties involved there is inevitably a need to make assumptions.

14.1.3 Assumptions are made cautiously, and explained within the text.³¹ The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

14.1.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.³² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect characteristics are described within the assessment as appropriate.

³⁰ The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.
³¹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pageId=156210>):
"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."
³² Environmental Assessment of Plans and Programmes Regulations 2004

15 AIR

- Objective 3: To reduce air pollution and ensure air quality continues to improve across the borough

Relevant NP policies

- The Faversham Creek NP does not contain any policies specifically related to air quality.

Assessment

- 15.1.1 The NP does not contain any policies specifically related to air quality. Indirectly some policies could be seen to address this issue, with Policy NE1 requires the avoidance of significant harm to 'the natural environment' which could cover air quality issues. A number of design policies also refer to promoting pedestrian spaces which should promote walking and may contribute to a reduction in vehicle-based trips, leading to benefits. The promotion of mixed use development may also contribute to reducing the need to vehicles trips.
- 15.1.2 The level of development proposed in Faversham Creek is low and therefore, on balance, it is not anticipated that the NP will lead to significant negative effects in relation to air quality.

Conclusions and recommendations

- 15.1.3 The NP is not predicted to negatively affect air quality; and there are no recommendations.

16 BIODIVERSITY

- Objective 8: To conserve and enhance biodiversity and the natural environment

Relevant NP policies

- Plan-wide policies: NE1, NE2 and NE3 (Natural Environment)

Assessment

- 16.1.1 The NP contains three key Natural Environment policies aimed at improving biodiversity in the plan area. The focus of these policies is on terrestrial biodiversity sites and there are no policies relating specifically to estuarine biodiversity. While the NP does discuss the reduction of creekside pollution and remediation of contaminated sites, the plan does not contain any policies specifically relating to these aims. Similarly, the plan notes that silting of the creek is an issue for navigation but does not contain any policies on this issue. The NP notes that issues around possible dredging of Faversham Creek are still being considered but does not propose or suggest dredging as part of the NP. Any dredging would require a licence from the Marine Management Organisation (MMO). Dredging could have positive effects on biodiversity in terms of improving the ecological function of the waterway by increasing flushing rates etc. but there is also the potential for dredging to have negative effects.
- 16.1.2 A Habitat Regulations Assessment (HRA)³³ has been undertaken on the Faversham Creek NP. The HRA process is focussed on internationally designated sites that could potentially be affected by a proposal intervention. For the Faversham Creek Neighbourhood Plan area, The Swale SPA and Ramsar site was considered to be the only internationally designated site with the potential to be affected by the NP. The HRA concluded that there was the potential for the Faversham Creek NP to have significant adverse effects on The Swale SPA and Ramsar site. The HRA report has made a number of recommendations (set out further below) to reduce these effects to a level where they will not be significant. Until these recommendations have been accepted and incorporated into the Faversham Creek NP, it is considered that the NP (in its current form) would be likely to have a **significant negative effect** on biodiversity.

³³ Pursuant to the Conservation of Habitats and Species Regulations 2010.

Conclusions and recommendations

- 16.1.3 Significant negative effects are predicted for biodiversity, specifically on the internationally designated habitat of The Swale SPA and Ramsar site. Mitigation is available in the form of changes to objectives and policies to strengthen protection given to the SPA and Ramsar site. The HRA proposed changes to objectives 7, 4 and 11 and policies NE1, NE4, IW1, INF5 as well as the groups of policies specifically pertaining to Iron Wharf and Chambers Wharf, Standard Quay, Standard House and Fentiman's Yard. It is recommended that these proposed changes be made to the Faversham Creek NP.

17 CLIMATE CHANGE

- Objective 2: To ensure that Faversham meets the challenges of climate change and climate adaptation (through increased renewable energy and energy efficiency measures, sustainable construction methods and ecology and biodiversity good practice).

Relevant NP policies

- Plan-wide policies: DQ1 (Design Quality); NE1 and NE3 (Natural Environment); FL1, FL2, FL3, FL4 and FL5 (Flooding); INF5 (Infrastructure)
- Site specific policy: OW7 (Ordnance Wharf)

Assessment

- 17.1.1 Policies NE1 and NE3 will both contribute to the promoting of improved biodiversity in the NP area. While Objective 2 refers to 'ecology and biodiversity good practice', it is unclear how this relates to the overall aim of this objective to adapt to and mitigate climate change. As such, it is not possible to conclude that these two policies would have any positive effect on climate change.
- 17.1.2 Policy DQ1 provides a series of high-level design principles for new buildings in the NP area. While impacts on townscape and cultural heritage are the main focus of this set of policies, Policy DQ1 states that solar panels will be acceptable on slate or tile roofs. INF5 allows for renewable energy proposals where there will not be a detrimental effect on the character of a building. The mixed use nature of the NP area would also contribute to reducing the need to travel (and therefore help to reduce greenhouse gas emissions from transport).
- 17.1.3 A major focus of the NP is the management and mitigation of flood risk and in terms of adapting to the impacts of climate change. This is an important issue facing the Faversham area, and indeed the wider borough. Five flooding policies are contained in the NP (FL1 to FL5) and collectively these are considered to provide a high level of control over new development in the NP area. While this focus on flood risk which is appropriate and overwhelming positive and all of these measures would provide a positive benefit, given the small-scale of new development in the NP area and the global issue, it is not considered a significant effect in terms of mitigating climate change.

Conclusions and recommendations

- 17.1.4 The NP policies make appropriate provision for climate change, both in terms of limiting greenhouse gas emission and adapting to the effects of climate change; there are no recommendations.

18 CRIME AND SAFETY

- Objective 14: To reduce crime and anti-social behaviour and the fear of these.

Relevant NP policies

- Site specific policy: STQ3 (Standard Quay)

Assessment

- 18.1.1 While the NP is limited in what it can realistically influence in terms of reducing crime and anti-social behaviour in the area, it is acknowledged that the built environment can have some influence on these factors (sometimes referred as 'Secured by Design')³⁴. Many of the design policies refer to principals embodied in the Faversham Creek Streetscape Strategy³⁵. This streetscape strategy does not appear to contain design elements specifically included to address crime issues. This is not to say that the potential to reduce crime through the design of the area, particularly the public realm, was not considered in the development of the strategy. It is noted that the creekside strategy covers some quite detailed design aspects such as footpath design which would have public safety benefits. One of the policies (STQ3) refers to ensuring 'that land uses and design contribute to a place that is vibrant both night and day to ensure a safe and secure place'. While this policy expresses a positive sentiment, it is not known why it has only been applied to the Standard Quay development site.
- 18.1.2 A number of policies refer to providing pedestrian only waterfront walkway and considering (through design and access statements) how traffic and access issues have been addressed. In general terms, the promoting of pedestrian only spaces and the avoidance as far as practicable of conflict between pedestrians and vehicles could provide safety benefits.
- 18.1.3 Similarly, the general thrust of the NP is to promote the development of a mixed use space and this would be expected to have some crime and safety benefits in terms of increasing casual surveillance in the NP area, both during the daytime and night-time. In general terms, single type land uses tend to reduce levels of natural/casual surveillance.
- 18.1.4 A small number of policies proposed in NP are expected to have positive effects with respect to discouraging crime, anti-social behaviour and the fear of crime. However these effects are not expected to be significant and overall the plan is expected to have neutral effects in terms of this sustainability objective.

Conclusions and recommendations

- 18.1.5 The NP policies make some provision in relation to creating safe spaces and reducing fear of crime.
- 18.1.6 Consideration should be given to whether a creekwide policy relating to promoting safety and crime reduction through design would be of benefit (i.e. expand the scope of Policy STQ3 to cover all 12 development sites).

³⁴ Association of Chief Police Officers (2015) About Secured by Design [online] available at: <http://www.securedbydesign.com/about/index.aspx> (accessed 01/2015).

³⁵ Faversham Town Council (2011) Faversham Creek Streetscape Strategy [online] available at: http://favershamcreekneighbourhoodplan.org.uk/content/Creek%20Streetscape%20Strategy.pdf?bcsi_scan_AB11CAA0E2721250=1 (accessed 01/2015)

19 CULTURAL HERITAGE

- Objective 1: To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage of Faversham.

Relevant NP policies

- Plan-wide policies: HE1, HE2 and HE3 (Historic Environment and Heritage Assets); DQ1, DQ2 and DQ4 (Design Quality); HO2 (Housing); NE4 (Natural Environment)
- Site-specific policies: P2 (Purifier); OW4, OW5 and OW6 (Ordnance Wharf); BMMW2 (BMM Weston); FW3 (Frank and Whittome); SWQ3 (Swan Quay); OD3 (Former Oil Depot); CD3 (Former Coach Depot); STQ1 (Standard Quay); STH2 (Standard House); IW1 (Iron Wharf)

Assessment

19.1.1 Along with landscape/townscape, cultural heritage has the largest number of dedicated policies. This reflects the importance of the issue to the Faversham Creek area. The Historic Environment and Heritage Asset policies (HE1 to HE3) provide a clear set of assessment criteria for the re-use and/or restoration of historic assets. The Design Quality policies also have strong regard for the heritage values of the area and require these to be considered in relevant planning applications. In addition to this, most of the 12 specific development sites have one or more policies relating to cultural heritage. Collectively these policies would be likely to have **significant positive effects** in terms of cultural heritage.

19.1.2 While the NP contains a large number of policies specifically to protect heritage values, other policies will also likely provide cultural heritage benefits. Many of the site specific policies refer to the need to provide moorings for vessels while Policy IW1 requires that a boatyard be retained on the Iron Warf site. The creekside NP area has a long maritime history and maritime activities and industries make a strong contribution to the heritage value of the area. As such, the proposed measures to preserve these heritage values as part of the regeneration of the area are seen as positive and contribute to the overall **significant positive effect**.

Conclusions and recommendations

19.1.3 Overall, the NP is considered to have a **significant positive effect** in terms of cultural heritage; there are no recommendations in relation to cultural heritage.

20 EMPLOYMENT AND SKILLS

- Objective 17: To ensure high and stable levels of employment in accessible locations
- Objective 18: To raise the educational achievement levels across the borough and in particular Faversham and help people to acquire the skills needed to find and remain in employment.

Relevant NP policies

- Plan-wide policies: BTE1 and BTE2 (Business, Tourism and Employment)
- Site-specific policies: P1 (Purifier); OW1 (Ordnance Wharf); BMMW1 (BMM Weston); FW1 and FW2 (Frank and Whittome); SWQ1 (Swan Quay); CD1 (Former Coach Depot); BIE1 (Brents Industrial Estate); IW1 (Iron Wharf)

Assessment

- 20.1.1 The NP is limited in its ability to directly achieve the objectives in relation to employment and skills. However, through providing and protecting employment land uses it could assist in contributing towards the employment and skills objectives. Policies BTE1 and BTE2 both provide directly for such employment floorspace. In accordance with the mixed use strategy adopted by the plan, many of the site specific policies provide for employment floorspace. At eight of the 12 sites, employment floorspace is specifically provided for. It is considered that within the scope and context of the NP area, the proposed NP policies would lead to **significant positive effects** in terms of employment and skills.
- 20.1.2 While not considered to contribute to the overall significance of this effect it is also noteworthy that Policy OW1 provides for training rooms at Ordnance Wharf and Policy IW1 provides for a boatyard at Iron Wharf. Both of these proposed uses are beneficial from an employment and skills perspective.

Conclusions and recommendations

- 20.1.3 Overall, the NP is considered to have a **significant positive effect** in terms of employment and skills; there are no recommendations.

21 HEALTH

- Objective 13: To improve the health and well-being and reduce inequalities in health.

Relevant NP policies

- Plan-wide policies: DQ3 and DQ5 (Design Quality); CLR1 (Community Leisure and Recreation)
- Site-specific policies: IW2 (Iron Wharf)

Assessment

- 21.1.1 The NP is limited in its ability to directly achieve the objectives in relation to health. However, the redevelopment of the creekside area does have the potential to increase opportunities for active transport (e.g. walking and cycling etc.). High quality pedestrian spaces in particular are a key feature of the design policies (DQ3 and DQ5). As well as containing specific policy direction themselves, Policy DQ3 also refers to the Faversham Creekside Streetscape Strategy which contains more detailed, site-specific, design principles on pedestrian and public space.
- 21.1.2 Similarly, the general thrust of the NP is to promote the development of a mixed use space and this would be expected to have some health benefits in terms of reducing car based journeys in the NP area by reducing the need to travel and enabling a higher proportion of journeys to be made by active modes. Policy DQ5 is particularly important in this regard as it refers to 'clear and convenient connections with the (Faversham) town centre'. Ensuring that convenient and accessible non-car based travel options are maximised within the Faversham Creek NP area and surrounding areas will be essential to achieving development in line with this policy.

Conclusions and recommendations

- 21.1.3 Overall, the NP is considered to have a minor positive effect in terms of health; there are no recommendations.

22 HOUSING

- Objective 15: To provide affordable and decent housing adaptable to future needs of the community.

Relevant NP policies

- Plan-wide policies: HO1 and HO2 (Housing)
- Site-specific policies: OW1 (Ordnance Wharf); BMMW1 (BMM Weston); FW1 (Frank and Whittome); SWQ1 (Swan Quay); OD1 (Former Oil Depot); CD1 (Former Coach Depot); STH1 (Standard House); FY1 (Fentiman's Yard); IW1 (Iron Wharf)

Assessment

- 22.1.1 The two plan-wide policies state that housing will be permitted on a certain number of the 12 development sites. The site-specific policies identify that nine of the 12 sites could be used for residential purposes. Six of these nine sites provide for mixed use development with the remaining three being identified as being suitable solely for residential use. Policy HO2 stipulates that 35% of new development dwellings must be affordable housing.
- 22.1.2 It is considered that within the scope and context of the NP area, the proposed NP policies would lead to **significant positive effects** in terms of housing.

Conclusions and recommendations

- 22.1.3 Overall, the NP is considered to have a **significant positive effect** in terms of housing; there are no recommendations.

23 LANDSCAPE

- Objective 4: To protect and enhance the valued landscape and townscape of Faversham and contribute to borough wide enhancement and conservation.

Relevant NP policies

- Plan-wide policies: HE1, HE2 and HE3 (Historic Environment and Heritage Asset Policies); DQ2 and DQ5 (Design Quality); CLR2 (Community Leisure and Recreation); HO3 (Housing Policies); NE2 and NE4 (Natural Environment)
- Site-specific policies: OW2, OW5 and OW6 (Ordnance Wharf); BMMW2 (BMM Weston); FW1 (Frank and Whittome); STH4 (Standard House)

Assessment

- 23.1.1 Landscape/townscape has a large number of dedicated policies. This reflects the importance of townscape issues to the Faversham Creek area. The Historic Environment and Heritage Asset policies (HE1 to HE3) provide a clear set of assessment criteria for the re-use and/or restoration of historic assets. The Design Quality policies also have strong regard for the townscape values of the area and require these to be considered in relevant planning applications. In addition to this, some of the specific development sites have one or more policies relating to townscape. Collectively these policies would be likely to have **significant positive effects** in terms of landscape/townscape.

Conclusions and recommendations

- 23.1.2 Overall, the NP is considered to have a **significant positive effect** in terms of landscape/townscape; there are no recommendations.

24 LOCAL ECONOMY

- Objective 16: To sustain economic growth and competitiveness.

Relevant NP policies

- Plan-wide policies: BTE1 and BTE2 (Business, Tourism and Employment)
- Site-specific policies: P1 (Purifier); OW1 (Ordnance Wharf); BMMW1 (BMM Weston); FW1 (Frank and Whittome); SWQ1 (Swan Quay); CD1 (Former Coach Depot); STQ2 (Standard Quay); BIE1 (Brents Industrial Estate); IW1 (Iron Wharf)

Assessment

24.1.1 In accordance with the mixed use strategy adopted by the NP, the plan provides space for new business uses which would contribute towards the development of the local economy. Policies BTE1 and BTE2 both promote business uses. Specifically, these two policies focus on improving the contribution of tourism and visitors to the creekside economy, emphasising the areas rich maritime heritage. These policies also recognise the importance of this development being complementary to the wider Faversham town centre economy. The focus on development of features unique to the creekside area should help to ensure that the area complements, rather than competes with the town centre. At nine of the 12 sites, business floorspace is specifically provided for. Policy IW1 provides for a boatyard at Iron Wharf which is considered beneficial in terms of promoting the continuation of a traditional aspect of the Faversham Creek local economy.

24.1.2 It is considered that within the scope and context of the NP area, the proposed NP policies would lead to **significant positive effects** in terms of development of the local economy.

Conclusions and recommendations

24.1.3 Overall, the NP is considered to have a **significant positive effect** in terms of the local economy; there are no recommendations.

25 POPULATION

- Objective 10: To meet the challenges of a growing and ageing population.
- Objective 11: To reduce poverty and social exclusion.
- Objective 12: To improve accessibility for all to key services and facilities.

Relevant NP policies

- Plan-wide policies: CLR1 and CLR2 (Community Leisure and Recreation); HO2 (Housing); INF2 (Infrastructure)

Assessment

25.1.1 The NP is limited in its ability to directly achieve the objectives in relation to population. Policies CLR1 and CLR2 promote accessibility to public spaces and leisure facilities which will make a small contribution towards achieving Objective 12. The housing policies (including the site-specific policies providing for residential land use) will both assist to meet the challenge of a growing population (Objective 10) while Policy HO2 in relation to providing at least 35% affordable housing will assist in reducing social exclusion (an aspect of Objective 11). Reducing social exclusion will also be assisted by Policy INF2 which provides specifically for disabled access to waterfront areas.

- 25.1.2 There are no policies specifically in relation to providing for an aging population, reducing poverty and improving accessibility specifically to key services and facilities. However, given the size of the NP area and the small scale of development proposed, this omission is not unreasonable.

Conclusions and recommendations

- 25.1.3 Overall, the NP is considered to have a minor positive effect in terms of population; there are no recommendations.

26

SOIL

- Objective 5: To protect and enhance soil quality and reduce contamination

Relevant NP policies

- The Faversham Creek NP does not contain any policies specifically related to soil or contamination.

Assessment

- 26.1.1 Given that the development proposed under the NP entirely involved the use of previously developed land (PDL) it is considered that the NP performs well in terms of protecting soil quality by promoting the use of existing PDL which in turn reduces pressure to develop greenfield agricultural land (which would almost certainly result in the loss of soil or agricultural value). In this regard the NP is considered to provide a minor positive effect in relation to the protection of soils.

- 26.1.2 One of the consequences, however, of focusing development on PDL is the potential for these sites to be contaminated. Contamination is more likely on land which has previously been used for industrial purposes, which is the case for many of the 12 Faversham Creek NP development sites. In particular, Ordnance Wharf and the Oil and Coach Depot where previously used for the storage of oil and there was a gas works at the head of the creek. The NP notes that the Environment Agency is charged with regulating and permitting in relation to any contaminated sites. Any development on potential contaminated land would be subject to EA approval and this is considered to provide sufficient environmental protection.

Conclusions and recommendations

- 26.1.3 Overall, the NP is considered to have a minor positive effect in terms of soil; there are no recommendations.

27

TRANSPORT AND ACCESSIBILITY

- Objective 19: To promote traffic reduction and encourage more sustainable alternative forms of transport.

Relevant NP policies

- Plan-wide policies: DQ3 and DQ5 (Design Quality); CLR1 (Community Leisure and Recreation); INF1, INF2, INF3 and INF4 (Infrastructure)
- Site-specific policies: OW3 (Ordnance Wharf); SWQ2 (Swan Quay); OD2 (Former Oil Depot); CD2 (Former Coach Depot); STH5 (Standard House); FY1 (Fentiman's Yard); IW2 (Iron Wharf)

Assessment

- 27.1.1 The redevelopment of the creekside area does have the potential to increase opportunities for active transport (e.g. walking and cycling etc.). High quality pedestrian spaces in particular are a key feature of the design policies (DQ3 and DQ5). As well as containing specific policy direction themselves, Policy DQ3 also refers to the Faversham Creekside Streetscape Strategy which contains more detailed, site-specific, design principles on pedestrian and public space.
- 27.1.2 Similarly, the general thrust of the NP is to promote the development of a mixed use space and this would be expected to have some health benefits in terms of reducing car based journeys in the NP area by reducing the need to travel and enabling a higher proportion of journeys to be made by active modes. Policy DQ5 is particularly important in this regard as it refers to 'clear and convenient connections with the (Faversham) town centre'. Ensuring that convenient and accessible non-car based travel options are maximised within the Faversham Creek NP area and surrounding areas will be essential to achieving development in line with this policy.

Conclusions and recommendations

- 27.1.3 Given the small scale of the NP area and the relatively minor level of land use change and development, opportunities to promote traffic reduction are limited. However, within the NP's scope of influence it is clear that considerable thought has been given to how to create attractive and usable pedestrian spaces. While this is primarily proposed for amenity reasons, it will have a minor positive effect in relation to transport and accessibility.
- 27.1.4 There are no recommendations in relation to transport and accessibility.

28 WASTE

- Objective 9: To achieve the sustainable management of waste

Relevant NP policies

- The Faversham Creek NP does not contain any policies specifically related to waste.

Assessment

- 28.1.1 The Faversham Creek NP does not contain any policies specifically related to waste. However, the Swale Local Plan (LP) contains policies relevant to waste and these policies, where relevant, would apply to development in the Faversham Creek NP area. Swale LP policies CP3 and CP5 seek to achieve high standards of sustainable construction as part house building and therefore has the potential to increase the re-use of materials while reducing waste during construction. Swale LP Policy DM19 expects development to use materials and techniques which reduce waste and promotes waste reduction and recycling.

Conclusions and recommendations

- 28.1.2 While the Faversham Creek NP does not contain any specific waste policies, this issue is considered to be adequately covered by policies contained in the Swale LP; there are no recommendations.

29

WATER

- Objective 6: To manage and reduce the risk of flooding.
- Objective 7: To maintain and enhance water quality (ground and surface) and make efficient use of water.

Relevant NP policies

- Plan-wide policies: NE1 (Natural Environment); FL1, FL2, FL3, FL4 and FL5 (Flooding)
- Site-specific policies: OW7 (Ordnance Wharf)

Assessment

- 29.1.1 A major focus of the NP is the management and mitigation of flood risk. Five specific flooding policies are contained in the NP (FL1 to FL5) and collectively these are considered to provide a high level of control over new development in the NP area. This includes prohibiting residential ground floor uses in flood prone areas. The focus on flood risk is appropriate and overwhelmingly beneficial and is considered to provide a **significant positive effect** in terms of reducing flood risk in the NP area.
- 29.1.2 In terms of Objective 7, there is no specific policy relating to protecting water quality, however Policy NE1 does focus on avoiding significant effects on the waterway (i.e. Faversham Creek) and sites downstream. While the focus on effects on the waterway (and by extension estuarine ecology) is positive, given the small-scale of new development in the NP area and the lack of any major land use change, it is not considered a significant effect, either in terms of water quality or biodiversity.
- 29.1.3 The NP does not contain and polices on water efficiency. However, Policy CP3 of the Swale Local Plan seeks to achieve high standards of sustainable design as part of house building and therefore has the potential to ensure water efficiency measures are incorporated as part of new development. This policy would apply to development proposed in the Faversham Creek NP area and hence would address water efficiency.

Conclusions and recommendations

- 29.1.4 Overall, the NP is considered to have a **significant positive effect** in terms of flooding.
- 29.1.5 In relation to water quality, increased public access to creekside areas and development of creekside sites has the potential to lead to a reduction in water quality in the creek and downstream waterbodies (which include the Swale SPA and Ramsar site). The NP is not expected to lead to significant adverse effects on water quality although the HRA recommended that the protection around water quality be strengthened through Objective 11 including a reference to emerging Swale Local Plan Policies DM 21 and CP 2 and that the 'Associated Natural Environment Projects (2)' include maintenance of current drainage. It is recommended that these proposed amendments be incorporated into the Faversham Creek NP.

30 CONCLUSIONS AND RECOMMENDATIONS AT THIS CURRENT STAGE

- 30.1.1 The assessment presented above highlights that the draft NP performs well in terms of many sustainability issues/objectives, with significant positive effects identified as likely in terms of: cultural heritage, employment and skills, housing, landscape, local economy and water.
- 30.1.2 Significant negative effects are currently predicted for biodiversity although changes to proposed NP objectives and policies are recommended to reduce this effect such that it would not be significant.
- 30.1.3 No other significant negative effects are predicted as the numerous policies in the NP are comprehensive and seek to maximise the beneficial effects of development whilst mitigating negative effects. The policies identify when proposals would be unacceptable and would be refused. It should be noted that no significant negative effects are envisaged on the assumption that all policies in the plan are implemented in decision-making; however in practice it is acknowledged that some minor policy trade-offs may be deemed acceptable. It is not considered that this would lead to a significant adverse effect though for the reasons stated above.
- 30.1.4 The assessment highlights a small number of instances where the plan might potentially reword or elaborate on policy wording for particular sustainability issues (crime and safety and water).
- 30.1.5 Finally, in terms of 'cumulative effects' it is important to note the potential for the plan to impact in-combination with the Swale Local Plan, which is due to be submitted to Government for examination in 2015. The plan seeks to ensure that Faversham continues to develop 'organically', focusing growth (and hence more transformational change) in the Thames Gateway area. Given the Local Plan, there is a need for the Neighbourhood Plan to ensure that Faversham continues to play a prominent role in the district, supporting its rural hinterland in particular.

PART 4:

WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

31 INTRODUCTION TO PART 4

The Environmental Report must include...

- Measures envisaged concerning monitoring.

31.1.1 This part of the report explains next steps that will be taken as part of plan-making / SEA.

32 PLAN FINALISATION AND ADOPTION

32.1.1 **Regulations 18 and 19** require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

32.1.2 **Regulation 20** states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SEA Statement must be published alongside the made Plan. The SEA Statement must present:

- information on the decision, i.e. must explain why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

33 MONITORING

33.1.1 At the current stage – i.e. in the Environmental Report - there is a need to present 'a description of the measures envisaged concerning monitoring'. In light of the assessment findings presented in Part 3 of this report, it is suggested that monitoring might focus on the approach that is taken to the redevelopment of particular key sites / buildings (e.g. to ensure that **heritage** values / the setting of valued heritage assets is not negatively affected). Monitoring should also focus on potential biodiversity effects, given potential for significant negative effects identified.

APPENDIX I - REGULATORY REQUIREMENTS

The information that must be contained in Annex 1 of the SEA Directive (which is transposed into Schedule 2 of the Environmental Assessment of Plans Regulations 2004); however, interpretation of Annex 1 is not straightforward. The table below 'interprets' Annex 1 requirements.

<u>Annex 1</u>	<u>Interpretation</u>
<i>The report must include...</i>	<i>The report must include...</i>
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.
	The likely significant effects associated with the draft plan
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
	A description of the measures envisaged concerning monitoring

i.e. answer - What's the Plan seeking to achieve?

i.e. answer - What's the 'context'?

i.e. answer - What's the 'baseline'?

i.e. answer - What are the key issues & objectives?

i.e. answer - What has Plan-making / SA involved up to this point?

i.e. answer - What are the appraisal findings at this current stage?

i.e. answer - What happens next?

i.e. answer - What's the scope of the SA?