



Sustainability Appraisal (SA) of the Swale Borough Local Plan Part 1: Bearing Fruits 2031 Consultation Draft



SA Report

August 2013

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INTRODUCTION

1 BACKGROUND

1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising positives. SA of Local Plans is legally required.¹

2 SA EXPLAINED

2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²

2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that *'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'*. The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3 The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as **the 'SA Report'**. Essentially, there is a need for the SA Report to answer the following four questions:

1. What is the scope of the SA?
2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point 'alternatives' are appraised.
3. What are the appraisal findings at this current stage?
 - i.e. in relation to the draft plan.
4. What happens next?

2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. **Table 1.1** makes the links between the ten Schedule 2 requirements and the four SA questions.

3 STRUCTURE OF THIS SA REPORT

3.1.1 This document is the SA Report of the Swale Local Plan at this current stage and has been prepared by URS with the exception of Appendix VIII of this report. Appendix VIII presents the broad implications of all new and saved allocations included in the plan and has been prepared by Swale Borough Council's Planning Officers. The four SA questions set out in Table 1.1 are answered in turn in the report.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2012).

² Directive 2001/42/EC

Table 3.1: Questions that must be answered within the SA Report

SA REPORT QUESTION	SUB-QUESTION	ANNEX I REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international, national and local levels
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> The 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, in particular, those relating to any areas of a particular environmental importance
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of 'reasonableness')
		<ul style="list-style-type: none"> The likely significant effects on the environment associated with alternatives ... and an outline of the reasons for selecting preferred options / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment 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
What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

N.B. The right-hand column of Table 3.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

PART 1: WHAT IS THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations³, this Part answers the series of questions below.

- What is the Plan seeking to achieve?
- What is the sustainability 'context'?
- What is the sustainability 'baseline'?
- What are the key issues that should be a focus of SA?

4.1.2 **Section 5** answers the first question by discussing the content of the Local Plan including its vision and objectives. The other three scoping questions are answered in **Sections 6 – 8**, with each question answered for the following sustainability 'topics':

- | | |
|-------------------------|-------------------------------|
| • Air | • Landscape |
| • Biodiversity | • Local Economy |
| • Climate change | • Population |
| • Crime and Safety | • Soil |
| • Cultural Heritage | • Transport and Accessibility |
| • Employment and Skills | • Waste |
| • Health | • Water |
| • Housing | |

4.1.3 These topics have been chosen to broadly reflect the anticipated aspects of the economy, community and the environment that might be susceptible to significant effects as a result of implementing the Local Plan and to also reflect those issues set out in the Regulations⁴.

4.2 Previous consultation on the scope of the SA

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 report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.⁵⁶ As such, these authorities were consulted on the scope of the SA in **2008**. All three authorities responded with views on what should be within the scope of the SA. The Scoping Report then finalised and is now available online at <http://www.swale.gov.uk/sustainability-appraisal/>. Although the Scoping Report was finalised, it is important to note that our understanding of the appropriate 'scope' for the SA has not remained entirely static since that time. This is appropriate given that understanding and evidence regarding sustainability problems/issues/objectives inevitably changes over time.

³ Environmental Assessment of Plans and Programmes Regulations 2004

⁴ biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; and landscape as set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004

⁵ In accordance 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 programme'*.

⁶ English heritage is to be divided into two organisations — one taking responsibility for the historic properties in its care, the other maintaining its statutory duties

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA 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 Local Plan is the most important planning document for Swale, setting out the vision and overall spatial strategy for the area and how it will be achieved for the period until 2031. Spatial planning brings together and integrates policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
- 5.1.2 The Local Plan is being prepared in three separate parts: Part 1 is the subject of the Council's current consultation and what this SA report relates to. Part 1 includes:
- policies to deliver the preferred overarching spatial strategy for the Borough within the context of the NPPF and achieving sustainable development
 - a series of core policies that take important issues for Swale with a view to ensuring that planning decisions made in any location support the principles of sustainable growth and overall objectives of the Local Plan;
 - allocations, 'Areas of Search' and 'Areas of Future Change' brought forward from the Swale Local Plan 2008, the Swale Strategic Housing Land Availability Assessment 2011/12 and the Employment Land Review 2010; and
 - a framework of development management policies to guide the determination of planning applications by setting out criteria for development proposals.
- 5.1.3 A list of all the policies in the current draft version of the Local Plan: **The Swale Borough Local Plan Part 1: Bearing Fruits 2031 Consultation Draft (August 2013)** is provided in **Appendix VI**. Part 2 of the Local Plan will, when prepared, set out allocations to meet Gypsy and Traveller needs where not met by Part 1 and the scope of Part 3 of the Local Plan has yet to be finalised but is likely to include a review of the Borough's Landscape Designations and a route alignment for the Sittingbourne Northern Relief Road.
- 5.1.4 The principal influence on plan preparation is the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must reflect. The Local Plan is also developed in-light of 'Realising our ambitions for Swale - the Borough strategy to 2031' published in 2012. This Strategy is both a long-term vision for the Borough and a roadmap for partnership working in the medium term. It has been developed and agreed jointly by all the organisations represented at some level in the 'Swale Locality Board's partnership structure', and is thus truly a vision and a strategy for the whole of the Borough.
- 5.1.5 The Local Plan is also developed in the light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011 and discussed further in the NPPF. There is a particular need for Swale to cooperate closely with its neighbouring boroughs of Canterbury City Council, Ashford Borough Council and Maidstone Borough Council. These authorities are also proposing growth in their areas and the levels proposed are discussed further in Part 2 Chapter 11 of this report.
- 5.1.6 The following '**vision**' for Swale has been developed for the purposes of the Local Plan –
- It is 2031 and Swale is known by the fruits of its endeavours.*

We have harnessed our assets – a strategic location, diverse communities and an outstanding natural environment – and are a sustainable, flourishing place in which to enjoy life and do business with:

- *Sittingbourne transformed into an attractive, competitive and prosperous town, with a thriving centre that residents across the Borough are proud to use;*
- *Sheerness and Queenborough as beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey;*
- *Faversham, a thriving market town and heritage destination that has grown organically; and*
- *Successful rural communities across the downs, farmed plains and coast as places of innovation; nurturing enterprise, local produce and greater self-reliance.*

5.1.7 A series of Local Plan '**objectives**' have also been developed:

Core objectives:

1. *Adapt to climate change with innovation, reduced use of resources, managed risk to our communities and opportunities for biodiversity to thrive.*
2. *Use our coastal assets to support a strong economy and a sustainably managed environment.*
3. *Support economic success and improve community wellbeing with a network of maintained, protected and improved natural assets in town and country.*
4. *Use our historic and natural assets to drive regeneration, tourism, and environmental quality.*
5. *Strive for high quality design to bring a better quality of life and self-confidence to our communities.*
6. *Support sectors that can build on our strengths, diversify our economy, promote investment in skills, and develop our distinct opportunities in pursuit of greener and pioneering technologies.*
7. *Bring economic growth, regeneration and community development, especially to our most deprived communities.*
8. *Support our farming and food sectors so that they are at the forefront of increasing food security, reducing food miles and increasing local food consumption.*
9. *Provide the right housing to support regeneration and stronger, greener communities.*
10. *Develop tourism and culture to support regeneration, employment growth, communities and environmental management.*
11. *Improve prosperity and environmental quality with efficient and sustainable transport networks.*
12. *Ensure timely delivery of the services and infrastructure to support strong communities.*

Place based objectives:

1. *Re-establish Sittingbourne as the principal town with investment in retail, leisure, culture and community services and further education, within new and improved green spaces and streets.*
2. *Reinforce Sheppey's uniqueness by ensuring change supports Sheerness as its commercial and service focus; strengthens and integrates communities at Rushenden, Queenborough and Minster/Halfway; manages coastal and heritage assets; modernises leisure and tourism industries; and supports isolated communities.*
3. *Sustain Faversham's role and character as an historic market town for residents and visitors with a range of businesses and services that increase diversity and interest.*
4. *Address identified needs in our rural communities so that they are sustained in ways that also respects their scale and character.*

5.2 What is the plan not trying 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 planning application process). The strategic nature of the plan is reflected in the scope of the SA and the level of detail it enters into.

6 WHAT IS THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relevant sustainability objectives, established at international / national level
- Any existing sustainability problems 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 SA involves reviewing sustainability 'context' messages set out within relevant published plans, policies, strategies and initiatives (PPSIs). The sustainability context review aims to generate an understanding of *broadly* the sustainability problems/issues that should be a focus of SA, and the sustainability objectives that should also be taken into account.

6.1.2 A detailed review of the sustainability context is also presented within the SA Scoping Report, although this was prepared in 2008. This section presents an updated summary.

6.2 Air

Internationally established objectives

6.2.1 The European Union (EU) Air Quality directive 2008/50/EC⁷ on Ambient Air Quality and Cleaner Air for Europe came into force in 2008 replacing EU Framework Directive (96/62/EC), its associated Daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC, and the Council Decision 97/101/EC, with a single legal act. These limit values are binding on the UK and have been set with the aim of avoiding, preventing or reducing harmful effects on human health and on the environment as a whole. The UK National Air Quality Strategy was initially published in 2000, under the requirements of the Environment Act 1995. The most recent revision of the strategy sets objective values for key pollutants, as a tool to help local authorities manage local air quality improvements in accordance with the EU Air Quality Directives. Some of these objective values have subsequently been laid out within The Air Quality (England) Regulations 2000 and later amendments.

The National Planning Policy Framework (NPPF)⁸

6.2.2 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.

Additional PPSIs

Box 6.1: 'Air Quality Strategy for England, Scotland, Wales and Northern Ireland'⁹ (2007) and 'Air Pollution: Action in a Changing Climate'¹⁰ (2010)

The Air Quality Strategy sets out plans to improve and protect air quality in the UK. It considers ambient air

⁷ Ambient Air Quality and Cleaner Air for Europe <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF>

⁸ CLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

⁹ Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: <http://www.defra.gov.uk/environment/quality/air/air-quality/approach/> (accessed 08/2012)

¹⁰ Defra (2010) Air Pollution: Action in a Changing Climate [online] available at: <http://www.defra.gov.uk/publications/files/pb13378-air-pollution.pdf> (accessed 08/2012)

quality only, leaving occupational exposure, in-vehicle exposure and indoor air quality to be addressed separately. The strategy sets health-based objectives for nine main air pollutants¹¹. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.

Given the rapid development of climate change focused policy since the publication of the Air Quality Strategy, additional guidance has been published on the synergies between these two issues. In particular, it notes the potential for additional *health* benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low-carbon vehicles and renewable energy.

6.3 Biodiversity

Internationally established objectives

- 6.3.1 The EU Sustainable Development Strategy¹², adopted in 2006, includes an objective to halt the loss of biodiversity by 2010. More recently at the European level, a new EU Biodiversity Strategy¹³ was adopted in May 2011 in order to deliver on the established Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

The National Planning Policy Framework (NPPF)

- 6.3.2 In order to contribute to the Government's commitment¹⁴ to halt the overall decline in biodiversity, the NPPF states that the planning system should look to minimise impacts on biodiversity, with net gains in biodiversity achieved wherever possible.
- 6.3.3 The NPPF states that planning policies should promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. The NPPF contains a commitment to 'plan for biodiversity at a landscape-scale across local authority boundaries'.
- 6.3.4 The NPPF calls upon local authorities to set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- 6.3.5 Positive planning for 'green infrastructure' is recognised as part of planning for ecological networks. Green infrastructure is defined as being: 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'.

¹¹ Benzene; 1,3-butadiene; carbon monoxide (CO); lead; nitrogen dioxide (NO₂); ozone; particles (PM₁₀); sulphur dioxide (SO₂); and polycyclic aromatic hydrocarbons.

¹² Council of the European Union (2006) The EU Sustainable Development Strategy [online] available at: <http://register.consilium.europa.eu/pdf/en/06/st10/st10117.en06.pdf> (accessed 11/2012)

¹³ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf (accessed 11/2012)

¹⁴ At the European level, a new EU Biodiversity Strategy was adopted in May 2011 in order to deliver on the established Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

Additional PPSIs

*Box 6.2: 'The Natural Environment White Paper (NEWP)'¹⁵, 'UK National Ecosystem Assessment (NEA)'¹⁶ and 'Biodiversity 2020'*¹⁷

The **Natural Environment White Paper (NEWP)** sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in 'nature reserves' to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.
- In terms of urban green infrastructure, the NEWP recognises that it is 'one of the most effective tools available to us in managing environmental risks such as flooding and heatwaves'.

The NEWP drew on the findings of the **National Ecosystem Assessment (NEA)**, a major project that was able to draw conclusions on the 'substantial' benefits that ecosystems provide to society directly and through supporting economic prosperity. The NEA identified development as a key driver of loss and biodiversity offsets as a possible means of increasing 'private sector involvement in conservation and habitat creation'.

The Government has also published 'Biodiversity 2020', which builds on the Natural Environment White Paper and sets out the strategic direction for biodiversity policy for the next decade. In relation to planning, it states that the objective should be to: 'guide development to the best locations, encourage greener design and enable development to enhance natural networks'

Box 6.3: The Wildlife Trusts' 'Living Landscapes' initiative'¹⁸ and 'Planning for green infrastructure and biodiversity'¹⁹ (2012)

The **Wildlife Trusts 'Living Landscape' initiative** focuses on the conservation of biodiversity over large areas of land where habitats are fragmented. Within 'Living Landscapes', a spatial approach to ecological restoration is applied with the aim of:

- Protecting and maximising the value of areas that are already rich in wildlife;
- Expanding, buffering, and creating connections and stepping stones between these areas; and
- Making the wider landscape more permeable to wildlife.

It is hoped that this restoration will both provide a healthy environment in which wildlife can thrive and enhance those natural processes that benefit people. A partnership approach is called for, with local government, agencies, the private sector and voluntary bodies required to act together.

In support of this landscape scale approach and the NPPF's call for positive planning for green infrastructure (GI), the TCPA and the Wildlife trusts have produced guidance on '**Planning for Biodiversity**'. It notes that as well as benefiting biodiversity, green infrastructure can help to 'deliver and complement some of the services currently provided by hard engineering techniques'. Local authorities are called upon to 'identify strategic GI within Local Plans' and also focus on making the built environment permeable for wildlife.

¹⁵ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf> (accessed 08/2012)

¹⁶ UNEP-WCMC (2011) UK National Ecosystem Assessment [online] available at: <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx> (accessed 08/2012)

¹⁷ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: <http://www.defra.gov.uk/publications/files/pb13583-biodiversity-strategy-2020-111111.pdf> (accessed 08/2012)

¹⁸ The Wildlife Trusts (2010) A Living Landscape: play your part in nature's recovery [online] available at: <http://www.wildlifetrusts.org/alivinglandscape> (accessed 08/2012)

¹⁹ The Wildlife Trusts & TCPA (2012) Planning for a healthy environment: good practice for green infrastructure and biodiversity [online] available at: <http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment> (accessed 08/2012)

Box 6.4: Woodland and forestry specific context

The final report of the **Independent Panel on Forestry**²⁰ has progressed the woodland conservation and management agenda considerably. It calls for society as a whole to value woodlands for the full range of beneficial ecosystem services that they can provide. It suggests that local authorities should look at the creative, cross boundary use of S106 agreements, biodiversity offsets and the community infrastructure levy as levers to 'produce green space schemes, including trees and woodland, that make a significant difference to the landscape'.

It also recommended that 'Local Authorities should use their Local Plans to introduce a "Wood First" policy for construction projects to increase use of wood in buildings. They should create a positive planning environment for sustainable wood and forestry businesses, as well as those based on woodland leisure and tourism, that should always enhance natural capital.'

Earlier policy was established through '**Seeing the Woods for the trees: A Forestry and Woodlands Framework for the South East**'²¹ This document sought to ensure outcomes including:

- Trees and woodlands supporting the development of sustainable communities.
- More people's health and well-being improved through visiting woodlands.
- Woodlands and trees, especially ancient woodlands and veteran trees, protected from loss.

*Box 6.5: Sustaining and enhancing trees, forests and woodland (2013)*²²

This strategy is based on a clear hierarchy of priorities protecting, improving and expanding public and private woodland assets. Trees, woods and forests are a vital national asset providing multiple economic, social and environmental benefits. The objective of this strategy is to ensure that this asset is protected, managed and enhanced so these benefits can be both maximised now and realised in the future. This means a forestry sector and woodland resource that keep growing, providing these multiple benefits; are financially sustainable and affordable; and are well equipped to respond to existing and future threats.

*Box 6.6: Swale Biodiversity Action Plan*²³ (2008)

The **Swale Biodiversity Action Plan** has actions relating to land-use planning as well as specific habitat actions for priority habitats and actions directed at supporting and encouraging local communities to take action for wildlife.

*Box 6.7: Growing the Garden of England: A strategy for environment and economy in Kent*²⁴

The aim of this strategy is to significantly reduce the rate of decline in biodiversity by 2015 and achieve measurable improvements in the conservation and enhancement of landscape and designated heritage assets.

*Box 6.8: Natural Environment and Rural Communities Act*²⁵ (2006)

The **Natural Environment and Rural Communities Act** stresses that biodiversity conservation should not be viewed solely as an environmental issue, but a core component of sustainable development, which underpins economic development and prosperity and offers a range of quality of life benefits across a range of local authority service areas.

²⁰ Defra (2012) The Independent Panel on Forestry: Final report [online] available at: <http://www.defra.gov.uk/forestrypanel/reports> (accessed 08/2012)

²¹ Forestry Commission (2004). Seeing the Woods for the trees: A Forestry and Woodlands Framework for the South East [online] available at: <http://www.forestry.gov.uk/seeingthewoodforthetrees>

²² <https://www.gov.uk/government/policies/sustaining-and-enhancing-trees-forests-and-woodland>

²³ Swale Biodiversity Action Plan <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/web-BAPBrochureWEB.pdf>

²⁴ <https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/the-kent-environment-strategy-and-progress-reports/kent-environment-strategy.pdf>

²⁵ http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf?timeline=true

6.4 Climate change

Internationally established objectives

6.4.1 In its 2007 strategy on climate change, the European Commission assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.²⁶ On energy, the Commission recommends that the EU's energy efficiency improves by 20 % and the share of renewable energy grows to 20 % by 2020.

The National Planning Policy Framework (2012)

6.4.2 The NPPF identifies as a 'core planning principle' the need to 'support the transition to a low carbon future in a changing climate'. A key role for planning in securing radical reductions in greenhouse gas emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008²⁷. Specifically, planning policy should support the move to a low carbon future through:

- planning for new development in locations and ways which reduce greenhouse gas emissions;
- actively supporting energy efficiency improvements to existing buildings;
- setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
- positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
- encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.

6.4.3 The NPPF 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. New developments should be planned so that they avoid increased vulnerability to climate change impacts. Risks should be managed through adaptation measures including the well planned green infrastructure.

6.4.4 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.

Additional PPSIs

Box 6.9: 'How local authorities can reduce emissions and manage climate risk'²⁸, and 'The Future of Heating'²⁹ (2012)

Planning functions are described as being a 'key lever in reducing emissions and adapting localities to a changing climate', with it considered particularly important that local authorities use these to:

- Enforce energy efficiency standards in new buildings and extensions;

²⁶ Commission of the European Communities (2007) Limiting Global Climate Change to 2 degrees Celsius: The way ahead for 2020 and beyond [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF> (accessed 11/2012)

²⁷ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

²⁸ Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at: http://hmccc.s3.amazonaws.com/Local%20Authorites/1584_CCC_LA%20Report_bookmarked_1b.pdf (accessed 08/2012)

²⁹ DECC (2012) The Future of Heating: A strategic framework for low carbon heat in the UK [online] available at: <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/heat/4805-future-heating-strategic-framework.pdf> (accessed 08/2012)

- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
- Work with developers to make renewable energy projects acceptable to local communities;
- Avoid increasing the area's risk to climate change impacts by locating new development in areas of lowest flood risk; and
- Plan for infrastructure such as low-carbon district heating networks, green infrastructure and sustainable drainage systems.

With regards to the latter point on low-carbon district heating networks, the DECC produced document '**The Future of Heating**' provides further guidance. It points out that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nation's greenhouse gas emissions. Renewable heat currently represents 1% of heat generation in the UK, although this is expected to grow significantly if decarbonisation targets are to be met. The Government's vision is of: 'buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to whole communities...focusing first on the energy efficiency of our buildings...'

Box 6.10: 'Flood and Water Management Act'³⁰ (2010) and 'Planning for SuDS'³¹ (2010)

The **Flood and Water Management Act** 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);
- 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;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Sustainable drainage systems (SuDS)

In relation to SuDS, further guidance is provided in the document 'Planning for SuDS'. This report calls for greater recognition of the opportunities for multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

Box 6.11: 'Climate change, justice and vulnerability'³²

This report calls for greater recognition of the social dimensions of vulnerability to climate change when considering adaptation policy. It notes that how badly a person or group will be affected by an extreme weather event is determined not only by their exposure to the event, but also on their vulnerability. This combination of factors can be described in terms of 'Climate Disadvantage'. This is a function of:

- a. the likelihood and degree of exposure to a hazard; and
- b. individual or group vulnerability with regards to such hazards.

Once recognised, these social dimensions of vulnerability require a widening of the scope of climate adaptation policy to take into account a broader set of concerns than has traditionally been the case. These concerns will include a number of areas of social policy which are not specifically concerned with climate change. For instance, a variety of social factors can affect the capacity of households to prepare for, and

³⁰ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 08/12)

³¹ CIRIA (2010) *Planning for SuDS – making it happen* [online] available at: <http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465> (accessed 07/12)

³² Joseph Rowntree Foundation (2011) *Climate change, justice and vulnerability* [online] available at: <http://www.jrf.org.uk/sites/files/jrf/climate-change-social-vulnerability-full.pdf> (accessed 08/2012)

respond to and recover from flooding:

- Low-income households are less able to take measures to make their property resilient to flooding and to respond to and recover from the impacts of floods
- The ability to relocate is affected by wealth, as is the ability to take out insurance against flood damage.
- Social networks affect the ability of residents to respond to flooding. For example, by providing social support and a response network, and by improving the local knowledge base.

Box 6.12: Climate Local³³ (2012)

This report has been developed by the Local Government Authority (LGA) and replaces The Nottingham Declaration on Climate Change. It is a strategy aimed at inspiring local authorities to take action to reduce carbon emissions and respond to climate changes. Kent County Council committed to the Climate Local initiative in September 2012³⁴, followed by Swale Borough Council Locality Board and Cabinet signing their commitment in December 2012³⁵. Climate Local asks councils to:

- Set out what actions they intend to undertake locally to reduce carbon emissions and respond to changes in the climate both within their own operations and services and with the local community;
- Set out their level of ambition and how they are going to monitor and demonstrate achievements; and Share with other councils and national partners' actions being undertaken and ambitions, progress and the learning from experiences and achievements.³⁶

Box 6.13: Kent and Medway Green Deal Partnership³⁷

The Kent and Medway Green Deal Partnership provides overall direction for retrofit activities and to the establishment of a Green Deal for Kent and Medway. The Green Deal is a Government initiative to support the installation of energy efficiency measures in householders and businesses with no up-front cost to the owner/occupier.

Box 6.14: Growing the Garden of England: A strategy for environment and economy in Kent³⁸

The second theme of this strategy aims to tackle climate change in the County. It sets out to achieve the following aims and targets:

- Reduce carbon emissions in Kent - By 2030 Kent's greenhouse gas emissions, measured as CO2 equivalent, will be 60% below 1990 levels.
- Help the public sector, the business community and Kent residents to manage both positive and negative impacts of climate change, including extreme weather events - By 2015 we will have tackled Kent's vulnerability to climate change and will be delivering a comprehensive action plan for adaptation. A system of monitoring and reviewing progress will be in place.

³³ Climate Local http://www.local.gov.uk/web/guest/the-lga-and-climate-change/-/journal_content/56/10171/3574359/ARTICLE-TEMPLATE

³⁴ http://www.kent.gov.uk/environment_and_planning/environment_and_climate_change/climate_local_kent.aspx

³⁵ <http://www.swale.gov.uk/climate-local/>

³⁶

http://www.kent.gov.uk/environment_and_planning/environment_and_climate_change/ways_to_save_money/warm_homes/kent_and_m edway_green_deal_par.aspx

³⁷

http://www.kent.gov.uk/environment_and_planning/environment_and_climate_change/ways_to_save_money/warm_homes/kent_and_m edway_green_deal_par.aspx

³⁸ <https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/the-kent-environment-strategy-and-progress-reports/kent-environment-strategy.pdf>

6.5 Cultural Heritage

The National Planning Policy Framework (2012)

6.5.1 The NPPF states that local planning authorities should set out in their local plan a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. Assets should be recognised as being 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’ that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Additional PPSIs

Box 6.15: ‘The Government’s Statement on the Historic Environment for England’³⁹ (2010)

This document sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Also of note is the reference to promoting the role of the historic environment within the Government’s response to climate change and wider sustainable development agenda.

Box 6.16: English heritage policy

Heritage at Risk⁴⁰ lists every heritage asset currently considered to be at risk in the UK according to local planning authority. Heritage assets are split into a number of categories namely; buildings, places of worship, scheduled monuments, registered parks and gardens, registered battlefields, protected wreck sites and conservation areas. With regards to Swale the English Heritage study considers that there are thirteen buildings considered at risk.

*Box 6.17: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031*⁴¹

Maximise Swale’s opportunities in a way which supports tourism and takes into consideration the needs and preferences of residents and visitors. Assist with the implementation of heritage activities.

6.6 Crime and Safety

The National Planning Policy Framework (2012)

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 in particular should provide safe options for all road users and enable minimal conflict between road users especially traffic and cyclists or pedestrians.

Additional PPSIs

Box 6.18: Influence of nature on and community well-being

The report **Natural Solutions** from the New Economics Foundation looks to highlight evidence from recent studies that demonstrates the important role that the natural world can play in delivering well-being and the

³⁹ HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx (accessed 08/2012)

⁴⁰ English Heritage (2012) Heritage at Risk [online] available at: <http://www.english-heritage.org.uk/content/publications/publicationsNew/heritage-at-risk/har-2012-lpa/HAR-entries-lpa-2012.pdf> (accessed 11/2012)

⁴¹ <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

delivery of key societal goals such as health, education, urban regeneration and crime reduction.

It points to the relationship between access to nature and positive health outcomes, with both physical and mental health benefits on offer through increased physical activity and environmental experience and contact. The natural environment is also described as potentially being a resource to help reduce crime levels and increase community cohesion by providing a neutral space in which people can meet and interact. In addition, green spaces and other outdoor locations can provide key environments for effective learning, with this particularly being the case for children not engaged in formal learning.

Box 6.19: The Local Transport Plan for Kent 2011-2016⁴² (2011)

The plan aims to deliver a safety and healthier community as an outcome of its transports plans. Various ambitions include; reducing casualties on the county's roads, reducing pollution and traffic impacts, improving accessibility to health, promoting active transport and protecting against anti-social behaviour.

Box 6.20: Swale Community Safety Partnership Swale Safer and Stronger Communities Plan 2011-14 Refresh 2012/13

The priorities for 2012-13 are:

- Domestic abuse
- Crime; Acquisitive Crime, and Fraud and Forgery
- Antisocial Behaviour; Repeat/Vulnerable Victims, Victim Satisfaction, Deliberate Fires
- Address needs of vulnerable adults to reduce reoffending
- Tackling substance misuse
- Prevent young people from offending
- Create stronger communities

Box 6.21: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031⁴³

The strategy aims is to create safer and stronger communities with reduced crime and disorder, reoffending and anti-social behaviour. Developing targeted responses to combat localised issues which deliver local solutions.

Box 6.22: Swale Borough Council – Shaping the future of Swale 2010-2013

This aims to work with partners to tackle crime, disorder, anti-social behaviour, substance misuse and to reduce reoffending.

6.7 Employment and Skills

The National Planning Policy Framework (2012)

6.7.1 The NPPF highlights the importance of considering market and economic signals. Land use should be used in a balanced approach so people are encouraged to minimise journey lengths to employment areas, education facilities and to other activities.

6.7.2 The economic role of the NPPF plays a major role in terms of using sustainable development to create a strong, responsive and competitive economy by ensuring sufficient land of the right type is available in the right places at the correct time to support growth and innovation.

⁴² The Local Transport Plan for Kent 2011-2016 (2011) <https://shareweb.kent.gov.uk/Documents/roads-and-transport/road-policies/local-transport-plan-3/final-ltp3.pdf>

⁴³ <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

6.7.3 The NPPF highlights the importance of understanding the business needs. Rural economies should also be supported by supporting expansion, diversification and tourism where appropriate.

Additional PPSIs

Box 6.23: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031⁴⁴

Priorities include increasing prosperity, improving the Borough’s skills profile and securing investment in transport infrastructure. This combination should help secure business within the Borough and enhance the local resident’s job opportunities.

Box 6.24: Vision for Kent (2006 – 2026)

Kent will be a county where learning is stimulated and supported for everyone – for life, for enjoyment and for employment.

6.7.4 Further policies in relation to employment are discussed under the “Local Economy” topic.

6.8 Health

The National Planning Policy Framework (2012)

6.8.1 The NPPF recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

6.8.2 The social role of the planning system is defined in the NPPF as ‘supporting vibrant and healthy communities’, with a ‘core planning principle’ being to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.

Additional PPSIs

Box 6.25: ‘The Marmot Review: Implications for Spatial Planning’⁴⁵ (2011) and ‘Get in on the Act: Health and Social Care Act’⁴⁶ (2012)

‘Fair Society, Healthy Lives’ (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health. It does so on the basis 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’.

It highlights three main policy actions to ensure that the built environment promotes health and reduces inequalities. These should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage. Specifically these actions are to:

- ‘Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality’
- ‘Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing’
- ‘Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation’.

The increasing role that local level authorities are expected to play in producing health outcomes is well

⁴⁴ <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

⁴⁵ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf> (accessed 08/2012)

⁴⁶ LGA (2012) Get in on the Act: Health and Social Care Act online] available at: http://www.local.gov.uk/c/document_library/get_file?uuid=81914af4-5de6-4ccb-93e2-3764523dd8b0&groupId=10171 (accessed 08/2012)

demonstrated by recent Government legislation. The **Health and Social Care Act 2012** transfers responsibility for public health from the NHS to local government⁴⁷, giving them a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Box 6.26: 'Environmental Audit Committee – Sustainable Food'⁴⁸ (2012)

This report highlights the lack of government guidance on providing communities with better access to local and sustainable food through Local Plans. It suggests that such guidance should encourage provisions within Local Plans that take account of such access and 'ensure that communities are provided with open spaces to grow their own produce'.

Box 6.27: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031⁴⁹

This strategy aims to achieve a Borough in which people live healthier lives and have access to high quality services that meet their needs by:

- Improving outcomes in wards;
- Reducing smoking and obesity; and
- Improving access to health facilities especially in the most disadvantaged areas.

6.9 Housing

The National Planning Policy Framework (2012)

- 6.9.1 The NPPF states that local planning authorities should significantly boost the supply of housing and meet the 'full, objectively assessed need for market and affordable housing' in their area. 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, with these to be developed in accordance with the 'principles of Garden Cities'.
- 6.9.2 In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- 6.9.3 The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

⁴⁷ Upper tier and unitary local authorities

⁴⁸ Environmental Audit Committee (2012) Sustainable Food [online] available at: <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/879/87902.htm> (accessed 08/2012)

⁴⁹ <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

Planning policy for traveller sites (2012)⁵⁰

- 6.9.4 This document 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. Pitch targets for gypsy and travellers, and plot targets for travelling show people should be set, with a five year supply of specific deliverable sites identified against these targets. The Government’s aims in respect of planning for travellers sites include:
- Promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites;
 - Reducing the number of unauthorised development and encampments;
 - 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.

Additional PPSIs

Box 6.28: ‘Laying the foundations⁵¹, (2011)

The Government’s housing strategy ‘**Laying the Foundations**’ sets out a number of key objectives, including in relation to the quality of homes. The ‘Housing report’ report (discussed below) collates the official figures available on housing in order to establish whether the Government’s approach to housing is succeeding. A challenge identified for the Government is to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: ‘Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify over the coming years’.

The Government’s performance is analysed under a number of main headings, the following of which are of significance:

- Housing Supply: A small increase of new build is recorded, but this is from a historically low base. The number of completions in 2011 was 38% below the 2007 peak.
- Overcrowding: This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
- Homelessness: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit during 2013.
- Empty Homes: Despite 720,000 homes currently being classed as empty, the situation seems to be an improving one.
- Home Ownership: House prices are relatively steady, sales are up, and affordability is increasing. However, homeownership rates are falling and there is a decline in low cost ownership sales. Home ownership remains out of reach for most people.

Box 6.29: Chartered Institute of Housing analysis

The ‘**Housing Report**’⁵² collates the official figures available on housing in order to establish whether the Government’s approach to housing is succeeding. A challenge identified for the Government is to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: ‘Many of

⁵⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6078/2113371.pdf
⁵¹ CLG (2011) Laying the Foundations: A Housing Strategy for England [online] available at: (accessed 08/2012)
⁵² The Chartered Institute of Housing, National Housing Federation & Shelter (2012) The Housing Report: Edition 2 [online] available at: http://england.shelter.org.uk/_data/assets/pdf_file/0008/435653/Housing_Report_2_-_May_2012.pdf (accessed 11/2012)

the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify over the coming years’.

The Government’s performance is analysed under a number of headings, including:

- **Housing Supply:** A small increase of new build is recorded, but this is from a historically low base. The number of completions in 2011 was 38% below the 2007 peak.
- **Overcrowding:** This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
- **Homelessness:** There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit during 2013.
- **Empty Homes:** Despite 720,000 homes currently being classed as empty, the situation seems to be an improving one. This is particularly the case with long-term empty homes.
- **Home Ownership:** House prices are relatively steady, sales are up, and affordability is increasing. However, homeownership rates are falling and there is a decline in low cost ownership sales. Home ownership remains out of reach for most people.

Box 6.30: Joseph Rowntree Foundation analysis

The Joseph Rowntree Foundation **International Review of Land Supply and Planning Systems**⁵³ highlights that, despite record house prices in the early 2000s, the supply of new homes did not increase significantly. This lack of responsiveness to increases in house prices has led to affordability problems. The global financial crisis and resultant recession(s) has only worsened the supply situation.

In England, perceived constraints on the supply of land include: a lack of incentives for local authorities to support new development; the nature of the house-building industry; and existing disincentives to make land available in the light of future price increases. The mechanisms for funding and providing the necessary infrastructure can act as a constraint, as can the availability and cost of finance of development. There are particular risks associated with the re-use of land as compared with greenfield sites with respect to fragmentation of ownership, risks and costs. Market volatility further increases risks and uncertainty.

The JRF study reviewed the situation in other countries and the mechanisms used to ensure sufficient house building, most of which have their equivalent in England. Of key importance are:

- Incentives to bring land forward;
- Provision of infrastructure in advance of, or alongside, development; and
- Growth management boundaries/urban growth limits

In terms of the latter, growth management boundaries/urban growth limits are used by most countries to prevent urban sprawl. To ensure price stability, the limit is normally revisited at regular intervals, but urban containment inherently affects land prices both within and outside the limit. There are some examples of successful urban containment and relative price stability over time, notably Portland, Oregon, but successful management requires planners to be pro-active in monitoring and adjusting land supply. Currently Green Belt cover some 13 percent of the total land area of England (with urban land covers around 10 percent). The Planning Minister has recently stated that increasing this to just 12 percent would meet all identified future requirements and that this could be done while preserving Green Belt. JRF conclude that *‘The green belt has successfully prevented urban sprawl – but at a price. Evidence from other countries suggests that it should be operated more flexibly, with boundaries revisited regularly.’*

Box 6.31: Solutions to ‘the housing crisis’ suggested by Policy Exchange and the TCPA

⁵³ Joseph Rowntree Foundation (2013) International Review of Land Supply and Planning Systems [online] available at: <http://www.jrf.org.uk/sites/files/jrf/land-supply-planning-full.pdf> (accessed 04/2013)

In recent position statements both Policy Exchange⁵⁴ (a leading ‘think tank’) and the Town and Country Planning Association (TCPA)⁵⁵ highlight the extent of the housing challenge and identify that a key barrier to addressing the challenge is the poor perception of new development. Policy Exchange state that ‘A lot of people object to new development because they assume that the outcome will be buildings that are at best characterless, cheap in everything except price.’ The following solutions are suggested by the two organisations are quite different:

- Policy exchange advocate the need for ‘**self-build**’ to make a much more significant contribution. Self-build is where development involves a discrete project for a specific owner, who will hence input into the design and construction. Currently, in the UK 10% of new homes (less in England) is self-build, with the vast majority of development being undertaken by large developers (who, Policy Exchange suggest, can act as land speculators as much as builders to the detriment of building rates). Councils can support self-build by using land auctions to enable self-builders to procure plot sized areas of land.
- TCPA suggest that **large-scale new communities** (phased over time) should be prominent in ‘the portfolio of solutions that will be essential in tackling today’s acute housing shortage – a shortage which cannot be addressed exclusively on a plot-by-plot basis.’ TCPA believe that: ‘Well planned new communities provide an opportunity to create high-quality sustainable places, allowing for the highest sustainability standards, economies of scale, and better use of infrastructure. A holistic approach to creating new communities provides an opportunity to consider how homes and neighbourhoods can be made attractive places in which to live and work, in environments which are socially inclusive and resilient to climate change.’ In particular, TCPA advocate the idea of developing **Garden Cities and Suburbs** according to a series of agreed principles. Benefits of this approach include –
- The population of a new Garden City can provide the critical mass to support the necessary facilities for low-carbon lifestyles, such as rapid public transport, low-carbon energy systems, jobs located within walking distance of homes, and a range of cultural and leisure services, including a comprehensive green infrastructure network providing quick access to the wider countryside.
- Any negative impacts on the environment can be dealt with in a holistic way, with avoidance, mitigation and compensation considered from the outset.

Box 6.32: Swale Homelessness Strategy 2008 -2012

This strategy aims to prevent homelessness through offering realistic options and choice; and work in partnership to maximise housing options and improve the quality of life for local people.

Box 6.33: Swale Housing Strategy 2010-2015

This strategy aims to increase housing supply, including affordable housing; Improve housing condition and local neighbourhoods; support vulnerable people; and tackle disadvantage and improve quality of life.

Box 6.34: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031⁵⁶

This strategy aims to increase housing supply to meet the local needs and improve housing condition and local neighbourhoods.

Box 6.35: Vision for Kent (2006 – 2026)

The vision is for Kent to be a county where housing needs are met and decent, high quality homes help create attractive, safe and friendly communities.

⁵⁴ Policy Exchange (2013) A right to build: Local homes for local people [online] available at: <http://www.policyexchange.org.uk/images/publications/a%20right%20to%20build.pdf> (accessed 04/2013)

⁵⁵ TCPA (2013) Creating garden cities and suburbs today a guide for councils [online] available at: http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today_-_a_guide_for_councils.pdf (accessed 04/2013)

⁵⁶ <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

6.10 Landscape

The National Planning Policy Framework (2012)

- 6.10.1 The NPPF states that the planning system should protect and enhance valued landscapes. Particular weight is given to ‘conserving landscape and scenic beauty’. According to the NPPF, ‘great weight’ should be given to the conservation of the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB), which have the ‘highest level of protection’ in this regard. The conservation of cultural heritage and wildlife in these areas is also an ‘important consideration’
- 6.10.2 The NPPF calls for planning policies and decisions 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’.
- 6.10.3 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’.

Additional PPSIs

Box 6.36: The European Landscape Convention (2000)

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’. Among other things, the ELC commits all signatories to establishing and implementing policies aimed at landscape protection, management and planning / integrating landscape into town planning, cultural, environmental, agricultural, social and economic policies.

Box 6.37: Landscape Institute position statement on green infrastructure

In ‘**Green Infrastructure: An integrated approach to land use**’ (2013)⁵⁷ the Landscape Institute (LI) makes a distinction between:

- Elements of the landscape that can represent distinct green infrastructure (GI) ‘assets’, e.g.
- Urban area, Business Parks, Suburban Housing, Sustainable Drainage Systems, Community Centres (e.g. with sports pitches), ‘main green spines’ (e.g. waterways and major pedestrian/cycle routes, allotments, small-holdings and orchards, and country parks
- GI ‘functions’, e.g. water management, dealing with waste, climate change adaptation and mitigation, business benefits, local distinctiveness, recreation and health, education, community cohesion, food production, and biodiversity,

Six recommendations are made, two of which are aimed at local authorities:

Turn strategic GI thinking into reality - Ensure that GI is a core requirement in Local Plans, Infrastructure Development Plans and development briefs. Proper consideration should also be given to the potential for multifunctional GI to perform some of the roles that ‘grey’ infrastructure is used for, particularly water management and waste. Why? Not only does GI tend to be cheaper, but it also provides infrastructure that is resilient to an increasingly unpredictable climate.

Promote collaboration on GI across boundaries - By its nature, GI often crosses administrative boundaries, so it should be addressed through the Duty to Cooperate between local authorities. It should also be part of the remit of Local Enterprise Partnerships.

It is also notable that the position statement references **Trees in the Townscape: A Guide for Decision Makers**. This highlights that trees can contribute to storm-water, management, urban cooling and microclimate control, air-quality improvement, visual amenity and carbon sequestration. Where space is at a

⁵⁷ Landscape Institute (2013). Green Infrastructure: An integrated approach to land use [online] available at <http://www.landscapeinstitute.org/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf> (accessed 04/13)

premium and the built environment is dominant, trees provide significant natural assets that can be retrofitted into streets and other available spaces with relatively little disturbance to surrounding activities.

*Box 6.38: Kent Downs AONB - Management Plan (2009-2014)*⁵⁸

This management plan for the Kent Downs AONB sets out to secure the natural beauty, special landscape character and community vitality of the area. It includes a 'Vision for 2029' which describes how the area can respond to change in a manner which preserves the AONB for future generations. It sets out the need for the Kent Downs to be a landscape in which change (e.g. development or climate change related) supports the distinctive features of the AONB. A draft review of the plan for the period 2014-2019 is currently being consulted on.

*Box 6.39: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031*⁵⁹

This strategy aims to maximise the value of green spaces to help consolidate a sense of belonging among the communities.

6.11 Local Economy

Internationally established objectives

6.11.1 In 2010, the European Union published its strategy for achieving growth up until 2020.⁶⁰ This strategy focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient and more competitive economy; and inclusive growth, aimed at strengthening employment, and social and territorial cohesion.

The National Planning Policy Framework (2012)

6.11.2 The NPPF highlights the contribution the planning system can make 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'.

6.11.3 There is an emphasis on capitalising on 'inherent strengths', and to meeting the 'twin challenges of global competition and of a low carbon future'. There is a need to support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.

6.11.4 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.

Additional PPSIs

*Box 6.40: The Local Growth White Paper*⁶¹

The Local Growth White Paper notes that Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. In some cases this means focusing investment at areas with long term growth challenges, so that these areas can undergo transition to an economy that responds to a local demand. Places that are currently successful may also wish to prioritise activity to maximise further growth by

⁵⁸ Kent Downs Area of Outstanding Natural Beauty – Management plan (2009-2014) [online] available at: http://www.kentdowns.org.uk/Mplanmain.pdf?bcsi_scan_AB11CAA0E2721250=0&bcsi_scan_filename=Mplanmain.pdf (accessed 08/2012)

⁵⁹ <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

⁶⁰ European Commission (2010) Europe 2020: A strategy for smart, sustainable and inclusive growth [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF> (accessed 11/12)

⁶¹ BIS (2010) Local Growth White Paper [online] available at <http://www.bis.gov.uk/assets/BISCore/economic-development/docs/L/cm7961-local-growth-white-paper.pdf>

removing barriers, such as infrastructure constraints. However, the White Paper also emphasises that: ‘This does not mean that every place will grow at the same rate or that everywhere will, or will want to, become an economic powerhouse. Long term economic trends make differences in economic performance inevitable and these can and do change over time’.

Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations.

Finally, the White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete with the best internationally.

Box 6.41: ‘Parades of Shops – towards an understanding of performance and prospects’⁶² (2012) and ‘The Missing Links - Revitalising our rural economy’⁶³ (2012)

Despite their local economic and social importance, shopping parades have been subject to a continued decline. In order to buck this trend, the report suggests the need for appropriate policy responses. It is suggested that:

- The diversity of neighbourhood parades is recognised through flexible policy initiatives. These responses should look to ‘reinforce local distinctiveness and community value, and develop the social function of neighbourhood parades’ with a view to underpinning ‘on-going commercial viability’.
- The role of local parades in developing local economies by ‘providing a ‘seed-bed’ function for start-up businesses’ could be enhanced through the focused support for their ‘enterprise formation and employment growth potential’.

Another important area of concern for local economic growth is rural areas. The ‘significant untapped potential’ of rural areas to contribute to economic growth and employment is the focus of the report ‘Missing Links’. It considers distance to market to be a crucial concern and calls for the improvement of transport links and the provision of adequate digital infrastructure.

Box 6.42: ‘South-East LEP - Our Vision’⁶⁴ (2012)

The **South-East LEP – Our vision**⁶⁵ sets out as its mission the creation of ‘the most enterprising economy in England. In order to achieve this aim, it sets out a number of objectives that are to be achieved over the next twenty years. Of particular relevance in this case are the following:

- Every community across the LEP will be served by super-fast (100 mbps or greater) broadband networks; and
- There will be a steady flow of public and private investment in strategic infrastructure, including creating even better connections to key global markets.

Box 6.43: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031

This strategy brings businesses together to help in the decision making process, identifying gaps and identifying the appropriate use of major employment locations.

⁶² CLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at: <http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf> (accessed 08/2012)

⁶³ Federation of Small Businesses (2012) The Missing Links - Revitalising our rural economy [online] available at: http://www.fsb.org.uk/policy/assets/rural_report_web_final_proof.pdf (accessed 08/2012)

⁶⁴ South East LEP (2012) Our Vision online] available at: <http://southeastlep.com/about/our-vision> (accessed 08/2012)

⁶⁵ encompassing East Sussex, Essex, Kent, Medway, Southend and Thurrock

Box 6.44: Regional Tourism Strategy

The Thames Gateway is identified as a tourism growth area for realising the potential for growth in business, sporting, environmental and attraction based tourism as part of the wider regeneration strategy for the Gateway, adding value to the existing tourism market.

6.12 Population

The National Planning Policy Framework (2012)

6.12.1 The NPPF highlights the importance of assessing the population projections, migration and demographic change to ensure assessments of population need are comprehensive so diligent assessments can be made to meet the current and future needs.

Planning policy for traveller sites (2012)⁶⁶

6.12.2 This policy should be read in conjunction with the NPPF and emphasises the need to provide for travellers in Local Plans. The size and density 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.

Additional PPSIs

Box 6.45: Local Transport Plan for Kent 2011-16⁶⁷

Key priorities set out within the plan relating to population include:

- A safer and Healthier County;
- Supporting Independence;
- Tackling a Changing Climate; and
- Enjoying Life in Kent

Box 6.46: Living Later Life to the Full – A Policy Framework for Later Life⁶⁸

Key priorities set out within the plan relating to population include:

- To ensure communities are designed to be ‘age proof’, stronger, safer and sustainable;
- To improve transport and accessibility;
- To enable people to lead healthier lives and have better access to healthcare;
- To support people’s citizenship, learning and participation in community life;
- To ensure those people who need support to live independently have choice, control and good quality care;
- To encourage people to plan for a secure later life; and
- To promote a positive image of later life and dignity and respect for older people.

Box 6.47: Kent Prospects 2007 to 2012⁶⁹

Relevant objectives set out within the Kent Prospects report include to:

- Support innovation, skills and enterprise
- Promote opportunities associated with the Olympics and other events

⁶⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6078/2113371.pdf

⁶⁷ <https://shareweb.kent.gov.uk/Documents/roads-and-transport/road-policies/local-transport-plan-3/final-ltp3.pdf>

⁶⁸ <https://shareweb.kent.gov.uk/Documents/priorities-policies-plans/policy-framework-later-life.pdf>

⁶⁹ <https://shareweb.kent.gov.uk/Documents/community-and-living/Regeneration/kentprospects2007.pdf>

- Promote economic development and regeneration opportunities

6.13 Soil

The National Planning Policy Framework (2012)

6.13.1 In relation to conserving and enhancing the natural environment, the NPPF calls upon the planning system to protect and enhance soils. It expects local planning authorities ‘to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality’. 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, where appropriate’.

Additional PPSIs

Box 6.48: Further Government policy

In **Safeguarding our Soils: A strategy for England**⁷⁰, a vision is set out for the future of soils in the Country. An element of this vision is the condition of soils in urban areas, which are to be ‘sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system’. Good quality soils in urban areas are recognised as being ‘vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities’. That planning decisions take sufficient account of soil quality is a concern of the report, in particular in cases where ‘significant areas of the best and most versatile agricultural land are involved’. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the reports vision.

In terms of future trends, the report notes that pressures on soils and competition for land is likely to increase in future as a result of population growth, As a result, the effects of these trends and the ‘changing demands on our soils’ needs to be better understood and it must be ensured that ‘appropriate consideration is given to soils in the planning process’.

Box 6.49: Defra Soil Protection Programme

This seeks to protect the quantify diversity, quality and extent of soils to help develop strategies to eliminate threats to spoil and promote sustainable land management.

Box 6.50: The European Soil Thematic Strategy (2006)

This strategy aims to:

- Establish common principles for the protection and sustainable use of soils
- Prevent threats to soils, and mitigate the effects of those threats
- Preserve soil functions within the context of sustainable use
- Restore degraded and contaminated soils to approved levels of functionality

⁷⁰ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at: <http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf> (accessed 11/2012)

6.14 Transport and Accessibility

The National Planning Policy Framework (2012)

- 6.14.1 In terms of transport and travel policies, the NPPF notes that these 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.

Additional PPSIs

Box 6.51: 'Understanding Walking and Cycling'⁷¹ (2011)

This report looks to understand why sustainable and active travel is relatively uncommon in British towns when, potentially, higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related greenhouse gas emissions. It recognises that physical infrastructure alone is not sufficient, with a more holistic approach required to incentivise such journeys. Creating a safe physical environment for pedestrians and cyclists – e.g. through fully segregated cycle path; and restrictions on vehicle access – is one important measure.

Box 6.52: Local Transport Plan for Kent 2011-2016

Key objectives set out within the Local Transport Plan for Kent include to:

- Reduce journey times for personal travel, business and freight;
- Provide transport infrastructure;
- Support the function of the County's international gateways;
- Reduce and reverse the impact of transport on public health;
- Encourage and enable more physically active travel;
- Improve access by and integrate public transport, walking and cycling;
- Reduce traffic levels; and
- Improve carbon efficiency of current forms of transport.

Box 6.53: Realising our ambitions for Swale – Partnership priorities for the Borough to 2031⁷²

This strategy strives to secure investment in transport infrastructure:

- For staged investment to secure a solution to the issues of over capacity at Junction 5 of the M2
- Formation of a Quality Bus Partnership which provides better access to major employment areas; and
- Engage in the consultation for the new Integrated Kent Franchise for rail services, seeking affordability, integration with other transport modes and support for the Sheerness to Sittingbourne branch line.

Box 6.54: Growth Without Gridlock (A Transport Delivery Plan for Kent)⁷³

'Growth Without Gridlock' identifies the necessary transport infrastructure needed to accommodate the level of economic growth and regeneration planned for Kent, the measures required to manage the existing network and offers travel choice and better access to jobs/ Key transport priorities for Swale are identified as;

⁷¹ Lancaster University, University of Leeds & Oxford Brookes University (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCReportSept2011.pdf (accessed 08/2012)

⁷² <http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf>

⁷³ <https://shareweb.kent.gov.uk/Documents/News/growth-without-gridlock.pdf>

- Securing the necessary infrastructure to open up key development areas for housing and employment;
- Delivering capacity improvements on the Strategic Road Network; and
- Regeneration of Sittingbourne Town Centre.

6.15 Waste

Internationally established objectives

- 6.15.1 The EU's Thematic Strategy on the Prevention and Recycling of Waste is long-term strategy which aims to ensure that Europe becomes a recycling society that seeks to avoid waste and which uses waste as a resource.⁷⁴ The strategy proposes that approaches to waste management are modernised and that they promote more and better recycling.

The National Planning Policy Framework (2012)

- 6.15.2 The NPPF does not contain any specific waste policies⁷⁵. It states that national waste planning policy will be published as part of the National Waste Management Plan for England however until this is published Planning Policy Statement 10 Planning for Sustainable Waste Management will remain in place.

Planning Policy Statement 10: Planning for Sustainable Waste Management

- 6.15.3 Planning Policy Statement 10: Planning for Sustainable Waste Management sets out current government planning policy on waste management. The government's stated overall objective is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. PPS10 goes on to state that the government aims to break the link between economic growth and the environmental impact of waste by moving waste management up the waste hierarchy, involving significant investment in new waste management facilities. It sets out the following key planning objectives

- Drive waste management up the waste hierarchy.
- Communities taking more responsibility for their own waste, involving sufficient and timely provision of new facilities.
- Implementation of the national waste strategy and supporting targets.
- The recovery of waste without endangering human health and without harming the environment and enabling waste disposal in one of the nearest appropriate installations.
- Reflecting the concerns of stakeholders in waste management.
- Protection of green belts and recognition that the particular locational needs of some waste management facilities, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.
- Ensuring sustainable waste management is built into new development.

Additional PPSIs

Box 6.55: 'Government Review of Waste Policy in England'⁷⁶ (2011)

This report recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. As such, it sets out a vision to move beyond our current 'throwaway society' to a 'zero waste economy'. The report recognises that planning will play a critical role in

⁷⁴ European Commission (2011) Thematic Strategy on the Prevention and Recycling of Waste [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0013:FIN:EN:PDF> (accessed 11/2012)

⁷⁵ National waste planning policy will be published as part of the National Waste Management Plan for England

⁷⁶ Defra (2011) Government Review of Waste Policy in England [online] available at: <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf> (accessed 08/2012)

delivering this ambition. In terms of planning for waste the report notes that local authorities should consider the infrastructure needs of their community from the earliest stages of developing their local policies and plans. It also states that local communities should benefit from the hosting of waste facilities.

Box 6.56: Joint Municipal Waste Strategy (2007)⁷⁷

Principal objectives in managing municipal waste management in Kent:

- Deliver high quality services to the people of Kent, including an emphasis on waste reduction, recycling and diversion from landfill
- Meet the statutory targets set for Kent, and exceed them in areas where this is a locally agreed policy

Box 6.57: Waste Strategy (2007)

This strategy identifies the following targets

- Recycle or compost at least 45% of household waste by 2015
- Recycle or compost at least 50% of household waste by 2020.
- Reduce the amount of household waste not re-used, recycled or composted. This means reducing it from 22.3 million tonnes in 2000 to 12.2 million tonnes in 2020 (with a target of 15.9 million tonnes by 2010). This is a reduction of 45%.

Box 6.58: Swale First Corporate Plan 2012-2015 Updated for 2013/14⁷⁸

This plan aims to keep litter off the streets and away from open spaces to create a cleaner and greener Borough.

Box 6.59: Kent Minerals and Waste Core Strategy (Strategy and Policy Directions Consultation)

Key objectives for Kent in terms of waste management include to:

- Move waste up to the waste hierarchy, reducing the amount of non-hazardous waste sent to landfill;
- Encourage waste to be used to produce renewable energy incorporating both heat and power;
- Ensure waste is handled close to its source of production;
- Make provision for a variety of waste management facilities to ensure that Kent remains at the forefront of waste management, and has solutions for all major waste streams, whilst retaining flexibility to adapt to changes in technology; and
- Plug the ‘gaps’ in current provision for waste management especially in East Kent.

6.16 Water

Internationally established objectives

6.16.1 The Water Framework Directive (2000/60/EC) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra’s intention is to establish a ‘framework for integrated catchment management’ across England by the end of 2013. The Environment Agency is currently seeking to establish ‘Significant Water Management Issues’ within catchments with a view to presenting second River Basin Management Plans to ministers in 2015. The Plans will seek to deliver the objectives of the WFD namely:

⁷⁷ [https://shareweb.kent.gov.uk/Documents/environment-and-planning/recycling-and-rubbish/Kent-Joint-Municipal-Waste-Management-Strategy/kentjointmunicipalwastemanagementstrategy\[1\].pdf](https://shareweb.kent.gov.uk/Documents/environment-and-planning/recycling-and-rubbish/Kent-Joint-Municipal-Waste-Management-Strategy/kentjointmunicipalwastemanagementstrategy[1].pdf)

⁷⁸ http://issuu.com/swale-council/docs/corporate_plan_update- swale_first_2013?e=4021732/2669518

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by ‘priority’ and ‘priority hazardous’ substances; and
- Ensure the progressive reduction of groundwater pollution.

6.16.2 The Environment Agency believes that to achieve good status in all water bodies by 2027 (the target of the Water Framework Directive) will not be possible using only current technologies. In fact, achieving 75 per cent good status will require marked changes in land use and water infrastructure.

6.16.3 The EU’s ‘Blueprint to Safeguard Europe’s Water Resources’⁷⁹ highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU’s vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.

6.16.4 The EU Urban Waste Water Treatment Directive – 91/271/EEC80 aims to protect the environment and to ensure waste water treatment is of a high standard. It provides information of the various sensitive areas and the implications which may occur if waste water is not dealt with correctly.

The National Planning Policy Framework (2012)

6.16.5 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.

Additional PPSIs

Box 6.60: Further Government policy

The **Water White Paper**⁸¹ sets out the Government’s vision for a more resilient water sector, where water is valued as the precious resource it is. It states the measures That will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

Commitments are made in the White Paper to ‘encourage and incentivise water efficiency measures’ at the demand side. Through these measures and the demand management measures set out in Water Resource Management Plan’s for water companies, the Government aspires to reduce average demand to 130 litres per head, per day by 2030.

The avoidance of pollution is also a consideration in the White Paper, leading to a Government consultation on a national strategy on urban diffuse pollution in 2012. The consultation report⁸² notes that pollutants affecting failing waterbodies can be broken down into a number of categories including:

Point Source Pollution: Permitted discharges from factories and wastewater treatment are currently responsible for about 36% of pollution related to failing water bodies.

Diffuse pollution: Unplanned pollution from urban and rural activity, arising from sources such as industry, commerce, agriculture, and civil functions is responsible for 49% of the pollution related to failing water

⁷⁹ European Commission (2012) A Blueprint to Safeguard Europe’s Water Resources [online] available at http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final_EN_ACT-cov.pdf (accessed 11/2012)

⁸⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69592/pb13811-waste-water-2012.pdf

⁸¹ Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 11/2012)

⁸² Defra (2012) Tackling water pollution from the urban environment: Consultation on a strategy to address diffuse water pollution from the built environment [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82602/consult-udwp-doc-20121120.pdf (accessed 05/2013)

bodies. Agricultural diffuse pollution is responsible for 33% of failures; non-agricultural for 14%. In highly urbanised areas the contribution of urban diffuse pollution is much higher.

Box 6.61: Further Government guidance on flood risk

The **Flood and Water Management Act**⁸³ 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)
- 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
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion
- Sustainable drainage systems (SuDS)⁸⁴

Further guidance is provided in the document **Planning for SuDs**.⁸⁵ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

GP3: Groundwater Protection: Policy and Practice⁸⁶ (2012) implements the requirements of the WFD and Environmental Permitting Regs, protecting and enhancing water quality in both surface water and ground water and managing the sustainable supply of water as a resource. Principles are set out to ensure wise resource use and bring benefits to land, wildlife, flood risk management and communities. The Environment Agency's core groundwater policy is to protect and manage groundwater resources for present and future generations in ways that are appropriate for identified risks such as pollution and climate change. To achieve this the Environment Agency seek to:

- Meet the needs of the environment and people;
- Manage surface water and groundwater as an integrated whole;
- Use robust measures to prevent the pollution of groundwater; and
- Achieve the environmental objectives of the Water Framework Directive.

*Box 6.62: Kent Design Guide (2008)*⁸⁷

This promotes water efficiency measures through new development design.

*Box 6.63: Code for Sustainable Homes (2010)*⁸⁸

This promotes reduction in consumption of potable water in dwellings, through the use of water efficient fittings, appliances and water recycling systems. CSH Level 3 mandatory water consumption level is less than 105 litres per person per day.

⁸³ Flood & Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 11/12)

⁸⁴ N.B. The government proposes that the provisions of Schedule 3 to the Flood and Water Management Act 2010 will come into force on the 1st of October 2012 and will make it mandatory for any development in England or Wales to incorporate SuDs.

⁸⁵ CIRIA (2010) Planning for SuDs – making it happen [online] available at:

<http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465> (accessed 11/12)

⁸⁶ Environment Agency (2012) GP3: Groundwater Protection: Policy and Practice [online] available at: <http://www.environment-agency.gov.uk/research/library/publications/144346.aspx> [accessed 15/03/2013]

⁸⁷ http://www.kent.gov.uk/community_and_living/regeneration_and_economy/kent_design_initiative.aspx

⁸⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5976/code_for_sustainable_homes_techguide.pdf

*Box 6.64: Growing the Garden of England: A strategy for environment and economy in Kent (2011)*⁸⁹

This strategy promotes the importance of water as resource and the need to use it efficiently. The strategy has priorities which aim to increase the efficiency of homes and other developments in Kent to achieve higher standards and levels of sustainability.

*Box 6.65: Regional Flood Risk Assessment for the South East (2008)*⁹⁰

This identifies broad locations where significant housing coincides with high flood risk. The Thames Gateway is identified within this category.

Box 6.66: The Catchment Abstraction Management Strategy

The 'resource availability status' indicates the relative balance between committed and available resources in a particular area. The status is classified as 'no water available', 'over-licenced' or 'over abstracted'. The strategy illustrates implications for new development in the Borough especially in terms of water efficiency.

Box 6.67: Isle of Grain to South Foreland Shoreline Management Plan, Medway Estuary and Swale Shoreline Management Plan, North Kent and Swale Catchment Abstraction Management Plan.

This identifies sustainable long-term management policies for the coastal areas of Swale. Policy recommendations are in line with those recommended by Defra:

- Hold the line – maintain or upgrade the level of protection provided by the defences,
- Advance the line – build new defences seaward of the existing defence line,
- Managed realignment – allow retreat of the shoreline, with management control or limit movement, and
- No active intervention – a decision not to invest in providing or maintaining defences.

⁸⁹ <https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/the-kent-environment-strategy-and-progress-reports/kent-environment-strategy.pdf>

⁹⁰ http://www.climatesoutheast.org.uk/images/uploads/SE_flood_risk_appraisal_Nov_08.pdf

7 WHAT IS THE SUSTAINABILITY 'BASELINE'?

The SA 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.
- Any existing sustainability problems 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 Reviewing the sustainability 'baseline' is about generating a more detailed understanding of the local situation for the broad sustainability problems/issues identified through the context review (as well as a more locally specific understanding of the relevance of identified sustainability objectives). An understanding of the baseline for a given sustainability problem/issue can aid the identification and evaluation of 'likely significant effects' associated with the draft plan / alternatives.

7.1.2 A detailed review of the sustainability baseline is presented within the SA Scoping Report although this was prepared in 2008. This section presents an updated summary.

7.2 Air

What's the situation now?

7.2.1 Under the provisions of the Environment Act 1995, each Local Authority is obliged to review and assess the air quality within its area. The aim of this review and assessment process is to establish whether or not the Statutory Air Quality objectives for the following seven named pollutants are likely to be exceeded:

- Benzene
- 1,3 – butadiene
- Carbon monoxide (CO)
- Lead
- Nitrogen dioxide (NO₂)
- Particles(PM₁₀)
- Sulphur Dioxide (SO₂)

7.2.2 Swale Borough Council has considered all 7 pollutants and by a process of elimination identified pollutants for which there may be a risk of exceedence. Swale identified that PM₁₀ and NO₂ required further investigation at two locations in the Borough: Sheerness and Ospringe. Two continuous monitoring stations were established at these locations.

7.2.3 The main source of air pollution in the Borough is road traffic emissions from major roads, notably the M2, A2, and A249. There are currently four Air Quality Management Areas (AQMA) within Swale, with two most recently declared in February 2013;

- Newington (2009)
- Ospringe (2011)
- Sittingbourne East Street (2013)
- Sittingbourne St.Pauls Street (2013)

Exceedances of the annual mean objective for nitrogen dioxide (NO₂) were predicted. Other pollution sources, including industrial commercial and domestic sources, also make a contribution to background pollution concentrations⁹¹.

A study was carried out in the Bluetown and Queenborough area which assessed levels of NO_x, PM₁₀ and SO₂ emissions as it was identified as an area of concern in terms of air pollution. The report concluded that shipping contributed the highest percentage of emissions for all three pollutants within the study area.

What would the situation be without the plan?

7.2.4 Air pollution in areas around the M2, A2 and A249 is likely to continue to be an issue. However, should manufacturing levels continue to decline in the Borough, this may offset rises in air pollution from other sources

What are the key issues?

7.2.5 The following issues have been identified:

- Traffic and shipping are likely to continue to be a major source of air pollution in the Borough.
- Local air Quality is poor within areas of Sittingbourne and at Ospringe and Newington with 4 Air Quality Management Areas (AQMA) declared between 2009 and 2013.
- Increased emissions are likely to have an adverse impact on the wildlife and habitats within the Borough.

7.2.6 To reflect these key issues the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criterion':

SA Objective	To reduce air pollution and ensure air quality continues to improve across the Borough
Decision making criteria	Contribute to reductions in air quality monitoring pollutants at monitoring locations across the Borough?

7.3 Biodiversity

What's the situation now?

7.3.1 Swale Borough is rich in biodiversity, with a range of semi-natural and man-made habitats, some of which are recognised as being of importance at county, national or international levels. 20% of the Borough (8,632 hectares) is designated for international or national value, a further 5% (2,119 hectares) is designated for their County (local) value, and these are the 32 designated Sites of Nature Conservation Importance⁹².

7.3.2 Three of Natural England's Natural Areas - the Greater Thames Estuary, the North Kent Plain, and the North Downs span the Borough.

⁹¹ <http://www.swale.gov.uk/air-quality/>

⁹² The Kent Habitat Survey 2012 Final Report www.archnature.eu

- 7.3.3 Most of the land of Swale Borough is within the Greater Thames Estuary Natural Area. Soft sediments, forming extensive saltmarshes and mudflats, dominate the intertidal zone. These are separated along most of its length by man-made sea defences from the low-lying land. These areas were formerly subject to more frequent flooding, but are now mainly arable land, with much grassland and still some substantial areas of grazing marsh and its network of ditches, dykes, creeks and fleets. The value of this landscape is recognised in the designation of undeveloped parts of the North Kent coast as an Environmentally Sensitive Area. Arable and horticulture and improved grassland make up to 58% of the district's habitats, and includes almost a fifth of Kent's remaining traditional orchards
- 7.3.4 The Medway Estuary and Marshes form the largest area of intertidal habitats which have been identified as of value for nature conservation in Kent and are representative of the estuarine habitats found on the North Kent coast. A complex of mudflats and saltmarsh is present with in places grazing marsh behind the sea walls which is intersected by dykes and fleets. The area holds internationally important populations of wintering and passage birds and is also of importance for its breeding birds. Mudflats, intertidal saltmarsh and sea grass beds are important nursery habitats for sea fish. An outstanding assemblage of plant species also occurs on the site.
- 7.3.5 Figures 4 and 5 of the Scoping Report illustrate the nature conservation designations within the Borough.
- The Borough contains the following Special Areas of Conservation (SAC):
- Queendown Warren in the south west of the Borough – designated for the protection of habitats and (non-bird) species. It is also designated as a Site of Special Scientific Interest (SSSI) and is a fine example of unimproved calcareous grassland, particularly important for orchids.
 - The Blean Complex, one of the largest areas of woodland in England, is also designated as an SSSI. As a whole this area represents a mosaic of ancient semi-natural woodland with mixed coppice with oak standards, sweet chestnut coppice and conifer plantation. The diverse ground flora includes some species indicative of a long history of woodland cover. The area is also noted for birds with over 50 species of breeding bird having been recorded and for its invertebrate interest with nationally rare species of butterflies such as the heath fritillary.
- 7.3.6 Two Special Protection Areas (SPAs) are included partly within the Borough boundary. These are the Medway estuaries and marshes and The Swale. These two sites are also designated as Ramsar sites and SSSIs.
- 7.3.7 Swale contains 7 SSSIs falling wholly or partly within the Borough. These are set out in table 7.1 and the quality of them as recorded in May 2013 is illustrated.

Table 7.1: SSSI condition (Source: www.naturalengland.co.uk)

Name	% area meeting PSA target	%area favourable condition	% area unfavourable recovering	%area unfavourable no charge	% area unfavourable declining	%area destroyed/part destroyed
South East average	94.24	47.72	46.52	2.17	3.52	0.07
Purple Hill	100	64	36	0	0	0
Queendown Warren	100	100	0	0	0	0

Medway Estuary and Marshes	99.28	0	99.28	0.24	0	0.48
Sheppey Cliffs	100	100	0	0	0	0
The Swale	97.83	97.83	0	2.17	0	0
Church Woods, Blean	100	92.20	7.80	0	0	0

7.3.8 The Borough also contains the Elmley and Swale National Nature Reserves. Sheppey Cliffs and Foreshore are designated as a Geological Site of Special Scientific Interest. Kent County is home to 28 UK BAP Priority habitats and 85 Priority Species. Much of the land in and around Swale’s coast consists of UK BAP priority habitats⁹³, including:

- Intertidal mudflats in the Swale and the Medway Estuary, and to the north of Sheppey.
- Saltmarsh in the Swale and the Medway Estuary.
- Coastal grazing marsh, particularly along the Swale, but also in the Medway Estuary to the west of the Borough.
- Seagrass beds on the mudflats in the Swale.
- Saline lagoons, in the form of the defensive canals at Queenborough Lines and the boating lake at Barton’s Point Country Park.

7.3.9 Woodland in Swale supports a number of species identified in the UK BAP as priorities for action, including dormouse, Bechstein’s bat, tree pipit (which occurs in recently coppiced woodland), lesser spotted woodpecker, hawfinch (now a very rare bird in Kent), great crested newt, lesser butterfly orchid and fly orchid. A number of UK BAP priority species are associated particularly with farmland, including brown hare (which occurs in arable land on the downs as well as on coastal grazing marsh) and a suite of birds including corn bunting, grey partridge, lapwing, skylark, tree sparrow, turtle dove, yellow wagtail and yellowhammer. Built-up areas and gardens provide suitable habitats for a number of UK BAP priority species, including hedgehog, pipistrelle bat, song thrush, spotted flycatcher, common toad and stag beetle.

[What would the situation be without the plan?](#)

7.3.10 Estuary habitats are known to be at risk of deterioration as a result of sea-level rise leading to ‘coastal squeeze’ (whereby intertidal habitats are losing space between the increasingly high low-water mark and fixed coastal defences).

7.3.11 Remaining areas of wildflower grassland are now small and fragmented, meaning that the species they support exist in isolated populations and are therefore vulnerable to climate change impacts. Having said this, there is an increased emphasis (amongst Natural England and wildlife charities) on creating larger habitat blocks and linking habitat at ‘landscape scales’, which should help to ensure species populations are able to adapt as the climate changes.

[What are the key issues?](#)

7.3.12 The following issues have been identified:

⁹³ Swale BAP 2008

- Biodiversity is threatened by climate change in particular temperature rises and sea level rise, inappropriate built development, pollution, changing land management practices and vandalism.
- Rich biodiversity habitats within the Borough especially the coastal areas require greater protection to ensure no loss of habitat or species.
- Swale has not traditionally been active in the area of requiring green space or habitats to be created as part of new developments.
- The coastal components of The Swale and Medway Estuary and Marshes SPA and Ramsar site remain at risk from sea level rise and coastal squeeze from fixed defences.
- Potential for disturbance to birds using designated sites from recreational uses.

7.3.13 To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To conserve and enhance biodiversity and the natural environment
Decision making criteria	<ul style="list-style-type: none"> • Will it maintain and enhance relevant Habitats and species e.g. Mudflats or protected bird species? • Will it protect and enhance habitat corridors and linking routes? • Does it continue the protection of the internationally, nationally, European and regionally designated areas and appropriate propose appropriate enhancement? • Does it conserve and enhance the BAP priority habitats within the Borough? • Does it conserve and enhance the populations of protected and/or BAP priority species within the Borough? • Does it allow for the creation of new areas of BAP priority habitats? • Does it meet the principles of decision making on biodiversity in the good practice guide? • Does it create opportunities to link to and create the green grid network? • Does it allow for the permeability of new development for biodiversity?

7.4 Climate Change

What's the situation now?

7.4.1 Over the past century, average temperature has risen by 0.5°C and summer rainfall has decreased. Around the south east coastline the sea level is rising, threatening important coastal habitats and increasing the risk of flooding through sea level rise, major precipitation events and surface water run-off.

7.4.2 Emissions of the 'basket' of six greenhouse gases in the UK fell by around 15.3 per cent between the base year and 2006 (The base year is 1990 for carbon dioxide, methane and nitrous oxide, and 1995 for fluorinated compounds.). To meet its commitment to the Kyoto Protocol, the UK has agreed to reduce total greenhouse gas emissions by 12.5 per cent relative to the base year over the period 2008-2012.

7.4.3 A report commissioned by Defra estimates that 1,251,000 tonnes of carbon dioxide were emitted from the Borough in 2005 (as stated by Defra in April 2008 revision report). The basis of the emissions estimates is the local gas, electricity and road transport fuel consumption estimates issued by Defra. These sources account for around 80% of UK emissions; the remaining 20% are derived from the National Atmospheric Emissions Inventory estimates.

Table 7.2: Estimates of CO2 emissions by end user, revised April 2008

Authority	Total (tonnes)	Population ('000's)	Per capita total CO2 (tonnes)	Domestic per capita in CO2 (tonnes)
South East	58,190	8,164	7.1	2.5
Swale	1,088	127	8.6	2.3

Source: Defra

7.4.4 The table above illustrates that Swale produces a higher level of per capita CO2 tonnes than the south east average. It is thought this is linked to the industrial activity in some areas of the Borough. 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.

7.4.5 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.

7.4.6 The Thames Gateway is envisaged to be developed as an eco-region, setting and meeting high standards, not only for construction waste and low carbon, but also for water conservation and safeguarding against flood risk. The South East, Kent and the Borough are now pushing strongly for new development to incorporate sustainable design and construction methods, energy efficiency and renewable energy technologies.

7.4.7 The Council is a member of the Kent Energy Efficiency Partnership which has developed a fuel poverty strategy known as the Kent Health and Affordable Warmth Strategy with the specific aims including; raising awareness of fuel poverty; and working towards ensuring that the housing stock can deliver affordable warmth. This strategy is currently under review and a revised version will focus on the health aspects of the implications of energy and how to work to mitigate these.

7.4.8 The Kent, Sussex and Surrey Energy Saving Trust Advice Centre, managed by Creative Environment Network (CEN), offer domestic energy advice and discounted energy products to householders by leveraging funding from government utility companies and by negotiating bulk discounts. The overall improvement in energy efficiency achieved since 1996 is 15.33% and overall fuel efficiency for Swale achieved since 1996 is 30%. This has been achieved by a number of measures, including the provision of advice and information and referrals to the "Warm Front" and "Health Through Warmth" schemes.

7.4.9 Modelling has demonstrated the challenge that faces wildlife in adapting to climate change in the highly fragmented region of North West Europe. Coastal habitats are predicted to decline under sea-level rises⁹⁴.

What would the situation be without the plan?

7.4.10 UK Greenhouse gas emissions have been falling in recent years and the government is committed to continuing this reduction, although it is possible that the downward trend may have now stalled. Having said this, the simple fact is that the problem posed by levels of atmospheric greenhouse gasses is not likely to decrease in the near future.

7.4.11 Climate change impacts are inevitable across the Borough; global sea levels are changing and there is an increasing risk of flooding from coastal, river and surface water. Related to sea level rise, the threat to saltmarsh and mudflats throughout Europe will increase during this century as identified through studies undertaken on behalf of Natural England. Climatic shifts will also threaten species populations. In order to combat climate change, the Green Grid Network is developing across Swale, in partnership with authorities across the wider south east.

What are the key issues?

7.4.12 The following problems have been identified:

- Steps are required to address the emission of greenhouse gases from a number of sectors including transport, industry and the domestic user.
- Steps are required to identify and protect a green grid structure throughout the Borough allowing wildlife to migrate through the built and rural environment as climate changes.
- Climate change is a considerable threat to the Borough, in particular the coastal areas, the salt marshes and protected habitats through sea level rise, temperature increases.
- The poor public transport system across the Borough creates a car dependency. Transport improvements, such as improved public transport links and locating new development in sustainable locations can contribute to reducing emission levels.
- New and existing buildings require retro-fitting and development using sustainable construction methods to ensure that the Boroughs buildings are adaptive to climate change.
- The sustainability agenda requires the delivery of alternative energy sources, such as renewable energy technologies.
- Established development within the Borough should be retrofitted where possible, utilising government grants and funding where possible.

7.4.13 To reflect these key issues, the SA Scoping Report identified the following sustainability 'objectives' and supporting 'decision-making criteria':

SA Objective	<p>To minimise the need for energy, increase energy efficiency and to increase the use of renewable energy</p> <p>To encourage sustainable construction materials and methods</p>
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⁹⁴ Natural England, BRANCH, 2007, Final Report

Decision making criteria	<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?
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7.5 Crime and Safety

What's the situation now?

7.5.1 Table 7.3 below illustrates the total crime figures for the Borough for the period 2009/10 to 2011/12.

Table 7.3: Swale Crime Figures

Year	Crime per thousand persons
2009/10	42.5
2010/11	38.1
2011/12	36.9

Source: Neighbourhood Statistics

7.5.2 Crime in Swale is decreasing. The overall crime rate, using types of crime comparable with the Crime Survey of England and Wales (CSEW), in 2011/12, was 36.9 crimes per thousand people. This is marginally higher than the South East region which had 33.1 crimes per thousand people, but lower than the England rate of 38.4 crimes per thousand people. The overall crime rate in Swale declined 5.6 crimes per thousand between 2009/10 and 2011/12⁹⁵.

7.5.3 The most recent types of crime data relates to the year 2010/11 and shows that the highest crime type for Swale was criminal damage including arson with 15 crimes per thousand people. This is higher than the South East and the England rates which both have a rate of 12 crimes per thousand for this particular type of offence. Violence against a person is the next most common type of crime within Swale with a rate of 13 per thousand people; this is lower than the South East (14 per thousand people) and England statistics (15 per thousand people).

What would the situation be without the plan?

7.5.4 It is assumed that the baseline crime trends will continue into the future. However there is currently national debate about the reasons for decreasing crime levels and one reason might be the way crimes are recorded.

What are the key issues?

7.5.5 The following issues have been identified:

⁹⁵ <http://neighbourhood.statistics.gov.uk/HTMLDocs/Local%20Profiles%20V5.0/Localprofiles.html>

- Swale is a relatively safe Borough, with crime decreasing in recent years.
- The highest crime type for Swale was criminal damage including arson with 15 crimes per thousand people with violence against a person is the next most common type of crime within Swale.

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To reduce crime and anti-social behaviour and the fear of these
Decision making criteria	<ul style="list-style-type: none"> • Help reduce the fear of crime? • Reduce crime rates especially in areas where crime is highest? • Have designing out crime measures been incorporated into new development?

7.6 Cultural Heritage

What's the situation now?

- 7.6.1 The Borough has a wealth of historic areas, buildings and features reflecting its naval and maritime history, its roman and medieval legacy and its industrial archaeology.
- 7.6.2 There are at least 1,850 listed buildings, including one of the best surviving medieval farmsteads in the country and the earliest multi-storey iron framed building in the world in the Borough. This is four times the national average of listed buildings⁹⁶. The Borough contains 13 buildings identified on English Heritages Buildings at Risk Register⁹⁷. The Council has compiled a list of local at risk buildings which include 7 grade II* and 4 grade I buildings from the national listed building register. The Council has identified 41 buildings which require placing on the local buildings at risk register. Another indicator is the gradual decay of buildings or the cumulative effect that minor or poorly conceived and executed changes have on the Borough's heritage.
- 7.6.3 The Borough contains 21 scheduled monuments and 2,685 sites on the Sites and Monument Records. Swale contains 50 conservation areas, covering 2.4% of the Borough. A number of the conservation areas were designated over 20 years ago; the Council is therefore in the process of undertaking reviews of the designations. Currently there have been 20 conservation area designation reviews. Major conservation area reviews have recently been completed at Sittingbourne Town Centre, at Queenborough and at the Port of Sheerness. There are also 4 English Heritage Registered Parks and Gardens. The Kent Gardens Compendium, compiled by Kent County Council lists parks and gardens which offer more local and modern interest.
- 7.6.4 Within conservation areas, Article 4 directions (a direction removing some or all permitted development rights within the conservation area, issued by local planning authorities) can be applied. Currently in the Borough, Faversham Conservation Area has an Article 4 direction applying to approximately 1800 properties. This restricts work that is undertaken within the conservation area to require planning consent before commencement, in order to preserve the character and heritage of the area.

⁹⁶ Swale AMR 2006/07

⁹⁷ Heritage at Risk Register 2012

What would the situation be without the plan?

- 7.6.5 Given existing commitments to maintaining listed buildings and conservation areas (e.g. through the Article 4 direction in force across Faversham Conservation Area) it is likely that most heritage assets would be maintained into the future, although there could be some impacts, e.g. inappropriate development affecting the setting of heritage assets.

What are the key issues?

- 7.6.6 The following issues have been identified:
- Across the Borough (and nationwide) there continues to be a considerable level of unauthorised work to listed buildings and buildings within conservation areas, at times detrimentally damaging these buildings for future generations.
 - Across the Borough there are a number of redundant and disused buildings of heritage value, including those on the local and national buildings at risk registers.
 - Across the Borough there are 20 Article 4 directions, providing additional protection to certain features of the conservation area otherwise not protected.

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage
Decision making criteria	<ul style="list-style-type: none"> • Protect archaeological sites, historic buildings, conservation areas and other culturally important features?

7.7 Employment and Skills

What's the situation now?

- 7.7.1 In recent years Britain has and continues to face extremely difficult financial conditions, which has restricted the amount of economic growth nationally including in Swale. The Borough as a whole faces growing competition from a number of other locations in Kent and the South East. The increasing urbanisation of North West Kent and the rapid growth of towns such as Canterbury has meant that Swale must respond to these commercial and competitive pressures. However, as a Borough, Swale faces particular problems because of its 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.
- 7.7.2 There has been a reduction in the proportion of B-class jobs in the Borough, falling from 51% in 1997 to 41% in 2011⁹⁸. Finance, IT, other business activities have decreased for the third year in a row and surprisingly a reduction in manufacturing (the previous trend has been an annual growth). Overall jobs sectors have had minimal growth or losses which are attributed to the economic downturn. The Borough's economy remains slow to diversify, both in the urban and rural areas⁹⁹.

⁹⁸ NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

⁹⁹ Swale Annual Monitoring Report 2012

- 7.7.3 The levels of commuting for work outside the Borough are a particular issue, with 35% of the Borough's resident working population travelling outside of the Borough for work. People generally travel to Canterbury, Medway Towns and Maidstone. Commuting into the Borough also occurs with 22% of all workplace jobs recorded in the Borough in 2001 being workers from outside the Borough. Commuters were predominantly from Medway (35%), Canterbury (21%) and Maidstone (11%). Overall, Swale is considered to be a net exporter of labour¹⁰⁰,
- 7.7.4 The Swale Employment Land Review (2010) states that earnings in Swale are 15% lower than the South East average, this suggests that many Swale residents are commuting to higher paid jobs outside of the Borough and that there is a need for more, higher paid jobs locally.
- 7.7.5 The table below illustrates the working age (16-64) population (2011) of the Borough. Further information and statistics associated with regards to the working age population can be found in section 7.12 of this report.

Table 7.4: Working age population (2011)

	Swale (numbers)	Swale (%)	South East (%)	GB (%)
All people – working age	86,100	63.2	63.7	64.7
Males – working age	43,000	63.8	64.6	65.5
Females – working age	43,100	62.6	62.9	63.9

Source: Nomis¹⁰¹

- 7.7.6 Local resident earnings, as illustrated in the table below indicate that Swale performs lower than the south east average, but residents are earning more than the national average in terms of weekly pay. Residents earn less than the regional and national average in relation to hourly rates.

Table 7.5: Earnings by residence (2012)

	Swale (£)	SE (£)	GB (£)
Gross weekly pay	540.1	555.8	508.0
Male	567.7	613.3	548.8
Female	434.6	479.1	449.6
Hourly pay	13.35	14.24	12.88
Male	13.58	15.32	13.48
Female	12.63	12.83	12.04

Source: Nomis¹⁰²

¹⁰⁰Census 2001 and NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

¹⁰¹ Nomis [accessed 12.06.13]

¹⁰² Nomis [accessed 12.06.13]

7.7.7 The residents of Swale are employed in a wide variety of sectors. The following table illustrates this:

Table 7.6: Employee jobs (2008)

	Swale (employee jobs)	Swale (%)	SE (%)	GB (%)
Total employee jobs	42,800	-	-	-
Full-time	29,800	69.5	69.0	68.8
Part-time	13,100	30.5	31.0	31.2
Employee jobs by industry				
Manufacturing	6,200	14.4	8.1	10.2
Construction	2,300	5.3	4.5	4.8
Services	32,500	75.9	85.7	83.5
Distribution, hotels & restaurants	9,900	23.1	24.6	23.4
Transport & communications	3,300	7.8	5.9	5.8
Finance, IT, other business activities	6,500	15.2	24.0	22.0
Public admin, education & health	11,100	25.8	25.6	27.0
Other services	1,700	4.0	5.6	5.3
Tourism – related	3,200	7.4	8.2	8.2

Source: Nomis¹⁰³

7.7.8 As indicated above, the greatest proportion of Swale’s residents are employed in the service sector, reflecting the regional and national pattern. A significantly higher proportion of residents are employed in the manufacturing industry than those in the rest of the south east region and nationally.

7.7.9 A significantly lower proportion of residents are employed in the finance, IT and other business sectors compared to the south east region and the national average. This reflects the identified need in the Swale Economic Strategy to develop the skills base of the population to diversify the Boroughs employment structure. The Borough has low proportions of employment in the knowledge sectors; there has been an improvement over recent years. There is still a lot to be done to continue driving the improvement of the knowledge sector within Swale. Targeting investment that will generate higher skilled employment in more knowledge intensive sectors is a key priority of the Council.

¹⁰³ Nomis [accessed 12.06.13]

- 7.7.10 The Swale Employment Land Review (2010) identifies that the largest private sector employers in Swale are in the industrial and transportation sectors and include Aesica (pharmaceuticals), St. Regis Paper, Medway Ports and Shepherd Neame (brewers). Pfizer, a major pharmaceutical firm, has recently relocated from the Borough. There are no major office based firms based in Swale although two call centre operations are based at Kent Science Park. Another important local employer is the cluster of three prisons on the Isle of Sheppey. The tourism sector is also a significant supporter of local jobs, with many caravan parks based on Sheppey and many bed and breakfast establishments and self-catering accommodation across the North Kent Downs Area of Outstanding Natural Beauty.
- 7.7.11 Kent Science Park is a cluster of knowledge led businesses. For Swale to achieve its ambition of a step change in the local economy it is recognised that an expansion of activity at the Science Park is required. The Swale Employment Land Review (2010) states that there are currently proposals to develop two new 'Tech Units', of 2,300m² and 930m² to provide accommodation for new technology tenants and the expansion needs of existing businesses on site. Longer-term, the Science Park has aspirations for an extension to the existing site, providing up to 12,000 m² of additional floorspace, to be developed over the next 4-5 years.
- 7.7.12 The distances of travel to work by Swale's residents reflects the regional picture: 9% work from home the majority of the time, 24% (20% south east) work within 2km of home, 14% (15% south east) work between 5-10km of home, 17% (14% south east) work between 10-20km of home and 20% (18% south east) work between 20-60km plus from home.
- 7.7.13 Tourism is a key sector in Swale, there has been a 50% growth in tourism related employment in the last eight years. Tourism is still a low percentage of all Swale jobs (6.9%) when compared to the South East region (7.9%) and nationally (8.3%).
- 7.7.14 In Faversham, currently there is a high reliance on out commuting for employment to other areas within Swale and Canterbury.
- 7.7.15 The most recent data demonstrates the Borough's skills profile is improving. Among the current workforce, the proportion qualified to at least NVQ2 increased by over 6% between 2010 and 2012.
- 7.7.16 The following table illustrates the Borough's qualification achievements as recorded between January and December 2012. It can be seen that the attainment of NVQ4 and above (degree level and above) is significantly below the region's average and lower than the national average.

Table 7.7: Qualifications (Jan 2012-Dec 2012)

	Swale (number)	Swale (%)	SE (%)	GB (%)
NVQ4 and above	20700	25.2	36.8	34.4
NVQ3 and above	38600	46.9	58.2	55.1
NVQ2 and above	57300	69.5	75.4	71.8
NVQ1 and above	67200	81.7	87.7	84.0
Other qualifications	5800	7.0	5.4	6.3
No qualifications	9300	11.3	6.9	9.7

Source: Nomis¹⁰⁴

¹⁰⁴ Nomis [accessed 12.06.13]

7.7.17 The regeneration framework identifies that the poor performance in skills and qualifications has the potential to hold back the rest of the economy, especially given the need to attract higher value jobs.

What would the situation be without the plan?

7.7.18 Without the plan, insufficient land would be identified for economic growth in the future. This could potentially limit the future prosperity of Swale and lead to a decline in the economic performance of the area. Furthermore, continued poor performance in skills and qualifications has the potential to hold back the rest of the economy, especially given the need to attract higher value jobs. Employment within the service sector is likely to continue to be greatest in the Borough, reflecting the regional and national trends. The population is also expected to age in the future which could result in the decline of the working age population and therefore constrain the labour supply.

What are the key issues?

7.7.19 The following issues have been identified:

- High levels of out commuting to jobs particularly in the higher skilled sectors and the higher paid jobs especially using car as a main form of transport resulting in increased congestion.
- Declining local manufacturing industry, as identified by the Council.
- A significantly higher proportion of residents are employed in the manufacturing industry and the greatest proportion of Swale’s residents are employed in the service sector. There is a significantly lower proportion of residents are employed in the finance, IT and other business sectors compared to the south east and the national average;
- The average pay is significantly lower than the south east but is just above the national average. Female workers in the Borough are paid less than the national hourly rate and earn less on a weekly basis than both the national and regional average.
- Swale has a large number of people lacking qualifications and a shortage of graduate labour employment opportunities. Investment in skills and learning is regarded as critical for long term regeneration.
- The poor skills profile is a problem given the Borough is trying to branch out into the higher skilled knowledge based industries. The current low skill base of the population is reflected through the existing employment opportunities which have been historically offered.
- Potential constraints on the labour supply resulting from the future decline of the working age population.

To reflect these key issues, the SA Scoping Report identified the following sustainability ‘objective’ and supporting ‘decision-making criteria’:

SA Objectives	<p>To ensure high and stable levels of employment in accessible locations</p> <p>To raise the educational achievement levels across the Borough and help people to acquire the skills needed to find and remain in employment</p>
Decision making criteria	<ul style="list-style-type: none"> • Are the numbers of knowledge based and higher paid jobs increased? • Are new employment opportunities created to meet the needs of the residents? • Are employment locations sustainable and accessible by

	<p>public transport, walking and bicycle?</p> <ul style="list-style-type: none"> • Does it contribute to increased learning opportunities across the Borough?
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7.8 Health

What’s the situation now?

7.8.1 The average life expectancy of the Borough residents is 79.7 years (77.9 years male and 81.4 years female). Swale has one of the lowest life expectancies in the South East, the Swale Health Profile (2012)¹⁰⁵ states that life expectancy is increasing and is similar to the England average.

7.8.2 As explained in the previous section there is considerable areas of health inequality across the Borough, although the Swale Health Profile (2012) states that there are contrasts between the health of people in prosperous parts of Swale and those in the Isle of Sheppey.

7.8.3 The Swale Health Profile (2012) provides the following summary:

- The health of people in Swale is mixed in comparison to the England average.
- Deprivation is higher than average and about 6400 children live in poverty.
- Over the last 10 years, all cause mortality rates have fallen. Early death rates from heart disease and stroke have fallen and are similar to the England average.
- About 18.0% of year 6 children are classified as obese. A lower than average percentage of pupils spend at least three hours each week on school sport.
- The level of teenage pregnancy is worse than the England average.
- Estimated levels of adult ‘healthy eating’ and obesity are worse than the England average. Rates of hip fractures and smoking related deaths are worse than the England average. Rates of road injuries and deaths and hospital stays for alcohol related harm are better than the England average.
- Priorities in Swale include promoting older people’s independence through rehabilitation, addressing health inequalities in relation to heart disease and drug misuse, particularly in families with children.

What would the situation be without the plan?

7.8.4 Demands on the health care facilities in the Borough are likely to increase given that people are living longer / there is an ageing population. Development of the green grid network and new open spaces and biodiversity habitats should provide increased opportunity for enjoyment of the natural environment, and hence support healthier lifestyles.

What are the key issues?

- There is a need to provide more accessible local healthcare facilities.
- Demands for health care and associated services in the Borough are rising and are expected to continue to rise as the population increases and ages and new housing and employment opportunities increase.
- A focus on healthy lifestyles should be encouraged.
- Deprivation is higher than average and fuel poverty within the Borough still requires reducing.

¹⁰⁵ Swale Health Profile 2012

- The Borough’s recreational, cultural facilities and activities and natural green and open spaces of good quality are currently limited and require development and improvement to support local quality of life. This is especially the case in urban Sittingbourne and Sheerness.

7.8.5 To reflect these key issues, the SA Scoping Report identified the following sustainability ‘objective’ and supporting ‘decision-making criteria’:

SA Objective	To improve health and well-being and reduce inequalities in health
Decision making criteria	<ul style="list-style-type: none"> • Improve access to health services? • Does it contribute to fuel poverty reductions? • Improve access to recreation and open spaces? • Are negative air quality and pollution impacts mitigated against?

7.9 Housing

What’s the situation now?

- 7.9.1 Swale is essentially rural with more than 20 villages and a total of 34 parish councils dispersed through a substantial rural area. Swale has three main towns, Sittingbourne, Sheerness, and Faversham.
- 7.9.2 The Census 2011 data indicates the Borough had a total housing stock of 57,989 dwellings . 21% of the housing stock was built before 1919.
- 7.9.3 The Swale Borough Council Private Sector House Condition Survey identified the number of homes failing the decent homes standard to be 13,672 (28.7% of the private sector houses).Across Swale there are a number of empty homes which are currently not able to be brought into the housing stock.
- 7.9.4 In relation to private sector housing, the majority of properties are Semi Detached (32.5%)¹⁰⁶ and Terraced (31.5%) with the remainder being a combination of detached, flats and maisonettes. This compares with the 2002 report which assessed the private sector to be comprised of 34% terraces, 5% flats, 34% semi-detached properties and 27% detached properties.
- 7.9.5 In terms of tenure, the 2011 Census indicates that 68.3% is owner occupied, 15.3% is of affordable tenures and 16.4% is privately rented or rent free. In 2003, the average house price was £142,058, by 2008 this had risen to £204,187, and in January 2013 the average house price has decreased to £180,485¹⁰⁷. The biggest rises were for entry-level stock. There was a gap of 21.7% between wages and the cost of housing incomes over a three year period to 2004.
- 7.9.6 Average household sizes in Swale have fallen from 2.45 persons per household in 2001 to 2.40 persons per household identified in the Census for 2011.

¹⁰⁶ Neighbourhood Statistics [accessed 12.06.13]

¹⁰⁷ Landregistry.gov.uk [accessed 12.06.13]

- 7.9.7 The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) for Swale (2013)¹⁰⁸ indicates that the Gypsy, Traveller and Travelling Showpeople population at the time of the study is housed in a range of accommodation types. This includes two socially rented sites providing over 15 pitches; 35 authorised permanent private sites providing 94 pitches; and 13 authorised private sites with temporary consent providing 19 pitches. There are also three unlawful unauthorised developments and five unauthorised developments accommodating a total of 10 pitches. 59 households of Swale's Gypsy and Traveller population live in bricks and mortar and there is one unauthorised but tolerated yard for Travelling Showpeople in Swale accommodating five households. The current authorised residential provision for the Gypsy and Traveller population is 112 pitches and 7 plots for the Travelling Showpeople population.
- 7.9.8 The South East Plan (the 'RSS' and now revoked) housing completions target for Swale was 10,800 dwellings for the period 01/04/2006 to 31/03/2026, which equates to 540 dwellings per annum. The Borough's Strategic Housing Land Availability Assessment identifies an indicative Borough housing target of 10,800 dwellings between 2011 - 2031. Between 2006/07 and 2010/11 there were 3,238 completions. This equates to 648 completions on average per annum.
- 7.9.9 The delivery of new housing (and other development) is using up the reserves of previously developed land. This has implications for future growth within the Borough outside of the strategic regeneration projects. It is therefore recognised that greenfield reserves particularly in the post 2016 period will be required. This was supported by the South East Plan Panel Report (paragraph 19.72).
- 7.9.10 Gross affordable housing completions have averaged 126 per annum over the last 15 years and given this low level of completion the housing waiting list has increased and there are currently an estimated 4295 households in need of affordable housing¹⁰⁹.

What would the situation be without the plan?

- 7.9.11 The SHMA Update indicates that between 2011 and 2031 there could be between 13,400 and 17,700 net additional households depending on the demographic projections applied. The majority of net household growth is expected to be associated with smaller households, particularly one person households associated with the 65+ population. In terms of future affordable housing need it is projected that 1,522 households per annum will require affordable housing and net affordable housing need is expected to be 1,830 dwellings per annum in the short term¹¹⁰.
- 7.9.12 The prevailing market conditions will impact on housing growth and regeneration in the short and medium term in the Borough. The outcome is that the existing need for new housing in appropriate locations and of an appropriate type, design, size and tenure is likely to remain. This includes provision for the Gypsy and Traveller population as the GTAA has identified a need for 85 pitches to be provided for the Gypsy and Traveller population between 2013 and 2031. Without the Local Plan a 'business as usual approach' is likely to result in piecemeal development and regeneration opportunities for the Borough being missed. Market-led housing provision would also be dictated by a desire to deliver the most profitable sites and house types which may not be in the most sustainable locations.

What are the key issues?

- 7.9.13 The following issues have been identified:

¹⁰⁸ Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Swale Final Report, Salford Housing & Urban Studies Unit University of Salford June 2013

¹⁰⁹ NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

¹¹⁰ NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

- The provision of affordable housing in the Borough is currently below the target set in the adopted Local Plan. The Council needs to deliver further affordable homes to meet the needs of the population both in the urban and rural areas of the Borough however there are issues of viability.
- The escalating cost of buying and renting homes in rural areas means that the adequate provision of affordable housing to meet local need is of particular importance. This provision includes options for renting, shared ownership and low cost home ownership, secured, where appropriate, in perpetuity for local people.
- The Council needs to continue the improvement programme to ensure that the decent homes standard is achieved in existing and emerging housing stock.
- Rural housing both the delivery and affordability is a big issue facing the Borough.
- Pressure on housing supply as a result of an ageing population increasing household growth.
- Provision of adaptable housing to meet the needs of the disabled and elderly population (lifetime homes).

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To provide affordable and decent housing adaptable to future needs of the community
Decision making criteria	<ul style="list-style-type: none"> • 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? • Deliver housing is sustainable locations with access to employment, community and public transport hubs?

7.10 Landscape

What's the situation now?

7.10.1 At the national level, Natural England have mapped and described regional character areas across the country as part of their Countryside Character Programme. Three of the seven landscape character areas that fall wholly or partially within Kent, define the character of Swale Borough. The northern part of the Borough, generally including Sheppey and the marshland, falls within the Greater Thames Estuary. South of this the North Kent Plain forms the main agricultural and fruit belt across the Borough. Finally the dip slope of the North Downs is characterised by mostly arable land and pasture forms the southern part of the Borough.

- 7.10.2 There are a number of landscape designations that cover Swale Borough. Most of the landscape south of the M2 forms part of the nationally designated Kent Downs Area of Outstanding Natural Beauty (AONB), as illustrated in Figure 5 of the Scoping Report. Outside the AONB, the lower dip slope, together with some of the dry valleys, are recognised as areas of landscape value which have more than local significance having been previously designated as Special Landscape Areas by Kent County Council (see Figure 2 of the Scoping Report). The majority of the marshlands in the north of the mainland and south Sheppey are of also of similar landscape significance and these continue from the Medway Marshes to the west of the Borough to the Seasalter Marshes to the east. In the east of the Borough there is also the Blean Woods landscape, the majority of which extends into neighbouring Canterbury District.
- 7.10.3 At the county level Kent County Council have further refined and subdivided these character areas. The following character areas fall wholly or partly within Swale Borough:
- North Sheppey
 - Swale Marshes
 - Fruit Belt
 - Chatham Outskirts: Mid Kent Downs
 - Bicknor: Mid Kent Downs
 - Challock: Mid Kent Downs
 - Faversham Fruit Belt
 - Eastern Swale Marshes
 - Eastern Fruit Belt
 - The Blean
- 7.10.4 The Borough has a considerable and varied coastline – the longest in Kent at 111km. The mainland and southern coast of the Isle of Sheppey comprise low lying marshland, forming the Medway and Swale Estuary. The coastline is largely undeveloped, except within its creeks and sections of the Swale between Ridham and Milton Creek and Milton Creek to Seasalter. The north-west coast of the Isle of Sheppey is also largely undeveloped.
- 7.10.5 The northern coast of the Isle of Sheppey is of a very different character. Beaches and eroding cliffs provide a stark contrast to the south of the Island, whilst gently undulating hills, punctuated with chalet and caravan parks are a prominent feature of the coast.
- 7.10.6 The Council own or manage 309 hectares of major urban and country parks. In addition, numerous small pieces of open space are located in housing and town centre areas contributing greatly to the urban green landscape. The major parks are located throughout the Borough and vary in character from the formal such as Faversham Recreation Ground to the informal at The Glen, Minster. More recently a major country park has been established at Milton Creek, Sittingbourne.
- 7.10.7 The Council own and manage a number of areas of woodland across the Borough, which includes Perry Woods in Faversham, which is a major area of semi natural woodland. The Council is also part of a partnership which manages Church Woods which is part of the Blean woodland complex (SLA).
- 7.10.8 Portions of the Borough's landscape are dominated by the industries which operate on the land, such as the fruit growing belt, where there is a local dominance of poly tunnels.

What would the situation be without the plan?

7.10.9 The policies within the existing Local Plan will provide some level of protection to existing areas landscape value within the Borough. However, potential new areas that could be identified as having value over the plan period may require additional protection that is not available in the existing Local Plan. There is also likely to be increased pressure from the impacts of climate change on landscape features.

What are the key issues?

- 7.10.10 The following issues have been identified:
- Swale contains a high quality distinctive landscape which requires protection, enhancement, extension, connectivity and permeability to maintain its locally distinctive habitats.
 - The consequences of climate change are a problem facing some of the Borough’s highest quality landscapes including the marshes. The impacts of habitat fragmentation and isolation will become increasingly apparent as climate changes and development expands.
 - Although the acreage of fruit production has declined and changed the character of the landscape, there have been recent increases that have presented new challenges to the landscape. For example, poly tunnels can have a negative impact on the quality and appearance of the landscape and on land quality
 - Environmental quality is not distributed evenly across the Borough, access to natural green and open space is limited for many communities.
 - The Council’s Landscape Character and Biodiversity Appraisal 2010 found that of the 42 identified character areas, the condition of 5 was classed as ‘poor’, with a further 16 ‘moderate’.

To reflect these key issues, the SA Scoping Report identified the following sustainability ‘objective’ and supporting ‘decision-making criteria’:

SA Objective	To protect and enhance the valued landscape and townscape of Swale
Decision making criteria	<ul style="list-style-type: none"> • Does it preserve and enhance the nationally important landscape within the Kent Downs AONB? • Does it contribute positively to the Borough’s established high quality landscape? • Does it provide for new open spaces, allotments? • Does it contribute to the establishment of the green grid network?

7.11 Local Economy

What’s the situation now?

7.11.1 New business start-ups in 2011 stood at 43.6 businesses per 10,000 working population in Swale¹¹¹. This was significantly lower than the South East (58.2) and England (54.0) averages. Swale underperformed the County and Country averages for new business formation and the gap has increased noticeably during the recession.

¹¹¹<http://neighbourhood.statistics.gov.uk/dissemination/Info.do?m=0&s=1373450973322&enc=1&page=analysisandguidance/analysisarticles/local-authority-profiles.htm&njs=true&nsck=false&nssvg=false&nswid=1276>

Table 7.8: Business registrations and closures per 10,000 resident adult population (2011)

	Swale	South East	England
Business registration rate	43.6	58.2	54.0
Business closure rate (calculated)	40.8	51.2	47.0
Net change	2.8	7.0	7.0

Source: Neighbourhood Statistics

- 7.11.2 Swale's economic performance is constrained by poor infrastructure. To deliver the economic improvements desired by the Council, the right infrastructure is fundamental to support the growth and change desired. Transport and commercial property are highlighted in the State of the Borough report as key infrastructure improvement areas, but wider infrastructure requirements include utilities and communications technology. The Borough is on the strategic road network, but as detailed in the transport section upgrading and future investment is required to meet the economic needs of the Borough and the greater south east.
- 7.11.3 The relationship between employment growth and output as measured by the Gross Value Added (GVA) by sector in Swale over the time period of 1997-2011 indicates that the output of the Swale economy increased by 31% over the period whilst job growth increased by 14%¹¹². In relation to individual sectors, business services, communications and administration/support activities registered the highest increases in output and all with associated increased employment levels. In contrast, the manufacturing, wholesaling and transport activities all registered declines in economic output and jobs.
- 7.11.4 There are relatively few large firms in the Borough with only 3% of businesses having more than 50 employees and none with over 500, although this share is similar to Kent generally and nationally. Swale also has a high proportion (83%) of very small firms (0-9 employees). Swale is a net exporter of labour with a net outflow of approximately 9,500 workers or 17% of its resident workforce¹¹³.
- 7.11.5 The Swale Employment Land Review (2010), states that tourism has below average representation in the Borough, but has experienced average growth. The Isle of Sheppey with its quality beaches has made it a popular tourist destination. The Borough does contain a wealth of attractions for visitors to the area. This includes 14 identified historic houses and heritage sites, 8 museums and galleries, including the Fleur de Lis Heritage Centre in Faversham and the Sittingbourne Heritage Centre, and the Guildhall Museums. In 2006/07 72 visits per 1,000 population were made to museum's in the Borough.
- 7.11.6 The Council supports the development of tourism as both a driver for employment growth and a shift in the perception of the Borough. In particular the Borough is looking to take fuller advantage of the high quality natural environment through eco-tourism. Development of the 'business' tourism industry (hotels and conference facilities) is under consideration as an area of expansion in the Borough, particularly Sittingbourne.
- 7.11.7 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.

¹¹² NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

¹¹³ NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

What would the situation be without the plan?

7.11.8 The economy of the Borough is linked to that of the UK economy as a whole. For this reason predictions are difficult to make. However, the Borough is in a strong position to see a future increase in economic activity given its attractive location in the Thames Gateway. Having said this, without the plan, insufficient land would be identified for economic growth, which could potentially limit future economic activity. Furthermore, continued poor performance in skills and qualifications has the potential to hold back the rest of the economy, especially given the need to attract higher value jobs.. Future population change, particularly the population increasing in age, could result in the decline of the working age population and therefore constrain the labour supply needed to sustain the local economy.

What are the key issues?

- 7.11.9 The following issues have been identified:
- The Borough currently has a poor image with investors.
 - Declining traditional industries of manufacturing and processing within the Borough, and a decline in the rural economy.
 - An above average proportion of lower paid jobs with commuting to better paid jobs outside the Borough; a relatively low-skilled workforce.
 - The delivery of employment land competes with land for residential development.
 - The Borough needs to capitalise on development of the tourism sector, in particular eco tourism respecting the high quality natural environment.
 - Declining retail sectors and out migration of residents to surrounding shopping centres.
 - Under-representation in the financial and business services and other knowledge based sectors, which typically which have greater potential for growth.
 - The future economic performance is constrained by poor infrastructure, investment is required to rectify this issue and make the Borough an attractive place to invest.
 - The economic recession is placing pressures on the viability of existing employment sites and increasing demands for changes of use to other uses.
 - Future population projections resulting in an ageing population could constrain the labour supply.

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To sustain economic growth and competitiveness
Decision making criteria	<ul style="list-style-type: none"> • Does it contribute the development of eco-tourism industry? • Does it provide for opportunities to attract new businesses to the Borough? • Does it contribute to infrastructure improvements?

7.12 Population

What's the situation now?

7.12.1 The Borough's population recorded in the 2011 census was 135,835. The balance between males and females reflects the regional and national position. The population is growing fast, with an increase of approximately 28% between 1981 and 2011. The following table illustrates the population estimates:

Table 7.9: Swale's population estimate

	Swale	South East	England
All people	135,835	8,634,750	53,012,456
Males	67,152 (49.4%)	4,239,298 (49%)	26,069,148 (49%)
Females	68,683 (50.6%)	4,395,452 (51%)	26,943,308 (51%)

Source: Census 2011

7.12.2 The latest SHMA indicates some of the population growth has been as a result of natural change within the existing population. However the majority of the change is attributed to in migration with estimates of net in migration totalling 9,700 people between 2001-2011, which is equivalent to 73% of the growth in the population¹¹⁴.

7.12.3 The population's age and ethnic structure of Swale is illustrated in the tables below. Since 2001 the population has grown but is ageing with the majority of population growth associated with age groups 40+. There is also marginal population growth in younger age groups; 0-4 and 15-19 years.

Table 7.10: Population Age Structure (2011 Census) (%)

Age Group	Swale	South East	England
0-4	6.4	6.2	6.3
5-9	5.8	5.7	5.6
10-14	6.5	5.9	5.8
15-19	6.4	6.2	6.3
20-24	5.7	6.2	6.8
25-29	6	6.1	6.9
30-44	19.4	20.4	20.6
45-59	20.2	19.9	19.4
60-64	6.8	6.2	6
65-74	9.3	8.8	8.6
75-84	5.4	5.8	5.5
85-89	1.3	1.6	1.5
90+	0.7	0.9	0.8

Source: Census 2011

Table 7.11: Population Structure (Ethnicity) (Census 2011)

Ethnicity	Swale	South East	England
All	135,835	8,634,750	53,012,456

¹¹⁴ NLP Swale Borough Council SHMA Update and Development Needs Assessment February 2013

White (English/Welsh/Scottish/ Northern Irish/British)	126,130	7,358,998	42,279,236
White Irish	780	73571	517001
White Gypsy/Irish Traveller	730	73571	517001
White: Other	3515	380709	2430010
Mixed: White & Black Caribbean	533	45980	415616
Mixed: White & Black African	225	22825	161550
Mixed: White & Asian	441	58764	332708
Mixed: Other Mixed	376	40195	283005
Asian/Asian British: Indian	545	152132	1395702
Asian/Asian British: Pakistani	107	99246	1112282
Asian/Asian British: Bangladeshi	206	27951	436514
Asian/Asian British: Chinese	233	53061	379503
Asian/Asian British: Other Asian	398	119652	819402
Black or Black British: African	993	87345	977741
Black or Black British: Caribbean	277	34225	591016
Black or Black British: Other Black	125	14443	277857
Other Ethnic Group: Arab	47	19363	220985
Any Other Ethnic Group	174	31748	327433

Source: Neighbourhood Statistics

Rural Communities

7.12.4

Swale's rural communities are diverse; many rural settlements in Swale are of significant size and act as local service centres. Others suffer from isolation and a lack of local services. Rural deprivation impacts inconsistently across the Borough. Particular areas of high deprivation are the rural areas of Eastern Sheppey, with the Leysdown and Warden area in the most deprived 20% of all wards in England.

Deprivation

7.12.5 Swale ranks 99 out of 326 Councils in terms of the average rank of score on the National Indices of Deprivation 2010¹¹⁵, this summarises the Borough taken as a whole, including both deprived and less deprived Lower Super Output Areas (LSOAs). Within Kent, Swale is ranked as third most deprived district, improving from second place in 2007. Thanet and Shepway ranked as first and second respectively in the 2010 rankings. Against each of the six local authority measures, Swale performs particularly poorly against the rank of concentration measure, ranking 99th nationally. This measure looks at the relative deprivation of the most deprived 10% of the population within each local authority area. Swale’s lower ranking against this measure indicates that communities in the Borough are polarised, with very deprived areas, sitting alongside areas of relative affluence. 11% of Lower Super Output Areas (LSOAs) in Kent (94 areas) are within England’s 20% most deprived in Indices of Deprivation 2010.

7.12.6 Across the Borough, deprivation associated with employment, income and education and skills are the principal factors. Education and skills is the key issue affecting the largest area of the Borough, with 32 SOAs falling within the worst 20% nationally. The Isle of Sheppey experiences a particularly poor performance. Sheerness East is the ward currently with the worst ranked SOA in the Borough.

What would the situation be without the plan?

7.12.7 The population of the Borough is expected to continue to grow as a result of indigenous natural change and in migration trends could continue. Given past local trends the proportion of the population over 40+ is expected to increase over time also in line with regional and national trends and could result in the decline in the population of working age people.

What are the key issues?

- 7.12.8 The following issues have been identified:
- Quality of life indicators such as health and crime suggest that Swale is a relatively pleasant place to live, though deprivation is an issue¹¹⁶.
 - With regard to deprivation, education and skills is the key issue affecting the largest area of the Borough. However, deprivation is also strongly associated with employment and income as well.
 - An increasing ageing population and population growth are expected to put additional pressure on services, health provision and housing supply and could potentially constrain the labour supply.

To reflect these key issues, the SA Scoping Report identified the following sustainability ‘objective’ and supporting ‘decision-making criteria’:

SA Objective	To meet the challenges of a growing and ageing population To reduce poverty and social exclusion To improve accessibility for all to key services and facilities
Decision making criteria	<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?

¹¹⁵ <https://shareweb.kent.gov.uk/Documents/facts-and-figures/Deprivation/dep2-11-ID%202010%20headline%20findings-v2.pdf>
¹¹⁶ Regeneration Framework 2006

7.13 Soil

What's the situation now?

- 7.13.1 The diverse landscapes of the Borough can be largely attributed to its very rich and varied geology and soils. The following summarises these resources:
 - **Upper chalk of the North Downs:** dominates the southern area of the Borough, majority of the deposit is overlain by clay-with-flints on the higher ground – its soils supporting cereals, permanent grassland and deciduous woodland and head deposits in the valley bottoms - soils generally support grassland.
 - **Thanet, Oldhaven and Blackheath beds:** north of the chalk and overlain with a complex mix of brickearths and gravels. Sittingbourne and Faversham are located within this band, along with the Roman Road of Watling Street (A2). Soils support a variety of crops, most notably apples and other top fruit with some hops.
 - **London clay:** geology of the northern and far eastern parts of the Borough, including the Isle of Sheppey. Low lying is overlain with alluvial deposits, which form an almost continuous belt of marshland along the north edge of the mainland and across southern Sheppey – support grazing and some areas sufficiently drained to support cereals. Also on higher ground of northern Sheppey, capped with a small area of Bagshot beds around Minster and the distinctive clay ridge of the Blean in the east.
- 7.13.2 Both brownfield and greenfield locations will inevitably require development in the future across the Borough. Research has shown that in certain instances brownfield sites are more biologically diverse than agricultural land.
- 7.13.3 Compared to other authorities, Swale contains one of the highest proportions of high quality agricultural land in the UK. This resource is focused within a central mainland belt running approximately east west around the A2 Watling Street. This reflects the wind blown deposits of brickearth that are especially conducive to growing a wide range of crops and made the area renowned for its fruit growing. That heritage has significantly declined with arable and livestock now the main products.
- 7.13.4 The agricultural land classification of Swale is illustrated in Figure 3 of the Scoping Report.
- 7.13.5 On Sheppey, agricultural land quality is relatively poor, except in isolated pockets on the higher ground. However, even here, agriculture is the mainstay of the nationally important North Kent Marshes Environmentally Sensitive Area.

What would the situation be without the plan?

- 7.13.6 Without the plan, the pressure to develop on greenfield sites and other vacant sites will continue, and it can be assumed that development would occur in an un-planned and possibly un-sustainable manner. The loss of important land resources including high grade agricultural land could be reasonably anticipated. There are also envisaged to be pressures on agriculture land in the future caused by the need to adapt to climate change.

What are the key issues?

- 7.13.7 The key issues identified are as follows:
 - There is pressure to develop on agricultural land and competing uses resulting from climate change (greater agricultural production linked to self-sufficiency and the need to develop in areas at low risk to flooding).
 - Areas of contaminated land exist across the Borough, and will need to be remediated or protected as habitat sites where identified.

- Brownfield land can be important for biodiversity and, in some instances, offer a higher level of biodiversity than agricultural land; therefore there may be competing pressure for new development and biodiversity protection.

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To protect and enhance soil quality and reduce contamination
Decision making criteria	<ul style="list-style-type: none"> • Does it reduce contaminated sites and increase remediation of redundant industrial land? • Does it reduce or improve the quality of agricultural land? • Does it improve the quality of the Boroughs land overall? • Does it protect an identified brownfield site with conservation value or which provides a strategic link within the green grid network? • Does it affect high grade agricultural land? • Does it cause soil pollution/contamination?

7.14 Transport and Accessibility

What's the situation now?

- 7.14.1 The Borough is well related to the motorway and trunk network with access to the M2 and A249, leading to the M20, M26 and M25, the channel ports and the Channel Tunnel. Areas where it is known that particular capacity constraints exist include the M2 junctions 5 and 7.
- 7.14.2 Swale has seen significant investment in transport infrastructure in recent years. In 2006, the completion of the new (A249) Sheppey Crossing greatly improved connectivity between the Isle of Sheppey, the rest of Kent and the strategic road network, whilst improving links to the Port of Sheerness. During 2011 two other key schemes were completed. The Queenborough-Rushenden Link Road on Sheppey has opened up large new areas for regeneration in the area. Secondly, the Milton Creek crossing of the Sittingbourne Northern Relief Road (SNRR) has also opened providing a direct link between the A249 and key business areas north of Sittingbourne. Importantly it opens up further regeneration opportunities within the town centre. This leaves the remaining section of the SNRR to the A2 east of Sittingbourne needing to be completed.
- 7.14.3 Faversham and Sittingbourne have direct rail connections to London with a travelling time of just over an hour and benefit from the High Speed 1 services into St Pancras. There is a dependence on car use within the rural areas of the Borough resulting from the poor accessibility of the villages by public transport, in particular the low frequency of bus services. The dominance of the car creates a poor environment for walking including a lack of pedestrian priority measures, poor crossing facilities, pollution from vehicles and low quality streetscape.¹¹⁷
- 7.14.4 Car ownership in the Borough generally reflects the regional and national picture with regard to 2 car households which is 28.3%, compared to 29.8% in the southeast and 24.7% nationally. Swale has a slightly greater number of households owning 1 car, 42.4% in comparison with 41.7% in the south east and 42.2% nationally¹¹⁸.

¹¹⁷ Swale Transport Strategy 2006 -2011

¹¹⁸ Neighbourhood Statistics [accessed 12.06.13]

7.14.5 The main urban areas of the Borough are compact and relatively flat, an ideal environment for cyclists. However, currently there is very little supporting infrastructure for cyclists. Throughout Kent there are approximately 490 kilometres of cycle network, made up of national, regional, recreational and urban cycle routes.

7.14.6 The Saxon Shore Way is a long-distance footpath that follows the Kent coast from Gravesend to Rye in East Sussex, some 140 miles. The Saxon Shore Way traces the coast as it was in Roman times and follows the line of the Roman fortifications. The Swale Heritage Trail is a shorter footpath of some 11 miles from Murston, west of Sittingbourne, to Goodnestone. Also, there are many local walking routes across the Borough.

7.14.7 The emerging green grid network provides a safe alternative route which cyclists and walkers can use, as well as residents for day to day journeys.

What would the situation be without the plan?

7.14.8 Without new policies that promote sustainable transport, improved accessibility and a greater choice in modes of transport, the numbers of cars on the roads in Swale will increase. This will have an inevitable knock-on effect on congestion (and therefore air quality) and on road safety.

7.14.9 The rail network of Swale has been improved through Channel Tunnel Rail Link (CTRL) Domestic Services in the Borough, this will continue to lead to improved rail links and usage by the local population.

What are the key issues?

7.14.10 The following key issues have been identified:

- The principal transport constraint in the Borough is at J5 of the M2 with the A249. There may be emerging issues with other M2 junctions and other points on the strategic road network.
- To avoid congestion provision of final section of Sittingbourne Northern Relief Road to Bapchild is needed along with improvements to Sittingbourne town centre traffic management and upgrading of junctions with the A249 at Key Street and Grovehurst.
- In the longer term (probably beyond the plan period), rebalancing the highway network away from M2 J5 may require provision of a new J5a on the M2 and a southern relief road for Sittingbourne.
- Connections between the rural communities, employment, services and amenities are very poor with regard to accessible public transport.
- Poor accessibility of rural villages by public transport.
- Low use of public transport to get to work compared to the country average.
- Poor supporting infrastructure for cyclists in the Borough.
- Poor quality pedestrian environment in certain areas of the Borough.

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To promote traffic reduction and encourage more sustainable alternative forms of transport
Decision making criteria	<ul style="list-style-type: none"> • Does it provide improvement and new routes for cyclists and pedestrian? • Does it reduce the need to travel by car?

- Will the development lead to adverse impacts on the Strategic Road Network, particularly junction 5 and 7 of the M2 which cannot be mitigated acceptably?

7.15 Waste

What’s the situation now?

7.15.1 The amount of residual household waste collected per household in Kent has been falling over time, as illustrated in Figure 15.2 below. The target for this performance indicator is 704 Kg and it can be seen that this was achieved in 2008/09.

Table 7.12: Residual Household Waste per Household for Kent¹¹⁹

Year	Residual Household Waste Collected per Household
2004/05	916kg
2005/06	899kg
2006/07	836kg
2007/08	780kg
2008/09	699kg

7.15.2 In line with the decrease in the amount of residual household waste per household for Kent, the proportion of waste sent for reuse, recycling and composting for Kent has increased over the same time period, as illustrated in Table 7.13.

Table 7.13: Household Waste diverted from Landfill in KCC Area 2005 - 2011¹²⁰

Year	Household waste diverted from Landfill (%)
2005/06	28.1
2006/07	44.4
2007/08	44.6
2008/09	54.8
2009/10	70.0
2010/11	69.0

Source: KCC Waste Management Unit

Figures published in the 7th Kent Minerals and Waste Annual Monitoring Report illustrate the following municipal waste data for Kent County¹²¹:

- 738,535tonnes of this waste:
- 28.5% sent to Landfill

¹¹⁹ Audit Commission Performance Indicator N191 – <http://oneplace.audit-commission.gov.uk> [accessed 21.09.10]

¹²⁰ Kent Minerals and Waste AMR 2011(7th Annual Minerals and Waste Monitoring Report)

¹²¹ Kent Minerals and Waste AMR 2011(7th Annual Minerals and Waste Monitoring Report)

Municipal Solid Wastes	<ul style="list-style-type: none"> • 27.6% incinerated with EfW • 31% recycled • 12.9% composted
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The following illustrates the performance of Swale Borough against the government’s Best Value Performance Indicators for Waste (2007/08):

Household dry recycling (82a)	14,085,55 tonnes (26.07%)
Household green recycling (82b)	659.65 tonnes (1.22%)
Household recycling and composting (82a+b)	27.29%
Household waste collected per person (84a)	420kg

7.15.3 The latest Defra waste statistical research has identified Swale as falling within the top ten authorities with the largest percentage decrease in household waste per head in the 2007/08 period. The Council has reduced the household waste collected per person by 9.24% to 420.40kg compared to 463kg in 2006/07¹²².

7.15.4 The Borough contains 28 waste management sites, as recorded in the Minerals and Waste Annual Monitoring Report 2005/06. Household waste recycling centres, including those that recycle green waste, are located at Church Marshes, Gas Road in Sittingbourne, Stoneyard in Sheerness and Salter’s Lane in Faversham. Local recycling centres allowing for the collection of paper, glass, plastic, clothing, cardboard, books etc. Faversham contains 18 local centres, Sheppey has 19 local centres, and the Sittingbourne area contains 30 local centres. The Swale twin bin waste collection scheme was introduced in 2007, collecting glass bottles and jars, paper products, plastic bottles, cans, foil and aerosols. Parts of the Borough on the twin bin scheme regularly exceed 36% recycling rate. In November 2007, over a 4-week period, Swale recycling rate was 43.81% including kerbside collections and bring-sites.

What would the situation be without the plan?

7.15.5 Without the plan there would be no emphasis on promoting waste reduction as part of new development within Swale, and so it might be that opportunities for changing behavioural patterns amongst residents (and hence increasing recycling rates) are missed.

What are the key issues?

7.15.6 The following key issues have been identified:

- Continued need for new developments to incorporate waste storage facilities.
- Continuation of meeting and exceeding recycling and waste management targets set at the County, regional and national level.

To reflect these key issues, the SA Scoping Report identified the following sustainability ‘objective’ and supporting ‘decision-making criteria’:

SA Objective	To achieve the sustainable management of waste
Decision making criteria	<ul style="list-style-type: none"> • Reduce waste arisings?

¹²² Ibid.

- 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?

7.16 Water

What’s the situation now?

- 7.16.1 The water companies relevant to Swale are Southern Water and South East Water. Southern Water provides wastewater treatment to all of Swale and supplies water to Sittingbourne, Sheppey and the west of the Borough. South East Water provides water to the east of the Borough.
- 7.16.2 The majority (68%) of Southern Water’s supplies comes from groundwater, predominantly from the Chalk aquifer which is widespread across the region. A further 28% comes from river abstractions, including the Medway and Stour in Kent. The remaining 4% of supplies come from the surface water impounding reservoirs, all of which are owned and operated by the company. The largest of these is Bewl Water. This is a pumped storage reservoir with water being abstracted from the River Medway, stored and subsequently released as required for re-abstraction further downstream. The reservoir is owned and operated by Southern Water, but South East Water has an entitlement to 25% of the yield.
- 7.16.3 Over 70% of the water that South East Water delivers comes from just over 150 boreholes and wells, with the remainder from six river intakes and surface water reservoirs.¹²³
- 7.16.4 A high proportion of the Borough falls within the Environment Agency’s tidal flood zones. A Strategic Flood Risk Assessment (SFRA) for Swale has been completed (August 2009) which provides greater clarity of flood zones within the Borough for present day, for 2070 (for commercial development) and 2115 (for housing), taking into account the effects of climate change.
- 7.16.5 The SFRA assessed 9 potential development areas in detail. In terms of tidal flood risk Sittingbourne Town Centre, Iwade and Faversham Town Centre have significant proportions of their areas in Flood Zone 1 (low risk). Other areas (including Milton Creek, Faversham Creek, Sheerness and Queenborough and Rushenden) had extensive areas covered by the tidal flood zones. As the SFRA demonstrates, flood risk will increase with climate change.
- 7.16.6 Surface water, groundwater, and to a lesser extent fluvial flooding also present risks and are highlighted in the SFRA. The SFRA gives guidance on the application of sustainable drainage systems.
- 7.16.7 Currently none of the river length in the Swale/North Kent catchment is achieving good ecological status/potential. Expected progress to 2015 is moderate. The overall status for the groundwater body across Swale is good¹²⁴.
- 7.16.8 Ground water levels within the Borough are changing. Industrial water abstraction has declined, mainly due to the Paper Mill in Swale closing; however, due to the closure of the mill, ground water levels have risen considerably in Sittingbourne and pose a risk of flooding at times of intense rainfall when capacity of the drainage system is at its maximum.

¹²³ Swale LDF Topic Paper 10 – Water, August 2009
¹²⁴ Environment Agency – My backyard [accessed 12.06.13]

- 7.16.9 The Environment Agency's North Kent CAMS (2004) made an assessment of the water availability within a number of water resource management units, including surface and groundwater sources. The groundwater units in particular are exploited for the purposes of public water supply. The final status assigned to each unit is detailed in the table below.

Table 7.14: Water Abstraction Site

Site	Status
Sheppey water balance – a rain fed unit	No water available
Iwade water balance – a rain fed unit	No water available
Teynham water balance – a spring fed unit	No water available
Seasalter water balance – a spring fed unit	No water available
Gillingham Chalk & LLT	Over abstracted
Sittingbourne Chalk & LLT	Over abstracted
Faversham Chalk	Over licensed
Selling Chalk	Over licensed
Faversham LLT	Water available
Selling LLT	Water available

Source: CAMS

- 7.16.10 Bathing waters are evaluated by the Environment Agency. Bathing water quality has improved significantly since 1990. Between 1998 and 2008 the number of bathing waters meeting the European guideline standards increased by a third. This is largely due to water companies investing to improve the quality of their sewage discharges. There has been a small decline in bathing water quality since 2006, due to diffuse pollution from agricultural and urban sources, and storm sewage overflows operating more frequently. Further sewerage improvements are planned in the water companies' environment programmes. In 2013 both monitoring stations in Swale, at Sheerness and Leysdown, were classed as meeting the higher standard of bathing water cleanliness¹²⁵.

What would the situation be without the plan?

- 7.16.11 The risk of flooding will continue to be an issue across the Borough, and it is likely that some aspects of flood risk will worsen as a result of climate change leading to sea-level rise and changed patterns of weather. Availability of water resources is also likely to be a continuing issue in the south-east as a result of climate change. This is despite the fact that water efficiency measures will be implemented in buildings through building regulations; and water companies can be expected to act to conserve water resources (Southern Water's Draft Business Plan for 2010-2015 states that they plan to install over 500,000 meters by 2015 to achieve full metering).

¹²⁵ <http://environment.data.gov.uk/bwq/explorer/index.html>

What are the key issues?

7.16.12 The following issues have been identified:

- The Borough is vulnerable to tidal flooding and from surface water flooding which will be exacerbated by climate change.
- Water abstraction and water availability will continue to be an issue, especially as development increases.
- Increased water consumption will have an increased impact on the biodiversity that inhabits water bodies and water systems.
- As available land for new development becomes scarce, land which falls within flood risk areas is likely to require considering. Through undertaking detailed flood risk assessments, mitigation measures can be incorporated to potentially allow non-vulnerable uses to be permitted.

To reflect these key issues, the SA Scoping Report identified the following sustainability 'objective' and supporting 'decision-making criteria':

SA Objective	To manage and reduce the risk of flooding To maintain and enhance water quality (ground and surface) and make efficient use of water
Decision making criteria	<ul style="list-style-type: none"> • Improve the quality of water within the Borough? • Reduce the demand for water (water efficiency measures)? • Ensure the 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 systems and other flood prevention systems to attract biodiversity, and to ensure that such systems are integrated into the wider green grid network?

8 WHAT ARE THE KEY ISSUES THAT SHOULD BE THE FOCUS OF THE APPRAISAL?

The SA Report must include...

- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance

8.1 Introduction

8.1.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report (2008) was able to identify a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains focused. These issues were then 'converted' into the form of sustainability 'objectives'.

8.1.2 Sustainability objectives are listed in **Table 8.1** for each of the 15 sustainability topics. Table 8.1 also presents a range of decision-making prompts alongside each objective. These objectives and decision-making prompts provide a methodological 'framework' upon which to base the appraisal of alternatives / the draft plan. It should be noted that the decision making prompts are used as a guide to identify potential impacts.

Table 8.1: Sustainability topics and objectives (i.e. the appraisal 'framework')

Topic	Sustainability objectives <i>There is a need to...</i>	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 within the Borough? • 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 objectives <i>There is a need to...</i>	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 objectives <i>There is a need to...</i>	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 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? • Deliver housing in sustainable locations with access to employment, community and public transport hubs?
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 to 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 objectives <i>There is a need to...</i>	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 systems 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 / SA INVOLVED UP TO THIS POINT?

9 INTRODUCTION (TO PART 2)

The SA Report must include...

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

9.1.1 Over the last three years Swale Borough Council has been through a number of different stages to produce the current revised draft Local Plan:

- **Stage 1: Swale Core Strategy Pick Your Own: Issues and Strategic Spatial Options (January 2011)** Explored alternative options for the number of new homes, jobs and associated infrastructure and where it should be located. It set out:
 - the agreed vision for the Borough and the objectives that assist with delivering this vision;
 - a broad development strategy for the Borough;
 - four strategic spatial development options; and
 - a proposed framework of core policies and development management policies.
- **Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012):** The draft plan was at this time in a Core Strategy format and it considered both the technical evidence and the views provided on the Pick Your Own document to arrive at a preferred strategic option for the overall amount and location of development and allocated key sites and infrastructure to achieve this. It set out a suite of policies to help achieve the vision and objectives.
- **Stage 3: The Swale Borough Local Plan Part 1: Bearing Fruits 2031 Consultation Draft (August 2013):** This is currently the draft Local Plan and has taken into account the consultation response to stage 2 as well as the impact of the National Planning Policy Framework (NPPF). In particular the change following Stage 2 is that nearly all site allocations to meet the plan's vision, objectives and development targets are included. At Stage 2 detail of only the most significant allocations was included, although it did indicate where those other smaller allocations would be located. The current revised draft Local Plan has also been restructured since the last consultation so that it is more aligned with the themes of the NPPF and includes a Swale Sustainable Development policy which sets out Swale's expectations with regards to the presumption in favour of sustainable development.

Figure 9.1 illustrates the Local Plan and SA stages undertaken to date and the stage Swale Borough Council is at in the plan making and SA processes.

Figure 9.1: The plan-making / SA process



9.1.2 There have been a number of ‘interim’ appraisal steps associated with the above stages. It is the role of this Part of the SA Report to present interim appraisal findings - where they remain current and relevant - and to explain how interim appraisals (particularly that which focused on the main ‘alternatives’) have influenced preparation of the current revised draft Local Plan.

9.1.3 This Part of this SA Report is therefore structured as follows –

- Chapter 10 - Sets out interim appraisal work undertaken with a view to informing the Council’s preferred approach to **‘broad spatial distribution of development’**
- Chapter 11 - Sets out interim appraisal work undertaken with a view to informing the Council’s preferred approach to the quantum of **‘growth’**, i.e. the number of new homes / jobs that should be supported over the plan period.
- Chapter 12 - Sets out interim appraisal work undertaken with a view to informing the Council’s preferred approach to identifying **‘Employment land at Faversham’**

Chapter 13 - Sets out interim appraisal work undertaken with a view to informing the Council's preferred policy approach to '**Gypsy and Traveller accommodation**'

Chapter 13 - Sets out interim appraisal work undertaken with a view to informing the Council's preferred policy approach to '**Affordable housing targets**'

9.1.4 Other alternatives were considered for policy approaches. Rather than dedicating a Chapter here, in Part 2, to this interim appraisal work, the full interim appraisal findings/recommendations presented in Interim SA Reports, which were published alongside the consultation documents at Stages 1 and 2 are available online - <http://www.swale.gov.uk/sustainability-appraisal/> Appraisal recommendations made at Stage 2 consultation and how these have been addressed by the current version of the plan are provided in **Appendix VII**.

10 BROAD SPATIAL DISTRIBUTION OF DEVELOPMENT

10.1 Introduction

10.1.1 The Council's approach to the broad spatial distribution of development in the Borough is a key aspect of the Local Plan. A number of alternative spatial distributions were therefore considered during Stage 1: Swale Core Strategy Pick Your Own: Issues and Strategic Spatial Options (January 2011). Following consultation on this early version of the plan and the interim appraisal work a preferred approach was developed and presented at Stage 2 which has subsequently been brought forward in the current plan. The following sections provide a summary of the alternatives considered and how the preferred approach was chosen in light of appraisal findings.

10.2 Identifying reasonable alternatives

10.2.1 At **Stage 1: Swale Core Strategy Pick Your Own: Issues and Strategic Spatial Options (January 2011)** four strategic spatial options that presented choices around level of development and potential spatial distribution were consulted upon. They were as follows:

1. Focus at urban areas for 13,500 homes and lower employment growth.
2. Focus at urban areas and larger villages for 13,500 homes and lower employment growth.
3. Focus at urban areas for 13,500 homes and higher employment growth.
4. Focus at urban areas for 18,500 homes and higher employment growth

10.2.2 **Box 10.1** illustrates the four options and further explanation of their spatial distribution is provided in **Appendix I**. The options were identified through an option generating workshop in May 2010 held by the Council with key stakeholders and were informed by a number of baseline studies. In arriving at the four options, the Council considered the potential contribution of the options to the vision and plan objectives and discounted a number of other options that were not considered to be 'reasonable' and therefore were not developed further. These included:

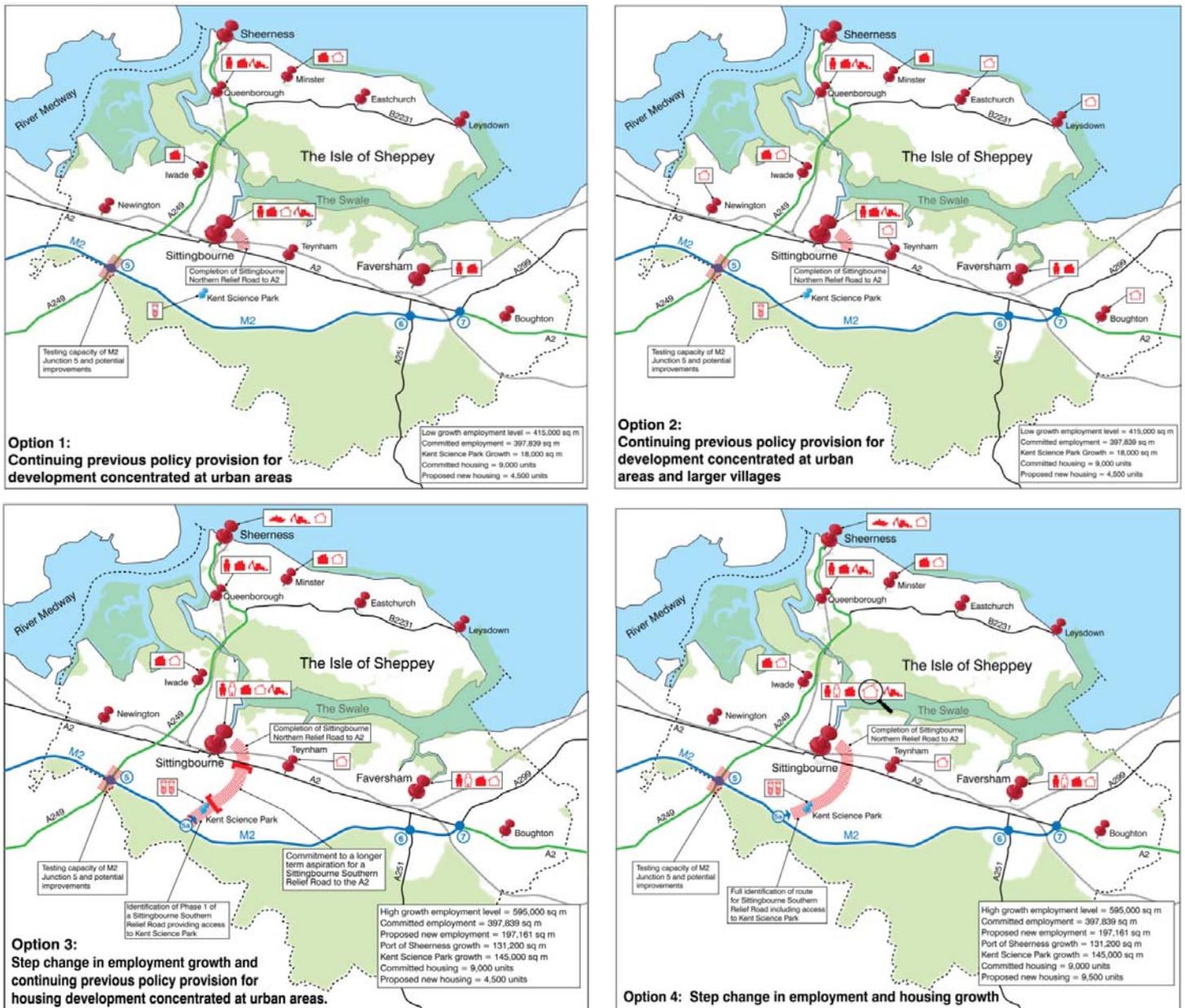
- Growth within international/national environmental designations.
- Identification of new settlements.
- Major growth outside Thames Gateway.
- Wider dispersal to minor rural settlements (their development needs would be considered via Core Strategy policies).
- No growth

10.2.3 At **Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012)** a preferred approach to the spatial distribution of proposed development was put forward and consulted upon. This located development, in broad terms, at the following locations, descending in scale and type:

1. The principal town of Sittingbourne;
2. The other Borough urban centres of Faversham and Sheerness (and its nearby centres of Queenborough, Rushenden and Minster/Halfway);
3. Rural Local Service Centres – Iwade, Newington, Eastchurch, Leysdown, Teynham and Boughton; and
4. the smaller villages

10.2.4 Under this approach the levels of growth were weighted toward Sittingbourne and the Isle of Sheppey reflecting their position within the Government’s Thames Gateway growth area. Priority was also given to the use of brownfield land. The availability of brownfield land is however lower than other areas within the Gateway area and will be insufficient to meet all future development needs. Urban and village extensions are therefore needed to maintain a supply of land for housing and jobs under this option.

Box 10.1: Strategic Spatial Options considered at Stage 1



10.3 Developing the preferred approach in-light of appraisal findings

10.3.1 The broad spatial distribution of all five options consulted upon at **Stage 1 and Stage 2** of plan making have been appraised against the SA objectives. Detailed appraisal findings are presented in **Appendix I**. It should be noted that the quantum of growth for the plan has been appraised separately as a result of more recent evidence regarding objectively assessed need. The appraisal findings for options for the quantum of growth are discussed in the next chapter.

The broad spatial distribution presented at **Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012) (Option 5)** is the Council's preferred approach for the broad spatial distribution of development. **This selection is broadly in line with interim appraisal findings.**

- 10.3.2 The appraisal indicated that Options 1, 3, 4 and 5 propose development predominantly within existing urban areas (Sittingbourne, Faversham and Sheerness), or as extensions to urban areas which overall has the greatest potential to avoid potential impacts on the environment and reduce the need to travel to key services and facilities. All options are expected to result in the loss of best and most versatile agricultural given the spatial extent of this resource in the Borough however Options 3, 4 and 5 would involve more development focussed on previously developed land compared to Options 1 and 2. This would also assist with the delivery of social and economic objectives by promoting regeneration.
- 10.3.3 Option 2 has a larger rural housing focus, directing housing sites towards greenfield land and the identified larger rural centres (Eastchurch, Leysdown, Iwade, Newington, Teynham and Boughton Street). Generally, with more development distributed to these locations compared to other options this is expected to have a greater negative effect on the local character and landscape of the rural area and the valued natural environment of the Borough. Potential negative impacts upon health, transport and climate resulting from the increased need to travel and reduced accessibility to key services is also likely compared to the other options.

11 GROWTH QUANTUM

11.1 Introduction

11.1.1 The NPPF requires all Local Planning Authorities to prepare Local Plans which meet the full, objectively assessed, needs for both business and housing in their area. As the NPPF was published after the **Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012)** the development targets to deliver local business and housing needs have been reviewed. Revised evidence has been prepared regarding the potential levels of growth predicted for the Borough over the plan period. This revised evidence is set out in the Strategic Housing Market Assessment Update and Development Needs Assessment (Nathaniel Litchfield and Partners 2013) (hereafter referred to as the SHMA Update and Development Needs Assessment 2013).

11.1.2 The following sections provide a summary of the appraisal of a number of growth quantum scenarios considered in the SHMA Update and Development Needs Assessment 2013. These have been selected as ‘reasonable alternatives’ for the growth strategy. The following sections also explain why the preferred growth strategy has been selected.

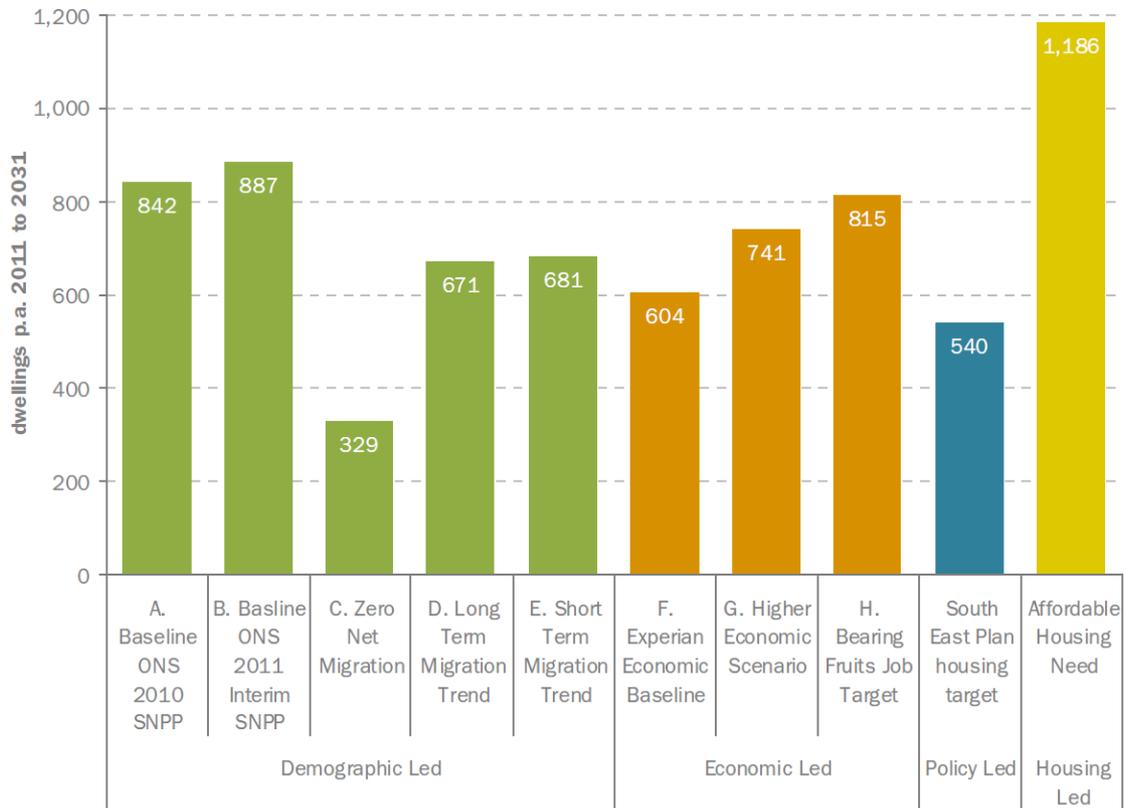
11.2 Identifying reasonable alternatives

11.2.1 The SHMA Update and Development Needs Assessment 2013 developed a number of housing and economic based scenarios to assess the level of new jobs and homes that could be provided in the Swale Borough over the plan period.

- 11.2.2 Ten scenarios were identified for the purposes of the study -
- Five 'demographic led' scenarios (A,B,C, D and E) – which reflect varying levels of development required to meet projected levels of population change;
 - Three 'economic led' scenarios (F,G,H) – which reflect varying levels of development required to ensure forecasts of future employment change are supported by the local labour supply;
 - One 'policy-led' scenario - which reflects the South East Plan Regional Spatial Strategy 2006-2026 housing target for Swale and the target previously consulted on at Stages 1 and 2 of the plan making process; and
 - One 'housing led' scenario – which reflects the level of development required to meet current and future needs for affordable housing.

11.2.3 **Figure 11.1** is taken from the SHMA Update / Development Needs Study. It shows the ten scenarios and the annual dwelling requirements for each. The demographic and economic led scenarios indicate a range of growth of between 329 and 887 dwellings per annum and -14 and 427 jobs per annum.

Figure 11.1 Potential growth scenarios



Source: NLP Analysis/KCC Demographic Modelling

11.2.4 The Council selected, for further consideration, the following three demographic and economic led scenarios as potentially providing for objectively assessed need:

- Economic Baseline: 214 jobs per annum, 4,280 over plan period, 604 dwellings pa, 12,080 over plan period
- Higher Economic Baseline: 353 jobs per annum, 7,053 over plan period 741 dwellings per annum, 14,820 over plan period
- Demographic led Office of National Statistics 2011 Projection: 414 jobs per annum, 8,271 over plan period 887 dwellings per annum, 17,740 over plan period

11.2.5 The Council considered that these encompassed the range of scenarios presented in the SHMA Update and Development Needs Assessment.

11.2.6 Following the above assessment the Council also considered as a ‘reasonable alternative’ continuing with the previously consulted on housing target of 540 dwellings per annum (shown as the Policy led scenario) but with a job growth target of 353 jobs per annum in line with the higher economic baseline scenario. This was selected based on the short term average of housing delivery (reflecting current economic difficulties) and the longer term average of housing delivery (reflecting a range of economic cycles) and due to the fact that much of the employment land bank is already committed and that at least some of the growth forecast is already being delivered.

11.2.7 The ‘zero-net migration’ scenario (scenario C) was not selected as a ‘reasonable alternative’ as this reflects the net effect of population change within the existing population rather than any consistent levels of net in-migration previously experienced by the Borough and would not

support employment growth. The scenario to meet the affordable housing dwelling need of 1,186 affordable dwellings per annum was also not selected as a 'reasonable alternative' as this would significantly exceed the need for housing from demographic change. The Council believes that although it would have positive impacts for affordability, it is untested in the context of past delivery trends for the Borough and would put greater pressure on the local environment.

11.2.8 The spatial distribution of these growth scenarios was then considered and in order to undertake the appraisal of options it was assumed that the preferred broad spatial approach that was presented in the **Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012)** was appropriate. The levels of growth do have a bearing on the resulting spatial distribution of development, i.e. the specific locations that are allocated. Effects identified therefore carry a degree of uncertainty in the absence of more detailed site specific appraisal information and also evidence to determine whether necessary infrastructure in combination with growth proposed in neighbouring authorities¹²⁶ can actually accommodate these varying growth levels.

11.2.9 In summary, it was determined that the 'reasonable alternatives' for the growth strategy that should be appraised were:

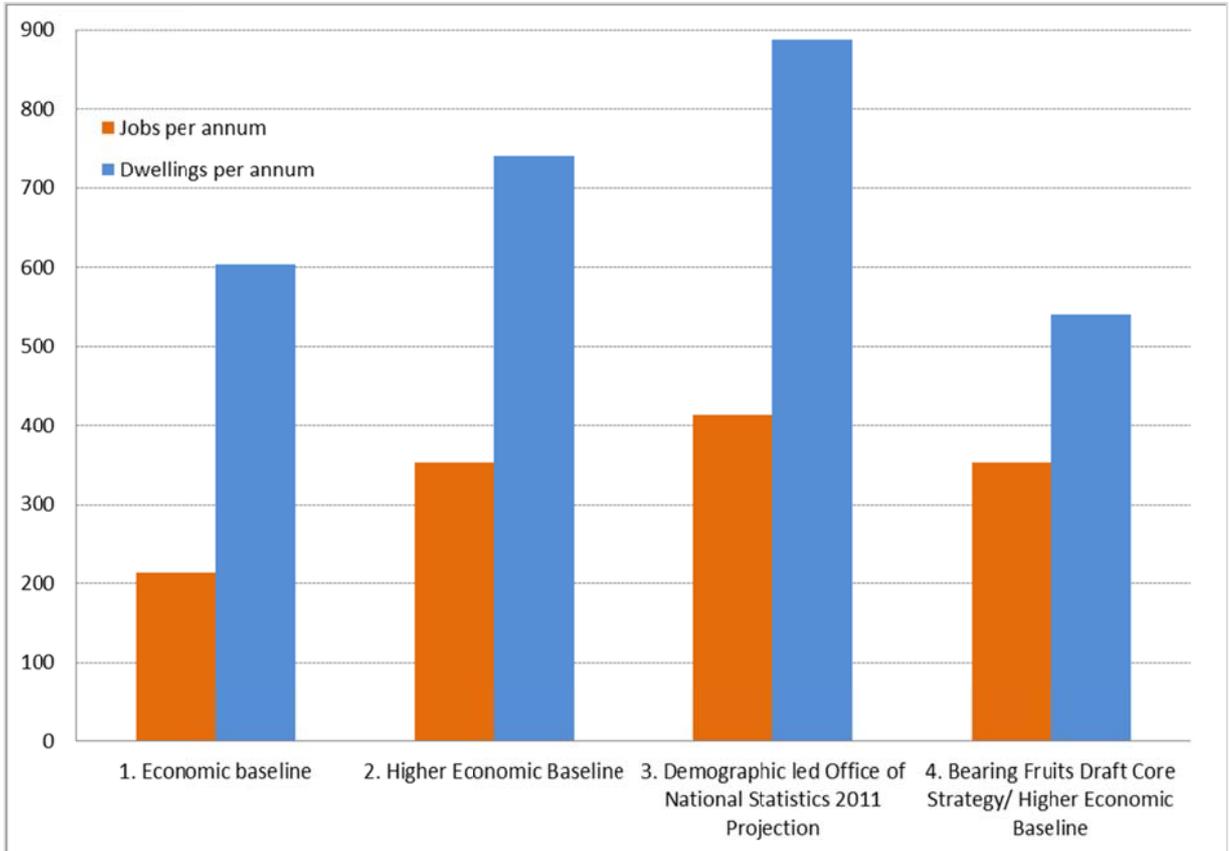
Option	Jobs	Housing
1. Economic Baseline	214 per annum, 4,280 over the plan period	604 dwellings per annum, 12,080 over the plan period
2. Higher Economic Baseline	353 per annum, 7,053 over the plan period	741 dwellings per annum, 14,820 over the plan period
3. Demographic led Office of National Statistics 2011 Projection	414 per annum, 8,271 over the plan period	887 dwellings per annum, 17,745 over the plan period
4. Bearing Fruits Draft Core Strategy/Higher Economic Baseline	353 per annum, 7,053 over the plan period	540 dwelling per annum, 10,800 over the plan period

Note: The modelling states that there is not a simple relationship between the number of jobs per year and the total for the plan period

11.2.10 The jobs and housing growth per annum proposed under the above options are illustrated in Figure 11.2.

¹²⁶ Maidstone Borough Council - Working housing target of 14,800 properties to be delivered between 2011 and 2031; Canterbury City Council 15,600 units between 2011-2031 which equates to 780 dwelling per annum; Medway Council 17,930 to 2028. The Core Strategy therefore proposes the delivery of at least 815 dwellings per annum (785 within the Thames Gateway) on average over the plan period up to 2028 and Ashford Borough Council - 16,770 new dwellings in Ashfield Growth Area 2006 to 2021, plus contingency of 10% and 1,180 new dwellings in the rest of the borough.

Figure 11.2 'Reasonable alternatives' for the growth strategy



11.3 Developing the preferred approach in-light of appraisal findings

11.3.1 The Council's preferred approach is Option 4 which delivers 10,800 dwellings and 7,053 jobs over the plan period. **This approach is broadly in accordance with the interim appraisal findings with respect to achieving environmental objectives however it does not perform as well as other options in terms of meeting economic and housing related SA objectives.**

11.3.2 The appraisal found that all options would increase the population of Swale through provision of housing and employment development albeit at differing levels. Without appropriate mitigation, the associated pressures that growth would place on the environment resulting from vehicle movements; energy and water usage; generation of pollutants and greenhouse gas emissions; and the loss of high grade agricultural land across the Borough could result in negative effects, particularly for the higher growth options. In addition, higher levels of growth could also result in negative effects on the Borough's valued local landscapes and townscapes. However given the evidence available it is difficult to determine the significance of these effects under each option. The appraisal would benefit from more detailed supporting evidence related to biodiversity, landscape sensitivity and infrastructure for each option.

11.3.3 The appraisal concluded that although all the options present potentially positive and negative effects on the SA objectives, given the levels of growth proposed, Options 1 and 4 have the potential to deliver a less significant adverse effect upon the Borough's environment.

11.3.4 In terms of performance against social and economic objectives, the future ageing population is expected to constrain the future labour supply and place pressure on housing supply therefore the positive effects of employment and economic growth for all options could be limited, particularly for achieving higher levels of growth. Option 4 also does not deliver the

objectively assessed housing need (identified in the Council's SHMA Update) to meet the economic growth proposed under this option, and therefore could have negative effects upon the provision of necessary housing supply and sustaining the local economy if accommodation for workers is not available locally. This option may, in the short term, reduce the amount of out-commuting which currently occurs resulting in positive effects upon the employment, air quality, transport and climate baseline. However in the long term it could also encourage commuting into the Borough resulting in negative effects upon transport, climate and air quality. Option 1 aims to deliver the future economic baseline based on objectively assessed need, and it provides a housing supply to support the labour supply needed to deliver this. Overall, this option is expected to perform better than Option 4 with regards to achieving economic and social objectives.

11.3.5 Detailed appraisal findings are presented in **Appendix II**.

12 EMPLOYMENT LAND AT FAVERSHAM

12.1 Introduction

12.1.1 As part of the Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012) the Council consulted on a number of options to deliver new employment land at Faversham. Over recent years some employment land identified by the Swale Borough Local Plan 2008 has not come forward and whilst the Council's Employment Land Review (2010) found that the majority of these sites continue to be suitable for employment purposes, it was recommended that a new, relatively small scale industrial site(s), be identified to provide for 20,000 square metres of business, industry, warehousing and office floorspace ('B' class uses) at Faversham.

12.2 Identifying reasonable alternatives

12.2.1 At present, the Council's evidence suggests there are insufficient available and suitable sites within the urban area to provide the quality of site needed in a location with good access to the main transport network. This has led to the Council considering an edge of town site.

12.2.2 To determine a potential area of search the Council considered the Urban Extension Landscape Capacity Study (2010) which examined the character of land around the town and its ability to accommodate change. In broad terms, the study found that the town's northern and western edges had a low capacity to be developed. Additionally, the Council notes that these areas are subject to tidal flooding and important wildlife designations. Between the Faversham-Ramsgate railway line, to the east of the town, and Ospringe village to the south west, the landscape is described by the study as having moderate capacity for change. Land running clockwise from the Faversham-Ramsgate railway to Brogdale Road south of the town was identified as an area of search. The search area represents the greatest potential for near immediate access to the M2 Motorway, A2 and A229 Thanet Way and also avoiding development in the south-western and western parts of the town which could be both harmful to the character, setting and quality of environment of Ospringe and its Conservation Area. The Council sought submissions from landowners within the identified area of search as part of the preparation of its Employment Land Review (2010) and Strategic Housing Land Availability Assessment 2010/11. The Council's assessment of submitted sites which included consideration of landscape issues led to three 'short listed' locations which were consulted upon as part of the Stage 2: Bearing Fruits Draft Core Strategy (March 2012). These were:

- Option A – Land at Perry Court Farm, Brogdale Road. - 33 hectare (ha) site framed by the Abbey School, Ashford Road, Brogdale Road and the M2.
- Option B – Land between Ashford Road and Salters Lane. - 14 ha site framed by the A2, Ashford Road, Salters Lane and the M2 Motorway.
- Option C – Land at Lady Dane Farm, Love Lane - 27 ha site comprised of farm land east of Love Lane and South of Graveney Road, whilst its southern border comprises the Faversham-Canterbury railway.

12.2.3 Following this consultation the preferred site was Love Lane. This was because the locations for Option A and B could, in the longer term, result in additional pressure over time to develop other land that could expand Faversham up to the M2 potentially changing its character and setting. Since the Stage 2 consultation, a changed situation at the Oare Gravel workings site (a previously allocated employment site under the Local Plan but the owner is now prepared to bring the site forward) has meant the Council has reconsidered the options for employment land provision at Faversham. The Oare Gravel workings site (Option D) has therefore been appraised alongside the other site options (A-C). This is a 67 ha site located to the north west of the town close to Oare village, bounded by Oare Creek, Ham Road and the North Kent Marshes.

12.3 Developing the preferred approach in-light of appraisal findings

- 12.3.1 The Council's preferred choice for allocating employment land at Faversham is Option D-Oare Gravel workings site with Option C allocated as a reserve site should Option D not come forward. **This is partially in line with the interim appraisal findings.**
- 12.3.2 The appraisal found that all options would help to boost the amount of employment in the Borough and contribute towards delivering housing. When comparing the options, Option C was considered to be the least constrained by sensitive environmental features compared to the other options but would result in the loss of high grade agricultural land and require improvements to access. Option D would have positive effects with regards to avoiding the loss of high grade agricultural land and remediating contaminated land although there are number of potentially negative effects on the environment which would need to be addressed through mitigation. Constraints identified for development at Oare include landscape, ecology, flood risk, transport and heritage. As part of the redevelopment of Option D there would however be opportunities to enhance on-site biodiversity and heritage assets. Evidence from the Employment Land Review 2010 suggests Option D would be less favourable to commercial developers compared to Options A-C due to the costs of remediation and limited accessibility.
- 12.3.3 The interim appraisal indicated that for the Oare site key considerations for its redevelopment should be incorporated into relevant policies. This included the need to provide biodiversity protection and enhancement to maximise positive effects upon the adjacent Swale Special Protection Area and the ecology value of the site itself. In addition, ensuring development is designed sensitively to minimise the wider visual impacts. The use of SUDS and locating development in areas of least risk on the site were also suggested to protect development from flooding and so that flood risk is not increased elsewhere.
- 12.3.4 For Option C, the interim appraisal also indicated key considerations for development to be incorporated into relevant policies. This included securing an access point onto the A2 and ensuring development encourages the use of sustainable modes of transport. Further investigation to determine the potential biodiversity value of the site and the significance of the loss of high grade agricultural land would also be needed.
- 12.3.5 Detailed appraisal findings are presented in **Appendix III.**

13 GYPSY AND TRAVELLER ACCOMMODATION

13.1 Introduction

13.1.1 Swale Borough has one of the largest Gypsy and Traveller populations within Kent and the South East of England with over 50 sites as indicated by the latest Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2013)¹²⁷. In recognition of this, making sufficient provision for Gypsies and Travellers in a fair fashion for all is a key objective of the Council's Swale Gypsy and Traveller Corporate Policy (July 2009), Swale Gypsy and Traveller Corporate Site Assessment (2010) and its Housing Strategy (2008-2015). The following sections identify the various alternatives considered for policy approaches to providing Gypsy and Traveller accommodation and the preferred policy approach chosen.

13.2 Identifying reasonable alternatives

13.2.1 At **Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012)** three options for the number of pitches to be provided for the Gypsy and Traveller population were presented for consultation ranging between 11 and 82 pitches to be provided between 2013-2031. These were based upon need/demand and capacity/opportunity drawing upon evidence prepared for the South East Plan. Since Stage 2, the Council has commissioned a GTAA for the Borough which identifies an objectively assessed need for 85 pitches to be provided for the Gypsy and Traveller population between 2013 and 2031. This is reduced to 82 given pitch completions up to the 1st April 2013

13.2.2 To help meet the Borough's need for new pitches, identified by the Gypsy and Traveller Accommodation Assessment (GTAA), the Council has also considered the following policy approaches the pitch provision:

- 1) 1% of the total number of dwellings proposed for each Local Plan housing allocation and windfall sites above 149 dwellings or above to be provided as Gypsy and Traveller serviced pitches (capped at a maximum of 10 pitches per site) and 1 pitch to be provided for each Local Plan housing allocation and windfall sites of 50-149 dwellings.
- 2) No pitch allocations as part of mainstream housing sites, and having specific Gypsy/ Traveller allocations.
- 3) No pitch allocations and just relying on windfall planning application sites for Gypsy and Traveller sites.

13.2.3 With regards to Option 1, the proposed 1% and suggested thresholds were proposed by the Council's planning officers given their knowledge of the site allocations and in the absence of other evidence.

13.3 Developing the preferred approach in-light of appraisal findings

13.3.1 The Council's preferred quantum of pitches to plan for is 85 (82 excluding completions February – March 2013) new pitches, based on the evidence in the latest GTAA of objectively assessed need. This is the upper end of the range of options already appraised at Stage 2. **This preferred quantum is in line with the previous interim appraisal findings.** Detailed appraisal of these options is presented in the Interim SA Appraisal report for Stage 2. .

13.3.2 In summary, the appraisal found all of the options perform well in relation to achievement of a number of SA objectives. A key consideration was that Options 2 (82 pitches) and 3 (44 pitches) propose a higher level of new pitches over the plan period, which would help to ensure that the needs of the Gypsy and Traveller population are met.

¹²⁷ Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Swale Final Report, Salford Housing & Urban Studies Unit University of Salford June 2013

- 13.3.3 In terms of the policy approaches considered to deliver these pitches, the Council's preferred approach is Option 1 which would require 1% of the total number of dwellings proposed for each Local Plan housing allocation and windfall sites above 149 dwellings or above to be provided as Gypsy and Traveller serviced pitches (capped at a maximum of 10 pitches per site) and 1 pitch to be provided for each Local Plan housing allocation and windfall sites of 50-149 dwellings. The Council has also included as part its preferred **Policy DM10** that a commuted sum can be agreed with the Council as an alternative if it can be clearly demonstrated the site would not be suitable for the Gypsy and Traveller community. The policy also states that if it is necessary to demonstrate a 5 year supply of pitches then the Council will allocate and grant permission for sites subject to specific criteria. **This preferred approach is broadly in line with the interim appraisal findings.** Detailed appraisal findings are presented in **Appendix IV**.
- 13.3.4 The appraisal found that Options 1 and 2 would locate pitches principally in, and adjacent to, urban areas in the Borough and would provide more certainty regarding the locations for development compared to Option 3. Although the location of pitches could result in the loss of agricultural land and potential for negative effects on local landscape and biodiversity, Options 1 and 2 would provide locations accessible to key services and facilities. Compared to other options, Option 1 is likely to make more efficient use of land and access arrangements by co-locating pitches with proposed housing. Option 1 is also likely to have **significant positive effects** with regards to social objectives as co-locating housing and pitch provision would help to reduce the social exclusion of the Gypsy and Traveller community.
- 13.3.5 The appraisal identified a level of uncertainty surrounding the effects of Option 3 and in part Option 1 due to the unknown locations of windfall sites. Under Option 1 it is also somewhat uncertain as to when the pitches would be delivered under each housing allocation or windfall site and if their inclusion as part allocations would increase costs of developing housing sites therefore there may be short term issues with provision. Considering all the options, Option 3 is considered to be less favourable as this would not be a proactive approach to providing pitches for this part of the local community.

14 AFFORDABLE HOUSING TARGETS

14.1 Introduction

14.1.1 In 2010, 78% of newly forming households could not afford market housing, whilst 71% of single households could not afford a one-bedroom shared-ownership flat. The SHMA Update and Development Needs Assessment 2013 also identifies an estimated 4,295 households in need of affordable housing within Swale, as highlighted by the scale of the housing waiting list. The Council has therefore considered a number of ways in which to set the target for affordable housing and these are discussed in the following sections followed by the reasons for choosing the preferred option.

14.2 Identifying reasonable alternatives

14.2.1 The Council's Housing Strategy (2010-2015) sets out the aims and objectives and vision for the Borough. In particular the strategy promotes the effective physical and social integration of new affordable housing and new occupiers with new market housing and within existing communities.

14.2.2 The South East Plan identified the East Kent area as having less capacity to resource affordable housing development, because of comparatively lower developer engagement than in other parts of Kent and the South East. The South East Plan suggested an overall 30% affordable housing target, to be delivered via all sources (including 100% affordable schemes such as rural exceptions) for the sub-region, 5% below the South East norm.

14.2.3 The East Kent Strategic Housing Market Assessment 2009 (EKSHMA) identifies that housing markets do not respect administrative boundaries and may comprise smaller, more local sub-markets and neighbourhoods. They are also constantly evolving, and therefore housing and planning policies need to be pitched at geographically smaller levels. They must take into account trends in the sub-regional housing and employment markets as well as the interrelatedness of housing markets and economic growth. The EKSHMA indicates that where there is a series of factors (relative price, relative need, economic ambition) these can result in targets of higher than 30% for affordable housing. Where these factors are not present, they recommend the South East Plan 30% target.

14.2.4 Given the above, the Council has identified the following options for setting an affordable housing target although it should be noted that these are to be subject to viability testing:

- 1) Number of affordable housing units to be determined in accordance with the affordable housing target of 30% (East Kent target of the now revoked South East Plan)
- 2) Number of affordable housing units to be determined in accordance with the affordable housing target of 35% (Kent target of the now revoked South East Plan)
- 3) Number of affordable housing units to be determined in accordance with the affordable housing target range of 30-35% according to the local housing market area (30% at Sheerness/Minster and East Sheppey and 35% at Sittingbourne, Faversham and East Swale Rural Area)

14.3 Developing the preferred approach in-light of appraisal findings

14.3.1 The Council's preferred approach is to take forward Option 3 which follows the recommendations of the EKSHMA. These targets are to be subject to viability testing. In addition, the Council proposes to allow developers in the short term to deliver reduced targets where it can be demonstrated that the viability of a scheme will be severely compromised as a result of meeting the affordable housing policy target. This mechanism will help to ensure sites are not prevented from coming forward and lower levels of affordable housing can still be

provided, even though the identified population need for affordable housing will not be fully met. **This preferred approach is broadly in line with the interim appraisal findings.**

- 14.3.2 The appraisal found that all options are unlikely to have significant effects or any differential effects on environmental and some social and economic objectives. All options would have a potentially positive effect upon the housing objective as they would provide affordable housing across the Borough, therefore contributing towards meeting the considerable need for this type of housing. None of the options however meet the identified local population need fully and given the current economic climate and recent past trends of affordable housing delivery this may be difficult to deliver and address unless significantly higher levels of growth are proposed. Option 3 has considered local level evidence (relative price, need and economic ambition) associated with each market location, where this is available, and is therefore likely to be more deliverable in the longer term as it is based on more robust evidence. Higher levels of affordable housing proposed by Option 2 could result in developments not coming forward in areas where evidence suggests a lower level target is likely to be more deliverable. Option 3 seeks to take into consideration local market conditions and Option 1 would deliver a lower level across the Borough. All targets may not be achievable given the current economic climate and consideration of development costs and viability.
- 14.3.3 Detailed appraisal findings are presented in **Appendix V**.