

## **PART 3: WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?**

## 15 INTRODUCTION (TO PART 3)

The report must include...

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

### 15.1 Overview

15.1.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the draft Plan. Part 3 is structured as follows:

- Chapter 16 presents an appraisal of the plan under 15 'sustainability topic' headings
- Chapter 17 discusses overall conclusions and recommendations at this current stage

### 15.2 Methodology

15.2.1 The appraisal is structured under '15 sustainability topic' headings. For each topic a range of sustainability objectives and issues (as identified through scoping) are listed. Taken together, the sustainability topics, objectives and issues provide a methodological 'framework' for the appraisal of likely significant effects on the baseline.

15.2.2 Within each sustainability topic chapter 'significant effects' of the draft plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.<sup>128</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

### 15.3 Limitations

15.3.1 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained.<sup>129</sup> In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms. Effects identified therefore carry a degree of uncertainty in the absence of more detailed site specific appraisal information and also evidence to determine the cumulative effects of the plan with growth proposed in neighbouring authorities<sup>130</sup>. For example, it is uncertain whether infrastructure can accommodate the level of development across the sub region.

### 15.4 Added structure

15.4.1 To give the appraisal 'added structure', in addition to drawing conclusions on the likely effects associated with 'the draft plan', stand-alone consideration is given to each the following three 'elements' of the Local Plan:

- The spatial strategy including the levels of growth, broad spatial strategy and area specific spatial strategy. This includes consideration of policies allocating locations for

<sup>128</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>129</sup> As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

<sup>130</sup> 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.

development which are those listed under “Locations for new development and longer term opportunities” in Appendix VI ;

- Core policies;
- Development management policies.

15.4.2 For each sustainability topic in section 16 the effects of policies allocating locations for development are discussed under the appraisal of the preferred ‘strategy’ policies. This draws upon the findings set out in **Appendix VIII** which has been prepared by the Council and gives an indication of the broad implications of all new and saved allocations included in the plan on each of the sustainability topics. This appraisal has been drawn from information held on each site in the Swale Strategic Housing Land Availability Assessment (2013) and Employment Land Review (2010).

15.4.3 In the following section, policies within the plan are assigned one of the following symbols in-line with predicted ‘broad implications’. It is important to note that these symbols are not used to indicate significant effects.

↗	Positive implications	↘	Negative implications
↔	No/neutral implications	?	Unclear implications

16 APPRAISAL OF THE REVISED DRAFT LOCAL PLAN

16.1 Air

Relevant sustainability objectives

- To reduce air pollution and ensure air quality continues to improve across the Borough

Appraisal of the preferred 'strategy' (ST) policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↔	↘	↔	↘	↔	↔	↔

- 16.1.1 Growth planned in Swale between 2011-2031 (as set out in **Policies ST2 and ST4**) will lead to an increase in the population of Swale, which could in turn lead to an increase in vehicle movements and associated pollutants released through transportation. These policies do however expect this growth to be delivered in accordance with the preferred spatial strategy which locates new development principally in and around existing larger settlements within the Borough including Sittingbourne, the Isle of Sheppey and Faversham areas. This is likely to ensure that the majority of new development is in close proximity to existing key services and facilities, which could lead to the reduction in the need for people to travel in the Borough and could therefore help to reduce air pollution generated from new development.
- 16.1.2 The quantum of growth planned for housing set out in **Policy ST2 and ST4** (10,800/540 per annum over the plan period) is not, however, based on objectively assessed demographic, affordable housing or economic need identified in the Council's Strategic Housing Market Assessment Update and Development Needs Assessment (Nathaniel Litchfield and Partners 2013) (SHMA Update) rather past trends and deliverability. This could result in the necessary housing supply to provide for the labour supply required to deliver the proposed economic growth is not available locally. This option may, in the short term, reduce the amount of out-commuting which currently occurs resulting positive effects upon local air quality . However in the long term it could also encourage commuting into the Borough resulting in negative effects upon transport, climate and air quality. Swale is currently a net exporter of labour, in the short term, this level of housing growth has the potential to reduce out commuting as it could result in a constrained labour supply. This therefore has the potential for positive effects upon local air quality. However in the long term, coupled with pressures on housing and labour supply resulting from an ageing population, in commuting could occur potentially resulting in negative effects upon local air quality.
- 16.1.3 Policies of the preferred spatial strategy also promote the provision of public transport and sustainable modes of transport and **Policy ST1** commits to applying national policy with respect to pollution.
- 16.1.4 Recognising there are designated Air Quality Management Areas (AQMAs) in the Borough, **Policy ST5** (Sittingbourne Area Strategy) expects development in the Sittingbourne area (which includes the village of Newington) to be consistent with local air quality action plans for Newington High Street, St. Paul's Street and East Street in Sittingbourne which are the locations of AQMAs in this area. This is expected to reduce the likelihood of negative effects upon the local air quality as a result. The A2 through Ospringe is also subject to an AQMA however **Policy ST7** does not specifically guide developments to address impacts on local air quality. **Policy A6** Land at the Western Link Faversham does require developers here to provide an air quality assessment. The supporting text expects development to respond to the air quality action plan for the AQMA and achieve no detriment in air quality here. Similarly

**Policy A7** allocating land at Oare Gravel Workings expects development to minimise adverse transport impacts arising (including matters of air quality) associated with the Ospringe AQMA.

16.1.5 Potential improvements to public transport and measures to encourage walking and cycling are also proposed as part of policies allocating locations for development. These are therefore likely to indirectly reduce the need to travel by car and thus minimise adverse effects to local air quality.

Appraisal of the preferred ‘core’ (CP) policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	?	↗	↗	↗	↗	↗	↔

16.1.6 **Policy CP2** (Transport Infrastructure) identifies the importance of locating new development in appropriate locations to minimise the need to travel between homes and employment, shopping, community facilities. It also emphasises the need to ensure development is located close to public transport links to encourage a modal shift from a reliance on the private car. Both these measures could contribute towards reducing the negative effects of increased vehicle usage upon air quality through encouraging the use of public transport and reducing the need to travel in the Borough over the plan period. Other policies (**CP3, CP4 and CP5**) support these principles. **Policy CP1** has potentially uncertain effects as the policy supports locating development adjacent to the strategic and primary road networks but there is no reference to ensuring sustainable modes of transport are encouraged. This would however be addressed by **Policy CP2** and other development management and strategy policies.

Appraisal of the preferred ‘development management’ (DM) policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↗	↗	↔	↔	↗	↗	↔	↗	↗	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

16.1.7 Development management policies are also expected to help reduce negative impacts on the local air quality baseline. **Policy DM6** (Managing Transport Demand and Impact) requires development proposals to demonstrate that development opportunities for sustainable modes of travel have been taken up and to integrate air quality management into the location and design of access. Proposals are also required to demonstrate that they do not worsen air

quality to an unacceptable degree. **Policies DM7** (Vehicle Parking) and **DM20** (Sustainable Design and Construction) encourage a high standard of design which will incorporate facilities to encourage sustainable modes of travel such as cycling. Other development management policies (**DM4, DM14 and DM15**) also encourage this and improved public transport. Policy **DM7** (Gypsy and Traveller sites) also expects proposals for gypsies and travellers sites to cause no significant harm to the health and well-being of occupants or others by impacting air quality.

#### Appraisal of the 'revised draft Local Plan as a whole'

- 16.1.8 The level of development proposed in Swale over the plan period will lead to an increase in population, which will in turn increase emissions of pollution through an increase in people travelling throughout the Borough. The spatial strategy does direct development towards existing larger settlements and increased provision of public transport which is likely to ensure that developments incorporate measures to reduce the need to travel by car which could assist with reducing negative effects from vehicle usage upon local air quality. Policies relating to allocations close to existing AQMAs also expect development brought forward to demonstrate they would not increase pollutants at these locations.
- 16.1.9 The quantum of growth planned for housing over the plan period is not however based on objectively assessed demographic, affordable housing or economic need. This could result in positive and negative effects upon local air quality in the short term by reducing out commuting currently experienced and in the long term from labour commuting into the Borough. **Overall, the effects of the implementation of the policies proposed in the revised draft Local Plan are uncertain on the Borough's air quality.**

#### Recommendations

**Policy ST7** (Our approach to the Faversham area and the Kent Downs) could be further strengthened to ensure development proposals coming forward in this area do not increase the levels of pollutants at the A2 section through Ospringe which is an AQMA. This could be included by adding an additional criterion which expects development to not increase the levels of pollutants at the identified AQMA at Ospringe and where possible improve air quality in this area of the Borough.

16.2 Biodiversity

Relevant sustainability objectives

- To conserve and enhance biodiversity and the natural environment

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↘	↗	↘	↗	↗	↗

16.2.1 Growth planned in Swale between 2011-2031 (as set out in **Policies ST2 and ST4**) will lead to an increase in the population and the development of Swale. The proposed growth strategy and spatial strategy, as set out in **Policies ST2-ST7**, does broadly seek to provide development whilst also protecting and where possible, enhancing the Borough's biodiversity. Although the preferred spatial strategy avoids development within internationally and nationally designated biodiversity sites, given the location of these sensitive sites in relation to existing settlements, there is potential for the quantum of growth proposed to bring recreational pressure (as identified by a recent study of recreational disturbance to wintering waterfowl on intertidal habitats between Gravesend and Whitstable) resulting from development on these sensitive sites. The Habitats Regulations Assessment, which is yet to be completed, is expected to determine the significance of effects of the proposed growth and spatial strategy. **Policy ST2** does expect development requiring assessment under the Habitats Regulations Assessment to protect the integrity and special interest of the European designated sites. Policies allocating locations for development which are in close proximity to European designated sites such as the Oare Gravel Workings site (**Policy A7**) and land at North East Sittingbourne (**Policy A2**) do expect these issues to be addressed as part of development coming forward and also seek biodiversity enhancements and net gain.

16.2.2 Development could also potentially lead to negative effects on local biodiversity as a result of locating new development principally in and around existing larger settlements on greenfield land including Sittingbourne, the Isle of Sheppey and Faversham areas.

16.2.3 **Policy ST1** (Delivering Sustainable Development in Swale) also aims to conserve and enhance the natural environment by protecting designated biodiversity and seeks to secure net biodiversity gain as part of new development.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↘	↗	↗	↗	↗	↗

16.2.4 The majority of the core policies, in combination, seek to conserve the Borough's biodiversity by avoiding development which would impact on designated biodiversity areas and the potential impacts from activities resulting from development such as recreation. These policies also seek net biodiversity gain and enhancements as part of development. They are therefore likely to have positive effects on the Borough's biodiversity baseline. **Policy CP6** (Conserving and enhancing the natural environment) in particular, promotes this proactive approach. **Policy CP2** supports the delivery of transport infrastructure in the Borough which could have negative effects on biodiversity through the greater use of waterways and air quality impacts

resulting from traffic generation. It is however recognised that development management policies are expected to mitigate impacts upon biodiversity and secure net gain.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↗	↔	↗	↔	↔	↔	↗	↗	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↗	↗	↗	↗	↗	↗	↔	↗	↗	↗	↗	↗	↔	↔	↔	↗	↔

16.2.5 Additionally, the Borough’s biodiversity is expected to be protected through a number of the plan’s development management policies. **Policy DM27** specifically aims to ensure development proposals will conserve, enhance and extend biodiversity, providing for net gains in biodiversity where possible. It expects adverse impacts to be minimised and to compensate where impacts cannot be mitigated. The policy sets out the weight to be given to protecting designated sites from development which is proportionate to their importance. **Policy DM14** also aims to conserve and enhance the natural environment. **Policy DM29** also supports enabling development for proposals that contravene planning policies for the protection of the countryside where this can bring significant biodiversity and landscape enhancements, particularly at Biodiversity Opportunity Areas and/ or areas with poor or moderate landscape condition. Other development management policies support the protection of valued landscapes (**DM13**), which are also valued for their biodiversity, and biodiversity habitat such as trees and hedges (**DM28**). Provision of open space and recreational facilities (**DM18**) as part of new development and the protection of local green spaces (**DM19**) could also help to reduce recreational pressure on sensitive biodiversity areas close to development sites. Sustainable design (**DM20** and **DM15**) which can also provide green infrastructure and biodiversity benefits.

16.2.6 The Swale and Medway Estuary and Marshes SPA and Ramsar sites are at risk from sea level rise and coastal squeeze. The implementation of **Policy DM5** (The occupancy of holiday parks) **Policy DM22** (The Coast) and **Policy DM23** (Coastal Change Management Area) are likely to help to address this issue by ensuring that new development protects biodiversity in the coastal environment and also limits development within the coastal change management area.

Appraisal of the 'revised draft Local Plan as a whole'

16.2.7 The implementation of the strategic policies proposed in the revised draft Local Plan set a framework for significant levels of growth in the Borough, however the plan’s strategic, core and development management policies incorporate various measures to protect and enhance biodiversity aiming to achieve biodiversity gain. Overall, the plan is expected to deliver **significant positive effects** on the Borough’s biodiversity and natural environment baseline. Although this is somewhat uncertain as detailed evidence to determine the likely significance of effects on internationally and nationally designated biodiversity sites arising from the

policies allocating locations for development is not yet available. At this stage it is expected any significant effects can be mitigated.

16.3 Climate Change

Relevant sustainability objectives

- To minimise the need for energy, increase energy efficiency and to increase the use of renewable energy;
- To encourage sustainable construction materials and methods

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↘	↗	↘	↗	↗	↗

16.3.1 Growth planned in Swale between 2011-2031 (as set out in **Policy ST2 and ST4**) will lead to an increase in the population of Swale. This level of growth would lead to an increase in vehicle movements, energy usage and pressure on the natural environment across the Borough which could have negative impacts on meeting climate change objectives. However these policies do seek to reduce energy use per capita by locating new development principally in and around existing larger settlements (Sittingbourne, Faversham, Queenborough and Rushenden) in close proximity to existing key services and facilities, and therefore reducing the need for people to travel by car in the Borough. In combination with other policies which encourage the use of sustainable modes of transport, the strategy is expected to contribute to mitigating climate change by aiming to reduce emissions per capita.

16.3.2 The quantum of growth planned for housing over the plan period, as set out in **Policy ST2**, is not however based on objectively assessed demographic, affordable housing or economic need. Swale is currently a net exporter of labour, in the short term, this level of housing growth has the potential to reduce out commuting by constraining growth in the local labour supply resulting from new housing growth. This therefore has the potential for positive effects upon climate change objectives by reducing greenhouse emissions per capita arising from car travel. However in the long term, coupled with the pressures on housing and labour supply resulting from an ageing population, in commuting could occur resulting in negative effects.

16.3.3 **Policy ST1** (Delivering Sustainable Development in Swale) also specifically seeks to meet the challenge of climate change through design, locating development to maximise reductions in greenhouse gas emissions, integrating green infrastructure and the expansion of renewable energy and adapting to climate change by managing coastal change and flood risk. **Policy ST7** expects development to address the risks of flooding and forecast climate and coastal change, particularly around the coast and at Faversham and Oare Creeks.

16.3.4 Potential improvements to public transport, measures to encourage walking and cycling and sustainable design are also proposed as part of a number of policies allocating locations for development. **Policy A1** (North West Sittingbourne) and **Policy A2** (Land at North East Sittingbourne) also encourage sustainable energy generation at these locations in accordance with the Council's Renewable Energy Study. Saved Local Plan 2008 policy allocation **AAP6** (Queenborough and Rushenden) also encourages a neighbourhood combined heat and power scheme to be considered as part of mixed use development in this area. These policies are therefore expected to contribute towards meeting the climate change objectives.

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
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Broad Implications	↗	↗	↗	↗	↗	↗	↗
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Appraisal of the preferred 'core' policies

- 16.3.5 All core policies, in combination, provide measures to mitigate and adapt to the impacts of climate change and therefore are likely to have positive effects with regard to reducing per capita energy usage.
- 16.3.6 **Policy CP2** (Transport Infrastructure) identifies the importance of locating new development in appropriate locations to minimise the need to travel between homes and employment, shopping, and community facilities. It also emphasises the need to ensure development is located close to public transport links to encourage a modal shift from a reliance on the private car. Both these measures are expected to contribute positively towards reducing greenhouse emissions generated by new development. Housing and health related policies (**CP3, CP4**) support these principles and **Policy CP5** (Infrastructure) identifies the delivery of renewable energy development as part of required utilities infrastructure for new development. In terms of contributing towards the achievement of climate change adaptation over the plan period, **Policy CP6** and **Policy CP7** focus on the importance of protecting and enhancing the green infrastructure network and areas of biodiversity and landscape value within the Borough.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↗	↗	↔	↗	↗	↗	↔	↗	↗	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↗	↗	↗	↗	↗	↗	↔	↔	↗	↔	↗	↔	↔	↔	↔	↗	↔

- 16.3.7 Development management policies of the plan are expected to have positive effects with regard to mitigating and adapting to the impacts of climate change. **Policy DM20** (Sustainable Design and Construction) aims to increase water and energy efficiency as part of new development and increase the amount of decentralised, low-carbon and renewable energy sources by expecting development proposals to be well designed. These principles are also included in **Policy DM15** (Achieving High Quality Design and Distinctiveness). **Policy DM14** is a criteria based policy for development proposals. This also expects proposals to respond positively to meeting the challenge of climate change, flooding and coastal change.
- 16.3.8 Furthermore, **Policy DM20** expects development to meet recognised design standards such as the Code for Sustainable Homes Level 3 and 4 or above and BREEAM "Good" and "Very Good" depending upon the type and size of development, which would incorporate a number of measures to mitigate and adapt to climate change impacts.

16.3.9 **Policies DM21-23** seek to manage the coast and flood risk areas in accordance with national policy. These policies are expected to assist with adapting to the effects of climate change in the longer term.

[Appraisal of the 'revised draft Local Plan as a whole'](#)

16.3.10 Overall, the implementation of the policies proposed in the revised draft Local Plan are expected to result in **neutral effects** with regard to reducing the local population's energy usage over the plan period, increasing the use of renewable energy and helping the Borough to adapt to future climate change. They promote a climate change mitigation and adaptation strategy which could reduce greenhouse emissions per capita in the Borough by reducing the need to travel and encouraging increased use of sustainable modes of transport and renewable energy as well as steering development away from flood risk areas. However the quantum of housing growth proposed is not based on objectively assessed need and could, in the long term, lead to in commuting and associated increases in travel and thus greenhouse gas emissions.

16.4 Crime and Safety

Relevant sustainability objectives

- To reduce crime and anti-social behaviour and the fear of these

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↔	↔	↔	↔	↔	↔

16.4.1 **Strategic policies ST2-ST7** are not expected to directly affect crime reduction, the fear of crime or anti-social behaviour in the Borough and significant effects are therefore unlikely. However **Policy ST1** (Delivering sustainable development in Swale) and the development area based policies do promote the delivery of good design and ensuring the vitality of town centres which could deliver safer environments as part of new development.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↔	↔	↗	↗	↔	↔	↔

16.4.2 **Policy CP3** (Delivering a wide choice of high quality homes) expects housing development to incorporate design measures which will ensure safe and accessible environments that should help to minimise the fear of crime and crime incidents. **Policy CP4** also (Promoting healthy communities) aims to create social interaction and safe environments through mixed uses and the design and layout of development. Although crime is generally low across the Borough these requirements for new development are likely to have some positive effects on the reduction of crime, anti-social behaviour and fear of crime.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

16.4.3 Development management policies promote design and other measures which are expected to deliver safer environments including safe and secure cycle parking as part of **Policy DM7** and safe connections and security as part of **Policy DM14** (General Development Criteria) and **DM15** (Achieving High Quality Design and Distinctiveness). Indirectly, **Policy DM1** is also expected to deliver safer environments which could reduce crime and anti-social behaviour in town centres by maintaining and enhancing their vitality and viability.

Appraisal of the 'revised draft Local Plan as a whole'

16.4.4 A small number of policies proposed in the revised draft Local Plan are expected to have **positive effects** with respect to discouraging crime, anti-social behaviour and the fear of crime however these effects are not expected to be significant and overall the plan is expected to have **neutral effects** upon achieving this SA objective. Given the Borough is relatively safe and this is expected to continue during the plan period, additional policies or policy wording to further support this objective are not considered to be required.

16.5 Cultural heritage

Relevant sustainability objectives

- To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↘	↗	↘	↗	↗	↗

16.5.1 The Borough has a number of historic areas, buildings and features reflecting its rich maritime history, industrial archaeology and roman and medieval legacies. Some buildings of heritage value are redundant and disused and are currently on local and national buildings at risk registers.

16.5.2 Over the plan period, the level of growth, set out in **Policies ST2 and ST4**, has the potential to disturb, and negatively affect, these assets depending on the development brought forward. **Policy ST1** aims to manage this by delivering sustainable development which conserves and enhances the historic environment by applying national policy to heritage assets. It seeks to ensure all assets are central to strategies, plans, policies and development proposals through the identification, assessment and positive integration of the importance, form and character of these assets.

16.5.3 The preferred spatial strategy policies steer development to locations in and adjacent to existing settlements, in particular the towns of Sittingbourne, Faversham and Sheerness, all of which have a variety of historic assets. Area based policies **ST5** (Sittingbourne), **ST6** (Isle of Sheppey) and **ST7** (Faversham) all incorporate measures that expect new development to deliver effective heritage protection and enhancement including the distinctiveness of town and rural areas.

16.5.4 Policies allocating locations for development also incorporate, where relevant, protection and enhancement for the Borough's heritage assets. These include **Policy A3** Land south of Kemsley Mill Sittingbourne which expects heritage asset enhancements as part of new employment development here and also **Policy A7** Oare Gravel Workings which has a number of heritage assets on the site which will need to be further assessed and integrated as part of new employment development at this site. Policies allocating sites within and adjacent to existing settlements, particularly those seeking to regenerate areas of Sittingbourne and Queenborough and Rushenden, also recognise the need to identify, consider and appropriately respond to any heritage assets present. These policies are therefore expected to have positive effects upon the Borough's built and cultural heritage.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↘	↗	↗	↘	↗	↗

16.5.5 **Policies CP6 and CP7** seek to protect and enhance Swale’s historic landscape and assets through conservation, preservation, management and enhancement. In particular **Policy CP7** identifies the importance of development proposals bringing heritage assets back into use through neighbourhood plans, regeneration areas and town centres especially where these are risk.

16.5.6 Although **Policies CP1, CP2, CP3 and CP5** promote development and infrastructure needed to deliver the growth strategy which could have potential negative effects on heritage, it is recognised that a number of other plan policies seek to safeguard, protect, and enhance these assets. **Policy CP1** does identify the re-use of heritage assets as a ‘priority location’ which is a location for employment development if preferred locations cannot be found. Also the promotion of tourism development under this policy has the potential to have indirect positive effects on heritage assets. Furthermore, there is an expectation set out in **Policy CP3** for new housing development to achieve sustainable and high quality design which responds to its local context, this would include its historical context.

Appraisal of the preferred ‘development management’ policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↗	↗	↗	↔	↗	↗	↗	↗	↗

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↗	↔	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗

16.5.7 A number of development management policies support the conservation and enhancement of the Borough’s built and cultural heritage: These include:

- **Policy DM3** (The rural economy) – this requires proposals for development in rural areas to result in no significant harm to the historical character of the area;
- **Policy DM9** (Rural exceptions housing) - this requires proposals for development in rural areas to result in no significant harm to the historical character of the area;
- **Policy DM10** (Gypsy and Traveller sites) – the Council will allocate and grant planning permission for sites which cause no significant harm to the natural or built environment that cannot be adequately mitigated;
- **Policy DM14** (General development criteria) – expects proposals to conserve and enhance the historic environment;
- **Policy DM22** (The Coast) – seeks to enhance coastal heritage and provide protection, enhancement and management of the coastal landscape and seascape;
- **Policy DM24** (Conserving and enhancing valued landscapes) – conserve and where appropriate enhance both designated and non designated landscapes which would include landscapes with historic character;

- **Policy DM27** (Biological and geological conservation) – this requires development proposals to apply national policy with regards to preserving, restoring and re-creating aged or veteran trees; and irreplaceable habitat, including ancient woodland; and
- **Policies DM28, DM31, DM32, DM33, DM34, and DM35** provide protection to trees which make an important contribution to the historic conservation of a site or its surroundings; seek to preserve Listed Buildings except where case can be made for alteration (or demolition); expect development within Conservation Areas to preserve or enhance all features that contribute to the area’s special character or appearance; preserve Scheduled Ancient Monuments and Archaeological Sites and Historic Parks and Gardens and protect their settings; and conserve the local historic character of areas of high townscape value.

16.5.8 **Policy DM20** (Sustainable Design and Construction) provides protection to the historic context of sites from inappropriate construction techniques and development relating to energy efficiency and reducing waste and carbon emissions and **Policy DM15** (Achieving High Quality Design and Distinctiveness) also expects development proposals to promote and reinforce local distinctiveness and retain biodiversity features where they contribute to the historic value of the site.

[Appraisal of the ‘revised draft Local Plan as a whole’](#)

16.5.9 The plan’s aims for the delivery of growth and its spatial strategy have the potential to disturb, and negatively affect, the Borough’s built and cultural heritage. However, the protection and where appropriate, enhancement of the Borough’s heritage assets afforded by the preferred strategy policies, core policies, development management policies as well as policies allocating locations for development are expected to result in **significant positive effects** on the Borough’s heritage over the plan period.

## 16.6 Employment and skills

### Relevant sustainability objectives

- To ensure high and stable levels of employment in accessible locations
- To raise the educational achievement levels across the Borough and help people to acquire the skills needed to find and remain in employment

### Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

- 16.6.1 The draft revised Local Plan sets out ambitious employment growth for the Borough between 2011 and 2031. **Policy ST2** (Development targets for jobs and new homes 2011-2031) identifies a job target of 7,053 over the period which, on average, would be 353 jobs to be created each year and expects new development proposals to maintain the Borough's current employment sites whilst increasing choice and meeting the needs of particular economic sectors identified by the plan. This policy also provides flexibility to deliver further employment opportunities as it includes a mechanism for the Council to review the plan should the 5 year past trend of 'B' class net employment completions exceed 24,000 sq m per annum.
- 16.6.2 The quantum of growth planned for housing set out in **Policies ST2 and ST4** is not, however, based on objectively assessed demographic or economic need identified in the Council's SHMA, rather past trends and predicted deliverability. As discussed under the air and climate topics, this level of housing growth, coupled with pressures on housing and labour supply resulting from an ageing population, may not support the increases in the local labour supply required to deliver the proposed employment growth. This could result in positive and negative effects upon the achievement of the employment objective by reducing out commuting in the short term and in commuting in the long term.
- 16.6.3 **Policy ST4** (Meeting the local plan development targets) identifies the amount of floorspace already with planning permission (318,069 sq m) and also the amount and distribution of new floorspace as part of new allocations. This focuses new employment allocations predominantly at Queenborough/Rushenden and Sittingbourne in accordance with the Thames Gateway growth status as well as sites at Faversham and Teynham. These provide a significant supply in relation to the floor space which might be required to deliver the jobs target.
- 16.6.4 **Policy ST1** (Delivering sustainable development in Swale) expects development proposals to ensure the vitality of town centres, attract inward investment through expansion of local firms, secure growth in biosciences and technology and support the rural economy. This will help to achieve the delivery of employment opportunities and skills.
- 16.6.5 The preferred spatial distribution of development is expected to result in positive effects with respect to providing employment opportunities at accessible locations, as it seeks to deliver much of the economic development proposed at principal settlements. These locations are more accessible than rural areas. The distribution is also expected to redress any imbalances with the amount and quality of supply in the Borough's larger settlements. This approach is also likely to assist with regeneration of the urban areas and could provide opportunities for populations in deprived areas of the Borough to acquire new skills.
- 16.6.6 Area based **policies ST5-ST7** and policies allocating locations for development also support the provision of new employment opportunities primarily in the Borough's towns. **Policy ST5** seeks to ensure the vitality of Sittingbourne town centre, provision of key services and the

development of areas such as Milton Creek which would help to improve the attractiveness of the town for future employment opportunities. Development adjacent to Sittingbourne proposed under **Policies A1, A2 and A3** could also encourage further expansion of highly skilled jobs and help towards reducing out-commuting currently experienced in the Borough. **Saved Local Plan 2008 policy C8** Sittingbourne Learning Hub is likely to assist with raising educational attainment and skills of the local population by providing an accessible modern learning hub for the town.

16.6.7 **Policy ST6** seeks to enhance Sheerness town centre, regenerate areas of Queenborough/Rushenden and also deliver expanded schools and libraries. **Policy ST7** seeks to provide employment opportunities through some new sites and the neighbourhood plan at Faversham Creek as well as support appropriate economic development in rural areas.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

16.6.8 **Policy CP1** (Building a strong and competitive economy) supports high and stable levels of employment, compared to the current baseline, and seeks to increase skills and educational achievement levels across the Borough. Regarding upskilling, the policy supports proposals which encourage educational facilities or an expansion of vocational learning and the development of links between educational institutions and work as well as work based learning. It also seeks to deliver growth pharmaceutical and science sectors which could deliver highly skilled opportunities as well as growth in the tourist industry which could provide new opportunities particularly on the Isle of Sheppey.

16.6.9 In addition, the policy aims to deliver a balanced supply of employment opportunities across existing employment sites and as part of new provision at Sittingbourne, Faversham and the Isle of Sheppey and through safeguarding existing sites and allocations. It seeks to reduce out-commuting by supporting sectors of the job market which encourage the local population to look outside the Borough.

16.6.10 **Policy CP5** (Infrastructure) is also expected to assist with the delivery of public services including libraries, training facilities and job centres and education and community facilities for new development which would help to raise skills and educational attainment.

16.6.11 Other core policies, in particular **CP2** (Transport infrastructure) and **CP4** (Promoting healthy communities) indirectly support maintaining employment levels by delivering health benefits, and infrastructure to support employment development.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↗	↗	↗	↗	↔	↗	↔	↗	↗	↔	↔	↗	↔	↔	↔	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

16.6.12 A number of development management policies are likely to have positive effects upon delivering increased employment opportunities across the Borough.

16.6.13 In particular, **Policy DM3** supports the sustainable growth and expansion of business and enterprise in rural areas. This provides a steer for delivering appropriate development in rural areas and provides criteria for development brought forward in tourism and leisure and agricultural and forestry sectors, key parts of the Borough’s rural economy. This is therefore likely to support new employment opportunities within Swale’s rural economy. Other policies relating to transport (**DM6**) and housing (**DM8, DM9 and DM12**) are also likely to contribute positively indirectly in terms of attracting employment opportunities, as these policies support delivering access and housing requirements for a local workforce.

16.6.14 **Policies DM1 and DM2** seek to maintain and enhance the vitality and viability of town centres and encourage new retail and leisure development, which will also help to attract new investment and therefore create employment.

[Appraisal of the ‘revised draft Local Plan as a whole’](#)

16.6.15 The majority of the policies proposed in the revised draft Local Plan are expected overall to deliver **positive effects** with regards to ensuring high and stable levels of employment in accessible locations and raising the educational achievement and skill levels across the Borough over the plan period. However it is recognised that the quantum of growth planned for housing in the plan set out in **Policies ST2 and ST4** is not based on the employment growth forecast or demographic projections and may constrain the delivery of employment growth.

**Recommendation**

Consider revising the proposed housing growth target so that it can deliver housing to support the plan’s proposed growth in employment in the long term identified in Policies ST2 and ST4 based on objectively assessed need.

16.7 Health

Relevant sustainability objectives

- To improve health and well-being and reduce inequalities

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

16.7.1 Growth planned in Swale between 2011-2031 (as set out in **Policy ST2 and ST4**) will lead to an increase in the population of Swale, placing pressure on health infrastructure. **Policy CP5** (Infrastructure) and other area based policies will help towards achieving the delivery of appropriate infrastructure including health facilities to support development.

16.7.2 **Policy ST1** (Delivering sustainable development in Swale) commits to promoting healthy communities to deliver the social, recreational and cultural facilities and services needed. The preferred spatial strategy locates new development principally in and around existing larger settlements within the Borough including Sittingbourne, the Isle of Sheppey and Faversham areas and encourages the delivery of regeneration in urban areas. This is expected to tackle health inequality and deprivation in these areas, and should help to ensure that the majority of new development is in close proximity to existing key services and facilities, including health and recreational facilities.

16.7.3 **Policies ST5 to ST7** include a range of requirements for new development in these areas which encourage the provision of open space and green spaces, encourage sustainable modes of transport; promote the vitality of towns, encourage regeneration and ensure local air quality is not worsened. All these measures are expected to have positive effects on the health of the local population. Policies allocating locations for development are also expected to deliver these benefits in combination with Core policies and Development Management policies (see following sections). All of the main housing allocations highlight the need for increased capacity at local GP surgeries at Faversham, Teynham and North West Sittingbourne to accommodate new residents and provide new public footpaths and cycle routes which will improve access to open spaces and improve local health due to increased opportunities to exercise.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

16.7.4 **Policy CP4** (Promoting healthy communities) is expected to have significant positive effects on health in the Borough. This protects community services and facilities and supports provision of open space, sport and recreation facilities as well as a number other measures to ensure design of new development delivers health benefits and ease of access to a healthy food supply. The requirement for Health Impact Assessments for certain developments, in particular within Swale's most deprived wards, is likely to ensure that health inequalities are examined.

16.7.5 **Policy CP2** (Transport Infrastructure) seeks improvements to health by encouraging walking, cycling and a reduction in private car use which could help to improve local air quality. **Policy CP5** (Infrastructure) is expected to assist with the delivery of required health and community facilities, sports and open space facilities for development which would secure health benefits for the Borough.

16.7.6 The enhancement and protection of green infrastructure through **Policy CP6** and **Policy CP7** is also likely to indirectly support improvements to health by providing further recreational facilities.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↗	↔	↗	↔	↔	↗	↗	↗	↗	↗	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↗	↗	↗	↔	↗	↔	↔	↔	↔	↗	↔	↗	↔	↔	↔	↔	↗	↔

16.7.7 Development management policies are also likely to have positive effects upon health by encouraging sustainable modes of transport, good design, protection and provision of open space, sports and recreational facilities as part of new development, promoting urban regeneration and reducing impacts of development upon local air quality. **Policy DM18** specifically seeks to protect and provide, as part of new development, open space, sports and recreational facilities in accordance with need and **Policy DM19** aims to protect local green spaces including those of recreational value. **Policy DM6** (Managing Transport Demand and Impact) requires development proposals to demonstrate that development opportunities for sustainable modes of travel have been taken up and to integrate air quality management into the location and design of access. Proposals are also required to demonstrate that they do not worsen air quality to an unacceptable degree. **Policies DM7** (Vehicle Parking) and **DM20** (Sustainable Design and Construction) encourage a high standard of design which will incorporate facilities to encourage sustainable modes of travel such as cycling and help to reduce fuel poverty. Policies **DM2**, **DM14** and **DM15** also encourage these measures in new development and **DM1** seeks to ensure the vitality of town centres.

16.7.8 **Policy DM10** (Gypsy and Travellers sites) also expects proposals for gypsies and travellers sites to cause no significant harm to the health and well-being of occupants or others by development impacts. Other development management policies which seek to conserve and enhance biodiversity and valued landscapes are also likely to provide health benefits.

Appraisal of the 'revised draft Local Plan as a whole'

16.7.9 Policies proposed in the revised draft Local Plan either directly or indirectly are expected to lead to **positive effects** upon the health of the Borough's population over the plan period due to increased recreation, access to open space, encouraging cycling and walking and

sustainable design. As there are a large number of policy themes influencing impacts on health and well-being which are interrelated it is expected that there would be **significant positive effects** overall.

16.8 Housing

- To provide affordable and decent housing adaptable to future needs of the community

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

16.8.1 Employment and housing growth for the Borough as set out by **Policy ST2** (Development targets for jobs and new homes 2011-2031) and **Policy ST4** (Meeting the local plan development targets) aims to provide employment opportunities for the Borough's future population; assist with the delivery of regeneration particularly in the deprived areas of Sheppey, Sittingbourne and Faversham; and deliver housing for the local community including provision for gypsies and travellers and affordable housing. There is a considerable need currently in the Borough to provide affordable housing for the local population and over the plan period. This is particularly an issue for rural areas of the Borough.

16.8.2 The housing target currently set out in **Policy ST2 and ST4** (10,800/540 per annum over the plan period) is not however based on objectively assessed demographic or affordable housing need or even economic need identified in the Council's SHMA Update, instead it has been generated by past trends and expected deliverability. This is therefore expected to fall short of delivering housing for the future population and addressing affordable housing need. The predicted ageing of the Borough's population in the future is also expected to result in increased pressure on the housing supply due to changes in household size. It is recognised that **Policy ST2** does provide a mechanism for review with the trigger being the 5 year past trend of average net housing completions exceeding 600 dwellings per annum.

16.8.3 **Policy ST1** (Delivering sustainable development in Swale) expects development proposals and all parties to deliver a wide choice of high quality homes by delivering realistic levels of housing based upon deliverability, local demographic change and economic aspirations as well as supporting local need through housing opportunity, choice and independence. It specifically supports the vitality of rural communities by meeting identified housing needs in these locations in accordance with their settlement role.

16.8.4 The preferred spatial distribution of development (**Policy ST3**) is expected to result in positive effects with regards to delivering housing as this supports development predominantly in urban areas but also smaller scales of growth in rural areas, particularly the Rural Local Service Centres thereby supporting communities across the Borough.

16.8.5 **Policies ST5-ST7** set out the strategy for different areas of the Borough. With policies allocating locations for development these provide a range of sites to encourage the provision of new housing development (coupled with pitch provision for the Gypsy and Traveller community on larger sites) and regeneration in the Borough's towns, particularly the Queenborough and Rushenden and Sittingbourne town centre allocations. These policies also support smaller scale growth in rural communities to assist with sustaining these communities.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
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Broad Implications	↔	↔	↗	↔	↔	↔	↔
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- 16.8.6 **Policy CP3** (Delivering a wide choice of high quality homes) is a key core policy which can assist positively with delivering affordable and decent housing for the local community.
- 16.8.7 This policy seeks to provide housing at locations in accordance with the preferred settlement hierarchy but particularly focussed on allocated sites, windfall sites, town centres and within deprived communities. The policy provides support to proposals which respond to the issues of local housing market areas and deliver affordable housing for both urban and rural areas of the Borough. Supporting text for the policy provides further information regarding the issues facing the housing market at various locations in the Borough. This is expected to have positive effects on the significant need for affordable housing although it is recognised it will not fully tackle the current backlog and future need.
- 16.8.8 Further, the policy aims to deliver housing to meet the requirements of specific groups of the local population including families, older persons, ethnic groups including Gypsies and Travellers and the disabled. It also promotes high quality design of new homes and supports proposals which bring vacant homes back into use and up to Decent Homes standard.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↗	↗	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

- 16.8.9 A number of the development management policies of the plan are also expected to deliver positive effects with regards to delivering affordable and decent housing for the local community.
- 16.8.10 **Policy DM8** (Affordable housing) seeks to deliver affordable housing as part of new development and provide a mix of affordable/social rented and intermediate housing. The policy expects housing to, where possible, be designed to Lifetime Standards with a proportion (to be agreed with developers) provided for wheelchair users. The number of affordable housing units to be delivered ranges between 30-35% appropriate to the housing market area and is based upon recommendations of the East Kent Strategic Housing Market Assessment. These levels would contribute to delivering affordable housing need but would not deliver it fully and are still subject to viability testing. The policy's supporting text suggests that developers in the short term may be able 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 is set out under 'exceptional

circumstances’ in the policy. In the short term this could reduce the number of affordable houses provided however the policy requires this to be subject to a legal agreement to ensure that full provision of affordable housing is reconsidered should land values rise prior to commencement of development or any subsequent phases of development. This could therefore increase provision in the medium term.

- 16.8.11 Rural housing in terms of both the delivery of need and affordability is addressed through **Policy DM9** (Rural exceptions housing). This policy sets out criteria for development proposals which includes demonstrating need and the policy also covers affordable pitches for Gypsy and Travellers. To maintain this provision in the longer term the policy requires proposals to be subject to legal agreements which provide permanent control and management of this affordable housing. This is therefore expected to have long term positive effects for affordable housing in rural areas.
- 16.8.12 **Policy DM10** (Gypsy and Travellers sites) aims to deliver pitches on sites allocated for housing where they are above a particular threshold. Where it can be demonstrated that the site would not be suitable for pitches developers can agree funding for pitch provision. As discussed in Part 2, there is uncertainty as to when the pitches would be delivered as part of each housing allocation or windfall site and if their inclusion as part allocations would increase costs of developing housing sites. There may therefore be short term issues with provision. If a 5 year land supply needs to be demonstrated then the policy states the Council will allocate and grant permission for separate sites subject to specific criteria which includes rural exception sites meeting needs for affordable traveller sites.
- 16.8.13 High standards of design for new housing development are encouraged by **Policy DM20, Policy DM14 and Policy DM16**. Specifically **Policy DM20** identifies the need to provide development which is adaptable to change over the long term, deliver Code for Sustainable Homes standards Level 3 or more in all residential developments and Level 4 or above for new residential developments of 10 units or greater or sites over 0.3 hectares. Policies **DM14** and **DM16** seek high standards of accessibility and inclusion so that all potential users can use development safely and easily. They also expect development to be designed so that it is flexible in responding to future changes in lifestyle and demographic changes.

[Appraisal of the ‘revised draft Local Plan as a whole’](#)

- 16.8.14 The policies proposed in the revised draft Local Plan are expected to deliver housing including affordable and decent homes across the Borough. However the plan’s proposed housing growth is not expected to help sustain the economic growth proposed as part of the plan or deliver the required number of affordable houses based on objectively assessed need. It will therefore limit the positive effects against this objective however it is recognised that this is potentially difficult to achieve given the current economic climate and considering past trends. **Policy ST2** does allow for a review of the plan should 5 year past trend indicate average net housing completions exceed 600 dwellings per annum. Overall the plan is therefore expected to have **positive effects** with regards to helping towards providing affordable and decent housing adaptable to future needs of the community. However these are not expected to be significant.

**Recommendation**

Consider revising the proposed housing growth target so that it can deliver housing to support the plan’s economic growth identified in Policies ST2 and ST4 based on objectively assessed need.

16.9 Landscape

Relevant sustainability objectives

- To protect and enhance the valued landscape and townscape of Swale

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↘	↗	↘	↗	↗	↗

- 16.9.1 Growth planned in Swale over the plan period, set out in **Policies ST2** and **ST4**, will result in changes to the local landscape and townscape as a result of new development. **Policy ST1** seeks to manage this development by steering growth to locations in accordance with the settlement strategy, set out in **Policy ST3**, and protect and enhance landscape designations such as the Kent Downs Area of Outstanding Natural Beauty, landscape quality and open space.
- 16.9.2 **Policy ST3** expects development in settlements to be commensurate to their existing characteristics and potential negative effects on landscape should be mitigated through good design. By focussing the largest scale of growth in the main Borough centre of Sittingbourne, with secondary urban scales of growth compatible to their historic and natural assets in the other Borough centres such as Faversham, the spatial strategy is expecting to avoid nationally designated landscape areas such as the AONB present in the south of the Borough. Rural Local Service Centres are also the main focus of lower scales of development, with only limited infill development and, exceptionally, appropriate modest development at the edges of the built up area boundaries, elsewhere. It is recognised that the preferred strategy will involve some development on greenfield land as urban and village extensions which, without mitigation, could result in negative effects upon local landscape and townscape where these areas are identified as having low capacity for change (Swale Urban Extension Landscape Capacity Study or where there may be impacts upon local designations such as Areas of High Landscape Value (Kent and Swale level).
- 16.9.3 **Policies ST5** (Sittingbourne), **ST6** (Isle of Sheppey) and **ST7** (Faversham) all incorporate measures that highlight the importance of maintaining the separation and distinctiveness of the main towns within Swale. This should help to protect areas of high landscape value as part of locating new development at these towns.
- 16.9.4 The policies allocating locations for development largely avoid sites designated for their landscape interest and most of the allocations require at least the mitigation of any adverse impact on the landscape. Some of the larger allocations would improve the landscape setting by introducing features of interest such as **Policy A2** Land at North East Sittingbourne requires landscape enhancements to enhance the adjacent Special Protection Area. In addition, **Policy A1** North West Sittingbourne requires a large area of open space to be provided including a continuous buffer along the A249. **Policy A11** allocates land within existing settlements for residential development. These policies will help focus development in appropriate locations and limit pressure on greenfield locations, thereby potentially helping to protect high quality landscapes. Some policies allocating locations for development include locations within landscapes of low and moderate capacity for change as outlined by the Council's urban extension landscape capacity study and also adjacent or within Areas of High Landscape Value. These policies do recognise these constraints and therefore make provision for landscape mitigation, enhancement and/or open space provision.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↘	↘	↗	↗	↘	↗	↗

16.9.5 Provision to promote the greater use of landscaping and habitat creation to support biodiversity and contribute to the Local Natural Assets and Green Infrastructure Strategy while delivering a wide choice of high quality homes as required by **Policy CP3** could have positive effects on the Borough's landscape. **Policies CP1** and **CP2** promote economic development and the provision of transport infrastructure which could have negative effects on landscape. However it is recognised that a number of development management policies seek to safeguard, protect, and enhance designated and non-designated landscapes and implement good design.

16.9.6 The plan also seeks to provide as appropriate open space, sport and recreation opportunities (**CP4** and **DM18**) in accordance with the Local Natural Assets and Green Infrastructure Strategy and therefore is expected to assist in meeting landscape objectives. Policies **CP6** and **CP7** seek to protect and enhance Swale's green and historic infrastructure. This could also have positive effects on the Borough's landscape.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↗	↗	↗	↗	↗	↗

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↗	↗	↗	↔	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗

16.9.7 Various development management policies in the plan, including **DM24**, **DM27**, **DM29**, **DM30** and **DM18**, are particularly proactive in safeguarding, protecting and enhancing designated and non-designated landscapes, areas of geological and biological conservation, best and most versatile agricultural land providing open space, sports and recreation provision. These policies are therefore expected to have positive effects on landscape.

16.9.8 The plan makes provision, in certain, 'exceptional' circumstances for development, including residential development, in rural areas (**DM9** and **DM10**) but expects development to ensure there are no significant adverse impacts upon settlements and the surrounding countryside. Sustainable design and construction standards (**DM20**) may also have the potential for negative effects for landscape and townscape character if design measures produce development forms not appropriate to their setting. However as part of this policy,

development would need to avoid adverse impacts that would significantly conflict with other policies of the plan such as the protection of valued landscape. This would also be mitigated by other development management policies including **DM14**, **DM15** and **DM32**.

- 16.9.9 The character and distinctiveness of rural areas and the coast is recognised in the plan and policies that aim to contribute to its protection included (**DM11**, **DM13**, **DM22**, **DM25**, and **DM26**). The plan also supports development which enables landscape and biodiversity enhancement in the countryside where this is needed (**DM29**).
- 16.9.10 Other policies seek to protect landscape features such as trees and hedgerows (**DM28**) and the landscape character of historic parks and gardens (**DM34**) and Areas of High Townscape Value (**DM35**). Policies seeking good design as part of new development and alterations to existing development (**DM20** and **DM17**) are also likely to result in positive effects with respect to protecting local landscape and townscape.

#### Appraisal of the 'revised draft Local Plan as a whole'

- 16.9.11 The plan does promote growth and aims to deliver economic benefits of development which result in pressures on Swale's townscape and landscape. However, the preferred spatial strategy, core policies and development management policies are expected to avoid development within sensitive landscape areas, particularly impacts upon the Kent Downs Area of Outstanding Natural Beauty and provide a strong policy framework for mitigation and enhancement. Overall the plan is anticipated to result in **positive effects** with regards to protecting and enhancing the valued landscape and townscape of the Borough.

## 16.10 Local Economy

### Relevant sustainability objectives

- To sustain economic growth and competitiveness

### Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

- 16.10.1 The preferred strategy policies set out an overarching policy framework which is expected to support economic growth and competitiveness in the Borough across the plan period
- 16.10.2 The first requirement for development proposals to deliver under **Policy ST1** (Delivering sustainable development in Swale) is to build a strong competitive economy by meeting needs on a choice of sites, attracting inward investment through the expansion of local firms and also securing growth in biosciences and technology. This policy also supports the rural economy, ensuring the vitality of town centres and also delivering high quality communications infrastructure which would all support economic growth and competitiveness.
- 16.10.3 **Policy ST2** (Development targets for jobs and new homes 2011-2031) identifies a job target of 7,053 over the plan period which on average would be 353 jobs created each year. This is an ambitious economic growth strategy, when considering the current baseline, which would be delivered through sites with planning permission, existing allocations and proposed allocations in accordance with the spatial strategy as set out by **Policies ST4-ST7**.
- 16.10.4 **Policy ST4** (Meeting the local plan development targets) identifies the amount of floorspace already with planning permission (318,069 sq m) and also the amount and distribution of new floorspace as part of new allocations. This focuses new employment allocations predominantly at Queenborough/Rushenden and Sittingbourne in accordance with the Thames Gateway growth status but also at, Faversham and Teynham. This is expected to facilitate the delivery of economic growth.
- 16.10.5 The number of new homes proposed under **Policies ST2 and ST4** (10,800/540 per annum over the plan period) is not however expected to be enough to fully support the employment target proposed as it is not based on objectively assessed need identified in the Council's SHMA Update. With the future ageing population also increasing pressure on the housing supply this could limit the local workforce in the long term and thus could have negative effects in terms sustaining the Borough's economic growth. It could also have positive effects in the short term by reducing out commuting as discussed under the air, climate and employment topics. It is recognised that **Policy ST2** does allow for a review of the plan should the 5 year past trend indicate average net housing completions exceed 600 dwellings per annum, which could mitigate these potential effects in the longer term.
- 16.10.6 The preferred spatial distribution of development is likely to result in positive effects with respect to sustaining economic growth as it seeks to deliver much of the economic development proposed at principal settlements where the majority of the workforce and other supporting services would be located. This approach is also likely to assist with regeneration of urban areas and could address deprivation through investment in these locations.
- 16.10.7 The preferred spatial strategy does however result in the loss of some high grade agricultural soil. The Council's SHMA Update indicates that the resource is one of the most productive agricultural areas in Kent and is important in its local contribution to food production. According to Experian economic forecasts 270 people are in full time employment in the

agricultural sector, but this is unlikely to include seasonal/temporary workers and the forecasts expect employment in this sector to grow by 30%. Evidence to determine the economic impacts of the loss of soil on this resource resulting from the proposed development strategy is not available and therefore effects are uncertain.

- 16.10.8 Area based policies **ST5-ST7** and policies allocating locations for development also support the local economy primarily in the Borough’s towns but also sectors related to the rural economy. They all identify transport infrastructure requirements needed to deliver growth.
- 16.10.9 **Policy ST5** and policies allocating locations for development seek to ensure the vitality of Sittingbourne town centre, provision of key services and the development of areas such as Milton Creek, continual expansion of the existing employment sites and new supply of office space as part of mixed use development within and adjacent to Sittingbourne. Rural employment provision as part of a mixed use extension to Teynham is also supported.
- 16.10.10 **Policy ST6** seeks to enhance Sheerness town centre; regenerate areas of Queenborough/ Rushenden and the Trinity Road area; and also support and diversify the existing tourism offer on the Isle of Sheppey. **Policy ST7** seeks to safeguard, diversify and expand the tourism focus of the area and provide employment opportunities through some new sites and the neighbourhood plan at Faversham Creek. The policy also supports appropriate economic development in rural areas. These policies are expected to assist with sustaining economic growth in these areas and also enhance the competitiveness of the Borough with other Boroughs and Districts in the County, particularly with respect to its tourism offer.

Appraisal of the preferred ‘core’ policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

- 16.10.11 All the core policies are expected to support the achievement of sustaining economic growth and competitiveness in the Borough across the plan period either directly or indirectly. **Policy CP1** (Building a strong and competitive economy) is the principal policy in terms of achieving this as its primary aim is to strengthen economic development in the Borough.
- 16.10.12 The policy supports proposals for office and industrial development in accordance with the spatial strategy. It promotes growth in tourism, pharmaceutical and science sectors, retail and leisure, and low carbon sectors. Growth in some of these sectors could reduce out commuting which it is understood approximately 17% of the working population currently do. It also supports proposals which stabilise floorspace loss within manufacturing, which has recently declined in the Borough, or exploit Swale’s competitive strengths. The policy’s supporting text suggests that this could be diversifying into higher value manufacturing, logistics and distribution and environmental sectors. It should however be noted that in the long term though, the proposed housing supply and the ageing population could limit the working age population in the Borough which could result in in commuting.
- 16.10.13 In addition, **Policy CP1** aims to deliver a balanced supply of development sites across existing employment sites, as part of new provision at Sittingbourne, Faversham and the Isle of Sheppey and through safeguarding existing sites and allocations. The facilitation of digital infrastructure and support for the rural economy through proposals which create new markets and greater resilience in the agricultural/woodland/forestry sectors are also promoted by this policy, therefore helping to deliver a competitive and diverse economy.
- 16.10.14 **Policies CP2** (Transport infrastructure) and **CP5** (Infrastructure) are also expected to assist with the delivery of key infrastructure needed for economic development. Other core policies

are likely to have indirect positive effects by creating attractive and quality environment to draw businesses to the Borough and also benefit the tourism and agricultural sectors.

#### Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↗	↗	↗	↗	↗	↗	↔	↗	↗	↔	↔	↗	↔	↔	↔	↔	↔

  

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↗	↔	↗	↔	↗	↔	↔	↗	↔	↗	↗	↔	↔	↔	↔	↔

16.10.15 Various development management policies are likely to have positive effects in terms of the Borough's ability to sustain economic growth and competitiveness.

16.10.16 **Policy DM3** supports the sustainable growth and expansion of business and enterprise in rural areas. Policies **DM1** and **DM2** seek to maintain and enhance the vitality and viability of town centres and encourage new retail and leisure development. This could have secondary positive effects by making the Borough's town centres more attractive for businesses in other sectors wishing to make new investment, potentially service and finance sectors.

16.10.17 Furthermore, **Policy DM5** (The occupancy of holiday parks), **DM22** (The coast) and **Policy DM4** (New or extensions to existing holiday parks) could assist managed growth in the tourism sector in coastal areas by supporting appropriate development in this area.

16.10.18 Policies relating to transport (**DM6**) and housing (**DM8, DM9**) are also likely to contribute positively by providing the necessary infrastructure to support economic development. Further, **Policy DM20** (Sustainable Design and Construction) could bring positive benefits within the low carbon sector as supporting the development of low carbon energy schemes and sustainable construction could help to generate new business opportunities in the area.

16.10.19 Other development management policies which seek to protect and enhance the natural and built environment are likely to have indirect positive effects by ensuring proposals deliver a high quality environment which could attract businesses to the Borough and also benefit the tourism and agricultural sectors.

#### Appraisal of the 'revised draft Local Plan as a whole'

16.10.20 The policies proposed in the revised draft Local Plan are expected to deliver a strong policy framework to encourage economic investment needed in both urban and rural across the Borough and encouraging growth in B class uses and enhancing the Borough's tourism offer. The plan's proposed housing growth is not however expected to help sustain this proposed growth, although it is recognised that **Policy ST2** does allow for a review of the plan should the 5 year past trend indicate average net housing completions exceed 600 dwellings per

annum. Overall the plan is therefore expected to have **positive effects** with regards to sustaining economic growth and competitiveness.

### **Recommendation**

Consider revising the proposed housing growth target so that it can support the plan's economic growth identified in Policies ST2 and ST4 based on objectively assessed need.

**16.11 Population**

Relevant sustainability objectives

- 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

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↘	↗	↘	↗	↗	↗

- 16.11.1 The Borough's population is expected to grow and age between 2011-2031 placing pressure on the Borough's services and housing supply and potentially reducing the working age population in the Borough. The level of employment and housing growth for the Borough as set out by **Policy ST2** and **Policy ST4** is expected to provide employment opportunities for the Borough's population. The level of housing growth proposed is not however based on objectively assessed demographic or economic need identified in the Council's SHMA Update. It is therefore not anticipated to support the forecast population increase, household growth resulting from an ageing population or the workforce needed to deliver the proposed economic growth. To assist with mitigating this, **Policy ST2** does allow for a review of the plan should the 5 year past trend indicate average net housing completions exceed 600 dwellings per annum.
- 16.11.2 Pockets of high deprivation exist within the Borough predominantly in the main towns but also rural areas particularly western wards on the Isle of Sheppey. With regard to the causes of deprivation, education and skills as well as employment and income are key factors. **Policy ST1** (Delivering sustainable development in Swale) expects development proposals to build a strong and competitive economy, ensure the vitality of town centres, deliver high quality homes as well as provide social, recreational and cultural facilities needed to support local communities.
- 16.11.3 The preferred spatial distribution of development (**Policy ST3**) is likely to result in positive effects with respect to the delivery of regeneration, particularly in the deprived areas of Sheppey, Sittingbourne and Faversham, by prioritising the redevelopment of previously developed land and improving accessibility to key services and facilities. **Policies ST5-ST7** related to the different areas of the Borough and policies allocating locations for development support the provision of new infrastructure for development at these locations and encourage regeneration. Specifically, **Policy ST5 and saved policy allocations AAP7 and AAP8** seek to ensure the vitality of Sittingbourne town centre, provision of key services and the development of Milton Creek.
- 16.11.4 **Policy ST6** is expected to help reduce poverty in the most deprived areas of the Borough. This policy supports proposals which would enhance Sheerness town centre and regenerate the Trinity Road area, as well as areas of Queenborough/ Rushenden. It also encourages proposals which would implement measures to reduce deprivation and deliver social and community infrastructure in Sheppey.
- 16.11.5 **Policy ST7** refers to improving levels of deprivation in Davington and East Down wards of Faversham and increased capacity in infrastructure and services at these locations. This would therefore have negative effects upon reducing poverty in these areas.

16.11.6 The preferred growth strategy is also anticipated to assist with reducing social exclusion. As part of the housing growth, provision is made for Gypsy and Traveller pitches, predominantly within and adjacent to existing settlements and therefore co-located with key services and facilities.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

16.11.7 The preferred core policies are likely to have positive effects on achieving the population SA objectives.

16.11.8 **Policy CP1** (Building a strong and competitive economy) supports employment and seeks to increase skills and educational achievement levels across the Borough. This policy is therefore expected to assist with reducing levels of deprivation associated with education, skills and employment.

16.11.9 **Policy CP3** (Delivering a wide choice of high quality homes) seeks to deliver housing to meet the requirements of specific groups of the local population including families, older persons, ethnic groups including Gypsies and Travellers and the disabled. This policy also promotes high quality design of new homes and supports proposals which bring vacant homes back into use and up to Decent Homes standard. This policy is therefore expected to reduce fuel poverty.

16.11.10 **Policy CP4** (Promoting healthy communities) protects community services and facilities and supports provision of open space, sport and recreation facilities as well as a number other measures to ensure design of new development delivers health benefits and provides ease of access to a healthy food supply. This policy is expected to help reduce deprivation particularly in Sittingbourne, Faversham and areas of the Isle of Sheppey.

16.11.11 To assist with the delivery of key services to support new development and improve accessibility, **Policy CP5** (Infrastructure) and **Policy CP2** (Transport infrastructure) seeks to secure developer contributions and measures to facilitate access. The enhancement and protection of green infrastructure through **Policy CP6** and historic green infrastructure under **Policy CP7** are also likely to deliver improvements to health which could in turn help to reduce deprivation.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↗	↗	↗	↔	↔	↗	↔	↗	↗	↗	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
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Broad Implications	↔	↗	↗	↗	↗	↔	↗	↔	↗	↗	↔	↗	↗	↔	↔	↔	↗	↔
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- 16.11.12 Development management policies of the plan seek to deliver a number of benefits as part of new development which could contribute to meeting the needs of the growing and ageing population, reduce poverty and social exclusion and improve access to services and facilities.
- 16.11.13 **Policy DM3** supports rural communities by encouraging proposals which promote the rural economy.  
  
**Policy DM8** (Affordable housing) and **Policy DM9** (Rural exceptions housing) seek to deliver affordable housing needs of the local community both in urban and rural areas and provide for the Gypsy and Traveller community.
- 16.11.14 In terms of reducing social exclusion, **Policy DM10** (Provision for Gypsies and Travellers) aims to deliver pitches for this local community group as part of larger housing allocations. Co-locating housing and pitch provision is expected to reduce the social exclusion of the Gypsy and Traveller community.
- 16.11.15 **Policy DM18** specifically seeks to protect and provide, as part of new development, open space, sports and recreational facilities in accordance with need and **Policy DM19** protects local green spaces across the Borough for the local community. Further, **Policy DM6** (Managing Transport Demand and Impact) aims to deliver improvements to access.
- 16.11.16 High standards of design in development which could alleviate fuel poverty currently experienced in areas of the Borough are encouraged by **Policies DM14, DM15 and DM20**.
- 16.11.17 Overall, the plan's preferred spatial strategy, directing development towards existing larger settlements, and its core and development management policies are anticipated to have **positive effects** in terms of improving accessibility to key services and facilities as well as reducing deprivation and social exclusion through the promotion of regeneration and inclusion of the Gypsy and Traveller community. The proposed level of housing growth is not however anticipated to support the forecast population increase, household growth resulting from an ageing population or the workforce needed to deliver the proposed economic growth. This could result in **negative effects** upon achieving the objective of meeting the challenges of a growing and ageing population. Furthermore, **negative effects** in terms of reducing poverty in Faversham could occur under **Policy ST7** due to the policy requiring improved levels of deprivation rather than reducing levels.

[Appraisal of the 'revised draft Local Plan as a whole'](#)

**Recommendation**

Consider revising the proposed housing growth target so that it can support the plan's economic growth identified in Policies ST2 and ST4 based on objectively assessed need Amend Policy ST7 point 9 as follows ~~Improve~~ **Reduce** levels of deprivation in Davington and East Downs Wards and/or facilitate as required, increased capacity in infrastructure and services in accordance with the Local Plan Implementation and Delivery Schedule

16.12 Soil

Relevant sustainability objectives

- To protect and enhance soil quality and reduce contamination

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↔/?	↔	↔/?	↔	↗	↔

- 16.12.1 The Borough's very rich and varied geology and soils means that it has one of the highest proportions of high quality agricultural land in the UK. To deliver the proposed growth and spatial strategy set out in **Policies ST2-ST7** greenfield locations will be needed as the Council has identified that there is an insufficient supply of previously developed sites to deliver the strategy. Given the majority of the land surrounding the principal towns of Sittingbourne and Faversham is high grade agricultural land this is expected to result in the loss of some of this resource in these areas.
- 16.12.2 There is limited evidence to determine the cumulative effect upon the loss of high grade agricultural land resulting from the strategy. As discussed below the Council has identified some of the policies allocating locations for development are well contained by urban development and are not in agricultural use.
- 16.12.3 **Policy ST1** (Delivering Sustainable Development in Swale) does expect development proposals to apply national policy in respect of pollution, despoiled, degraded, derelict, contaminated, unstable and previously developed land. Two of the NPPF's core planning objectives are to 'contribute to conserving and enhancing the natural environment and reducing pollution' by preference being given to land of lesser environmental value for allocating land where this is consistent with other policies in the NPPF and to 'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value'. It also expects developers to prevent new or existing development 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'.
- 16.12.4 **Policy ST1** also requires developments to conserve and enhance the natural environment by taking into account the benefits of the best and most versatile agricultural land by steering significant levels of development to lower quality areas where compatible with the preferred spatial strategy and in addressing flood risk, climate change and coastal change.
- 16.12.5 **Policy ST3** and area based policies **ST5-ST7** promote regeneration which could have positive effects with regards to remediating contaminated land in the Borough's urban areas. Although **Policy ST1** broadly seeks to deliver positive effects in terms of protecting soil quality, policies allocating locations for development (**Policies A1, A2, A4 and A8**) include some locations on high grade agricultural land. The Council has identified some of these are contained by urban development and are not in agricultural use. Other policies (**A6, A7, A8 A9, A11 and NP1**) do also recognise some sites are contaminated and expect new development to make these sites safe from contamination.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↘	↘	↘	↗	↘	↗	↗

16.12.6 Given the need to develop greenfield land to deliver housing, economic development and infrastructure in the Borough and the presence of high grade agricultural land surrounding the principal settlements of Sittingbourne and Faversham, it is likely that policies **CP1**, **CP2**, **CP3** and **CP5** could lead to negative effects with regards to the loss of high quality soil. Mitigation of these effects is expected to be provided by development management policy **DM30** (Agricultural land) which seeks to safeguard best and most versatile agricultural land. **Policy CP3** steers housing development, in accordance with the settlement strategy (**Policy ST3**) to allocated sites, locations in town centres and deprived communities as well as windfall sites. With regards to windfall sites, the policy does state the Council will support these locations, including on previously developed land, except where the site’s character, local context or environmental value determines otherwise. This suggests protection would be afforded to high grade agricultural land in these circumstances. As discussed above, policies allocating locations for development do include contaminated sites and expect remediation as part of their redevelopment which would have positive effects on reducing the Borough’s contaminated areas.

16.12.7 **Policies CP6** and **CP7** conserve the Borough’s natural and historic environment and are therefore expected to also contribute positively to the achievement of protecting and enhancing soil quality, as well as reducing contamination through the regeneration of historic sites.

Appraisal of the preferred ‘development management’ policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↗	↗	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↗	↗	↗	↗	↗	↗	↔	↗	↗	↗	↗	↗	↔	↔	↔	↗	↔

16.12.8 **Policy DM 30** (Agricultural Land) is the key development management policy with respect to protecting the Borough’s soil quality. The policy sets out that development will only be permitted on agricultural land where there is an overriding need which cannot be met on land within the built up boundaries. The policy also seeks to safeguard best and most versatile agricultural land (specifically Grades 1, 2 and 3a) unless it meets specific criteria which include ‘the site being allocated for development by the Local Plan, there being no alternative site on land of a lower grade than 3a; or the use of lower grade land would significantly and

*demonstrably work against the achievement of sustainable development; and the development will not result in the remainder of an agricultural holding becoming not viable’.*

- 16.12.9 Other development management policies of the plan which could potentially protect soil quality and enhance soil quality include **Policy DM27** which specifically aims to ensure development proposals will conserve, enhance and extend biodiversity, providing for net gains in biodiversity where possible. **Policy DM29** also supports enabling development for proposals that contravene planning policies for the protection of the countryside where this can bring significant biodiversity and landscape enhancements particularly at Biodiversity Opportunity Areas.
- 16.12.10 Furthermore, policies protecting the coastal zone, water quality and flood risk (**DM21, DM22, and DM23**) are also expected to protect soil quality and reduce contamination through the management of surface water run-off. **Policy DM3** (The rural economy) also expects new development in rural areas to first consider reuse of existing buildings or development of other previously developed land unless they are not available or the location supports the needs of rural communities or the active and sustainable management of the countryside. This policy also protects the interests of the agricultural sector which could also have an indirect effect on protecting high grade agricultural land.

[Appraisal of the ‘revised draft Local Plan as a whole’](#)

- 16.12.11 The implementation of the strategic policies proposed in the revised draft Local Plan seeks to deliver significant growth in the Borough over the plan period. As the Council has identified that the Borough has an insufficient supply of brownfield land to deliver this growth, greenfield land will be needed for development. In accordance with the preferred spatial strategy, land may be developed within or adjacent to existing settlements which could result in both positive and negative effects upon protecting the Borough’s soil quality and the reduction of contamination. Remediation of brownfield land within existing settlements is expected but the loss of high quality agricultural land also around the main settlements. The extent of the high grade agricultural resource along the A2 corridor does limit the ability to avoid all areas of high grade agricultural soil. It is recognised that some allocations resulting in the loss of agricultural land are not in agricultural use, or are well contained by urban development. The plan’s strategic, core and development management policies as well policies allocating sites recognise this and do include policies to protect soil quality, measures to protect and enhance biodiversity, and seek to remediate and make sites safe from contamination.
- 16.12.12 Overall, the plan is expected to deliver **positive effects** with regards to protecting the Borough’s soil quality and reducing contamination by minimising the loss of best and most versatile agricultural land and encouraging the remediation of contaminated sites.

16.13 Transport and Accessibility

Relevant sustainability objectives

- To promote traffic reduction and encourage more sustainable alternative forms of transport

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↗	↗	↗	↗	↗	↗

16.13.1 The growth set out in **Policies ST2 and ST4** for the Borough will lead to an increase in the population of Swale, which is likely to result in an increase in vehicle movements. These policies do however expect this growth to be delivered in accordance with the preferred spatial strategy which locates new development principally in and around existing larger settlements within the Borough including Sittingbourne and Faversham. This is likely to ensure that the majority of new development is in close proximity to existing key services and facilities, which is expected to reduce the need for people to travel in the Borough.

16.13.2 As discussed under air and climate, the quantum of growth planned for housing set out in **Policy ST2 and ST4** (10,800/540 per annum over the plan period) is not, based on objectively assessed demographic, affordable housing or economic need identified in the Council's SHMA Update and could lead to in commuting in the longer term as it is not expected to help maintain the required labour supply. This could therefore have negative effects in terms of achieving the transport and accessibility objective.

16.13.3 Policies of the preferred spatial strategy (**ST3, ST5-ST7**) promote the provision of public transport and sustainable modes of transport as part of new development as well as road schemes to support development. Potential improvements to public transport and measures to encourage walking and cycling are also proposed as part of policies allocating locations for development. These measures are likely to reduce the need to travel by car. Policies indicating locations for development also incorporate a number of road access improvements identified as being necessary for the proposed developments.

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	?	↗	↗	↗	↗	↔	↔

16.13.4 **Policy CP2** (Transport Infrastructure) identifies the importance of locating new development in appropriate locations to minimise the need to travel between homes and employment, shopping, community. It also emphasises the need to ensure development is located close to public transport links (for example bus, rail, cycling and walking infrastructure) to encourage a modal shift from a reliance on the private car. This is expected to encourage the use of public transport and reducing the need to travel in the Borough over the plan period. Other policies (**CP3, CP4 and CP5**) support these principles.

- 16.13.5 In addition **Policy CP2** supports the greater use of waterways for commercial traffic where this would not have an unacceptable adverse environmental impact which cannot be satisfactorily mitigated.
- 16.13.6 **Policy CP2** and **Policy CP5** (Infrastructure) also support the implementation of transport infrastructure as part of new development. This includes securing investment and thus improvements in the Borough’s transport network as part of new development. This would therefore include investment in both sustainable forms of transport and private car transport infrastructure.
- 16.13.7 **Policy CP1** has potentially uncertain effects as the policy supports locating development adjacent to the strategic and primary road networks but there is no reference to ensuring sustainable modes of transport are encouraged at these locations. This would however be addressed by **Policy CP2** and other development management and strategy policies.

Appraisal of the preferred ‘development management’ policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↗	↗	↔	↔	↗	↗	↔	↗	↗	↔	↗	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

- 16.13.8 Positive effects upon the transport and accessibility sustainability objective are expected through **Policy DM6** (Managing Transport Demand and Impact) which would apply to new development proposals. This policy requires development proposals to demonstrate that development opportunities for sustainable modes of travel have been taken up and expects environmentally acceptable improvements to the network to be implemented where capacity issues arise from new development. It safeguards usable wharfage or rail facilities from being lost to new development. It also expects the location, design and layout of development proposals to prioritise the needs of pedestrians and cyclists, including the disabled; integrate access to public transport; ensure existing public rights are retained and created in appropriate locations; and on major developments include facilities for charging plug-in and other ultra-low emission vehicles.
- 16.13.9 Policies **DM7** (Vehicle Parking) and **DM20** (Sustainable Design and Construction) encourage a high standard of design which will incorporate facilities to encourage sustainable modes of travel such as cycling. Policies **DM2**, **DM14** and **DM15** also encourage this and improved public transport.

Appraisal of the ‘revised draft Local Plan as a whole’

- 16.13.10 The plan’s preferred spatial strategy, directing development towards existing larger settlements, and its core, development management policies are expected to reduce the need to travel and increase provision of public transport, walking and cycling facilities. There are

also a number of policies which seek to secure improvements to road infrastructure as part of new development which would therefore facilitate car usage. The quantum of growth planned for housing over the plan period is also not based on objectively assessed demographic, affordable housing or economic need, which could result in people commuting into the Borough, in the long term, as the supply of housing locally could constrain the local labour supply.

- 16.13.11 It is therefore concluded that the revised draft Local Plan is expected to have **positive effects** on transport and accessibility overall, however these will depend on the success of the initiatives to discourage car usage and are potentially limited in the longer term due to the potential shortfall in the housing supply not supporting the proposed economic growth and generating in commuting from outside the Borough.

16.14 Waste

Relevant sustainability objectives

- To achieve the sustainable management of waste

Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗/?	?	?	?	?	?	?

16.14.1 The proposed growth strategy promotes new built development which is expected to increase the Borough's population and employment opportunities, all of which have the potential to increase construction, municipal and commercial and industrial waste arisings. Planning for infrastructure to manage these waste arisings is dealt with by Kent County Council under a separate plan. This forms part of the development plan for Swale. Local boroughs are responsible for waste collection and it is uncertain whether the expected levels of growth and their spatial distribution in the Borough would result in waste collection and management capacity issues at existing facilities or result in the need for new capacity which would affect the achievement of managing waste sustainably in the future. **Policy ST1** does encourage good design and the use of national building standards which would incorporate sustainable management of construction waste and encourage the use of recycled materials

Appraisal of the preferred 'core' policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↘	↘	↗	↔	↗	↔	↔

16.14.2 Economic development and infrastructure growth provided under policies **CP1** and **CP2** has the potential to increase construction and commercial and industrial waste arisings. Policy **CP3** does seek to achieve high standards of sustainable construction as part house building and therefore has the potential to increase the re-use of materials. **Policy CP5** promotes collaborative working with other organisations to identify and address any deficiencies in infrastructure. This includes discussing requirements for waste management infrastructure, the development of which, could help ensure disposal of waste material (where required) in accordance with the waste hierarchy.

Appraisal of the preferred 'development management' policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↔	↔/?	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

16.14.3 **Policy DM20** (Sustainable Design and Construction) expects development to use materials and techniques which reduce waste during construction and **Policy DM15** (Achieving High Quality Design and Distinctiveness) also promote the use of recyclable materials in construction. Although **Policy DM20** expects development to promote waste reduction and recycling, it is not clear how this would be implemented to help to achieve the sustainable management of waste as part of new development.

[Appraisal of the 'revised draft Local Plan as a whole'](#)

16.14.4 The preferred growth strategy has the potential to increase waste arisings during construction and when development is operational. A small number of plan policies encourage sustainable construction by reducing waste and increasing the use of recycled materials, which could assist with achieving the sustainable management of waste for this phase of development. **Policy DM20** requires development to promote waste reduction and recycling however it is not clear how this would be implemented and whether this applies to construction and for when development is operational. In addition, effects of the preferred growth strategy on the ability of existing waste infrastructure to achieve the sustainable management of waste in the future are uncertain. It is recognised **Policy CP5** seeks to explore this issue with appropriate authorities. Overall, the plan is considered to have **uncertain effects** with regards to achieving the sustainable management of waste.

**Recommendation**

Consider specifying how different types of development would promote waste reduction and recycling currently identified in **Policy DM20** to assist with achieving the sustainable management of waste as part of new development and provide further explanation in **Policy DM20**.

## 16.15 Water

### Relevant sustainability objectives

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

### Appraisal of the preferred 'strategy' policies

Policy	ST1	ST2	ST3	ST4	ST5	ST6	ST7
Broad Implications	↗	↘	↗	↘	↘	↗	↗

- 16.15.1 The Borough is vulnerable to tidal flooding with areas of Sittingbourne, Faversham, Sheerness and Queenborough and Rushenden potentially at risk. Water resources in the Borough are provided predominantly by groundwater including the chalk aquifer which is widespread across the south east region. Although industry water abstraction has declined in the Borough in recent years new development is expected to place pressure on this resource particularly in the longer term and also at wastewater treatment works. Growth planned in Swale over the plan period, (set out in **policies ST2 and ST4**), therefore has the potential for negative implications with respect to flood risk and water quality.
- 16.15.2 To address flood risk, **Policy ST1** expects development in the Borough to apply policy within the Coastal Change Management Area and apply national policy with respect to flood risk on land around the estuary and from streams, drainage and groundwater. With regards to water, the policy expects development to efficiently use natural resources and apply national policy with respect to pollution and contamination which is expected to assist in protecting water supply and quality.
- 16.15.3 The preferred spatial strategy set out in **Policy ST3** and **Policies ST5-ST7** does steer development to the main settlements in the Borough which could result in development within areas of high risk of flooding. **Policy ST6** (The Strategy for the Isle of Sheppey area) recognises this potential constraint and expects development proposals to be appropriate to the level of risk from flooding and climate change and **Policy ST7** (Our approach to the Faversham area and the Kent Downs) also requires development to address risks of flooding and forecast climate change. **Policy ST5** (The Sittingbourne area strategy) does not however specifically require development to address flood risk issues in this area but **Policy DM21** (Water, Flooding and Drainage) is expected to ensure development proposals consider this constraint in line with national policy.
- 16.15.4 The levels of growth at these locations could also have impacts upon water supply and waste water treatment capacity and thus water quality. The Council has identified that Southern Water and South East Water's existing Water Resource Management Plans demonstrate that although there may be stresses in the longer term supplies in the area, the expected growth and the timing of this is not expected to present impossible difficulties in terms of water supply and quality given investment already being made and long term planning. It should be noted that these plans are currently being updated.
- 16.15.5 The plan identifies current restrictions in the capacity of the connections to the Teynham Waste Water Treatment Works. **Policy ST5** and **Policy A4** identifies the need to address this as part of new development coming forward.
- 16.15.6 Policies allocating locations for development in the revised draft Local Plan and as part of the saved Local Plan 2008 put forward some development in areas at risk of flooding. These include **Policy A1** Land north west of Sittingbourne, **Policy AAP2** Faversham Creekside,

**Policy AAP8** Milton Creek and **Policy A7** Oare Gravel workings site. Where flood risk has been identified policies expect development proposals brought forward to address this constraint through appropriate management and mitigation and some of the locations support regeneration and therefore are expected to meet the NPPF’s Exception Test requirements. The Council has also confirmed that consultation with the Environment Agency with regards to these locations has confirmed they have no issues with regards to them meeting national policy.

16.15.7 Furthermore policies allocating locations identified for regeneration, such as those at Queenborough and Rushenden will include remediation of contaminated land and therefore could lead to a positive effect on water quality in these locations.

Appraisal of the preferred ‘core’ policies

Policy	CP1	CP2	CP3	CP4	CP5	CP6	CP7
Broad Implications	↗	↘	↗	↗	↗	↗	↔

16.15.8 A number of the core policies support the need to manage flood risk and promote the efficient use of water.

16.15.9 **Policy CP1** which promotes economic development expects development to create resilience in existing businesses to forecast changes in flood risk, climate change and natural processes and supports development in the low carbon sectors. **Policy CP3** seeks to achieve high standards of sustainable design as part of house building and therefore has the potential to ensure water efficiency measures are incorporated as part of new development.

16.15.10 **Policy CP5** also promotes collaborative working with other organisations to identify and address deficiencies relating to utility infrastructure. This includes water supply and waste water treatment infrastructure. Furthermore, **Policy CP6** is likely to help manage the risks to those in vulnerable areas such as from surface water flooding by providing for green infrastructure.

Appraisal of the preferred ‘development management’ policies

Policy	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17
Broad Implications	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔

Policy	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	DM26	DM27	DM28	DM29	DM30	DM31	DM32	DM33	DM34	DM35
Broad Implications	↔	↗	↗	↗	↗	↗	↔	↔	↔	↗	↔	↗	↔	↗	↔	↔	↔	↔

- 16.15.11 The key development management policy of the plan which is expected to achieve development which manages flood risk and protects water quality is **Policy DM21** (Water, flooding and drainage). This policy seeks to consider development in accordance with the NPPF and its supporting Technical Guidance which aims to steer development to areas at least risk of flooding and ensure site specific flood risk assessments are carried out. The policy requires these assessments to identify where necessary flood alleviation and defence measures and developers should submit details of suitable warnings and emergency plans to be provided to ensure flood risk is managed in areas at risk. The policy calls for drainage measures to be considered in the planning and design of new development and use SuDS where possible. The supporting text refers developers to the SuDS Design and Best Practice Manual and also highlights the need to consider the impact on the historic environment. This approach to drainage of new development is expected to protect and could potentially improve the quality of the Borough's receiving water courses and groundwater which have in the past had a poor ecological status.
- 16.15.12 **Policy DM21** also expects developers to seek agreement with the relevant water company to demonstrate that there will be adequate water supply and waste water connection and treatment facilities for new development before construction commences.
- 16.15.13 **Policies DM22** (The Coast) and **DM23** (Coastal Change Management Area) provide a policy framework for managing the coastal zone from inappropriate development across the plan period and also relocating development out of areas at risk which supports the management of flood risk.
- 16.15.14 **Policy DM20** (Sustainable Design and Construction) also expects new development to incorporate water efficiency measures and protect water quality. New development is required to meet recognised design standards such as the Code for Sustainable Homes Level 3 and 4 or above and BREEAM "Good" and "Very Good" depending upon the type and size of development, which would incorporate measures which promote water efficiency and sustainable drainage. The supporting text for this policy expects developers to complete an energy and water statement showing what water and energy efficiency measures have been included in their proposals. **Policy DM15** (Achieving High Quality Design and Distinctiveness) also requires new development to respond positively to making efficient and prudent use of natural resources and **Policy DM1** (General development criteria) expects development proposals to respond positively to meeting the challenge of flood risk and coastal change.
- 16.15.15 Furthermore, development management policies promoting net biodiversity gain as part of new development are also expected to assist with protecting water quality and managing surface water flood risk through the provision of green infrastructure.

#### Appraisal of the 'revised draft Local Plan as a whole'

- 16.15.16 The implementation of the strategic policies proposed in the revised draft Local Plan seeks to deliver significant growth in the Borough, focused particularly within or adjacent to existing settlements. Given the extent of the areas of the Borough at risk of flooding, proposed development is identified in these risk areas and could therefore result in negative effects in terms of increasing flood risk but with appropriate mitigation the management of flood risk can be achieved. Levels of growth will place pressure, particularly over the long term, on the Borough's water supplies and waste water treatment infrastructure which could have negative impacts upon maintaining water quality however the water companies have not identified any significant constraints. The plan's strategic, core and development management policies as well policies allocating sites recognise these issues and do include policies to manage flood risk and coastal change, and incorporate various measures to ensure development delivers efficiencies in terms of water usage, incorporates appropriate drainage techniques. Further, policies promoting the regeneration of sites are expected to result in their remediation and likely improvements to water quality.

- 16.15.17 The plan is therefore expected to deliver **positive effects** overall with regards to managing and reducing flood risk, maintaining and enhancing water quality and ensuring the efficient use of water.

#### **Recommendation**

Within **Policy ST5** (The Sittingbourne area strategy) incorporate policy wording that emphasises the importance of new development addressing the risks of flooding.

## 17 CONCLUSIONS AND RECOMMENDATIONS AT THIS CURRENT STAGE

### 17.1 Conclusions

- 17.1.1 Growth planned in Swale between 2011-2031, as set out in **Policy ST2** and **ST4** of the revised draft Local Plan, will lead to an increase in the population of Swale. This in turn may have negative implications for the achievement of environmental objectives given the sensitivities that exist locally. For example, development could lead to pressure on important landscape and biodiversity habitats, and an increase in travel by private car could cause localised air quality impacts and increases in greenhouse gas emissions.
- 17.1.2 However, the preferred spatial approach to accommodating growth should help to ensure that negative effects are avoided or minimised. Locating significant development both for housing and employment principally within and adjacent to existing urban areas (Sittingbourne, Faversham and Sheerness as opposed to the larger rural centres or villages) will help to avoid/minimise environmental impacts including impacts to habitats of European importance, the Kent Downs Area of Outstanding Natural Beauty and will also reduce the need to travel and promote regeneration. It is recognised that, given the extent of the best and most versatile agricultural soil in the Borough there will be a loss of this resource, however development on previously developed land remains a priority and greenfield land not in agricultural use or well contained by urban development are preferred locations.
- 17.1.3 Whilst the preferred growth quantum (Policies ST2 and ST4) does not give rise to major concerns from an environmental perspective (given the spatial approach to growth, and the application of mitigatory policy as described below) its performance in terms of achieving the objectives *'To provide affordable and decent housing adaptable to future needs of the community'* and *'To meet the challenges of a growing and ageing population'* is limited. Given that the housing growth proposed is not based on objectively assessed need this would also potentially limit the achievement of economic SA objectives resulting from potential effects on the local labour supply.
- 17.1.4 In terms of the detailed policy approach that is set out within the plan ('core policies' and 'development management policies'), the appraisal has found that the preferred approach is broadly positive in terms of achieving sustainability objectives.
- 17.1.5 The achievement of environmental objectives will be supported by policies protecting sensitive areas such as the Swale and Medway Estuary habitats, important landscapes and "at risk" areas such as areas liable to flood and the coastal zone. In addition, policies seeking to ensure development proposals brought forward conserve and enhance the built and natural environment including agricultural land and provide more sustainable options in terms of transport are expected to help towards achieving environmental objectives.
- 17.1.6 Policies supporting a competitive and diverse economy by encouraging employment development in underrepresented sectors such as tourism, securing future growth for the rural economy and seeking to deliver the necessary infrastructure to facilitate growth are expected to support the achievement of economic objectives for the Borough. The detailed policy approach is also likely to support social objectives through the provision of green, health and social infrastructure, promoting the vitality of towns, encouraging regeneration and aiming to provide a mix of housing for different groups of the local population. Policies have been developed in the light of the appraisal recommendations; however, it is recognised that the 'ambition' of the policy approach must be tempered by the need to ensure that development is not made unviable. Several appraisal recommendations remain outstanding at this current time.
- 17.1.7 For three key policy issues – the approach to addressing the approach to employment land at Faversham, the policy approach to addressing Gypsy and Traveller pitch provision and affordable housing– Part 2 of this SA Report describes how the preferred approach was developed 'via' a consideration of alternatives.

- 17.1.8 Regarding the approach to employment land at Faversham, the appraisal found that the preferred approach (choice of the Oare site and Love Lane as a reserve site should Oare not come forward) would ensure development in the first instance avoids the loss of high grade agricultural land, although the Oare site does not perform as well as other alternatives considered against other environmental objectives such as biodiversity, flood risk and heritage. With its redevelopment there are however potential opportunities for net biodiversity gain and management of heritage assets at the Oare site. The appraisal indicated a number of key considerations for the development of this site and the Love Lane site and these have been carried forward as part of Policies A7 and A8 of the draft plan.
- 17.1.9 For addressing Gypsy and Traveller pitch provision, the preferred quantum of pitch provision is based upon objectively assessed need and therefore would help to ensure the needs of the Gypsy and Traveller population are met in line with previous interim appraisal findings. In terms of policy approaches for delivering this provision, the preferred approach of providing pitches as part of housing allocations and windfall sites over a particular threshold performed well compared to other options as it is likely to make more efficient use of land and access arrangements by co-locating pitches with proposed housing and would help to reduce the social exclusion of the Gypsy and Traveller community. There are however uncertainties with regards to the when the pitches would be delivered under each housing allocation and if this approach would increase the costs of developing housing sites.
- 17.1.10 For affordable housing, options regarding how targets should be applied were appraised. The appraisal found that the preferred approach (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 or reduced targets in the short term if it can be demonstrated the viability of the scheme will be severely compromised) performs better than other options with respect to meeting the need for affordable housing as this approach considers local level evidence (relative price, need and economic ambition) associated with each market location, where this is available. It should however be noted that the targets proposed are still to be subject to viability testing.

**17.2 Recommendations**

- 17.2.1 The following recommendations are made at this stage. These recommendations will be considered when preparing the Proposed Submission version of the Plan.

Recommendation	To ensure performance of the plan is maximised in terms of ....
The positive impact of Policy ST7 (Our approach to the Faversham area and the Kent Downs) could be further strengthened to ensure development proposals coming forward in this area do not increase the levels of pollutants at the A2 section through Ospringe which is an Air Quality Management Area (AQMA). This could be included by adding an additional criterion which expects development to not increase the levels of pollutants at the identified AQMA at Ospringe and where possible improve air quality in this area of the Borough.	<b>Air quality</b> : To reduce air pollution and ensure air quality continues to improve across the Borough
Consider revising the proposed housing growth target so that it can support the plan’s economic growth identified in Policies ST2 and ST4 and the delivery of housing based on objectively assessed need.	<b>Employment and skills:</b> To ensure high and stable levels of employment in accessible locations <b>Housing:</b> To provide affordable and decent housing adaptable to future needs of the community <b>Local Economy:</b> To sustain economic growth and competitiveness

	<b>Population:</b> To meet the challenges of a growing and ageing population
Amend Policy ST7 point 9 as follows <del>Improve</del> <b>Reduce</b> levels of deprivation in Davington and East Downs Wards and/or facilitate as required, increased capacity in infrastructure and services in accordance with the Local Plan Implementation and Delivery Schedule	<b>Population:</b> To reduce poverty and social exclusion
Consider specifying how different types of development would promote waste reduction and recycling currently identified in Policy DM20 to assist with achieving the sustainable management of waste as part of new development and provide further explanation in Policy DM20.	<b>Waste:</b> To achieve the sustainable management of waste
Within Policy ST5 (The Sittingbourne area strategy) incorporate policy wording that emphasises the importance of new development addressing the risks of flooding.	<b>Water:</b> To manage and reduce the risk of flooding; to maintain and enhance water quality (ground and surface) and make efficient use of water.

17.2.2

In addition, it is noted that some of the policies allocating locations for development which have been saved in the Local Plan 2008 are in need of review following changes in circumstances in terms of their delivery and the need to address particular environmental constraints not currently referred to. Although the revised draft Local Plan core and development management policies would address such issues, the Council may wish to consider bringing forward revised allocations within the draft Local Plan to allow these saved policies to be reviewed.

**PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?**

## 18 INTRODUCTION (TO PART 4)

The SA Report must include...

- A description of the measures envisaged concerning monitoring

### 18.1 Plan finalisation, adoption and monitoring

18.1.1 This Part of the SA Report explains the next steps that will be taken as part of the plan-making /SA process, including in relation to monitoring.

18.1.2 Following this current period of consultation, the Proposed Submission version of the Plan will be prepared with consideration of the issues raised during consultation. This will be the version of the Plan that the Council believes to be 'sound' and hence intends to submit to Government for Examination.

18.1.3 There will then be a period for public representations on the Proposed Submission version. After this has finished the main issues raised will be identified by the Council, who will then consider whether, in light of representations that have been received, the Plan is still deemed 'sound' and therefore appropriate to submit the Plan for Examination.

18.1.4 At Examination the Inspector will consider representations before then reporting back on the Plan's soundness. Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) *'the measures decided concerning monitoring'*.

### 18.2 Monitoring

18.2.1 At the current stage – i.e. in the SA Report - there is a need to present *'a description of the measures envisaged concerning monitoring'* only. In-light of the appraisal findings presented in Part 3, the following is suggested.

Sustainability topic / objective(s)	Suggested monitoring indicators
<b>Air</b> - To reduce air pollution and ensure air quality continues to improve across the Borough	<ul style="list-style-type: none"> <li>• New designations of Air Quality Management Areas (AQMA);</li> <li>• Frequency of air pollution standards violations; and</li> <li>• Per capita emissions of 'conventional' air pollutants (CO, VOC, NOX, PM10); and</li> <li>• Per capita fossil fuel consumption, and emissions of CO2</li> </ul>
<b>Biodiversity</b> - To conserve and enhance biodiversity and the natural environment	<ul style="list-style-type: none"> <li>• % of SSSI in favourable and unfavourable condition</li> <li>• Locally important habitats (BAP priority habitats) created</li> <li>• Amount of new habitat created by new development</li> <li>• Biodiversity value of the green grid</li> </ul>
<b>Climate change</b> - To minimise the need for energy, increase energy efficiency and to increase the use of renewable energy; To encourage sustainable construction materials and	<ul style="list-style-type: none"> <li>• Renewable energy installations and low carbon technologies developed in the Borough</li> <li>• Per capita fossil fuel consumption, and emissions of greenhouse gases</li> <li>• Development achieving recognised sustainable design and construction standards</li> </ul>

Sustainability topic / objective(s)	Suggested monitoring indicators
methods	
<b>Crime and Safety</b> - To reduce crime and anti-social behaviour and the fear of these	<ul style="list-style-type: none"> <li>• Crime statistics (violence against a person, burglary, theft of and from a motor vehicle, instances of shop lifting)</li> <li>• Fear of crime</li> </ul>
<b>Cultural Heritage</b> - To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage	<ul style="list-style-type: none"> <li>• Identified listed buildings, locally listed/ important buildings and structures, Scheduled Monuments, historic parks and gardens, conservation areas and changes to these</li> <li>• Number of buildings on the national and local lists of heritage buildings at risk</li> </ul>
<b>Employment and Skills-</b> To ensure high and stable levels of employment in accessible locations; To 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"> <li>• Employment by Occupation</li> <li>• Annual average wage</li> <li>• Economic activity and economic inactivity</li> <li>• Employment/ unemployment rates</li> <li>• Education qualifications achieved by residents</li> </ul>
<b>Health</b> - To improve health and well-being and reduce inequalities in health	<ul style="list-style-type: none"> <li>• Quality of life - limiting long term illness</li> <li>• Life expectancy at birth</li> <li>• Health deprivation</li> <li>• Recipients of welfare benefits</li> <li>• Provision of new open spaces within the Borough</li> <li>• Death rates by cause - Standardised Mortality Ratio for all causes;</li> <li>• Age standardised mortality rates for a) all cancers; b) circulatory diseases; and c) respiratory diseases</li> <li>• Infant mortality</li> <li>• Access to a GP</li> <li>• Doctor / Patient ratio</li> </ul>
<b>Housing</b> - To provide affordable and decent housing adaptable to future needs of the community	<ul style="list-style-type: none"> <li>• Average house price</li> <li>• Identified affordable housing need, completions and shortfall in delivery</li> <li>• Applicants on the housing register</li> <li>• Total number of households</li> <li>• Household type</li> <li>• % homes meeting/ not meeting the decent home standard</li> <li>• Empty properties</li> <li>• Developments meeting/ constructed to lifetime homes standards</li> </ul>

Sustainability topic / objective(s)	Suggested monitoring indicators
	<ul style="list-style-type: none"> <li>• Housing completions</li> <li>• Developments built to ecohomes/ CSH mandatory standards</li> <li>• Provision of Gypsy and Traveller and Travelling Showpeople pitches and sites.</li> </ul>
<b>Landscape</b> - To protect and enhance the valued landscape and townscape of Swale	<ul style="list-style-type: none"> <li>• Changes in landscape character area conditions</li> <li>• Creation of new public open space and allotments</li> <li>• Improvements to existing open spaces and allotments</li> <li>• Improvement/ decline in condition of the AONB</li> </ul>
<b>Local Economy</b> - To sustain economic growth and competitiveness	<ul style="list-style-type: none"> <li>• Companies/ businesses located in area</li> <li>• Tourism facilities and opportunities</li> <li>• % of the working-age population that is in employment;</li> <li>• Jobs density (number of jobs filled to working age population)</li> <li>• Amount of floor space developed for employment by type</li> <li>• Employment land available by type</li> <li>• Amount of employment land lost to residential development</li> <li>• Economic activity rate</li> <li>• GVA £ per capita</li> <li>• The total number of VAT registered businesses in the area at the end of the year;</li> <li>• Town centre vacancy rates</li> <li>• Business start-ups and closures</li> <li>• Percentage of jobs in the tourism sector</li> <li>• Number of tourist visitors</li> </ul>
<b>Population</b> - 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.	<ul style="list-style-type: none"> <li>• Population Profile (age structure, ethnicity etc.)</li> <li>• Household size</li> <li>• % of a) children and; b) population over 60 that live in households that are income deprived</li> <li>• Access to local green space</li> <li>• No. of major and minor planning applications approved which demonstrate suitable access for disabled people</li> <li>• % of development located in Key Service Centres and Local Service Centres</li> </ul>
<b>Soil</b> - To protect and enhance soil quality and reduce contamination	<ul style="list-style-type: none"> <li>• Amount of development on Previously Developed Land</li> <li>• Land use densities</li> <li>• Amount of best and most versatile agricultural land (grades 1,2,3a) lost to</li> </ul>

Sustainability topic / objective(s)	Suggested monitoring indicators
	development <ul style="list-style-type: none"> <li>• Land remediation</li> </ul>
<b>Transport and Accessibility</b> - To promote traffic reduction and encourage more sustainable alternative forms of transport	<ul style="list-style-type: none"> <li>• Method of travel to work</li> <li>• Distance travelled to work and average commute time</li> <li>• Household car ownership</li> <li>• Per capita expenditures on roads, parking and traffic services</li> <li>• Public Rights of Way designated across the Borough</li> <li>• Implementation of road improvement schemes</li> <li>• Proportion of children’s travel to school and other local destinations by walking and cycling</li> <li>• Frequency of air pollution standards violations</li> <li>• Per capita emissions of ‘conventional’ air pollutants (co, VOC, NOx, PM10)</li> </ul>
<b>Waste</b> - To achieve the sustainable management of waste	<ul style="list-style-type: none"> <li>• Waste arisings (all waste streams);</li> <li>• Recycling and composting rates; and Recycling facilities</li> <li>• Capacity for Handling Waste Materials</li> </ul>
<b>Water</b> - To manage and reduce the risk of flooding; To maintain and enhance water quality (ground and surface) and make efficient use of water	<ul style="list-style-type: none"> <li>• Chemical and biological water (surface and groundwater) quality</li> <li>• Water consumption per capita</li> <li>• Dwellings at risk of flooding and consents contrary to EA advice on flooding</li> <li>• Implementation of SuDs with a focus on water quality as well as flood risk</li> <li>• Waste water treatment capacity</li> </ul>