



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



**SA Report**

**Non Technical Summary**

August 2013

## INTRODUCTION

URS is commissioned to undertake a Sustainability Appraisal (SA) in support of the emerging Swale Local Plan. The Local Plan is the most important planning document for Swale, setting out the vision and overall spatial strategy for the area and how it will be achieved for the period until 2031. Spatial planning brings together and integrates policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.

The principal influence on plan preparation is the Government's National Planning Policy Framework (NPPF) published in March 2012, which sets out a range of national policies that Local Plans must reflect. The Local Plan is also developed in light of 'Realising our ambitions for Swale - the Borough strategy to 2031' published in 2012.

The Local Plan is being prepared in three separate parts: Part 1 is the subject of the Council's current consultation relates to. Part 1 includes:

- Policies to deliver the preferred overarching spatial strategy for the Borough within the context of the NPPF and achieving sustainable development;
- A series of core policies that take important issues for Swale with a view to ensuring that planning decisions made in any location support the principles of sustainable growth and overall objectives of the Local Plan;
- Allocations, 'Areas of Search' and 'Areas of Future Change' drawn from the Swale Local Plan 2008, the Swale Strategic Housing Land Availability Assessment 2010 and the Employment Land Review 2010; and
- A framework of development management policies to guide the determination of planning applications by setting out criteria for development proposals.

SA is a legally required process for considering and communicating the likely sustainability effects of a draft plan, and the alternatives considered in the drafting of the plan. This process aims to achieve sustainable development through the plan by predicting its economic, social and environmental effects and suggesting ways to avoid or minimise negative effects and maximise positive ones.

The version of the plan which has been appraised and is being consulted upon at this current stage is the Swale Borough Local Plan Part 1: Bearing Fruits 20131 Consultation Draft (August 2013). An SA Report has been prepared detailing the appraisal process undertaken so far and this is the non-technical summary of the SA Report.

To date, SA of the draft Swale Local Plan has involved the following tasks and these are discussed in the various sections of this non-technical summary:

- Establishing the sustainability issues which should be the focus of the SA and the objectives used to predict effects of the draft plan: see [What's the scope of the SA?](#)
- Appraising 'reasonable alternatives' - with a view to informing preparation of the draft plan: see [What has plan-making/ SA involved up to this point?](#)
- Appraising the draft plan with a view to informing plan finalisation: see [What are the appraisal findings at this current stage?](#)
- Suggesting measures to monitor the predicted sustainability effects: see [What happens next?](#)

## WHAT'S THE SCOPE OF THE SA?

An important first step in the SA process involves establishing the 'scope' of the SA, i.e. those sustainability issues which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to consider:

- **The sustainability context** – this primarily involves reviewing the Government’s National Planning Policy Framework which Local Plans must reflect but also consideration of sustainability messages established through other plans, policies, strategies and initiatives.
- **The sustainability baseline** - involves reviewing available data to establish an understanding of the current state of the environment / socio-economic characteristics of Swale and the surrounding area; and also thinking about their likely ‘evolution’ of the Borough.

An SA Scoping Report was prepared in 2008 and consulted upon with the required consultation bodies: Natural England, The Environment Agency and English Heritage. A copy of the SA Scoping Report is available here: <http://www.swale.gov.uk/sustainability-appraisal/> A detailed review of the sustainability context and baseline is presented within the SA Scoping Report. This has been updated and is presented in Part 1 of the SA Report.

The following table is a summary of the sustainability issues described within the SA report following a review of the sustainability context and baseline. Drawing on this review, 15 ‘sustainability objectives’ were identified and grouped under topic headings. This has provided a focussed framework for the SA to predict the effects of the plan.

It should be noted that as part of undertaking the appraisal every effort is made to identify / evaluate effects accurately using the framework as a focus; however, this is challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by the understanding of the sustainability baseline and other evidence to inform the appraisal of plan implementation. Limitations have included detailed site specific information and an understanding of the effects of the plan, for example on the transport network, in combination with plans prepared by neighbouring Councils. In many instances it is therefore not possible to predict significant effects, but it is possible to comment on the merits of plan implementation (or otherwise) in more general terms.

Topic	Baseline/ Context review : Key issues identified for the Borough	Sustainability objectives There is a need to...
Air	<p>Traffic and shipping are likely to continue to be a major source of air pollution in the Borough.</p> <p>Local air quality is poor within areas of Sittingbourne and at Ospringe and Newington with 4 Air Quality Management Areas (AQMA) declared between 2009 and 2013.</p> <p>Increased emissions are likely to have an adverse impact on the wildlife and habitats within the Borough.</p>	<p>Reduce air pollution and ensure air quality continues to improve across the Borough</p>
Biodiversity	<p>Biodiversity in the Borough is threatened by climate change in particular temperature rises and sea level rise, inappropriate built development, pollution, changing land management practices and vandalism.</p> <p>Rich biodiversity habitats within the Borough especially the coastal areas require greater protection to ensure no loss of habitat or species.</p> <p>Swale has not traditionally been active in the area of requiring green space or habitats to be created as part of new developments.</p> <p>The coastal components of The Swale and Medway Estuary and Marshes Special Protection Area and Ramsar site (European biodiversity designation) remain at risk from sea level rise and coastal squeeze from fixed defences.</p> <p>Potential for disturbance to birds using designated sites from recreational uses</p>	<p>Conserve and enhance biodiversity and the natural environment</p>
Climate Change	<p>Steps are required to address the emission of greenhouse gases from a number of sectors including transport, industry and the domestic user.</p> <p>Steps are required to identify and protect a green grid structure throughout the Borough allowing wildlife to migrate through the built and rural environment as climate changes.</p> <p>Climate change is a considerable threat to the Borough, in particular the coastal areas, the salt marshes and protected habitats through sea level rise, temperature increases.</p> <p>The poor public transport system across the Borough creates a car dependency. Transport improvements, such as improved public transport links and locating new development in sustainable locations can contribute to reducing emission levels.</p> <p>New and existing buildings require retro-fitting and development using sustainable construction methods to ensure that the Boroughs buildings are adaptive to climate change.</p> <p>The sustainability policy agenda requires the delivery of alternative energy sources, such as renewable energy technologies.</p> <p>Established development within the Borough should be retrofitted where possible, utilising government grants and funding</p>	<p>Minimise the need for energy, increase energy efficiency and to increase the use of renewable energy;</p> <p>Encourage sustainable construction materials and methods</p>

Topic	Baseline/ Context review : Key issues identified for the Borough	Sustainability objectives There is a need to...
	where possible.	
Crime and Safety	<p>Swale is a relatively safe Borough, with crime decreasing in recent years.</p> <p>The highest crime type for Swale was criminal damage including arson with 15 crimes per thousand people with violence against a person is the next most common type of crime within Swale.</p>	Reduce crime and anti-social behaviour and the fear of these
Cultural heritage	<p>Across the Borough (and nationwide) there continues to be a considerable level of unauthorised work to listed buildings and buildings within conservation areas, at times detrimentally damaging these buildings for future generations.</p> <p>Across the Borough there are a number of redundant and disused buildings of heritage value, including those on the local and national buildings at risk registers.</p>	Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage
Employment and Skills	<p>High levels of out commuting to jobs particularly in the higher skilled sectors and the higher paid jobs especially using car as a main form of transport resulting in increased congestion.</p> <p>Declining local manufacturing industry, as identified by the Council;</p> <p>A significantly higher proportion of residents are employed in the manufacturing industry and the greatest proportion of Swale's residents are employed in the service sector. There is a significantly lower proportion of residents employed in the finance, IT and other business sectors compared to the south east and the national average;</p> <p>The average pay is significantly lower than the south east but is just above the national average. Female workers in the Borough are paid less than the national hourly rate and earn less on a weekly basis than both the national and regional average.</p> <p>Swale has a large number of people lacking qualifications and a shortage of graduate labour employment opportunities. Investment in skills and learning is regarded as critical for long term regeneration.</p> <p>The poor skills profile is a problem when the Borough is trying to branch out into the higher skilled knowledge based industries. The current low skill base of the population is reflected through the existing employment opportunities which have been historically offered.</p> <p>Potential constraints on the labour supply resulting from the future decline of the working age population.</p>	<p>Ensure high and stable levels of employment in accessible locations</p> <p>Raise the educational achievement levels across the Borough and help people to acquire the skills needed to find and remain in employment</p>
Health	<p>There is a need to provide more accessible local healthcare facilities.</p> <p>Demands for health care and associated services in the Borough are rising and are expected to continue to rise as the population increases and ages and new housing and employment opportunities increase.</p>	Improve health and well-being and reduce inequalities in health

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	<p>A focus on healthy lifestyles should be encouraged.</p> <p>Deprivation is higher than average and fuel poverty within the Borough still requires reducing.</p> <p>The Borough's recreational, cultural facilities and activities and natural green and open spaces of good quality are currently limited and require development and improvement to support local quality of life. This is especially the case in urban Sittingbourne and Sheerness.</p>	
Housing	<p>The provision of affordable housing in the Borough is currently below the target set in the adopted Local Plan, the Council needs to deliver further affordable homes to meet the needs of the population both in the urban and rural areas of the Borough.</p> <p>The escalating cost of buying and renting homes in rural areas means that the adequate provision of affordable housing to meet local need is of particular importance. This provision includes options for renting, shared ownership and low cost home ownership, secured, where appropriate, in perpetuity for local people.</p> <p>The Council needs to continue the improvement programme to ensure that the decent homes standard is achieved in existing and emerging housing stock.</p> <p>Rural housing both the delivery and affordability is a big issue facing the Borough.</p> <p>Pressure on housing supply as a result of an ageing population increasing household growth.</p> <p>Provision of adaptable housing to meet the needs of the disabled and elderly population (lifetime homes).</p>	Provide affordable and decent housing adaptable to future needs of the community
Landscape	<p>Swale contains a high quality distinctive landscape which requires protection, enhancement, extension, connectivity and permeability to maintain its locally distinctive habitats.</p> <p>The consequences of climate change are a problem facing some of the Borough's highest quality landscapes including the marshes. The impacts of habitat fragmentation and isolation will become increasingly apparent as climate changes and development expands.</p> <p>Environmental quality is not distributed evenly across the Borough, access to natural green and open space is limited for many communities.</p> <p>The Council's Landscape Character and Biodiversity Appraisal 2010 found that of the 42 identified character areas, the condition of 5 was classed as 'poor', with a further 16 'moderate'.</p>	Protect and enhance the valued landscape and townscape of Swale
Local Economy	<p>The Borough currently has a poor image with investors.</p> <p>Declining traditional industries of manufacturing and processing within the Borough, and a decline in the rural economy.</p>	Sustain economic growth and competitiveness

Topic	Baseline/ Context review : Key issues identified for the Borough	Sustainability objectives There is a need to...
	<p>An above average proportion of lower paid jobs with commuting to better paid jobs outside the Borough; a relatively low-skilled workforce.</p> <p>The delivery of employment land competes with land for residential development.</p> <p>The Borough needs to capitalise on development of the tourism sector, in particular eco tourism respecting the high quality natural environment.</p> <p>Declining retail sectors and out migration of residents to surrounding shopping centres.</p> <p>Under-representation in the financial and business services and other knowledge based sectors, which typically which have greater potential for growth.</p> <p>The future economic performance is constrained by poor infrastructure, investment is required to rectify this issue and make the Borough an attractive place to invest.</p> <p>The economic recession is placing pressures on the viability of existing employment sites and increasing demands for changes of use to other uses.</p> <p>Future population projections resulting in an ageing population could constrain the labour supply.</p>	
Population	<p>Quality of life indicators such as health and crime suggest that Swale is a relatively pleasant place to live, though deprivation is an issue</p> <p>With regard to deprivation, education and skills is the key issue affecting the largest area of the Borough, however, deprivation is also strongly associated with employment and income.</p> <p>An increasing ageing population and population growth are expected to put additional pressure on services, health provision and housing supply and could potentially constrain the labour supply.</p>	<p>Meet the challenges of a growing and ageing population</p> <p>Reduce poverty and social exclusion</p> <p>Improve accessibility for all to key services and facilities</p>
Soil	<p>There is pressure to develop on agricultural land and competing uses resulting from climate change (greater agricultural production linked to self-sufficiency and the need to develop in areas at low risk to flooding).</p> <p>Areas of contaminated land exist across the Borough, and will need to be remediated or protected as habitat sites where identified.</p> <p>Brownfield land can be important for biodiversity and, in some instances, offer a higher level of biodiversity than agricultural land; therefore there may be competing pressure for new development and biodiversity protection.</p>	<p>Protect and enhance soil quality and reduce contamination</p>

Topic	Baseline/ Context review : Key issues identified for the Borough	Sustainability objectives There is a need to...
Transport and Accessibility	<p>The principal transport constraint in the Borough is at J5 of the M2 with the A249. There may be emerging issues with other M2 junctions and other points on the strategic road network.</p> <p>To avoid congestion provision of final section of Sittingbourne Northern Relief Road to Bapchild is needed along with improvements to Sittingbourne town centre traffic management and upgrading of junctions with the A249 at Key Street and Grovehurst</p> <p>In the longer term (probably beyond the plan period), rebalancing the highway network away from M2 J5 may require provision of a new J5a on the M2 and a southern relief road for Sittingbourne.</p> <p>Connections between the rural communities, employment, services and amenities are very poor with regard to accessible public transport.</p> <p>Poor accessibility of rural villages by public transport.</p> <p>Low use of public transport to get to work compared to the country average.</p> <p>Poor supporting infrastructure for cyclists in the Borough.</p> <p>Poor quality pedestrian environment in certain areas of the Borough.</p>	Promote traffic reduction and encourage more sustainable alternative forms of transport
Waste	<p>Continued need for new developments to incorporate waste storage facilities.</p> <p>Continuation of meeting and exceeding recycling and waste management targets set at the County, regional and national level.</p>	Achieve the sustainable management of waste
Water	<p>The Borough is vulnerable to tidal flooding and from surface water flooding which will be exacerbated by climate change.</p> <p>Water abstraction and water availability will continue to be an issue, especially as development increases.</p> <p>Increased water consumption will have an increased impact on the biodiversity that inhabits water bodies and water systems.</p> <p>As available land for new development becomes scarce, land which falls within flood risk areas is likely to require considering. Through undertaking detailed flood risk assessments, mitigation measures can be incorporated to potentially allow non-vulnerable uses to be permitted</p>	<p>Manage and reduce the risk of flooding</p> <p>Maintain and enhance water quality (ground and surface) and make efficient use of water</p>

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

Over the last three years Swale Borough Council has been through a number of different stages to produce the current revised draft Local Plan (Stage 3):

- Stage 1: Swale Core Strategy Pick Your Own: Issues and Strategic Spatial Options (January 2011)
- Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012):
- Stage 3: The Swale Borough Local Plan Part 1: Bearing Fruits 2031 Consultation Draft (August 2013):

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



There have been a number of 'interim' appraisal steps as illustrated. Part 2 of the SA Report and associated appendices present appraisal findings of the main 'alternative' approaches considered in preparing the plan - where they remain current and relevant. This, where relevant, has considered the appraisal findings at interim appraisal stages.

The main alternatives considered for the plan have included:

- **The broad spatial distribution of development in the Borough –**

This is a key aspect of the Local Plan. Four spatial distributions were considered during Stage 1: Swale Core Strategy Pick Your Own: Issues and Strategic Spatial Options (January 2011). Following

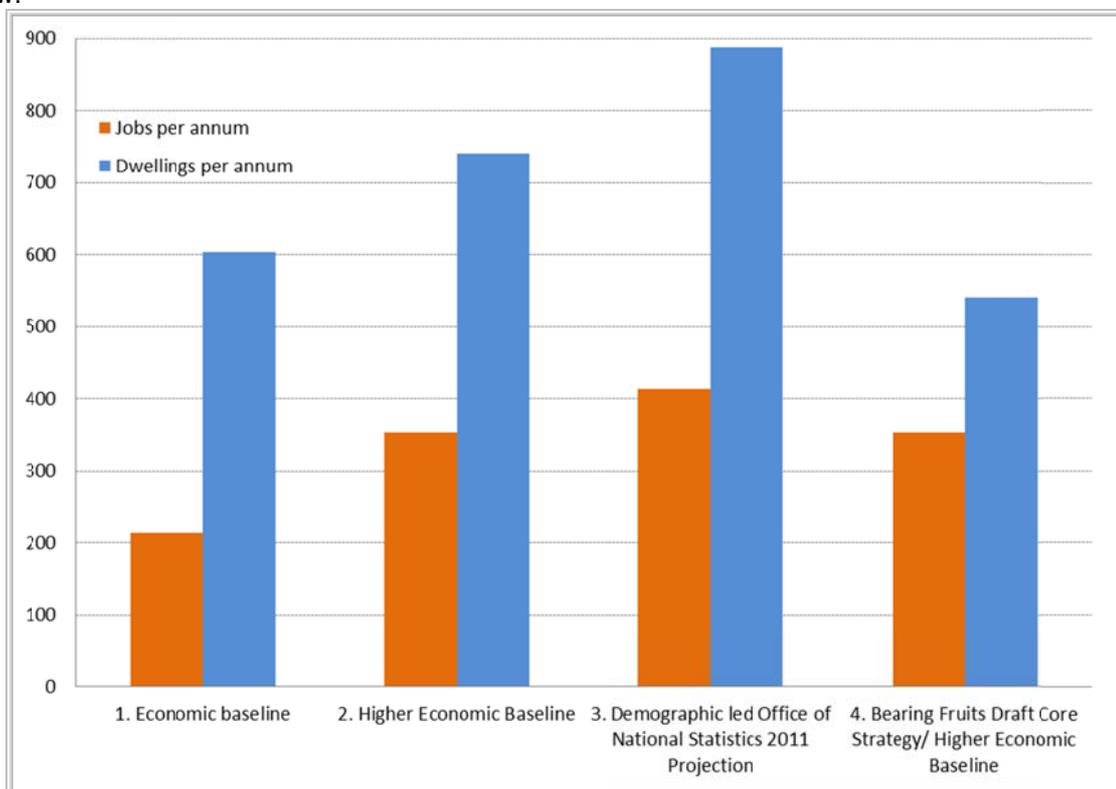
consultation on this early version of the plan and the interim appraisal work an additional distribution was developed and presented at Stage 2. The distribution presented at Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012) (Option 5) is the Council's preferred approach for the broad spatial distribution of development in the current version of the plan. This locates development, in broad terms, at the following locations, descending in scale and type:

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

Levels of growth are weighted toward Sittingbourne and the Isle of Sheppey reflecting their position within the Government's Thames Gateway growth area. Priority is also given to the use of brownfield land (previously used/developed). The availability of brownfield land is however insufficient to meet all future development needs. Urban and village extensions are therefore needed to maintain a supply of land for housing and jobs. The selection of this approach is broadly in line with interim appraisal findings.

- **The amount of growth, i.e. the number of new homes / jobs that should be supported over the plan period –**

The NPPF requires all Local Planning Authorities to prepare Local Plans which meet the needs for both business and housing in their area. As the NPPF was published after the Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012) the Council has reviewed the amount of growth to deliver local business and housing needs and this has undergone an objective assessment. This is set out in the Council's Strategic Housing Market Assessment (SHMA) Update and Development Needs Assessment (Nathaniel Litchfield and Partners 2013). Four different options for the amount of growth were considered by the Council in determining their preferred approach. These were as illustrated below:



The Council selected Options 1-3 as potentially those options providing for objectively assessed demographic and economic need. The Council considered that these encompassed the range of scenarios presented in the SHMA Update and Development Needs Assessment. Following this the Council also considered, as a 'reasonable alternative', continuing with the previously consulted on housing target of 540 dwellings per annum but with a job growth target of 353 jobs per annum in line with the higher economic baseline scenario option shown above. This was selected based on recent trends reflecting current economic difficulties and the deliverability of housing and jobs.

The Council's preferred approach is Option 4 which delivers 540 dwellings and 353 jobs per annum which is 10,800 dwellings and 7,053 jobs over the plan period. This approach is broadly in accordance with the interim appraisal findings with respect to achieving the environmental related SA objectives (e.g air, biodiversity, climate, soil, landscape), however it does not perform as well as other options in terms of meeting economic (i.e local economy, employment and skills) and housing related (i.e housing, population) SA objectives. This is because it is not based on the objectively assessed needs of the future population or the number of houses potentially needed to support the labour supply for the economic growth proposed.

- **The choice of allocating Employment land at Faversham**

As part of the Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012) the Council consulted on a number of options to deliver new employment land at Faversham. Over recent years some employment land identified by the Swale Borough Local Plan 2008 has not come forward and whilst the Council's Employment Land Review (2010) found that the majority of these sites continue to be suitable for employment purposes, it was recommended that a new, relatively small scale industrial site(s), be identified to provide for 20,000 square metres of business, industry, warehousing and office floorspace ('B' class uses) at Faversham. At present, the Council's evidence suggests there are insufficient available and suitable sites within the urban area to provide the quality of site needed in a location with good access to the main transport network. This has led to the Council considering an edge of town site.

To determine possible locations the Council considered landscape evidence of areas around the town to determine an area of search. The Council sought submissions from landowners within the identified area of search as part of the preparation of its Employment Land Review (2010) and Strategic Housing Land Availability Assessment 2010/11. This led to three 'short listed' locations which were consulted upon as part of the Stage 2: Bearing Fruits Draft Core Strategy 2012. These were:

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

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

The Council's preferred choice for allocating employment land at Faversham is Option D- Oare Gravel workings site with Option C allocated as a reserve site should Option D not come forward. This is partially in line with the interim appraisal findings which found that when compared to all the other options, Option C was the least constrained by sensitive environmental features. Option D would have

positive effects with regards to avoiding the loss of high grade agricultural land and remediating contaminated land, although there are number of potentially negative effects on the environment which would need to be addressed through mitigation. As part of the redevelopment of Option D there would however be opportunities to enhance on-site biodiversity and heritage assets.

- **The approach to making provision for Gypsy and Traveller accommodation**

Swale Borough has one of the largest Gypsy and Traveller populations within Kent and the South East of England. In recognition of this, making sufficient provision for Gypsies and Travellers in a fair fashion for all is a key objective of Council. At Stage 2: Bearing Fruits: Swale Borough Draft Core Strategy (March 2012) three options for the number of pitches to be provided for the Gypsy and Traveller population were presented for consultation ranging between 11 and 82 pitches to be provided between 2013-2031. These were based upon need/demand and capacity/opportunity drawing upon evidence prepared for the South East Plan. Since Stage 2, the Council has commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) for the Borough which identifies an objectively assessed need for 85 pitches to be provided for the Gypsy and Traveller population between 2013 and 2031. This is reduced to 82 given pitch completions up to the 1st April 2013

To help meet the Borough's need for new pitches, identified by the GTAA, the Council has also considered the following policy approaches to deliver this number of pitches:

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

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

In terms of the policy approaches considered to deliver these pitches, the Council's preferred approach is Option 1 which would require 1% of the total number of dwellings proposed for each Local Plan housing allocation and windfall sites above 149 dwellings or above to be provided as Gypsy and Traveller serviced pitches (capped at a maximum of 10 pitches per site) and 1 pitch to be provided for each Local Plan housing allocation and windfall sites of 50-149 dwellings. The Council has also included as part its preferred Policy DM10 that a sum of money can be agreed with the Council as an alternative if it can be clearly demonstrated the site would not be suitable for the Gypsy and Traveller community. The policy also states that if it is necessary to demonstrate there is a 5 year supply of pitches then the Council will allocate and grant permission for sites subject to specific criteria. This preferred approach is broadly in line with the interim appraisal findings.

- **The approach to determining Affordable housing targets**

Evidence suggests that there is a considerable need for affordable housing in the Borough, as highlighted by the scale of the housing waiting list. The Council has therefore considered a number of ways in which to set the target for affordable housing. The Council identified the following options considering evidence presented in the East Kent Strategic Housing Market Assessment (EKSHMA) 2009 for setting an affordable housing target It should be noted that these are to be subject to testing with regards to their viability:

1. Number of affordable housing units to be determined in accordance with the affordable housing target of 30%

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

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

Other alternatives were considered for policy approaches and these findings are discussed in previous interim appraisal reports, which were published alongside the consultation documents at Stages 1 and 2. These are available online - <http://www.swale.gov.uk/sustainability-appraisal/> Appraisal recommendations made at Stage 2 consultation and how these have been addressed by the current version of the plan are also provided in Appendix VII of the SA Report.

### WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

At this current stage the Swale Borough Local Plan Part 1: Bearing Fruits 20131 Consultation Draft (August 2013) has been appraised and recommendations made. Detailed appraisal findings are presented in the SA Report Part 3. This is structured according to the sustainability 'topics' and 'objectives' identified through scoping (see discussion of scoping above). The following sets out a summary conclusion of the appraisal and the recommendations proposed.

Growth planned in Swale between 2011-2031, as set out in Policy ST2 and ST4 of the draft Local Plan, will lead to an increase in the population of Swale. This in turn may have negative implications for the achievement of SA 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.

However, the preferred spatial distribution for accommodating new development should help to ensure that negative effects are avoided or minimised. Locating significant development both for housing and jobs 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 nature sites of European importance, Kent's valued landscape (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 high grade agricultural soil in the Borough there will be a loss of this soil resource, however development on previously developed land remains a priority. Land not in agricultural use or well contained by existing development in the Borough's settlements are preferred locations.

Whilst the preferred amount of jobs and housing which is to be planned for (Policies ST2 and ST4) does not give rise to major concerns in terms of impacts on the Borough's environment (given its broad distribution, and the other policies in the plan which aim to protect the environment) 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. This is because it is not based on the needs of the future population or the number of houses potentially needed to support the labour supply for the economic growth proposed. Given that the housing growth proposed is not based on objectively assessed need this would also potentially limit the achievement of economic SA objectives.

The appraisal has found that the other policies set out within the plan ('core policies' and 'development management policies') are broadly positive in terms of achieving sustainability objectives.

The achievement of environmental objectives (i.e. biodiversity, landscape, water) 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 (i.e. cultural heritage, transport, soil).

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 (i.e. local economy, employment and skills).

The policies in the plan are also likely to support social objectives (i.e. health, housing, population) through the provision of green spaces, health and social facilities, 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 moderated by the need to ensure that development is not made unviable. Several appraisal recommendations remain outstanding at this current time. These include:

Recommendation	To ensure performance of the plan is maximised in terms of ....
<p>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.</p>	<p><b>Air quality</b> : To reduce air pollution and ensure air quality continues to improve across the Borough</p>
<p>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.</p>	<p><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</p>
<p>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</p>	<p><b>Population:</b> To reduce poverty and social exclusion</p>
<p>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.</p>	<p><b>Waste:</b> To achieve the sustainable management of waste</p>

Recommendation	To ensure performance of the plan is maximised in terms of ....
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.

## WHAT HAPPENS NEXT?

Following this period of current 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.

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.

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 the effects of the implementation of the plan.

Part 4 of the SA report sets out suggested monitoring measures grouped under the sustainability appraisal topics and objectives. A selection are presented below:

Sustainability topic	Suggested monitoring indicators
<b>Air</b>	<ul style="list-style-type: none"> <li>• New designations of Air Quality Management Areas (AQMA);</li> </ul>
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>• Amount of new habitat created by new development</li> </ul>
<b>Climate change</b>	<ul style="list-style-type: none"> <li>• Per capita fossil fuel consumption, and emissions of greenhouse gases</li> </ul>
<b>Crime and Safety</b>	<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> </ul>
<b>Cultural Heritage</b>	<ul style="list-style-type: none"> <li>• Number of buildings on the national and local lists of heritage buildings at risk</li> </ul>
<b>Employment and Skills</b>	<ul style="list-style-type: none"> <li>• Annual average wage</li> </ul>
<b>Health</b>	<ul style="list-style-type: none"> <li>• Access to a GP</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>• Identified affordable housing need, completions and shortfall in delivery</li> </ul>
<b>Landscape</b>	<ul style="list-style-type: none"> <li>• Changes in landscape character area conditions</li> </ul>
<b>Local Economy</b>	<ul style="list-style-type: none"> <li>• Business start-ups and closures</li> </ul>
<b>Population</b>	<ul style="list-style-type: none"> <li>• % of a) children and; b) population over 60 that live in households that are income</li> </ul>

Sustainability topic	Suggested monitoring indicators
	deprived
<b>Soil</b>	<ul style="list-style-type: none"> <li>• Amount of development on Previously Developed Land</li> </ul>
<b>Transport and Accessibility</b>	<ul style="list-style-type: none"> <li>• Distance travelled to work and average commute time</li> </ul>
<b>Waste</b>	<ul style="list-style-type: none"> <li>• Recycling and composting rates; and Recycling facilities</li> </ul>
<b>Water</b>	<ul style="list-style-type: none"> <li>• Dwellings at risk of flooding and consents contrary to Environment Agency advice on flooding</li> </ul>