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AGENDA

LOCAL PLAN PANEL MEETING

Date: Thursday, 14 March 2019
Time: 7.00 pm
Venue: Council Chamber, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Membership:

Councillors Mike Baldock, Monique Bonney, Andy Booth, Richard Darby, James Hunt, Gerry Lewin (Chairman), Peter Marchington, Bryan Mulhern (Vice-Chairman) and David Simmons.

Quorum = 3

Pages

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It is important that the Chairman is informed of any person attending who is disabled or unable to use the stairs, so that suitable arrangements may be made in the event of an emergency.

2. Apologies for Absence and Confirmation of Substitutes

3. Minutes

To approve the Minutes of the Meeting held on 29 November 2018 (Minute Nos. 369 - 373) as a correct record.

4. Declarations of Interest

Councillors should not act or take decisions in order to gain financial or other material benefits for themselves or their spouse, civil partner or person with whom they are living with as a spouse or civil partner. They must declare and resolve any interests and relationships.

The Chairman will ask Members if they have any interests to declare in respect of items on this agenda, under the following headings:

(a) Disclosable Pecuniary Interests (DPI) under the Localism Act 2011. The nature as well as the existence of any such interest must be declared. After declaring a DPI, the Member must leave the meeting and not take part in the discussion or vote. This applies even if there is provision for public speaking.

(b) Disclosable Non Pecuniary (DNPI) under the Code of Conduct adopted by the Council in May 2012. The nature as well as the existence of any such interest must be declared. After declaring a DNPI interest, the Member may stay, speak and vote on the matter.

(c) Where it is possible that a fair-minded and informed observer, having considered the facts would conclude that there was a real possibility that the Member might be predetermined or biased the Member should declare their predetermination or bias and then leave the room while that item is considered.

Advice to Members: If any Councillor has any doubt about the existence or nature of any DPI or DNPI which he/she may have in any item on this agenda, he/she should seek advice from the Monitoring Officer, the Head of Legal or from other Solicitors in Legal Services as early as possible, and in advance of the Meeting.

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Issued on: Monday, 4 March 2019

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Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Local Plan Panel Meeting	
Meeting Date	14 March 2019
Report Title	Retail and Leisure Needs Assessment
Cabinet Member	Cllr Gerry Lewin, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Gill Harris
Key Decision	Yes
Classification	**Open**
Recommendations	1. That the Panel note the content of the Retail and Leisure Needs Assessment Study as part of the Local Plan Review evidence base to be used in shaping the planning strategies for the Borough's town centres and town centre policies. 2. Recommend to Cabinet to adopt, as a material consideration, a local threshold of 500 sq. m. for retail/leisure floorspace proposals outside of designated centres to require an impact assessment of the proposal as set out in paragraph 89 of the NPPF

1 Purpose of Report and Executive Summary

1.1 The key purpose of the Retail and Leisure Needs Assessment is to provide the evidence base to assist in the formulation of future development plan policy as well as to provide baseline information to assist in the determination of planning applications for retail and leisure development. It supersedes the previous 2010 Retail and Town Centre Study.

1.2 The evidence sets out what the specific retail and leisure development needs are for the new plan period and provides information that facilitates an informed discussion on potential options within the remit of national planning policy as set out in the NPPF and national planning policy guidance. The full report is contained in appendix I of this paper.

1.3 In summary, the Retail and Leisure Needs Assessment concludes the following:

- Sittingbourne town centre could accommodate up to 1,900 sq. m. of additional convenience floorspace and between 12,300 and 22,600 sq. m. of additional comparison floorspace for the period to 2037/38
- Faversham town centre has no capacity for additional convenience floorspace and for comparison floorspace, capacity for between 2,700 and 4,700 sq. m. for the same period

- Sheerness town centre could accommodate up to 1,200 sq. m. of additional convenience floorspace and between 4,500 and 7,900 sq. m. of additional comparison floorspace for the period to 2037/38.
- The 'health' (vitality and viability) of the Borough's town centres is good with vacancy rates largely in line with national trends and a good range of shops and services
- Commercial leisure needs for the period to 2037/38 are met (or are being met by developments in the pipeline) but there is capacity for between seven and nine new gyms in the Borough.
- The Local Plan Review should consider a revised retail hierarchy that excludes Rushenden as it no longer functions as a local centre, having only one small newsagent
- Revisions to the town centre boundaries and primary shopping areas are proposed to better reflect the range and type of uses and activities taking place in these areas and to align with national policy
- That a local impact threshold for assessing retail proposals on the edge of town centres or out of centre should be adopted as 500 sq. m. (compared to the national threshold of 2,500 sq. m. set out in the NPPF).

2 Background

2.1 Consultants WYG Planning were appointed in August 2018 to undertake the Retail and Leisure Needs Assessment. The Assessment uses an industry standard methodology regarded as best practice, to assess the needs for additional retail and commercial leisure for the local plan review period. In addition, 'health check' assessments were undertaken for Sittingbourne, Faversham and Sheerness town centres.

2.2 The current retail hierarchy that is set out in Bearing Fruits Policy DM2 has been reviewed as have the town centre boundaries and primary shopping areas. In July 2018, the government published its revised NPPF and there is now only the requirement to identify a *primary shopping area* within the town centre. The *primary shopping area* is explained in the NPPF glossary as the "defined area where retail development is concentrated". The report, therefore only identifies the town centre boundary and the primary shopping area.

2.3 A shopping survey was undertaken to ascertain local shopping habits and patterns. This was done using telephone surveys across 6 zones in the Borough based on postcode areas. The telephone survey gathers information on where respondents shop for various specific items, how often and how much they spend. They were asked why they shop in these locations and what might encourage them to spend more time there (in Swale).

Retail floorspace needs

2.4 The results of the telephone household survey and ONS household growth projection data is used to extrapolate growth in expenditure. This information is combined with other data (such as spending retention rates, influence of internet shopping, general shopping habits and patterns and store trading ratios) and converted to a floorspace need figure for each of the town centres as below for the period up to 2037/38 with a based date of 2018/19.

Settlement	**Convenience (sq. m.)**	**Comparison (sq. m.)**
Sittingbourne	1,900	12,300 – 22,600
Faversham	NIL	2,700 – 4,700
Sheerness	1,200	4,500 – 7,900

2.5 ‘Convenience’ goods include food and other items that are easily purchased such as newspapers. The convenience goods capacity in Sittingbourne and Sheerness is modest in the medium term (10 years) with capacity in the longer term potentially able to support a medium sized foodstore or be met by an extension to existing facilities in the towns. Faversham on the other hand does not have any additional convenience floorspace capacity on the basis that existing provision is high for a town of its size and includes a broad range of retailers including multi nationals and independents.

2.6 ‘Comparison’ goods are those items that are purchased less frequently and in a more planned way such as clothing, footwear and furniture. The majority of the comparison goods floorspace capacity is in Sittingbourne with modest capacity for Faversham and Sheerness.

2.7 The NPPF sets out the expectation that local plans should allocate sites for retail and leisure uses if such needs are identified. For the Local Plan Review, this means that the Council will need to aim to allocate a range of suitable sites in the town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. If there are no sites in the town centre, appropriate edge of centre sites that are well connected to the town centre could be identified and if there are none, planning policies will need to explain how these identified needs can be met in other accessible locations that are well connected to the town centre. Potential sites and policy options will be explored and presented at the Issues and Option stage.

Commercial leisure needs

2.8 The Assessment concludes that there is need for between 7 and 9 gyms in the Borough and that there is no need for any additional leisure facilities (specifically ten pin bowling, bingo or cinema provision). Any capacity for cinema provision is already addressed as a result of the Spirit of Sittingbourne development that includes a new eight screen cinema.

Town centre health checks

2.9 The heath check assessments for each of the three town centres are based on indicators published in the government’s national planning practice guidance that accompanies the NPPF. Appendix B of the Assessment contains the detail of the methodology but to summarise, the checks include an assessment of range of uses and retailer representations, vacancy rates, assessment of environmental quality and an assessment of accessibility by a range of transportation modes, provision of car parking facilities and customer views/perceptions as collected from the household survey. Sittingbourne, Faversham and Sheerness town centres are performing well and display good levels of vitality and viability.

Sittingbourne town centre

2.10 Sittingbourne town centre is the largest town centre in the Borough with approximately 59,000 sq. m. of retail floorspace (260 commercial units). It has a range of both national multiple retailers (28%) and independent shops (56%) and retail services, hairdressers, tattoo parlours, beauticians etc. (20%). The vacancy rate for Sittingbourne (12%) is comparable with the UK average of 11%. With the Spirit of Sittingbourne well underway, the town will soon have a new complex of restaurants and a cinema to add to the town's offer. The Assessment report concludes that the vitality and viability of the town is good and suggests some minor tweaks to the town centre boundary to more accurately reflect the character of the town and the nature of the uses and to include full building footprints.

2.11 The Assessment report proposes that the primary shopping area is amended to include the development associated with the 'Spirit of Sittingbourne' development to the north towards the train station. The recommended boundaries are shown in appendix J of the Assessment report appended to this report in Appendix I.

2.12 The Assessment report also identifies a reasonably large level of expenditure leakage from Sittingbourne which, given the strength and provision in competing centres and the current challenging economic climate for retailers is unsurprising. The Assessment report recommends that the Council should plan to improve Sittingbourne town centre's comparison goods market share by way of further qualitative improvements to the town centre including, among other things, improvements to the existing retail stock and encouraging a wider range and mix of uses as well as town centre environmental improvements.

Faversham town centre

2.13 Faversham town centre has approximately 189 commercial units (35,810 sq. m. floorspace). It also has a range of both national multiple retailers and independent shops and services. The proportion of retail services is slightly above the UK average (17% compared with 15%). A relatively small number of units in Faversham are above 500 sq. m. and this is a likely explanation for the limited number of national multiple retailers in the town. The restaurant, take away and café sector is particularly strong with 22% of units providing this offer. The overall vacancy rate is well below the national average of 11% at 8%.

2.14 As is the case with Sittingbourne, there is significant expenditure leakage from Faversham, unsurprising given its proximity to and strength of offer at Canterbury, Ashford and Bluewater.

2.15 The Assessment report recommends the town centre boundary is extended to the west to include the Morrison's store and curtailed to the south to remove the railway station car park and residential properties to the south of Stone Street. It is also recommended that the boundary is curtailed to the east to exclude the residential properties off Church Road. It is proposed that the primary shopping area is amended to include full building footprints resulting in very minor changes. These recommendations are set out in appendix J of the Assessment report appended to this report in Appendix I.

Sheerness town centre

2.16 Sheerness town centre has some 225 retail and leisure units accommodating 41,600 sq. m. of floorspace. Whilst the range of convenience goods provision in the town is considered good, the provision of comparison goods is somewhat weaker, albeit reasonable for its size and catchment and providing a good number of independent retailers. Of the units offering comparison goods, 77% are independent retailers. There is a higher proportion of retail service units in Sheerness (19%) compared with the national average (15%). The vacancy rate is below the national average at 10% (compared with 11%) and the centre is generally considered to be safe although it would benefit from an improved range of comparison goods retailing and improved environmental quality.

2.17 The Assessment report recommends the town centre boundary is curtailed to the east to exclude residential properties to the north of Broadway and land to the rear of Sheerness swimming Pool. The primary shopping area should be extended slightly to the east to Trinity Road. These recommendations are set out in appendix J of the Assessment report appended to this report in Appendix I.

Recommendations in respect of the Council’s future retail and commercial leisure strategy

2.18 Town centre strategies in the borough council area need to be able to support the continued development/change in the ‘high street’ if they are to successfully compete. The NPPF is clear that planning policies and decisions should support the role that town centres play at the heart of local communities and that a positive approach should be taken with regards their growth, management and adaptation. The Assessment report makes a number of specific recommendations for each of the town centres (see pages 106 and 107 of the Assessment report).

2.19 These recommendations could be taken into consideration, with other evidence, to form the policy framework to deliver identified needs and wider objectives for the town centres that would then be subject to consultation at the Issues and Options stage later in the year.

Retail Hierarchy

2.20 The adopted local plan, Bearing Fruits sets out the retail hierarchy for the Borough in Policy DM2. Planning policies are required under the NPPF to define a network and hierarchy of centres and this was assessed as part of the work undertaken. Each of the 11 local centres has been assessed for their vitality and viability and their function as set out in appendix f of the Assessment report. This includes a look at the mix of shops and services available, vacancy rates, environmental quality and role of centre. The purpose of the local centres is to meet the day to day shopping/service needs of their local communities.

2.21 With the exception of Rushenden, the local centres in the Borough perform well and continue to serve a complementary role to the three town centres in the Borough. The evidence report concludes that the retail hierarchy for the local plan review should exclude Rushenden as it consists of one shop and does not function as a local centre. The remaining ten local centres are considered to perform their function well.

Retail Parks

2.22 Conspicuous by its absence is any reference to out-of-centre retail parks such as Sittingbourne Retail Park and Neatscourt Retail Park. In planning policy terms, out of centre retail parks are not regarded as ‘centres’ and should not be included in the retail hierarchy. They have a wider catchment, offer a specific shopping experience with no (or limited) services. However, the Council will continue to monitor the retail parks and all the centres in the hierarchy on an annual basis so that any concerns, issues or opportunities can be addressed. This will be reported in the Authority Monitoring Report (AMR) published on an annual basis.

Local Impact Threshold

2.23 When assessing applications for retail and leisure development outside town centres, local planning authorities can require an impact assessment if the development is over the 2,500 sq. m. threshold set out in the NPPF (paragraph 89) or a locally set floorspace threshold.

2.24 Following the assessment undertaken and having regard to the current health of the town centres, their performance, unit and floorspace composition, increasing competition from the internet and availability of units in the prime shopping area capable of meeting potential national multiple occupiers in each of the centres, it is recommended that the Council adopts a local impact threshold of 500 sq. m. This could be incorporated into policy in the local plan review and in the interim; the Council could resolve to adopt this approach as a material consideration for development management purposes.

2.25 This would provide the Council with sufficient flexibility to assess the merits and potential impact implications of edge and out-of-centre retail and leisure applications. The threshold should not only apply to new floorspace, but also to changes of use and variations of conditions to remove or amend restrictions on how units operate in practice.

2.26 It is important to note that whilst a locally set threshold would require the submission of an impact assessment of developments exceeding the threshold, national guidance requires that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed, the level of detail needed to be agreed during the pre-application process to avoid onerous requirements that may otherwise restrict and delay development opportunities coming forward.

3 Proposals

3.1 The proposals are that Members agree the Assessment report as the evidence base for the local plan review and endorse its content as the starting point for investigating and developing policy options for town centre, retail and leisure that will facilitate the delivery of the additional floorspace needs identified.

3.2 Formal consultation on the local plan review is programmed to take place in the autumn. In advance of that, Members will be required to provide a steer on the Issues and Options in the early summer. At this meeting of the Panel, Members will be presented with the options for town centres, retail and leisure that could be rolled forward for consultation. This would include proposals for a revised retail hierarchy and town centre and primary shopping area boundaries as well as potential development sites (if they can be identified).

3.3 Although the town centres are currently enjoying good ‘health’, with the uncertainty around the impacts of internet shopping, retail trends and other challenges, the evidence recommends a local impact threshold of 500 sq. m. is adopted by the Council. This could be incorporated into local plan policy (subject to consultation) but in the interim, if minded to, Members could recommend that this local threshold is adopted by Council at the earliest opportunity as a material consideration for development management purposes.

3.4 NPPF requires local plans to make sufficient provision for the development needs of their areas. With this in mind, the evidence should be used to inform the local plan review to allocate land for retail development as appropriate. Should there not be adequate sites, other options will need to be considered such as a more flexible policy approach and/or a criteria based policy for new retail and leisure development.

3.5 In order to progress options for further consideration, the recommendations of this report are:

1. That the Panel note the content of the Retail and Leisure Needs Assessment Study as part of the Local Plan Review evidence base to be used in shaping the planning strategies for the Borough’s town centres and town centre policies; and
2. Recommend to Cabinet to adopt, as a material consideration, a local threshold of 500 sq. m. for retail/leisure floorspace proposals outside of designated centres to require an impact assessment of the proposals as set out in paragraph 89 of the NPPF.

4 Alternative Options

4.1 It is essential that the local plan review is prepared to comply with the NPPF. This means the local plan review should seek to meet the authority area's development needs in a way that enables the delivery of sustainable development in accordance with the policies in the NPPF. The recommendations set out above would enable the Council to explore options that would then be subject to public consultation as part of the local plan review that will be presented to Members in the summer.

4.2 On the issue of a local impact threshold, Member could choose not to adopt this as a material consideration for development management purposes.

5 Consultation Undertaken or Proposed

5.1 The Retail and Leisure Needs Assessment is evidence and as such there is no requirement to consult on this document. This evidence informs the local plan review and feeds in to the document that will be consulted upon in due course for the Regulation 18 stage of the local plan review.

6 Implications

Issue	Implications
Corporate Plan	Supports the Council's corporate priorities for delivering regeneration and delivering improved quality of life.
Financial, Resource and Property	The Assessment has been carried out within the existing Local Plan budget.
Legal, Statutory and Procurement	This Assessment has been carried out to assist the Council in identifying its development needs in accordance with national policy.
Crime and Disorder	None anticipated at this time
Environment and Sustainability	The Local Plan process is subject to Sustainability Appraisal
Health and Wellbeing	None anticipated at this time
Risk Management and Health and Safety	None anticipated at this time
Equality and Diversity	The Local Plan process is subject to a Community Impact Assessment at the appropriate points.
Privacy and Data Protection	None anticipated at this time

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Swale Retail and Leisure Needs Assessment

8 Background Papers

None

Swale Borough Council

Retail and Leisure Needs Assessment

December 2018

Volume 1 of 2 – Main Report

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Contents

Appendices

1.0 Introduction

1.1 Instruction

1.1.1 WYG Planning ('WYG') was commissioned by Swale Borough Council (SBC) in August 2018 to undertake a Retail and Leisure Needs Assessment for the Council area. The key purpose of this study is to act as the evidence base to assist in the formulation of future development plan policy, as well as providing baseline information to assist in the determination of planning applications for retail and leisure development. The Study supersedes the previous 2010 Retail and Town Centre Study completed on behalf of the Council.

1.1.2 This Study will be used to inform the emerging Local Plan for the authority. The Council is currently embarking upon the production of a Local Plan review covering the period 2022-2038. The new Local Plan is expected to be adopted during 2022/23 and will identify how land is used, determining what will be built where. Initial consultation on the plan was undertaken between April and June 2018, Issues and Options consultation is proposed to take place in autumn 2019.

1.1.3 The study explores retail and commercial leisure need over the plan period to 2038 and provides an up to date review of the performance of the town centres in the Borough. The aims and objectives for the Study include the following:

- Update the quantitative numbers to establish retail shopping patterns and identify if there are quantitative retail and leisure needs;
- Undertake health check assessments of the three town centres (Sittingbourne, Sheerness and Faversham) providing appropriate recommendations on issues affecting the health of the centres;
- Undertake health check assessments of the 11 identified local centres and provide appropriate recommendations as relevant on issues affecting the health of the centres;
- Provide recommendations on the town centre boundaries and extent of the primary and secondary shopping frontages presently identified;
- A review of the relevant evidence and provide recommendations regarding retail impact assessment threshold/s;
- Advise of any qualitative needs for the identified town centres arising from the health check assessments.

1.1.4 Key contributions to the above objectives have been a number of items of new empirical research. First, we have commissioned NEMS Market Research to undertake a new a shopping survey of 600 households. The Study Area for the survey comprises 6 zones which follows the previous zones utilised in the 2010 study and are based on postcode areas.

1.1.5 The second area of empirical research has been in relation to the assessment of the health of the 3 town centres and the 11 local centres within the Borough. This exercise has incorporated land use surveys of these defined centres, along with a review of health check indicators and an appraisal of the qualitative results of the household survey data.

1.1.6 The Study is also informed by industry research having regard to published recognised retail and leisure data including demand/requirements from retail and leisure operators for presence in the defined town centres.

1.1.7 Finally, in accordance with the duty to cooperate, WYG has also worked with the Council to contact neighbouring local planning authorities in order to identify existing retail and commercial leisure commitments and proposals within competing centres which could have the effect of enhancing their retail and commercial leisure offer. The Councils we have contacted are:

- Canterbury City Council;
- Maidstone Borough Council;
- Ashford Borough Council;
- Medway Council; and
- Dartford Borough Council.

1.2 Structure of Study

1.2.1 Our study is structured as follows:

- Section 2 outlines the current national and local planning policy context for retail and leisure development issues in the Borough;
- Section 3 provides a context for the Study by outlining the current and emerging key retail and leisure trends in the UK;
- Section 4 sets out the key market research which informs the Study;
- Section 5 analyses retail market shares and patterns in the Study Area;
- Section 6 sets out our qualitative assessment/overview of the vitality and viability of Sittingbourne Town Centre;
- Section 7 sets out our qualitative assessment/overview of the vitality and viability of Faversham Town Centre;
- Section 8 sets out our qualitative assessment/overview of the vitality and viability of Sheerness Town Centre;

- Section 9 sets out our qualitative assessment/overview of the vitality and viability of Local Centres;
- Section 10 provides our assessment of the need for further convenience and comparison goods floorspace over the assessment period;
- Section 11 sets out our assessment of the need for further leisure floorspace over the assessment period; and
- Section 12 summarises our key findings and sets out our recommendations.

2.0 Planning Policy Context

2.1 Introduction

2.1.1 Given that this Study seeks to provide evidence to assist in the production of the Council's new Local Plan, it is important to review existing national planning policy of pertinence to retail, leisure and town centre matters to explore the context for the Study and how it may impact upon the production of future development plan policy. We also summarise Swale Borough Council's adopted planning policies, insofar as they are relevant to retail, commercial leisure and town centre matters.

2.2 National Planning Policy Framework (NPPF)

2.2.1 The revised National Planning Policy Framework (NPPF) was published in July 2018. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.

2.2.2 The main theme of the NPPF is that there should be 'a presumption in favour of sustainable development'. The economic objective seeks to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places at the right time to support growth. In terms of plan-making, it is stated that the planning system should be genuinely plan led and local planning authorities should positively seek opportunities to meet the development needs of their area, with an emphasis on Local Plans having sufficient flexibility to adapt to rapid change.

2.2.3 In terms of economic development, section 6 of the NPPF identifies that planning policies should create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity. Planning policies and decisions should recognise and address specific locational requirements of different sectors.

2.2.4 The NPPF stresses planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

2.2.5 The NPPF recognises the need to ensure the vitality and viability of towns and cities and support the role that they play at the heart of local communities by taking a positive approach to their growth, management and adaption. Paragraph 85 of the NPPF indicates that planning policies should:

- define a network and hierarchy of centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

- define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
- where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

2.2.6 Paragraph 86 requires local planning authorities to adopt a sequential approach to the consideration of planning applications for main town centre uses that are not in an existing centre or in accordance with an up-to-date Local Plan. The following paragraph 88 indicates that that the sequential approach should not apply to applications for small scale rural offices or other small scale rural development.

2.2.7 Paragraph 89 indicates that local planning authorities should require an impact assessment for retail and leisure development outside of town centres which are not in accordance with an up-to-date Local Plan and if the development is over a proportionate, locally set threshold. Where there is no locally defined threshold, the default threshold will be 2,500sq m.

2.2.8 Paragraph 90 indicates that where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on the vitality and viability of a town centre or on existing, planned, committed investment in a centre it should be refused.

2.2.9 The NPPF also recognises that retail and leisure activity should still, where possible, be focused in existing town centres. Retail and leisure proposals which cannot be accommodated in or adjacent to the town centre will have to satisfy a dual impact test and the sequential test.

2.3 Ensuring the Vitality of Town Centres Planning Practice Guidance

2.3.1 Ensuring the Vitality of Town Centres National Planning Practice Guidance was published in March 2014 and replaces the previous Planning for Town Centres Practice Guidance. It provides a more concise summation of how retail and main town centre planning policy is to be applied in practice. However, the objectives of the Practice Guidance remain comparable with those of its predecessor, with there being a stated requirement for local planning authorities to plan positively and support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive and diverse places for people to want to live, visit and work.

2.3.2 The Practice Guidance requires local planning authorities to fully assess and plan to meet needs for main town centre uses through the adoption of a 'town centre first' approach. Paragraphs 002 and 003 confirm that this should be delivered through a positive vision or strategy which is communicated through the development plan. The strategy should be facilitated through active engagement with the private sector and other interested organisations (including Portas Pilot organisations, Town Teams and so on). Any strategy should be based on evidence which clarifies the current state of town centres and opportunities to meet development needs and support centres' vitality and viability.

2.3.3 Such strategies should seek to address the following matters:

- the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period, including an audit of the vitality and viability of existing town centres and their ability to accommodate new development;
- consideration of the vision for the future of each town centre and the most appropriate mix of uses to enhance overall vitality and viability;
- the evaluation of the town centre to assess whether it can accommodate the scale of assessed need, and if it cannot, evaluating different policy options to help accommodate the need;
- the timeframe for new retail floorspace to be delivered;
- what other complementary strategies are necessary or appropriate to enhance the town centre to deliver the vision in the future; and
- the consideration of how car parking provision be enhanced and both parking charges and enforcement be made proportionate, in order to encourage town centre vitality.

2.3.4 Paragraph 005 of the Practice Guidance identifies a series of key indicators which are of relevance in assessing the health of a centre over time. Paragraph 005 goes on to state that not all successful town centre regeneration initiatives have been retail led or focused on substantial new development, but have instead involved improvements such as renewed public realm, parking, and accessibility and other partnership mechanisms.

2.3.5 Paragraph 007 identifies the importance of planning for tourism as an important component of any overall vision and indicates that local planning authorities should consider specific tourism needs (including locational or operational requirements) and opportunities for tourism to support local services, vibrancy and the built environment.

2.3.6 Paragraph 009 reaffirms the town centre first policy in the form of the sequential test, which requires local planning authorities to undertake an assessment of candidate sites' availability, suitability and viability when preparing their Local Plan. Such an assessment should also consider the scale of future needs and the type of land needed to accommodate main town centre uses.

2.3.7 The Ministry for Housing, Communities and Local Government (MHCLG) has confirmed to WYG that the planning practice guidance pertaining to town centre use planning policy will be updated to take account of the revised NPPF in due course, with no firm timescales at present.

2.4 Local Planning Policy Context and Other Council Strategies

2.4.1 The relevant development plan for the Council area consists of the following:

- The Swale Local Plan (Bearing Fruits 2031) – adopted July 2017
- Faversham Creek Neighbourhood Plan 2016-31 – adopted June 2017

Swale Borough Local Plan: Bearing Fruits 2031

Policy ST3: Swale Settlement Strategy

2.4.2 Policy ST3 identifies that development proposals on previously developed land within defined built up area boundaries and on allocated sites will be permitted in accordance with the settlement hierarchy. Sittingbourne is identified as the main urban centre in the Borough which will provide the primary urban focus for growth and development will support the town centre regeneration and underpin the town's role as the principal centre.

2.4.3 The other urban centres of Faversham and Sheerness will provide the secondary urban focus for growth at a scale and form compatible to their historic and natural assets and where it supports their role as local centres serving their hinterland.

2.4.4 Other urban local centres of Minster, Halfway, Queensborough and Rushenden are identified to be the focus of developments seeking to meet their own and wider needs. Rural Local Service Centres (Boughton, Eastchurch, Iwade, Leysdown, Newington, Teynham) will provide the tertiary focus for growth in the Borough and the primary focus for the rural area.

Policy ST5: Sittingbourne Area Strategy

2.4.5 Policy ST5 confirms the town is the principal urban centre and focus for main concentration of developments in and adjacent to the town. The policy supports development which: increases the supply of employment provision; ensures vitality of Sittingbourne Town Centre; improves connections to A249 and M2; and provides new housing alongside compliance with other policy objectives.

Policy ST6: Isle of Sheppey Area Strategy

2.4.6 Policy ST6 identifies that settlements within the West Sheppey Triangle are the focus of development and long-term change. Proposals will be expected to bring forward economic development, support the existing tourism offer, consolidate and enhance the retail service role of Sheerness Town Centre and bring forward comprehensive regeneration of the Trinity Road area, Queenborough/Rushden alongside other specific objectives.

Policy ST7: The Faversham Area and Kent Downs Strategy

2.4.7 Policy ST5 identifies that the conservation and enhancement of the historic and natural environment is the primary planning aim alongside strengthening the viability of Faversham and it's rural communities supporting their shared social, economic and cultural links.

Policy CP1: Building a strong, competitive economy

2.4.8 Development proposals are expected to stabilise job/floorspace losses, bring forward homegrown business creation, secure additional non-food retail/leisure growth, encourage educational facilities and vocational learning and contribute to the delivery of a comprehensive land portfolio for economic development.

Policy Regen 1: Central Sittingbourne Regeneration Area

2.4.9 Policy Regen 1 identifies a regeneration area for Sittingbourne where proposals which support the objective of consolidating and expanding Sittingbourne's position as the main retail, business, cultural, community and civic centre for the Borough will be permitted. The policy specifically refers to providing additional comparison goods retail space, a cinema, performance venue and a redeveloped and enhanced civic quarter.

2.4.10 The site is currently undergoing redevelopment by The Spirit of Sittingbourne. The mixed-use scheme, aiming for completion by early 2020, will deliver a new 8-screen multi-plex screen cinema, six new restaurant units, a 63 bed hotel, 213 residential apartments and a multi-storey car park.

Policy Regen 2: Queenborough and Rushden Regeneration Area

2.4.11 Within this area the Council will support proposal with the objective of regenerating the area for residential, employment and community uses. One of the identified objectives includes providing at Neatscourt, commercial floorspace unless this would adversely impact upon the vitality of Sheerness Town Centre.

Policy DM1: Maintaining and enhancing the vitality and viability of town centres and other areas

2.4.12 Within the defined primary shopping frontages, the Council will permit non-retail uses where they maintain or enhance the primary retail function of the area by adding to the mix of uses to help maintain or increase its overall vitality and viability, do not result in a significant loss of retail floorspace or break up a continuous retail frontage, do not lead to a concentration of non-retail frontage and do no result in the loss of erosion of a non-retail use that underpins the role, functioning and vitality and viability of the area.

2.4.13 Within the defined secondary shopping frontages, or within a local centre, non-retail uses will be permitted providing they will not lead to a significant concentration of non-retail floorspace or housing or the loss of significant retail frontage, result in the loss of existing residential accommodation of a use important to the community and lead to loss of residential amenity.

2.4.14 Outside of the primary and secondary shopping frontages or local centres, non-retail use will be permitted if it maintains the area's role, functioning, vitality and viability.

Policy DM2: Proposals for main town centre uses

2.4.15 The policy identifies the retail hierarchy for the Borough as follows:

- Town Centres – Sittingbourne (principal town), Faversham and Sheerness;
- Local Centres – Queenborough, Rushden, Halfway, Minster, Milton Regis, Boughton, Eastchurch, Iwade, Leysdown, Newington and Teynham.

2.4.16 Planning permission will be granted for main town centre uses taking account of the scale and type of development in relation to the size, role and function of the centre and where they are located within a defined town centre. Where it is demonstrated a town centre site is not available it should be located on a site on the edge of a town centre and should demonstrate through an impact assessment it would not individually or cumulatively undermine the vitality and viability of existing town centres, or of other local centres and the facilities and services of other locations.

2.4.17 The supporting text to the policy identifies that the floorspace threshold for impact assessments is that set out in a national planning policy (2,500sq m gross).

Policy DM3: Rural Economy

2.4.18 Planning permission will be granted for sustainable growth and expansion of business and enterprise in the rural area. For tourism/leisure, the policy states development proposals will be green/sustainable tourism and provide for an expansion of tourist and visitor facilities in appropriate locations where identified needs are not being met by existing facilities.

Faversham Creek Neighbourhood Development Plan

Community Leisure and Recreation Policies

2.4.19 Policy CLR1 requires new development on any waterfront site to provide public right of access to the waterfront for leisure and educational activities. Policy CLR2 requires applications for waterfront sites to include an appraisal of options for the provision of public spaces and leisure amenities.

Business, Tourism and Employment Policies

2.4.20 Policy BTE1 requires new development to enhance the Creekside area as a visitor attraction and attractive location for new businesses. Whilst policy BTE2 states new business activities in the plan area which contribute to the strength and diversity of Faversham's wider tourism and employment offer and do not undermine the town centre economy will be supported.

Site Specific Policies

2.4.21 The plan also identifies a number of sites for redevelopment, those including retail/commercial leisure are summarised:

- Site 05 Swan Quay – Policy SWQ1 states site to be used for mix of offices and workshops, retail, maritime general industrial and for a gallery.
- Site 07 Former Coach Depot – Policy CD1 identifies the ground floors could include a mix of Class B1 (offices and workshops), class A1 (retail) and facilities for boat users. Upper floors to be residential or holiday let use.
- Site 08 Standard Quay – Policy STQ2 seeks to establish a cluster of land uses that make this part of the Creek a visitor destination for maritime relates works, leisure, retail and food and drink uses.

2.5 Budget 2018 – The Government's Plans to 'Transform Town Centres'

2.5.1 In the 2018 Budget the Ministry of Housing, Communities and Local Government (MHCLG) announced a consultation on new planning reforms with various initiatives suggested that would allow for a more flexible and supportive approach to help transform/revitalise town centres. The suggested initiatives included changes to permitted development rights, business rate reliefs for small town centre businesses, and funding to help Council in drawing up and implementing plans for town centres to adapt/respond to changes in the retail climate.

Changes in Permitted Development Rights and Use Classes

2.5.2 In October 2018 MHCLG issued a consultation document titled 'Planning Reform: Supporting the high street and increasing the delivery of new homes'. The consultation period is until the middle of January 2019. To support greater diversity and footfall on the high street, and subject to prior approval, Part 1 proposes:

- changes to permitted development rights (PDR) to allow shops (Use Class A1), financial and professional services (A2), hot food takeaways (A5), betting shops, pay day loan shops and launderettes to change to office use (B1);
- changes to PDR to allow hot food takeaways (A5) to change to residential use (C3);
- extending the current temporary change of use PDR for shops (A1) financial and professional services (A2), restaurants and cafes (A3), hot food takeaways (A5), offices (B1), non-residential institutions (D1), assembly and leisure uses (D2), betting shops and pay day loan shops to change to A1, A2, A3 or B1, to also allow changes to a public library, exhibition hall, museum, clinic or health centre. The period of the temporary use would also be extended from 2 to 3 years;
- changing the A Class in the Use Classes Order, either to:
  - (a) remove the current named uses and replace them with 'a broader definition of uses for the sale, display or service to visiting members of the public'; or
  - (b) create a new use class for a mix of uses within A1, A2 and A3 uses 'beyond that which is considered to be ancillary', to replace the existing A1, A2 and A3 and create a single use class to cover shops, financial and professional services, restaurants and cafes;
- creating a new PDR that would be subject to prior approval (covering design, siting, appearance, impact on amenity, flooding and contamination risks, transport and highways), to allow additional storeys to be built above buildings in commercial, residential (C3) and some other uses (such as out-of-centre retail and leisure parks, or health centres).

Business Rate Relief

2.5.3 In his Budget the Chancellor confirmed the government will cut business rates by a third for small town centre retailers/businesses with a rateable value of less than £50,000. The government's funding for business rates relief totals £900 million. The Chancellor indicated the business rate reliefs would introduce an average annual saving of £8,000 for 90% of independent businesses.

2.5.4 Whilst the cut to business rates for small businesses has been welcomed, there has been disappointed that the fund doesn't help medium and large high street businesses which have been hardest hit by rate rises.

2.5.5 At the same time as announcing business rate reliefs the government also announced the introduction of a digital services tax from April 2020. The digital services tax is a levy against social media platforms, internet marketplaces and search engines. It is intended to be targeted at "established tech giants" rather than start-ups. The government is proposing a 2% tax rate against the sales that large digital companies make in the UK. It would be imposed on companies that are profitable and generate "at least £500m a year in global revenue".

Future High Street Fund

2.5.6 As part of the 2018 Budget, a new £675 million Future High Streets Fund was announced that is intended to assist local areas to respond/adapt to changes in their town centres, by using long term strategies. There will be a competition for the funding with local areas expected to partner with the private sector in their proposals, which should set out an overall vision of the specific improvements that would contribute to its achievement. It is envisaged that the Fund will then co-fund projects such as:

- Investment in physical infrastructure, including improving public and other transport access, improving flow and circulation within a town/ city centre, congestion-relieving infrastructure, other investment in physical infrastructure needed to support new housing and workspace development and existing local communities', and the regeneration of heritage high streets; and
- investment in land assembly, including to support the densification of residential and workspace around high streets in place of under-used retail units.'

2.5.7 A new High Streets Taskforce will also be created and funded, to support local leadership. The fund will also support the regeneration of heritage high streets (up to £55 million of the overall fund). This has two elements: helping to restore historic properties through Historic England; and (2) providing communities with resources to put historic buildings back into economic use.

2.5.8 The timescales for the Future High Streets Fund set out by MHCLG are as follows:

- Later in 2018: launch of the full prospectus.
- Early 2019: launch of the High Streets Taskforce.
- Spring 2019: Stage 1 Expressions of Interest, with local authorities developing private sector partnerships to deliver capital projects.
- Summer 2019: gateway assessment, with bids to be taken to Stage 2 (and local areas working up more detailed business cases).

2.6 Summary

2.6.1 This section of the study has reviewed existing national planning policy of pertinence to retail, leisure and town centre matters to explore the context for the Study.

2.6.2 National planning policy highlights the need to promote the vitality and viability of town centres through a town centre first approach and a defined hierarchy of centres. Applicants for main town centre uses are required to pass the sequential approach to site selection and provide a full assessment of the impact on the vitality and viability of protected centres. The Council's development plan follows the general trend of the most recent national policy guidance, identifying a hierarchy of centres and town centre first approach.

2.6.3 As required by this commission, policy recommendations on the basis of updates to the evidence base and national guidance is provided in Section 12.

3.0 Current & Emerging Retail & Leisure Trends

3.1 Introduction

3.1.1 In order to set out the wider context for the Study and inform our advice on the need for additional retail and leisure floorspace in the Borough, we provide an overview of prevailing retail and commercial leisure trends below. Our overview draws on recognised retail and leisure data sources, including research by Experian, Global Data and Mintel.

3.2 Changing Retail Climate

3.2.1 The retail property landscape across the UK has evolved significantly over the past 50 years, from post-war redevelopment in town centres, through to the emergence of retail warehouse parks and out-of-town regional shopping malls. For most of this period, the retail sector has experienced considerable expenditure growth, which has been attributed to a number of factors, including greater disposable income, availability of credit, new technology and a general overall increase in our standard of living. However, recent economic conditions have had a clear impact on expenditure and per capita convenience goods spending has actually reduced in recent years.

3.2.2 In recent years, shoppers have been increasingly prepared to travel in order to access a greater choice of shops and the type of leisure facilities which are more commonly available in larger towns and cities. As a consequence, larger town/city centres (with a regional or sub-regional role) have tended to perform relatively strongly, but a number of smaller towns (particularly those proximate to larger centres) have fared less well. The performance of many smaller towns has also been particularly impacted upon by the recession and the growth of internet shopping, which has resulted in many operators believing that they can achieve appropriate nationwide coverage with a smaller number of stores.

3.2.3 Those retailers who have development programmes are focusing on the provision of stores in strategic locations. They are focused on a much smaller portfolio of stores to cover main markets and to complement online sales. New and emerging retailers have frequently target no more than 50 stores in key locations and, as a consequence, this trend is having an impact on take-up levels in shopping centres. Indeed, many town centre schemes have been put on hold or scaled down in size, and with expenditure growth forecast being relatively low in the medium term, retailers are likely to remain cautious about store development.

3.2.4 PwC reported (November 2018) that in the first half of 2018 a net 1,123 stores disappeared from Britain's top 500 high streets compared with a 222 store loss over the equivalent period in 2017. Whilst daily store closures rates have plateaued at 14 stores a day, store openings have fallen, with a 773 difference between store opening in H1 2017 and H1 2018. The research identified that supermarkets, ice cream parlours, booksellers, stationers, and coffee shops showed the highest increase in net store numbers in the first half of 2018. Whilst a continuing decline of electrical goods retailers, pubs, fashion shops, charity shops and Italian restaurants were recorded.

3.2.5 Many retailers have found themselves struggling to pay their rents and other overheads, such as a rising minimum wage and business rates. This together with consumers doing more of their shopping online has resulted in a number of retailers restructuring (some involving a Company Voluntary Arrangement (CVA)) or going into administration including:

- M&S's announcement that it will close 30 clothing and homes stores by 2021 (November 2016), with 14 already closed in 2018;
- Debenham's announcement that 10 of its 176 UK stores will be closing, 2 of which already have (Farnborough and Eltham) (April 2017);
- House of Fraser entering into administration albeit immediately purchased by Sports Direct. At the time of writing it is not clear how many store closures will take place (August 2018);
- New Look's announcement of its intention to close 85 stores following a restructuring plan (November 2018);
- Maplin entering into administration resulting in the closure of their 200+ stores (February 2018);
- Toys R Us going into administration closing all of its 105 stores (February 2018);
- Laura Ashley's announcement that it plans to reduce the number of its UK stores from 160 to 120 (December 2018);
- Coast entering into administration with Karen Millen buying part of the business excluding 24 retail stores (October 2018);
- Carpetright's announcement of its restructuring and closing some 81 of its 400 stores (April 2018);
- Fenwick department store's announcement to "modernise and reorganise the business" which could potentially involve store closures (April 2018);
- Homebase's owners (Hilco) announcement of closing a further 42 stores (61 in total) as part of a proposed CVA by early 2019 (August 2018)
- Mothercare has announced that it will close 50 of their 137 UK stores (May 2018);
- Poundworld going into administration closing all 355 of its stores (June 2018); and

- HMV going into administration (for the second time in 6 years) announcing it is to close all of their 125 stores (December 2018).

3.2.6 It is clearly evident that trading conditions for a number of retailers are tough. Such closures/changes can result in particularly significant impacts at medium/smaller sized town centres, which tend to be the subject of higher vacancy rates, and which have also often suffered related reductions in rental levels and footfall in recent years. As a consequence, a greater proportion of comparison goods expenditure is being claimed by a smaller number of centres of sub-regional or regional importance.

3.2.7 However, such changes have also brought forward opportunities for different types of retailer. Some available units in town centres, including former BHS units, have been re-occupied by household discounters such as B&M Bargains, Poundland, Poundstretcher and Wilko. Whilst such lettings are valuable in bringing back premises into active use, many smaller centres are heavily reliant on such retailers, which generally operate at the lower end of the market.

3.2.8 In addition to national multiple retailers, independent traders, face pressure from both the internet and national multiple retailers. Such trader's success lie in them being able to offer a product/service not available elsewhere, or a service/shopping experience not offered by national multiple retailers.

3.2.9 It is evident that some centres are seeking to 'reinvent' themselves through an increased focus on quality independent and food and drink operators. Towns are also increasingly valuing their market as a means to differentiate themselves from retail parks and superstores, and many markets are looking to contemporary and speciality retailers to create interest and draw customers in. The greatest opportunities for successful vintage, craft and food and drink markets have so far been in centres served by affluent catchments.

3.2.10 The polarisation of retailing will result in larger more dominant centres continuing to attract key retailers (that have development programmes), with medium/smaller sized town centres potentially struggling to attract investment. District/local centres should be less affected and are likely to retain their attraction for top-up/day-to-day shopping.

3.3 Continued Growth in Internet & Multichannel Retailing

3.3.1 Many consumers who previously shopped in town centres and at retail parks are now increasingly using the internet to make purchases. Experian identifies that at 2017 'special forms of trading' (which includes internet, mail order and market sales) comprised an estimated 15.7% of total UK retail sales, which compares to a market share of just 5.6% at 2006. Experian estimates that the value of non-store sales in the UK at 2017 was £60.3 billion. It estimates that special forms of trading will increase further to 18.2% of retail expenditure at 2021. Thereafter, it is anticipated that additional growth will be relatively limited, with special forms of trading claiming 20.9% of UK retail expenditure at 2035 (the last reporting year for which Experian provides a figure).

3.3.2 The growth in internet as a sales medium has been enabled by the increase in access to the internet by UK households, which the Office for National Statistics reports increased from 57% of households at 2006 to 89% in 2016. The proportion of households with access to the internet is expected to increase further over the coming years and the popularity of shopping online is also assisted by mobile phones and tablets with faster 5G network technology. The Office for National Statistics indicates that the proportion of adults accessing the internet using a mobile phone has increased by nearly double since 2011 (from 36% to 66%).

3.3.3 It is evident that improvements in technology and an increased confidence in the security of online payments have supported substantial increases in internet sales in recent years which are clearly having an impact on retailers and town centres. In addition, the option of using the internet to 'click and collect' in-store at a dedicated counter, or at "pods" in supermarket car parks, is also increasing in popularity, with the service accounting for over 50% of John Lewis internet orders. Some retailers are also seeing benefits arising from the use of shops as 'showrooms' where shoppers can view and try goods before making purchases later in their home (multichannel retailing). More progressive retailers are also providing in-store Wi-Fi (which can be used to inform shoppers of promotions via their mobile phones) and technology points (which can allow shoppers to browse a wider product range than that carried in store). Accordingly, whilst new technology and the rise of internet shopping undoubtedly provides challenges the importance of 'click and collect' highlights that physical stores within town centres will still have a significant role in the multichannel shopping environment.

3.3.4 In addition, it is important to note that many purchases made online are actually sourced from the shelves of 'bricks and mortar' stores and thereby have the potential to support retail floorspace. This is acknowledged by Experian which now provides adjusted market share figures for special forms of trading in order to reflect purchases which are effected through stores. The adjusted allowance for special forms of trading equates to 3.4% for convenience goods at 2018, increasing to 4.2% at 2023 and to 4.8% at 2028 and 5.2% by 2034. For comparison goods, the adjusted allowance is 15.4% at 2018, increasing to 17.4% at 2023, 17.6% at 2028 and 17.9% at 2034.

3.4 The Continued Rise of the Grocery Discounters

3.4.1 Shoppers have turned away from food superstores in recent years. Mintel attributes the problems which face superstores to two principal factors.

3.4.2 Firstly, many young people are choosing to rent within or close to town and city centres. As a consequence, many undertake sporadic food shopping and often eat out, use takeaways, or buy instant meals. Accordingly, when young people undertake food shopping, they often have no greater need than that which can be serviced by a convenience store.

3.4.3 The second factor is the growth of discount operators, which have become more mainstream in both their offer and market positioning. Mintel suggests that the improvements in discounters' offer, such as wider ranges, better fresh foods and more premium foods, means that they have become an attractive alternative to both large food superstores and to convenience stores.

3.4.4 As a consequence, the 'big four' foodstore operators (Asda, Morrison's, Sainsbury's and Tesco) have become circumspect in respect of new store openings and, indeed, have closed a number of existing foodstores. All four have suffered significant declines in their market share over the past four or five years. As Figure 3.1 below indicates, Tesco has suffered a 1.9 percentage point reduction in its share of the food retail market between 2012 and 2018, and Morrison's has suffered a 1.4 percentage point reduction in market share. Considered together, the market share of the big four foodstore operators has declined from 59.6% in 2012 to 53.8% in 2018 (a reduction of 5.8 percentage points). In contrast, other retailers – most notably Aldi and Lidl – have benefitted from increases in their market share. Aldi's market share increased from 2.6% to 6.6% (equating to an increase of 4 percentage points) between 2012 and 2018.

Figure 3.1: Market Share of Key UK Food Retailers

Operator	2012	2013	2014	2015	2016	2017	2018
Tesco	23.9%	23.0%	23.3%	22.8%	22.6%	22.1%	22.0%
Sainsbury's	13.1%	12.9%	13.1%	12.8%	12.6%	12.2%	12.1%
Asda	13.3%	13.0%	13.0%	12.0%	11.3%	11.4%	11.3%
Morrison's	9.3%	8.9%	9.2%	8.6%	8.6%	8.3%	8.4%
Aldi	2.6%	3.3%	4.3%	4.8%	5.5%	6.0%	6.6%
Co-operative Food	5.4%	5.1%	5.2%	5.1%	4.9%	4.7%	4.7%
Waitrose	3.6%	3.7%	3.8%	4.0%	3.9%	3.9%	3.9%
Marks & Spencer	3.7%	3.7%	3.9%	4.0%	4.1%	4.1%	4.1%
Lidl	2.0%	2.0%	2.2%	2.5%	3.2%	3.2%	3.3%
Iceland	1.9%	1.9%	2.0%	2.0%	2.0%	2.0%	2.2%

Source: UK Food & Grocery Retailer Update, Global Data, February 2018

3.4.5 The current/recent strategy of the big four operators is twofold: (1) the development of smaller store formats for top-up food shopping; and (2) the reconfiguration and refurbishment of existing foodstores.

3.4.6 The development of smaller store formats (Sainsbury's Local, Tesco Express, Marks & Spencer Simply Food, and Little Waitrose) is in response to changing food shopping habits and the move from weekly shops to more frequent smaller shops. These smaller store formats are important in driving footfall in smaller district/town centres and in some cases act as a vital 'anchor store'.

3.4.7 In terms of the reconfiguration/refurbishment of existing foodstores, in some cases, product lines are being reduced and pricing is being made straightforward. Some operators are looking to introduce other uses/concessions to take existing floorspace and Sainsbury's acquisition of the Home Retail Group has allowed it to introduce Argos (which it now owns) into its stores. Small concessions of Habitat are also currently being tested within a number of Sainsbury's. The introduction of additional uses/concessions in foodstores has the potential to take trade away from town centres.

3.4.8 Aldi and Lidl have both sought to take advantage of the structural changes in the food retail market and have announced ambitious store opening targets that will further increase pressure on the big four operators. Aldi has identified major expansion plans and intends to open 70 new UK stores in 2018, as part of its target to have more than 1,000 stores by 2022. Aldi's plans include three formats: standard stores of between 18,000 sq ft and 20,000 sq ft with a minimum of 70 parking spaces; the 'Small Aldi' format of between 10,000 sq ft and 14,000 sq ft with a minimum of 40 parking spaces; and, the 'City Aldi' format of between 7,000 sq ft to 10,000 sq ft with no parking spaces required. Aldi is understood to be considering all types of property, including development sites, mixed-use schemes, retail parks, high streets, shopping centres and roadside.

3.4.9 Lidl plans to expand to trade from a portfolio of 1,200 UK stores in the coming years. Lidl's future requirements reportedly comprise units of between 20,000 sq ft and 30,000 sq ft, with sites of 1.5 acres required for standalone units and up to 4 acres for mixed-use schemes.

3.4.10 Partly in response to an ever-increasing competitive grocery market, earlier this year (April 2018) Sainsbury's confirmed plans to merge with Asda. The merger will be subject to a review by the Competition and Markets Authority (CMA) which, if approved, would result in a new grocery market leader. Sainsbury's have announced that they are keeping both the Sainsbury's and Asda fascia's and are not intending on closing any stores. Store closures may however be required as part of the CMA potential approval of the merger.

3.5 The Food and Drink Sector

3.5.1 In recent years, town centres have also increasingly relied upon an expanding food and drink sector to bring some vacant units back into active use. Eating out has become increasingly popular and both national multiples and independents have benefitted from the additional expenditure which has resulted. Barclaycard data identifies that spending in restaurants in the first quarter of 2017 was up 12.2% year-on-year.

3.5.2 Local Data Company (LDC) reports that the number of food and drink outlets in town centres had gone up by 6,000 between 2011-2016 whilst the number of town centre bars, pubs and night clubs fell by about 2,000. The largest food and drink growth areas included lounge bars (116%), cake makers (51%), juice bars (46%) and coffee shops (31%). In 2017, LDC reported the number of new food and beverage outlets opening in the UK reached a peak of around 743 new units per year. However, over the last year or so there is evidence that the food and drink market is becoming saturated with the likes of the following outlets restructuring, closing outlets, or going into administration:

- Byron Burger;
- Prezzo;
- Strada;
- Jaime's Italian;
- Gourmet Burger Kitchen; and
- Chimichanga.

3.5.3 Food and drink operators now require units which are in amongst the retail heart of a centre. Food and drink operators (particularly national multiples) can be particularly attractive to landlords as long leases can often be agreed to due to the cost of fit-outs.

3.5.4 Mintel also reports that although the three biggest operators, Odeon, Vue and Cineworld, still dominate the cinema market and account for 60% of the total UK cinema screens, there has been a steep increase in the number of independent screens. Niche cinema operators, such as Everyman, Curzon and The Light, are considered to have the potential to be particularly complementary to shopping environments. Such cinemas have more modest land take requirements than large multiplexes, and therefore may have a greater chance of being incorporated in a mixed-use development. Mintel reports that the growth of 'event cinema' and diverse food and drink offerings provided by independents means cinema is becoming a destination for consumers who are not typical cinema fans.

3.5.5 The health and fitness sector has been buoyed by the popularity of budget gyms. Operators such as Pure Gym, The Gym Group and easyGym have an operational model which is based on low costs and high volume. Such gyms tend to have plenty of equipment in order to encourage users, but are characterised by basic fit-outs and limited staff. Many budget gym operators – including Pure Gym and The Gym Group – are actively seeking to bring forward additional facilities, with a wide range of properties (including old theatres, larger shop units and office space) having the potential to meet their needs. The Leisure Database Company suggests that there were around 300 budget gyms across the country in summer 2016, but that this figure has the potential to increase to around 1,000 by 2019. Pure Gym is now the private health and fitness club market leaders in terms of both venue numbers (160 clubs) and memberships. The Gym Group and Anytime Fitness now also both have over 100 clubs (May 2018), with Xercise4Less, having over 50 gyms.

3.5.6 There are a number of emerging leisure concepts which are also helping to anchor retail environments, including bowling alleys, trampolining and crazy golf. These concepts can assist centres in providing a point of difference with the competition, ensure that visitors' dwell times are increased, and assist a town's evening economy. Such concepts do however require reasonably large footprint units/space which primarily due to physical constraints, town centres are not always able to provide/offer.

3.6 Brexit

3.6.1 The referendum in June 2016 on the UK's membership of the European Union resulted in a majority vote to leave the EU. The terms of withdrawal are being negotiated with the Commission now that 'Article 50' has been formally triggered.

3.6.2 Global Data published an analysis following the Autumn 2017 budget and its impact on retail, in which it acknowledges that the retail growth forecast is clouded by the lack of information on the government's policy on Brexit negotiations. Therefore, despite the referendum being over 2 years ago, there is still limited information and clarity on the changes arising from the UK's pending removal from the European Union. As such, there will be a need to monitor the impacts arising from the UK's exit from the EU and for any future update to this Study to take appropriate consideration of such changes.

3.7 Potential Impact of Trends on Swale Borough Town Centres

3.7.1 The town centres in the Borough continue to face a number of challenges, particularly from increasing competition from the internet, multichannel retailing, polarisation of retailing, and out-of-centre retail/leisure developments. These challenges will impact on the future strategy for the town centres.

3.7.2 It is important for the three town centres in Swale are able to respond to continued changes in the retail and leisure sector and to provide (or continue to provide) an offer/destination which distinguishes them from competing centres and out-of-centre retail and leisure destinations.

3.7.3 The continued growth of new out-of-centre/retail park formats represents a threat to the future vitality and viability of the boroughs town centres. In order to protect the vitality and viability of centres it is important therefore that the Council not only just control the expansion/change of use of out-of-centre development but also plan positively for town centre/edge-of-centre development opportunities.

3.7.4 Town Centre Strategies need to be able to support the continued development/changes in the 'high street' if they are to successfully compete. Such strategies may seek to:

(1) provide a good mix/variety of retail and leisure uses;

(2) attract a mix of additional land uses beyond retail/leisure, including residential, educational, community and office uses;

(3) build on existing cultural/heritage/tourist attractions;

(4) enhance existing town centre markets and speciality retailing;

(5) provide a high quality shopping/leisure experience;

(6) provide convenient, affordable and accessible town centre parking;

(7) promote and encourage events in the town centre;

(8) embrace, and not compete against, multi-channel retailing; and

(9) be responsive to changes in technology (the 'digital high street').

3.7.5 The key purpose of Town Centre Strategies should be to seek to build on the existing individuality of centres, be a focus/hub for their communities, and extend the 'dwell time' and spend of visitors/residents visiting the town centre and in turn the vitality and viability of the centre.

4.0 Original Market Research

4.1 Introduction

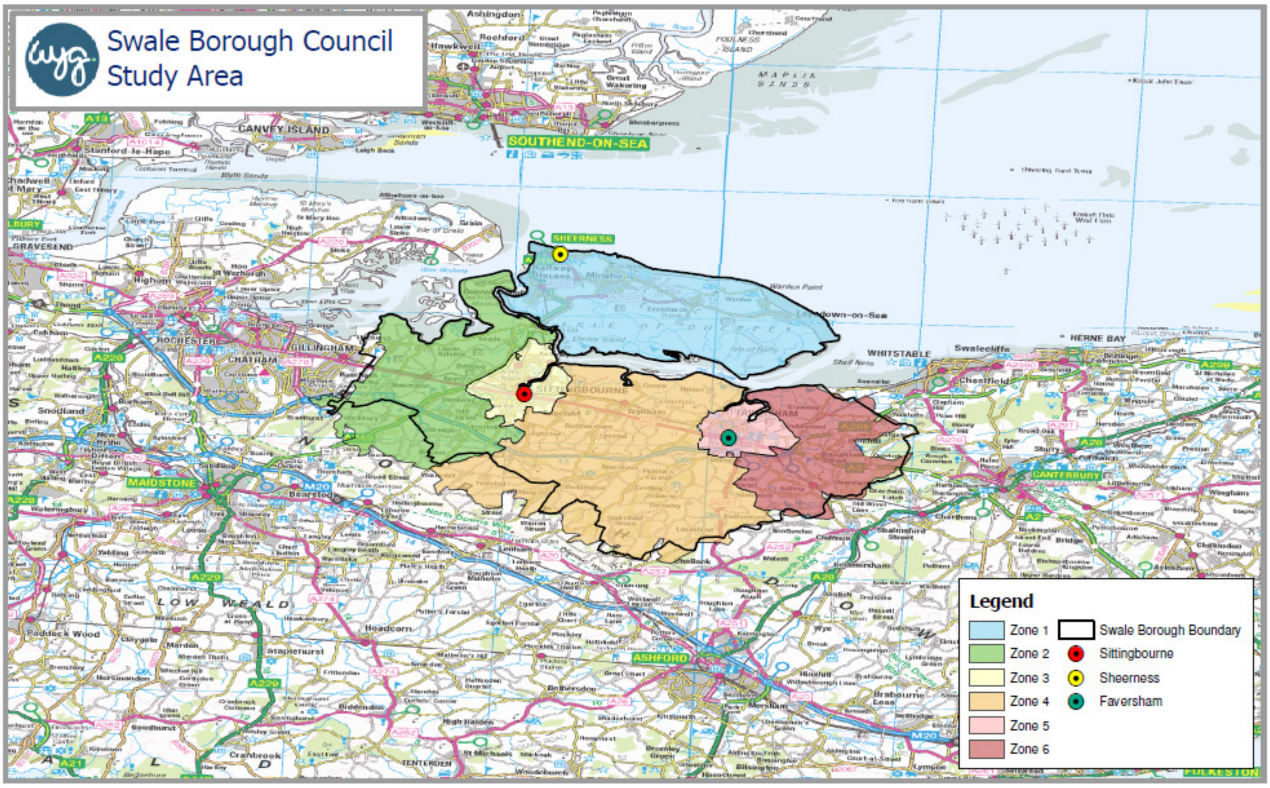
4.1.1 The undertaking of original market research enables in-depth analysis at a local level and allows the evaluation of the trade draw of particular town centres. The use of specifically commissioned and tailored survey research is fundamental to identifying the likely capacity for future retail and leisure needs across the Study Area. Notwithstanding this, WYG acknowledges that there can be limitations to survey research, particularly with regard to the sample size which can be achieved, and the results should therefore be taken to be a broad indication of consumer preferences.

4.1.2 A key requirement of this Study is the detailed understanding of shopping and leisure patterns in terms of the use of centres and the identification of the centres' catchment areas. WYG commissioned specialist market researchers NEMS to undertake a comprehensive household telephone survey to identify consumers' habits and preferences in the Study Area.

4.2 Telephone Household Survey

4.2.1 In September 2018, a survey of 600 households was undertaken across the defined Study Area which comprises 6 separate zones. Figure 4.1 below shows the Study Area.

Figure 4.1: Study Area



4.2.2 In accordance with the commission brief the adopted study area zones are the same as those adopted in the previous 2010 Retail and Town Centre Study undertaken on behalf of the Council. Utilisation of the same zones enables comparison of any changes in shopping patterns since 2010 across the borough.

4.2.3 Figure 4.2 below details the postcode sectors which make up the survey zones. Zone 1 comprises the Isle of Sheppey; Zone 2 the west of Sittingbourne; and Zone 3 centred around. Zone 4 represents the mid part of the Borough located between Faversham and Sittingbourne, with Zone 5 around the urban area of Faversham and Zone 6 to its east.

Figure 4.2 Postcodes by Survey Area

Survey Zone	Postcode Sector
Zone 1 - Isle of Sheppey	ME 11 5, ME12 1-4
Zone 2 - Borough West	ME9 7, ME 9 8
Zone 3 - Sittingbourne	ME10 1-5
Zone 4 – Central Borough	ME9 0, ME9 9, ME 13 0
Zone 5 - Faversham	ME13 7, ME13 8
Zone 6 - Borough East	ME13 9

4.2.4 The results of the household survey, *inter alia*, are utilised to calculate the expenditure claimed by each existing retail facility within the Study Area, a process which is considered in Section 10 of this study.

5.0 Retail Patterns and Market Share Analysis

5.1 Introduction

5.1.1 Drawing on the findings of the household telephone survey this section analyses the convenience and comparison goods retail market share patterns within the Study Area. In order to provide some context for these market share patterns this section firstly:

- provides an overview of the socio demographic context of the Council area;
- sets out the sub-regional centre hierarchy;
- summarises the existing retail and leisure provision in Swale;
- summarises existing retail and leisure facilities within the main competing centres.

5.1.2 An analysis of leisure market share patterns is provided as part of the commercial leisure need assessment set out in Section 11 of the study.

5.2 Socio Demographic Context of the Council Area

5.2.1 A population profiling exercise has been undertaken utilising the Experian Mosaic database to establish the socio demographic profile of the administrative area of Swale Borough. A national UK average is also provided so as to enable a comparative assessment to be undertaken. The breakdown and definition of each Experian Mosaic group is provided at **Appendix A**.

Figure 5.1 – Experian Mosaic Profiling (%)

Mosaic Group	Study Area	UK Average
Population (Adults 18+)	113,083	-
A: City Prosperity	0.0	4.3
B: Prestige Positions	3.8	7.2
C: Country Living	7.0	6.9
D: Rural Reality	11.0	6.8
E: Senior Security	10.2	8.0
F: Suburban Stability	9.0	6.0
G: Domestic Success	8.3	8.4
H: Aspiring Homemakers	16.5	9.1
I: Family Basics	8.7	7.2
J: Transient Renters	7.2	5.6
K: Municipal Challenge	1.9	5.8
L: Vintage Value	5.5	6.1
M: Modest Traditions	6.7	4.6
N: Urban Cohesion	0.1	5.0
O: Rental Hubs	1.6	7.7
U: Unclassified	2.5	1.4
Total	**100**	**100**

Source: Experian Mosaic Reports, August 2018
Notes: Population derived from Mosaic report – 2016 estimate Adults 18+

5.2.2 The Experian Mosaic results highlight that when compared to the UK average Swale Borough contains:

- A slightly higher proportion of residents within the 'Family Basics' (8.7% compared to 7.2%) category (stable families renting from social landlords/families where expenditure can exceed income/ younger families with budget home/families living in areas of high deprivation) and an almost identical proportion within the 'Domestic Success' (8.3% compared to 8.4%) category (affluent families in upmarket housing, well qualified singles, families in modern detached homes/traditional mid-range suburbs);
- a higher proportion of residents within the 'Aspiring Homemakers' (16.5% compared to 9.1%) category (younger and settled families in affordable/modest homes/fashion conscious young singles/partners setting up home/young singles renting in family suburbs);
- a lower proportion of residents in the 'Prestige Positions' (3.8% compared to 7.2%) category (families with substantial income/retired in sizeable homes/upmarket suburban homes/high achieving);
- a higher proportion of residents in the 'Transient Renters' (primarily younger population in low cost/social accommodation) category (7.2% compared to UK average of 5.6%);
- a lower proportion of residents (1.9% compared to 5.8%) within the 'Municipal Challenge' category (long term renters/older social renters/hard-pressed singles/multi-cultural household of social/low cost flats);
- a higher proportion of residents within the 'Suburban Stability' (9.0% compared to 6.0%) (couples with mid-range incomes/pre-retirement couples with respectable incomes/single mature in intermediate occupations/active families with teens/adult children);
- a slightly lower proportion of residents within the 'Vintage Value' (5.5% compared to 6.1%) (ageing/elderly in social/low value homes/retirement homes), yet a slightly higher proportion within 'Senior Security' (10.2% compared to 8.0%) (elderly in affordable/comfortable/standard homes) categories; and
- there are currently a very small proportion of residents within the Borough in the 'City Prosperity' category.

5.2.3 Whilst the Mosaic results generally highlight that Swale Borough has a higher proportion of residents within the rural and senior Experian Mosaic categories it also highlights that the Borough contains a higher proportion of aspiring young families/singles.

5.2.4 The socio demographics of a catchment area of a town will, in part, have an impact on the quantum and type of retail and leisure demand in a town centre.

5.3 Sub-Regional Centre Rankings

5.3.1 Figure 5.2 illustrates the position of the principal centres within the hierarchy of centres based on the Venuescore's UK Shopping Venue Rankings. The index ranks over 3,000 retail venues within the UK (including town centres, stand-alone malls, retail warehouse parks and factory outlet centres) based on the current retail provision. Towns and major shopping centres are rated using a scoring system which takes account of the presence in each location of multiple retailers – including anchor stores, fashion operators and non-fashion multiples. The rankings in the table represent the position of the centres at the time of the most recent Rankings as well as competing surrounding centres. A more detailed tabulation of retail rankings data is also provided which shows the historic performance of the centres in the preceding 2009 Rankings.

Figure 5.2: Sub-regional Centre Rankings

Centre	Classification	2010 Rank	2016 Rank	Change in Rank 2010-2016
Maidstone	Major Regional	51	52	-1
Canterbury	Regional	74	67	+7
Chatham	Sub-Regional	197	200	-3
Ashford	Sub-Regional	162	205	-42
Dartford	Sub-Regional	206	292	-86
Sittingbourne	**District**	**408**	**408**	**0**
Gillingham	District	398	654	-256
Sheerness	**District**	**845**	**696**	**+149**
Faversham	**District**	**1,139**	**710**	**+429**
Whitstable	District	1,247	879	+368
Herne Bay	Minor District	845	1,325	-480

Source: VenueScore 2010 and 2016 Rankings

5.3.2 Figure 5.2 shows that Sittingbourne is identified as a District Centre and has seen no change in its ranking between 2010 and 2016. Both the centres of Sheerness and Faversham, are also classified as District Centres, and have improved their rankings since 2010, with Faversham having a substantial increase by some 429 points. Gillingham, located approximately 12 miles north west of Sittingbourne, is also a District Centre and has seen a decrease in its ranking by some 256 points since 2010. Nearby centres of Ashford, Chatham and Dartford continue to be ranked higher than Sittingbourne in VenueScore Rankings as Sub-Regional Centres, although all of which have seen a fall within their position since 2010. Maidstone and Canterbury are larger centres classified as Major Regional and Regional respectively and have higher rankings than any of the centres within the Borough.

5.3.3 As noted earlier the Rankings are reflective of the presence of national multiple retailers in a particular centre and are therefore a more accurate barometer of the performance of larger centres. Accordingly, towards the lower end of the Rankings, the importance of a centre can be overlooked or amplified based on whether a handful of national multiples are present or not.

5.4 Existing Retail & Leisure Provision in Swale Borough

5.4.1 Provided below is a summary of existing retail and leisure provision in the Borough.

Sittingbourne

5.4.2 Sittingbourne Town Centre is the principal shopping and leisure location in the Borough. The town centre is located within the north west of the Borough around 6 miles to the north east of Maidstone and west of Canterbury. The centre provides a mix of retail and leisure facilities including some 28,070sq m gross of retail floorspace, 6,250sq m of retail service floorspace, 16,020sq m gross of leisure service floorspace and 3,950sq m gross of financial and business services floorspace (source: Experian Goad Survey, September 2018).

Faversham

5.4.3 Faversham is a historic market town located in the eastern part of the borough. The town is located approximately 7 miles to the east of Sittingbourne and 8 miles to the west of Canterbury. The town centre is relatively compact in nature, accommodating circa 36,000sq m gross of commercial floorspace (source: Experian Goad Survey, September 2018). In commercial floorspace terms Faversham is the smallest town centre in the Borough. Comparison goods retailers occupy the largest amount of floorspace (10,710 sqm). The town centre also provides 8,650sq m gross of leisure service floorspace together with convenience retail floorspace of 7,430 sqm, 3,250 sqm gross of retail service floorspace and 2,500 sqm of financial and business service floorspace. In addition to retail and commercial leisure facilities, the town centre also contains residential, office uses, places of worships and also the Shepherd Neame Brewery. These uses attract people to the town centre for reasons other than purely shopping and/or leisure.

Sheerness

5.4.4 Sheerness is located in the north western part of the Isle of Sheppey. Retail and commercial leisure floorspace (42,150sq m gross) in the town centre is primarily focused on High Street and The Broadway. Approximately half of the total floorspace is comprised of convenience and comparison goods floorspace (11,120 sqm and 10,450 sqm respectively). The centre also provides 9,290 sqm of leisure service floorspace, 4,900 sqm retail service, and 2,940sq m financial and business service floorspace. Alongside these uses, the town centre also provides a park, sport and leisure complex, places of worship, some limited residential, office and a further education college.

Local Centres

5.4.5 Overall there are 11 local centres within the Borough. The existing local centres are:

- Queenborough;
- Rushenden;
- Minster;
- Halfway Houses;
- Eastchurch;
- Leysdown;
- Iwade;
- Newington;
- Milton Regis;
- Teynham; and
- Boughton

5.4.6 The local centres provide important local day-to-day shopping facilities/services for their surrounding local residential areas. Figure 5.4 below summarises the total number of units in each centre.

Figure 5.4: Local Centres in the Borough

Local Centre		No. of Units	Key Anchor Stores
No	Name		
1	Queenborough	14	Co-op
2	Rushenden	1	-
3	Minster	13	Londis, Costcutter
4	Halfway Houses	32	Premier, Costcutter
5	Eastchurch	9	Londis, Costcutter
6	Leysdown	30	Premier
7	Iwade	6	Nisa Local
8	Newington	10	Co-op
9	Milton Regis	30	McColls, Lloyds Pharmacy
10	Teynham	24	Co-op, Costcutter
11	Boughton	7	-

Source: WYG Surveys, September 2018

5.4.7 Further details and vitality and viability health check assessments of Sittingbourne, Sheerness and Faversham town centres and the 11 local centres are provided in Sections 6-9 of the study.

Out-of-Centre Retail/Leisure Provision

5.4.8 In terms of out-of-centre retail and leisure provision the majority of the retail/leisure parks in the Borough are located in the Sittingbourne urban area. Figure 5.5 below provides details of the main retail/leisure parks and sets out the current key occupiers.

Figure 5.5: Main Out-of-Centre Retail/Leisure Parks in Swale Borough

	Distance from nearest Town Centre	No. of Units	Vacant Units	Key Occupiers
Sittingbourne Retail Park	0.2 miles	14	2	Halfords, M&S Foodhall, Dreams, Pets at Home, Bensons for Beds, Dunelm, Carpetright, Currys/PC World, Bunnings Warehouse, KFC, McDonald's and Pizza Hut
Trinity Trading Estate, Sittingbourne	0.8 miles	7	-	Asda, Howdens, Travis Perkins, Screwfix, National Tyres and Autocare, A2 Tyre Supplies, Formula 1 Autocentre
Spring Retail Park, Sittingbourne	0.1 miles	3	0	Iceland Food Warehouse, Home Bargains and Costa Coffee
Neats Court Retail Park, Queenborough	3.3 miles	13	1	The Original Factory Shop, B&M, Iceland, Poundland, Cancer Research, Sports Direct, Costa, Subway, Mote Park, Burger King, Starbucks and Marston's

Source: WYG Surveys, September 2018 and Completely Retail

5.4.9 There is also a good provision of out-of-centre foodstores in the Swale Borough area including the following large foodstores:

Sittingbourne:

- Asda, Trinity Trading Estate - 4,569sq m gross floorspace
- M&S Foodhall, Mill Way - 7,625sq m gross floorspace
- Morrison's, Mill Way - 6,739sq m gross floorspace
- Iceland Food Warehouse, Eurolink Way - 1,200sq m gross floorspace

Faversham:

- Morrisons, North Lane - 2,528sq m gross floorspace
- Sainsbury's, Bysing Wood Road - 4,549sq m gross floorspace

Sheerness:

- Morrisons, Neats Court - 5,116sq m gross floorspace

5.5 Surrounding Main Large Centres

5.5.1 The town centres within the Borough do not operate in isolation, particularly given the proximity of the Borough to larger regional retail/leisure centres. It is important to understand the nature of the existing and emerging retail offer in the surrounding 'competing' centres given that planned improvements could potentially materially impact upon shopping patterns, future performance and overall vitality and viability of the centres.

5.5.2 The surrounding centres which the household survey shows have an influence on shopping patterns in Swale are: Canterbury, Maidstone, Ashford and Chatham and Bluewater Shopping Centre.

Maidstone

5.5.3 Maidstone Town Centre is the main centre within Maidstone Borough located approximately 12 miles to the south west of Sittingbourne. The latest Retail Study was undertaken by DTZ in August 2013 and identifies the centre has some 580 units and 143,349sq m of retail and leisure floorspace, of which almost half (48%) is occupied by comparison goods retailers. This is followed by leisure services which comprise 16.5% of the total floorspace. The centre has some 28 of the 31 'major' retailers defined by Experian. Turning to convenience retail provision, the study identifies it has a slightly lower number of units than the South East average (37.9% compared to 43.1%).

5.5.4 The Study identifies that there is capacity for around 12,400sq m of additional comparison goods net sales floorspace by 2021, rising to 23,700 at 2031. For convenience goods, there is capacity for an additional 4,400sq m net sales floorspace at 2021, increasing to 6,100sq m at 2031. For majority of comparison goods floorspace capacity is directed towards Maidstone Town Centre (22,650sq m at 2031) with a smaller proportion of the total convenience floorspace capacity directed towards the town centre (1,800sq m at 2031).

Canterbury

5.5.5 Canterbury City Centre is identified as the primary focus for retail development and is situated at the top of the retail hierarchy within the Canterbury District Local Plan 2017. Canterbury is a historical cathedral city and a UNESCO World Heritage Site. The city is located approximately 10 miles to the east of Faversham and 16 miles east of Sittingbourne.

5.5.6 GL Hearn prepared the latest Canterbury Retail and Leisure Study published in June 2015. The study notes that the city's economy is heavily geared towards the tourism sector and combines a heritage and commercial offer. The city centre comprises 101,019sq m floorspace across 461 units. The majority of these are in comparison use (43%), followed by leisure service (27%) and then retail service (9%). The study highlights that the city has a strong comparison offer and notes than 59% of units are multiple retailers and the centre benefits from three department stores (Fenwicks, Debenhams, and M&S). The retail service is noted to be dominated by health and beauty services and some 5% below the national average, whilst leisure services are around 5% higher.

5.5.7 The retail study identifies that there is no quantitative or qualitative need for new convenience floorspace in the short term due to the commitments including Sainsbury's at Herne Bay and Aldi at King's Road. By 2031, the study identifies that there is capacity for around 2,608sq m floorspace. For comparison goods, there is capacity forecast for around 8,645sq m net floorspace at 2020 increasing to 19,924sq m net at 2025 and further to 33,800sq m net by 2031.

Ashford

5.5.8 Ashford is located approximately 13 miles to the south of Faversham and is the largest centre within Ashford Borough Council. The Area Action Plan for the town identifies there are five defined quarters within the town centre, each with a recognisable character: Town Centre Core; Civic Quarter; Commercial Quarter; Residential Transitional Quarter; International Station Quarter; and Southern Expansion Quarter. The main retail uses are located in the town centre core on a traditional linear High Street alongside The Park Mall and Country Square Shopping Centres.

5.5.9 The latest Retail Needs and Leisure Assessment was published in June 2015. The study identifies that within the primary shopping streets the centre has 227 units and a further 101 in shopping centres in retail/leisure use in 2014. The centre has a relatively low convenience provision with only 2% of units recorded in this use. The proportion of convenience units is more in line with the UK average. The study highlights the retail service provision is particularly high at around 34% compared to 25%, whilst the leisure services are below the UK average by 7%. The study notes that town centre lacks a major leisure facility such as a cinema.

5.5.10 Turning to future demand, the study identifies that there is no convenience capacity until 2030 due to the planned foodstores at Chilmington Green and Cheeseman's Green. At 2030, there is a requirement for around 2,511sq m net new convenience floorspace, which the study recommends is directed towards Ashford Town Centre. For comparison goods, the study identifies there is no capacity in the short term up to 2020, by 2025 there is forecast capacity for 8,631sq m net floorspace increasing to 18,807sq m net floorspace. Of this, 12,213sq m of the capacity at 2030 is for Ashford Town Centre.

5.5.11 Ashford Designer Outlet is located on the periphery of the town centre and has around 80 retail stores with a mix of high street national multiples and several 'premium' retailers in addition to a food court. The centre is currently undergoing £90million expansion of around 9,000sq m floorspace, which will see an additional 50 luxury and premium brands opening, a new food piazza, events space and children's play area.

Chatham

5.5.12 Chatham Town Centre is identified as the main town centre within Medway, as defined within the Local Plan 2003, supported by five smaller District Centres. Chatham is located some 9 miles to the west of Sittingbourne. The centre comprises a partially pedestrianised High Street which links with Rochester District Centre to the north west. The focus of the retail activity is along the High Street and at the Pentagon Shopping Centre.

5.5.13 The Retail and Commercial Leisure Assessment prepared by GVA in 2016 identifies the town centre has some 408 units offering 76,300sq m net floorspace. The study notes that it has a retail offer which is towards the 'lower middle' end of the market and the Pentagon Shopping Central appearance could benefit from investment and modernisation. Despite this, the more recent Volume 2 Retail and Commercial Leisure Assessment (March 2018) noted that the most common purpose of visit to the town centre was for non-food shopping.

5.5.14 The study identifies there is no capacity for Medway as a whole for comparison goods floorspace until 2025, at which time there is forecast capacity of 14,300sq m net floorspace rising to 61,100sq m net in 2037. For convenience goods, the 2016 study notes that there is capacity for around 8,600sq m net floorspace at 2020 for Medway rising to 15,700sq m net at 2037.

Bluewater Shopping Centre

5.5.15 Bluewater Shopping Centre, located within Dartford Borough, opened in 1999 and attracts around 27 million visitors per year. The shopping centre is situated approximately five miles east of Dartford and 23 miles west of Sittingbourne. The centre offers over 300 stores, 50 restaurants, cafes and bars and a 13-screen cinema, crazy golf, trampoline park, and soft play/adventure park.

5.5.16 The latest retail study for Dartford, prepared by GVA, the Retail and Commercial Leisure Study 2010, identifies Bluewater as one of Europe's largest indoor retail and leisure complexes. The study reports there is a total of 145,226sq m of retail floorspace across 358 units. Comparison retailers have a strong presence in the centre comprising 66% of the total units and almost 80% of the floorspace. Convenience provision is more limited at just 4% of the total unit number. Service units include food and drink uses alongside banks and travel agents and equate to around 21% of all units. Major retailers Marks and Spencer, John Lewis and House of Fraser anchor the store.

5.5.17 Outline planning permission (reference. 16/01207/OUT) was granted by Dartford Borough Council Development Control Committee in April 2017 for extensions and alterations to the shopping centre, most notably the West Village section of the shopping centre alongside separate extensions to the main shopping centre creating larger units and a re-configured layout. The permission granted an additional 30,000sq m floorspace for retail and catering space alongside reconfiguration of the town square, car park and relocation of the coach park. The extensions to the main shopping centre total around 16,850sq m, whilst the West Village extension will be approximately 14,750sq m. Condition 31 restricted the amount of convenience goods retail to not exceed a net additional 1% of the new floorspace. Conditions 32 and 33 of the permission restricted the amount of comparison floorspace to be a minimum of 51% and a maximum of 28,500sq m of the total additional floorspace permitted, and a maximum of 2,500sq m of additional floorspace to be used for use classes A3/A5.

5.5.18 The reserved matters for Phase 1 was approved in August 2017 with a number of conditions discharged since this time.

5.6 Shopping Patterns

5.6.1 This section contains a summary of the convenience and comparison goods shopping patterns within the study area. Both main food and top-up convenience goods shopping patterns are analysed and for comparison goods - combined comparison goods, bulky comparison goods and non-bulky comparison goods shopping patterns (excluding clothing and footwear) are examined separately. In addition, an analysis of the shopping patterns within each town associated with clothing and footwear purchases is also undertaken.

Convenience Goods Shopping Patterns

Main Food Shopping

5.6.2 The survey responses identify that respondents in Zone 1 (Isle of Sheppey) primarily undertake their main food shopping on Sheppey itself (88%). Of these, the majority are captured by stores in Sheerness Town Centre (67%), the Morrisons store at Neats Court Retail Park capturing 20% and other locations capturing the remaining 1%. Most of the other food shopping trips from Zone 1 are made at stores in Sittingbourne with 2% made at stores within the Town Centre, and 7% at other locations including the Asda store at the Trinity Trading Estate (4%) and at Morrisons on Mill Way (2%).

5.6.3 For Zone 2 (Borough West), 71% of main food shopping trips take place inside the Borough. Sittingbourne attracts the majority of these trips (57%), with the town centre stores capturing 24% and other stores outside of the town centre capturing 33%. Stores on the Isle of Sheppey capture 9% of trips, whilst some 24% of respondents carry out their main food shopping trips outside of the Borough. These locations include Gillingham (15% of trips), Maidstone (4%) and Rainham (3%).

5.6.4 In terms of Zone 3 (Sittingbourne), Sittingbourne also attracts the majority (89%) of main food shopping trips. Stores within Sittingbourne Town Centre attract 37% while other stores in Sittingbourne capture 52% of trips. 5% of respondents in Zone 3 last undertook their main food shop via the Internet.

Figure 5.6: Principal Main Food Shopping Patterns

Zones	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East
	1	2	3	4	5	6
Inside Borough	**97%**	**71%**	**93%**	**94%**	**87%**	**62%**
Sittingbourne	**9%**	**57%**	**89%**	**43%**	**5%**	**5%**
Sittingbourne Town Centre	2%	24%	37%	28%	4%	3%
Sittingbourne Other	7%	33%	52%	15%	1%	2%
Faversham	**0%**	**0%**	**1%**	**50%**	**82%**	**57%**
Faversham Town Centre	0%	0%	1%	11%	38%	35%
Faversham Other	0%	0%	0%	39%	45%	22%
Isle of Sheppey	**88%**	**9%**	**2%**	**0%**	**0%**	**0%**
Sheerness Town Centre	67%	7%	2%	0%	0%	0%
Neats Court Retail Park	20%	2%	0%	0%	0%	0%
Other	1%	0%	0%	0%	0%	0%
Other locations inside of the Borough	**0%**	**5%**	**0%**	**0%**	**0%**	**0%**
Outside Borough	**1%**	**24%**	**2%**	**3%**	**11%**	**34%**
Canterbury	0%	1%	1%	1%	3%	14%
Gillingham	0%	15%	0%	0%	0%	1%
Whitstable	0%	2%	0%	1%	8%	14%
Other locations outside of the Borough	1%	7%	1%	1%	0%	5%
Internet/Delivery	**2%**	**4%**	**5%**	**3%**	**2%**	**3%**

Source: Derived from NEMS Household Survey Results (September 2018)
Note: Figures may not add due to rounding

5.6.5 94% of main food shopping trips within Zone 4 (Central Borough) are made within Swale, 50% of which are captured by Faversham and 43% by Sittingbourne. Of the trips within Faversham, 39% are made to stores outside of the Town Centre. In Sittingbourne, town centre stores account for 28% and other stores 15% of trips. Only 3% of respondents within Zone 4 did their main food shopping outside of the Borough.

5.6.6 Within Zone 5 (Faversham), 82% of main food shopping trips are retained in Faversham. Of these, 38% are captured by the Town Centre stores and 45% by other stores elsewhere in the town. Sittingbourne attracts 5% of main food shopping within this Zone, while 11% of trips are made outside of the Borough with Whitstable capturing 8% and Canterbury 3% of trips.

5.6.7 Finally, in terms of Zone 6 (Borough East), 34% of main shopping trips are captured by stores outside of Swale, primarily at Canterbury and Whitstable. Inside Swale, 35% of trips are made to Faversham Town Centre, 22% to other stores within Faversham and 5% of trips are made to Sittingbourne.

5.6.8 Overall, the retention rates of main food shopping trips within the Borough are considered to generally be good.

Top-Up Shopping

5.6.9 Figure 5.7 identifies that Swale retains 99% of top-up shopping trips from Zone 1 (Isle of Sheppey), with 94% retained on the Isle of Sheppey and 5% in Sittingbourne. Of the trips retained within Sheppey, 48% are captured by town centre stores, 24% by stores at Neats Court Retail Park and 22% at other locations.

5.6.10 For Zone 2 (Borough West), Sittingbourne attracts 52% of top-up shopping trips, 24% of which are captured by town centre stores and 28% by stores in other locations in the town. The remainder of trips are primarily made at facilities within the Borough but outside of the 3 towns (33%) and at stores outside of the Borough (12%).

5.6.11 Sittingbourne retains 92% of top-up shopping trips from its zone (Zone 3). Of these, 35% of trips are made at town centre locations and 57% to other locations in the town. 5% of top-up trips are made to other locations outside of the three main towns within the Borough.

Figure 5.7: Principal Top-Up Food Shopping Patterns

Zones	**Isle of Sheppey**	**Borough West**	**Sittingbourne**	**Central Borough**	**Faversham**	**Borough East**
	1	**2**	**3**	**4**	**5**	**6**
Inside Borough	**99%**	**88%**	**98%**	**93%**	**95%**	**72%**
Sittingbourne	**5%**	**52%**	**92%**	**28%**	**0%**	**8%**
Sittingbourne Town Centre	0%	24%	35%	19%	0%	3%
Sittingbourne Other	5%	28%	57%	8%	0%	5%
Faversham	**0%**	**1%**	**1%**	**42%**	**95%**	**62%**
Faversham Town Centre	0%	1%	0%	19%	65%	41%
Faversham Other	0%	0%	1%	23%	30%	21%
Isle of Sheppey	**94%**	**2%**	**0%**	**0%**	**0%**	**0%**
Sheerness Town Centre	48%	2%	0%	0%	0%	0%
Neats Court Retail Park	24%	0%	0%	0%	0%	0%
Other locations on the Isle of Sheppey	22%	0%	0%	0%	0%	0%
Other locations inside of the Borough	**0%**	**33%**	**5%**	**23%**	**0%**	**1%**
Outside Borough	**1%**	**12%**	**2%**	**7%**	**5%**	**27%**
Canterbury	0%	0%	1%	2%	3%	5%
Gillingham	0%	6%	0%	0%	0%	0%
Whitstable	0%	0%	0%	4%	1%	16%
Other locations outside of the Borough	1%	7%	1%	1%	0%	6%
Internet/Delivery	**0%**	**0%**	**0%**	**0%**	**0%**	**1%**

Source: Derived from NEMS Household Survey Results (September 2018)
Note: Figures may not add due to rounding

5.6.12 Within Zone 4 (Central Borough), the highest proportion of top-up shopping trips take place at Faversham (42%) with 23% attracted to stores outside the town centre with 19% inside. Sittingbourne is the second most popular destination for top-up shopping trips from this zone attracting 28% of trips. Facilities outside of the main towns within the Borough attract 23% of top-up shopping trips, with Teynham Local Centre attracting 22% of these trips. Only 7% of top-up shopping trips take place at shops located outside of the Borough.

5.6.13 Faversham retains 95% of top-up shopping trips from its zone (Zone 5), with 65% made in town centre stores and 30% in other locations within the town. The remaining 5% of top-up shopping trips take place outside the Borough.

5.6.14 Faversham retains the majority (62%) of shopping trips from Zone 6 (Borough East). Some 27% of top-up shopping trips take place outside of the Borough with 16% of trips taking place at Whitstable, 5% at Canterbury and 3% at Ashford.

Comparison Goods Shopping Patterns

All Comparison Goods

5.6.15 Within the Isle of Sheppey Zone (Zone 1) retail facilities retain just 29% of comparison goods shopping trips. Of the remaining 71% of trips, 26% take place in Sittingbourne, whilst 21% are attracted to a number of different retail facilities outside the Borough. Just over a fifth of comparison goods shopping on the Isle of Sheppey takes place on the internet.

5.6.16 Within Zone 2 (Borough West), Sittingbourne attracts the highest proportion of comparison goods shopping trips (40%). Overall, the Borough's retention rate of trips is 44%, with 35% of trips taking place outside the Borough and 21% of comparison goods shopping taking place on the internet. Of the trips taking place outside the Borough, Bluewater Shopping Centre attracts the highest proportion (8%).

5.6.17 Bluewater Shopping Centre also has an influence on comparison goods shopping trips in the Sittingbourne Zone (Zone 3) attracting 9% of trips. Sittingbourne itself retains approximately half of trips from the zone whilst the Internet accounts for 23% of comparison goods transactions.

5.6.18 For Zone 4 (Central Borough), 41% of comparison goods shopping trips are retained within the Borough. Sittingbourne attracts 25% (15% in the town centre, 10% in other locations), Faversham attracts 14% (13% in the town centre) and other locations inside the Borough attract 2% of trips. 31% of shopping trips from Zone 4 are made to locations outside of the Borough, with stores in Canterbury (18%) the most popular destination. 29% of comparison shopping within the zone is done via the internet.

Figure 5.8: Comparison Goods Shopping Patterns

Zones	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East
	1	2	3	4	5	6
Inside Borough	**56%**	**44%**	**52%**	**41%**	**32%**	**18%**
Sittingbourne	**26%**	**40%**	**51%**	**25%**	**7%**	**1%**
Sittingbourne Town Centre	10%	22%	34%	15%	4%	1%
Sittingbourne Other	16%	17%	17%	10%	3%	0%
Faversham	**0%**	**0%**	**0%**	**14%**	**24%**	**16%**
Faversham Town Centre	0%	0%	0%	13%	24%	15%
Faversham Other	0%	0%	0%	1%	0%	1%
Sheerness	**29%**	**2%**	**0%**	**0%**	**0%**	**0%**
Sheerness Town Centre	26%	1%	0%	0%	0%	0%
Neats Court Retail Park	2%	1%	0%	0%	0%	0%
Other locations inside of the Borough	**2%**	**2%**	**2%**	**2%**	**0%**	**0%**
Outside Borough	**21%**	**35%**	**25%**	**31%**	**48%**	**63%**
Canterbury	1%	2%	5%	18%	40%	45%
Ashford	0%	1%	1%	2%	2%	2%
Gillingham	3%	5%	2%	2%	0%	0%
Chatham	1%	3%	1%	0%	1%	0%
Maidstone	6%	6%	3%	1%	0%	3%
Hempstead	2%	5%	2%	1%	0%	0%
Bluewater Shopping Centre	4%	8%	9%	2%	1%	3%
Other locations outside of the Borough	4%	5%	2%	4%	5%	9%
Internet/Delivery	**22%**	**21%**	**23%**	**29%**	**20%**	**19%**

Source: Derived from NEMS Household Survey Results (September 2018)
Notes: Figures may not add due to working

5.6.19 For residents within Zone 5 (Faversham), locations outside of Swale attract the highest proportion of comparison goods shopping trips (48%) with Canterbury proving the most popular destination (40% of trips). Of the locations within Swale, Faversham Town Centre attracts 24% of comparison goods trips and Sittingbourne 7%. Internet shopping accounts for 20% of comparison goods purchases.

5.6.20 Locations outside of the Borough attract the majority (63%) of comparison goods shopping trips from Zone 6 (Borough East). Canterbury attracts 45%, Maidstone and Bluewater both attract 3% with other locations accounting for the rest of these trips. Within Swale, only 16% of trips are made to Faversham and 1% to Sittingbourne. Comparison goods shopping over the internet accounts for a fifth of purchases in the zone.

5.6.21 Overall, with the exception of Zones 5 (Faversham) and 6 (Borough East), retail facilities in the Borough attract the highest proportion of comparison goods trips. Canterbury has a substantial influence on trips in both Zones 5 and 6 (40% and 45% respectively).

Non-bulky Comparison Goods Excluding Clothing & Footwear

5.6.22 Sittingbourne's retention of non-bulky comparison goods shopping trips varies across the Borough's Zones with Zone 1 retaining the highest proportion of trips (57%) and Zone 6 (Borough East) retaining the least (20%). We summarise the other key headline findings below:

- Sittingbourne has an influence on shopping trips across the Borough and, with the exception of Zone 6 (Borough East), attracts residents from each zone.
- Sheerness retains approximately a third of trips from the Isle of Sheppey Zone (Zone 1). Sittingbourne attracts around a fifth of trips with retail facilities outside also attracting around a fifth of trips.
- Faversham retains around a quarter of shopping trips from its zone (Zone 5) and attracts 17% and 20% of trips from Zones 4 (Central Borough) and 6 (Eastern Borough) respectively. It does not attract any trips from other zones.
- Canterbury has a significant influence on shopping patterns in Zones 5 (Faversham) and 6 (Borough East).
- Bluewater Shopping Centre attracts trips from each Borough zone, notably from Zones 2 (Borough West) and 3 (Sittingbourne) where it attracts 10% of trips.
- The influence of internet shopping varies across the zones (between 20% and 33%).

Figure 5.9: Non-Bulky Comparison Goods Shopping Patterns (Excl. Clothing & Footwear)

Zones	Isle of Sheppey 1	Borough West 2	Sittingbourne 3	Central Borough 4	Faversham 5	Borough East 6
Inside Borough	**57%**	**43%**	**49%**	**40%**	**34%**	**20%**
Sittingbourne	**21%**	**37%**	**47%**	**20%**	**7%**	**0%**
Sittingbourne Town Centre	8%	24%	38%	14%	5%	0%
Sittingbourne Other	13%	13%	10%	6%	2%	0%
Faversham	**0%**	**0%**	**0%**	**17%**	**27%**	**20%**
Faversham Town Centre	0%	0%	0%	17%	26%	19%
Faversham Other	0%	0%	0%	1%	0%	0%
Sheerness	**34%**	**3%**	**0%**	**0%**	**0%**	**0%**
Sheerness Town Centre	31%	2%	0%	0%	0%	0%
Neats Court Retail Park	3%	1%	0%	0%	0%	0%
Other locations inside of the Borough	**2%**	**3%**	**1%**	**3%**	**0%**	**0%**
Outside Borough	**19%**	**34%**	**23%**	**27%**	**43%**	**59%**
Canterbury	1%	2%	5%	18%	36%	42%
Ashford	0%	0%	0%	1%	2%	2%
Gillingham	2%	2%	1%	0%	0%	0%
Chatham	1%	2%	1%	0%	1%	0%
Maidstone	4%	6%	3%	1%	0%	4%
Hempstead	2%	6%	1%	1%	0%	1%
Bluewater Shopping Centre	5%	10%	10%	3%	1%	3%
Other locations outside of the Borough	3%	6%	2%	5%	3%	9%
Internet/Delivery	**24%**	**23%**	**28%**	**33%**	**23%**	**20%**

Source: Derived from NEMS Household Survey Results (September 2018)
Notes: Figures may not add due to working

Clothing and Footwear

5.6.23 Turning to clothing and footwear shopping patterns in the Borough, Figure 5.10 shows that across all zones, more shopping trips for clothing and footwear are made to destinations outside of Swale than inside. The leakage rates vary from between 48% in Zone 1 (Isle of Sheppey) to 77% within Zone 5 (Faversham). The other key headline findings are summarised as follows:

- Sittingbourne retains just 18% of trips from its zone (Zone 3). It also attracts trips from Zone 2 (Borough West) (19%) and Zone 4 (Central Borough). It has relatively limited influence on trips elsewhere in the Borough.
- Sheerness captures only a quarter of shopping trips from the Isle of Sheppey zone (Zone 1). Maidstone draws a fifth of shopping trips from this zone.

- Faversham captures a relatively small proportion (9%) of shopping trips from its zone (Zone 5) and actually attracts slightly more trips from neighbouring Zone 4 (Central Borough) and Zone 6 (Borough East) (11% and 17% respectively).
- Canterbury again has a significant influence on shopping patterns in Zones 5 (Faversham) and 6 (Borough East) capturing the majority of trips (66% and 52% respectively).
- Bluewater Shopping Centre's influence on clothing and footwear trips is primarily felt in the zones in the western part of the Borough where 15% if trips are attracted from Zone 2 (Borough West) and 24% from Zone 3 (Sittingbourne).
- Internet shopping takes place in all six zones with at least 12% of purchases made online. The internet has the most influence with clothing and footwear purchases in Zone 1 (Isle of Sheppey) where 23% of purchases are made on line.

Figure 5.10: Clothing and Footwear Shopping Patterns

Zones	**Isle of Sheppey**	**Borough West**	**Sittingbourne**	**Central Borough**	**Faversham**	**Borough East**
	1	**2**	**3**	**4**	**5**	**6**
Inside Borough	**29%**	**25%**	**20%**	**22%**	**10%**	**17%**
Sittingbourne	**4%**	**19%**	**19%**	**11%**	**1%**	**0%**
Sittingbourne Town Centre	2%	19%	18%	6%	1%	0%
Sittingbourne Other	2%	0%	2%	5%	0%	0%
Faversham	**0%**	**0%**	**0%**	**11%**	**9%**	**17%**
Faversham Town Centre	0%	0%	0%	9%	9%	10%
Faversham Other	0%	0%	0%	1%	0%	7%
Sheerness	**24%**	**6%**	**0%**	**0%**	**0%**	**0%**
Sheerness Town Centre	21%	1%	0%	0%	0%	0%
Neats Court Retail Park	3%	5%	0%	0%	0%	0%
Other locations inside of the Borough	**1%**	**1%**	**1%**	**0%**	**0%**	**0%**
Outside Borough	**48%**	**60%**	**68%**	**65%**	**77%**	**65%**
Canterbury	2%	6%	11%	39%	66%	52%
Ashford	5%	2%	7%	7%	2%	3%
Gillingham	0%	9%	7%	3%	0%	0%
Chatham	2%	7%	4%	0%	0%	0%
Maidstone	20%	4%	9%	1%	0%	4%
Hempstead	7%	12%	7%	1%	0%	0%
Bluewater Shopping Centre	6%	14%	24%	4%	1%	1%
Other locations outside of the Borough	6%	5%	1%	10%	7%	4%
Internet/Delivery	**23%**	**15%**	**12%**	**13%**	**13%**	**19%**

Source: Derived from NEMS Household Survey Results (September 2018)
Notes: Figures may not add due to working

Bulky Comparison Goods

5.6.24 Retail facilities outside the Borough generally have less of an influence on Swale Borough residents bulky comparison goods shopping behaviour, albeit in Zones 5 (Faversham) and 6 (Borough East) Canterbury has a greater influence on shopping trips.

Figure 5.11: Bulky Goods Shopping Patterns

Zones	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East
	1	2	3	4	5	6
Inside Borough	**72%**	**54%**	**70%**	**50%**	**27%**	**9%**
Sittingbourne	**56%**	**52%**	**67%**	**43%**	**12%**	**2%**
Sittingbourne Town Centre	14%	20%	30%	23%	5%	2%
Sittingbourne Other	42%	31%	37%	21%	7%	0%
Faversham	**0%**	**0%**	**0%**	**6%**	**15%**	**6%**
Faversham Town Centre	0%	0%	0%	6%	15%	6%
Faversham Other	0%	0%	0%	0%	0%	0%
Sheerness	**16%**	**1%**	**0%**	**0%**	**0%**	**0%**
Sheerness Town Centre	15%	0%	0%	0%	0%	0%
Neats Court Retail Park	1%	1%	0%	0%	0%	0%
Other locations inside of the Borough	**0%**	**0%**	**3%**	**0%**	**1%**	**1%**
Outside Borough	**10%**	**25%**	**15%**	**27%**	**56%**	**70%**
Canterbury	1%	1%	3%	15%	44%	56%
Ashford	0%	0%	0%	4%	1%	3%
Gillingham	5%	7%	2%	1%	0%	0%
Chatham	0%	2%	1%	0%	1%	0%
Maidstone	1%	7%	2%	0%	0%	2%
Hempstead	1%	3%	0%	0%	0%	0%
Bluewater Shopping Centre	0%	2%	5%	1%	0%	3%
Other locations outside of the Borough	1%	3%	1%	5%	8%	5%
Internet/Delivery	**18%**	**21%**	**15%**	**24%**	**17%**	**21%**

Source: Derived from NEMS Household Survey Results (September 2018)
Notes: Figures may not add due to working

5.6.25 The key findings are summarised below:

- The Borough retains over half (between 50-72%) of bulky comparison goods shopping trips in Zones 1-4, but the majority of trips in Zones 5 (Faversham) and 6 (Borough East) take place outside the Borough (56% and 70% respectively).
- Sittingbourne attracts the majority of bulky goods trips in Zones 1-3 (between 52-67%) and is also a key attractor for residents in Zone 4 (Central Borough) (43%).

- Sheerness retains only 16% of trips from the Isle of Sheppey zone (Zone 1) with Sittingbourne being the main attractor of trips from the island.
- Reflecting its limited bulky comparison goods facilities in the town, Faversham retains only 15% of trips from its zone (Zone 5) and has little influence beyond.
- Bluewater Shopping Centre has very little influence on bulky good shopping trips undertaken by residents in the Borough.
- Online shopping accounts for between 15% and 24% of all bulky comparison goods purchases across all zones. Zone 4 has the highest proportion whilst Zone 3 the lowest.

Internet

5.6.26 The NEMS survey results identify that, for certain comparison goods, residents in Swale are proficient at shopping online. The goods most commonly bought online are books, CDs and DVDs (between 49% and 72%). This is followed by small electrical goods (26-47%) and toys, games, bicycles & other sporting or recreational goods (22-59%). As expected, Chemist goods and DIY items are the least common comparison goods to be purchased online, at 2-11% and 2-9% respectively.

5.6.27 For convenience goods, the level of internet shopping is consistent across the zones at between 2% and 5%. As expected, given the nature of a top-up food shop, a low percentage of this is done online.

Figure 5.12 Internet Shopping Market Share

Zones	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East
Goods Category	**1**	**2**	**3**	**4**	**5**	**6**
Main Food	2%	4%	5%	3%	2%	3%
Top-up Food	0%	0%	0%	0%	0%	1%
Clothing and Footwear	23%	15%	12%	13%	13%	19%
Books, CDs & DVDs	59%	51%	72%	56%	53%	49%
Furnishings & Household Textile Goods	18%	17%	21%	21%	13%	20%
Small Household Goods	7%	10%	15%	29%	18%	9%
Clocks, Jewellery, Watches	9%	22%	25%	15%	24%	9%
Toys, Games, Bicycles & Others	43%	22%	27%	59%	24%	23%
Chemist Goods	2%	5%	11%	3%	2%	3%
Large Household Electricals	31%	41%	22%	41%	34%	38%
Small Electrical Goods	31%	34%	26%	47%	28%	29%
Furniture, Carpets & Floor Coverings	16%	12%	18%	21%	8%	10%
DIY incl. Gardening Goods	5%	3%	2%	9%	4%	5%

Source: Derived from NEMS Household Survey Results (September 2018)

5.6.28 In terms of how items purchased online are received, Figure 5.13 sets out the proportion that were via home delivery and those by click and collect.

Figure 5.13: Online Purchases Delivery Method

Goods Category	Online Delivery Method (%)		
	Home Delivery	Click and Collect	Downloaded
Main Food	100	0	N/A
Top-up Food	N/A	N/A	N/A
Clothing & Footwear	98	2	N/A
Books, CDs & DVDs	93	1	5
Furnishings & Household Textile Goods	91	9	N/A
Small Household Goods	99	1	N/A
Clocks, Jewellery, Watches	99	0	N/A
Toys, Games, Bicycles & others	99	1	N/A
Chemist Goods	98	0	N/A
Large Household Electricals	98	1	N/A
Small Electrical Goods	95	5	N/A
Furniture, Carpets & Floor Coverings	99	0	N/A
DIY incl. Gardening Goods	100	0	N/A

Source: Derived from NEMS Household Survey Results (September 2018)
Note: Figures may not add up to 100% due to rounding and/or additional answers provided in survey

5.6.29 In summary, the results show that:

- for online convenience goods shopping, all were received via home delivery;
- over 91% of all comparison goods categories were home delivered;
- purchases of furnishings and household textile goods were the most commonly collected from store (9%); and
- roughly 5% of purchases for books, CDs and DVDs were downloaded rather than delivered or collected from store.

5.7 Summary

5.7.1 The above sections set out the existing retail provision within Swale Borough, surrounding competing centres and an assessment of the shopping patterns of residents within the study area. The subsequent sections provide health checks and our qualitative assessment of any retail related deficiencies within each of the centres.

6.0 Qualitative Assessment – Sittingbourne Town Centre Health Check

6.1 Introduction

6.1.1 Following the findings of the household telephone survey and the retail market share patterns, this section provides a detailed qualitative health check assessment of the vitality and viability of Sittingbourne Town Centre to understand the health of the centre and assist in identifying any qualitative needs.

6.2 Vitality and Viability Town Centre Health Check

6.2.1 The following health check assessment is based on the indicators published in the NPPG to assess the vitality and viability of Sittingbourne Town Centre. Details of the criteria within the NPPG and the methodology utilised for the health check is contained at **Appendix B**.

6.2.2 Sittingbourne is the highest tier centre within Swale Borough and is designated as the Main Borough Urban Centre under Local Plan Policy ST3. The adopted Local Plan seeks to make Sittingbourne the primary urban focus for growth with development to support town centre regeneration.

6.2.3 The defined town centre is generally linear in form, following the length of the High Street which transitions into East Street and West Street at each end. To the north, the town centre follows the edge of St Michael's Road and extends to the station before again following St Michael's Road to the junction with West Street and London Road. To the south, the town centre boundary follows the northern edge of the Avenue of Remembrance and then Fairview Road to the junction of East Street and St Michael's Road.

6.2.4 The primary shopping area defined on the adopted proposals map is generally linear in form, encompassing the length of High Street and the Forum Shopping Centre. High Street forms part of a one-way system with the road being narrowed to allow better pedestrian movement. Secondary shopping frontages are located along East and West Streets at either end of High Street, where the road is two-way and pavements are noticeably narrower.

6.2.5 The town centre is currently seeing substantial investment being delivered by The Spirit of Sittingboure. The mixed-use scheme, aiming for completion by early 2020, will deliver a new 8-screen multi-plex screen cinema, six new restaurant units, a 63 bed hotel, 213 residential apartments and a multi-storey car park.

Diversity of Uses & Representation

6.2.6 We have reviewed the diversity of retail and service uses accommodated in the town centre (by number, type and quantum of floorspace) and provide our findings below. A breakdown of the unit numbers in the town centre is shown below in Figure 6.1 and 6.2. A plan illustrating the location and use of each unit in the town centre (as defined by Experian Goad) is provided at **Appendix C**.

6.2.7 It should be noted that Figures 6.1 and 6.2 exclude a number of uses, including health centres, religious institutions and educational institutions (Use Class D1) as well as offices (Use Class B1).

Figure 6.1: Sittingbourne Town Centre Diversity of Use for Commercial Units

	Sittingbourne		UK Average %
	No.	%	
Convenience	26	10	9
Comparison	72	28	30
Retail Service	52	20	15
Leisure Service	55	21	24
Finance & Business Service	25	10	10
Vacant	30	12	11
TOTAL	**260**	**100**	**100**

Figure 6.2: Sittingbourne Town Centre Diversity of Use for Commercial Floorspace

	Sittingbourne		UK Average %
	Sqm	%	
Convenience	11,660	20	15
Comparison	16,410	28	35
Retail Service	6,250	11	7
Leisure Service	16,020	27	25
Finance & Business Service	3,950	7	8
Vacant	4,800	8	10
TOTAL	**59,090**	**100**	**100**

Source: Experian Goad Survey, September 2018
UK average figure is at September 2018 (latest available at time of writing)
Excludes health centres, religious institutions, education institutions and offices
% figures may not add due to rounding

Convenience Goods

6.2.8 Sittingbourne provides a total of 26 convenience goods units with a combined floorspace of 11,660sq m gross. The Sainsbury's Foodstore, located on the Avenue of Remembrance is the largest convenience retailer within the town centre, providing 5,985sqm gross of floorspace. The town centre also benefits from Lidl and Aldi foodstores which provide 1,475 and 1,352 sqm gross of floorspace respectively. Other national convenience retailers in Sittingbourne include Iceland, Bargain Booze, Timpson, Holland & Barrett, and Greggs. Several smaller independent retailers are also present, including a tobacconist, butcher, shoe repair/engraving shop, and newsagents.

6.2.9 Figure 6.1 identifies that the current proportion of convenience goods stores in the town centre is comparable to the UK average. In terms of the proportion of convenience goods floorspace represents 20% of all town centre commercial floorspace, which is above the national average of 15%. This is not surprising given the foodstore provision in the town centre.

Comparison Goods

6.2.10 There are 72 comparison goods units in Sittingbourne, which represents 28% of the total units in the town centre. The proportion of units occupied by comparison goods retailers (28%) is slightly below the UK average (30%). Overall, 16,410 sqm floorspace is provided, equating to 28% of the total floorspace, a much lower proportion than the national average of 35%.

6.2.11 A breakdown of the 72 comparison units shows that 22 provide sporting goods, footwear, clothing or jewellery, 8 are charity shops, while other units include book shops, mobile phone shops, florists, pet shops and discount stores.

6.2.12 There is a reasonable range of national multiple retailers present within Sittingbourne. Clothing retailers include Burton, Bon Marche, Peacocks, The Edinburgh Woollen Mill, New Look, Sports Direct and M&Co. Other national comparison retailers include The Works, Clintons, WH Smith, Boots, Superdrug, Wilko, Game, Savers, CEX Entertainment, Poundland and Poundstretcher. However, of the 31 'major retailers' identified by Experian as key attractors to a town centre, Sittingbourne contains only 10.

6.2.13 Independent retailers occupy 56% (40) of the comparison units. The independent operators cover a broad range of retail type, including pet shops, gift shops, household goods and jewellers, and typically operate from the smaller units within Sittingbourne Town Centre. Overall, the town centre is considered to provide a good range of independent retailers.

Retail Services

6.2.14 The retail service offering in Sittingbourne is strongly represented by hairdressers, beauty salons and tattoo parlours with 31 out of the 52 retail service units (59%) occupied by such uses. In addition to these uses, the town centre offers a post office, dry cleaners, several undertakers, car repair garages and opticians.

6.2.15 The current provision of units in retail service use (20%) is higher than the UK average (15%). In floorspace terms the proportion of floorspace in retail service use (11%) is also higher than the UK average (7%). The retail service provision in the town centre is considered to be healthy.

Leisure Services

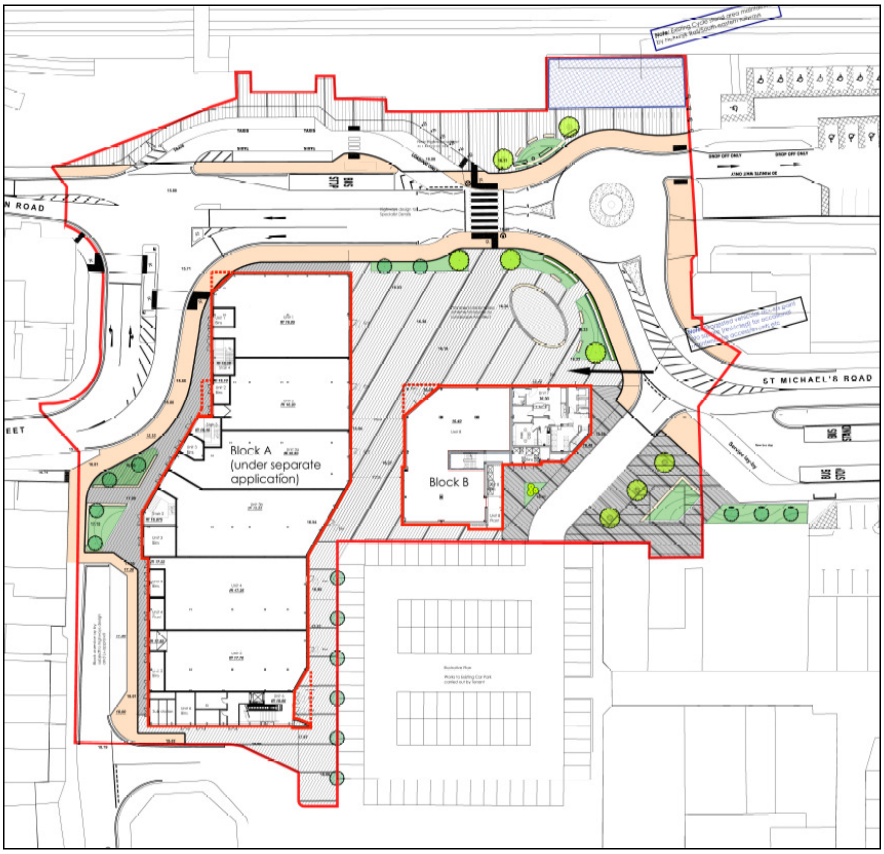
6.2.16 There is some 16,020 sqm of leisure service floorspace within Sittingbourne, which represents 27% of the total floorspace provision in the town centre. This provision is slightly higher (+2%) than the national average of 25%. In unit number terms, leisure services occupy 21% of the units in the town centre, which is lower (-3%) than the national average of 24%. This indicates that the units providing leisure uses are larger on average than those found in other town centres. This is borne out by providers including The Avenue Theatre (1,530 sqm), The Swallows Leisure Centre (3,340 sqm), Mecca Bingo (910 sqm) and The Golden Hope Public House (1,110 sqm) all occupying large premises.

6.2.17 There are 20 fastfood & takeaway operators within Sittingbourne Town Centre, occupying 7.7% of the available units. Whilst the proportion of units in fastfood/takeaway use is slightly higher than the UK average (5.7%) the number of units is not considered to detract from the vitality and viability of the town centre.

6.2.18 The majority of leisure services are provided by independent operators (78%), although national multiple operators include Starbucks, Costa Coffee, JD Wetherspoon and the bookmakers Betfred, William Hill, Coral and Paddy Power.

6.2.19 The leisure services provision in the town centre will be significantly improved following the completion of the mixed use redevelopment scheme to the West of The Forum Centre. The Spirit of Sittingbourne aiming for completion by early 2020, will deliver a new 8-screen multi-plex screen cinema, six new restaurant (including Nando's and Pizza Express) and a 63 bed hotel.

Figure 6.3: Spirit of Sittingbourne Redevelopment Site Plan



Source: Planning Application 16/506081

Financial and Business Services

6.2.20 There are 25 providers of financial and business services within the town centre including 13 estate agencies, 7 banks and building societies, a pawnbroker, accountant, solicitor, employment agency and a business equipment provider.

6.2.21 The proportion of financial and business service units and floorspace is broadly in line with the UK. We do not consider there to be any particular qualitative deficiencies in financial and business service provision in the town centre.

Markets

6.2.22 Sittingbourne Town Centre is also home to several markets, each offering a range of produce. Sittingbourne Market operates every Friday along the High Street and offers a range of everyday goods sold by local traders.

6.2.23 An artisan market operates along the High Street on the second Saturday of every month between 10am – 2pm offering a more specialised range of products from local producers including food and gifts.

6.2.24 A monthly themed market is also held on the fourth Saturday of the Month, again in the High Street from 10am-2pm. Past themes have included 'Food Fest', 'Simply Vinatage' 'Shop Local' and seasonal Christmas Markets.

6.2.25 Overall, the town centre is considered to be reasonably well provided for in terms of markets.

Vacancies

6.2.26 The level of vacancies across the town centre is comparable with the national average. Overall, there are 30 vacant units (12% of the total) occupying 8% of the total floorspace. The national average is presently 11% in terms of vacant units and 10% vacant floorspace.

6.2.27 The vacancies are spread throughout the town centre with no particular concentration, although it is noted that there are 6 vacant units presently within the Forum Shopping Centre, and the two largest vacant units on the High Street are 2 doors apart from each other (The former Argos and Store Twenty One units at 121 and 129 High Street respectively).

Operator Requirements

6.2.28 The 'Requirements List' identifies a total of 6 retail and commercial leisure operators currently seeking premises in the town centre. The operators seeking space in the town are shown in Figure 6.4 below.

Figure 6.4: Operator Requirements for Sittingbourne Town Centre

Name	Min Size (sq m)	Max Size (sq m)
Retail/Services		
Aldi	930	
Monkey Puzzle Day Nurseries	186	558
Age UK	93	650
Leisure – Food & Drink		
Subway	18.5	111
Pizza Hut Delivery	93	
Leisure - Other		
Anytime Fitness	371	743

Source: 'The Requirements List'

Pedestrian Flows

6.2.29 During our surveys, the centre was observed to be reasonably busy. Good levels of activity were observed along the pedestrianised length of High Street particularly at the entrance to the Forum and the junction with central avenue opposite. The eastern and western ends of the high street were observed to have lower levels of pedestrian activity, as was Station Street and Roman Square which leads to the Sainsbury's supermarket on the Avenue of Remembrance.

Accessibility

6.2.30 The accessibility of the centre is determined by the ease and convenience of access by a choice of means of travel – including that which is provided to pedestrians, cyclists and disabled people – and the ease of access from the main arrival points to the principal attractions in the centre.

6.2.31 Sittingbourne benefits from a main line railway station located to the north of the town centre, approximately a five-minute walk from the High Street. Train services stop here frequently and offer services to London St Pancras, London Victoria, Canterbury and Dover with other stops in between. The connectivity between the High Street and the railway station will be significantly improved following the completion of the Spirit of Sittingbourne leisure quarter redevelopment scheme.

6.2.32 Sittingbourne is well served by bus services with bus services available to Chatham, Maidstone, Sheerness, Faversham and Canterbury. Bus stops are located along St Michael's Road, adjacent to the railway station, on Bell Street, the Avenue of Remembrance and on East and West Streets.

6.2.33 Cycle parking in Sittingbourne is available at several points throughout the town centre. A large number of spaces are provided at the railway station, and other spaces are available outside the Sainsbury's supermarket and at the entrance to the Forum Shopping Centre. At the time of our visits, the cycle parking was not particularly well used.

6.2.34 Sittingbourne is well connected by road with the A2 providing the main link between east and west. The A249 links the west of the town with the Isle of Sheppy and the M2, which runs to the south provides wider connections to further afield.

6.2.35 There are a number car parks within and on the edge of the town centre. These include:

- Albany Road (104 spaces)
- St Michaels Road (126 spaces)
- Swallows Leisure Centre (120 spaces)
- Sainsbury's store (400 spaces)
- Central Avenue (60 spaces)
- Cockleshell Walk (96 spaces)
- Crown Quay Lane (42 spaces)
- The Forum (162 spaces)
- Swallows (86 spaces)
- Swale House (70 spaces (weekends and Bank Holidays only))
- Spring Street (72 spaces)
- Bell Road (24 spaces)

6.2.36 Car parking provision in the town centre will be enhanced following the completion of the Spirit of Sittingbourne 308 multi-storey car park.

6.2.37 It is noted that the NEMS household survey identified that 76% of respondents travel to Sittingbourne via car. However, 8% mentioned more/cheaper parking and 8% improved access/less traffic congestion as measures that would encourage them to visit the town centre more often.

Perception of Safety

6.2.38 Sittingbourne Town Centre benefits from a CCTV network with good coverage of the High Street, car parks and the railway station. The network monitors the town centre, helping to cut down on crime and traffic offences.

6.2.39 A search of local crime statistics identified that 113 crimes were committed within a mile of the town centre in July 2018. Of these crimes, 90 were recorded as anti-social behavioural offences and 14 as violent and/or sexual offences. The most common areas where crimes were committed were at Sittingbourne Railway station (9 crimes) and on or near West Street (5 crimes).

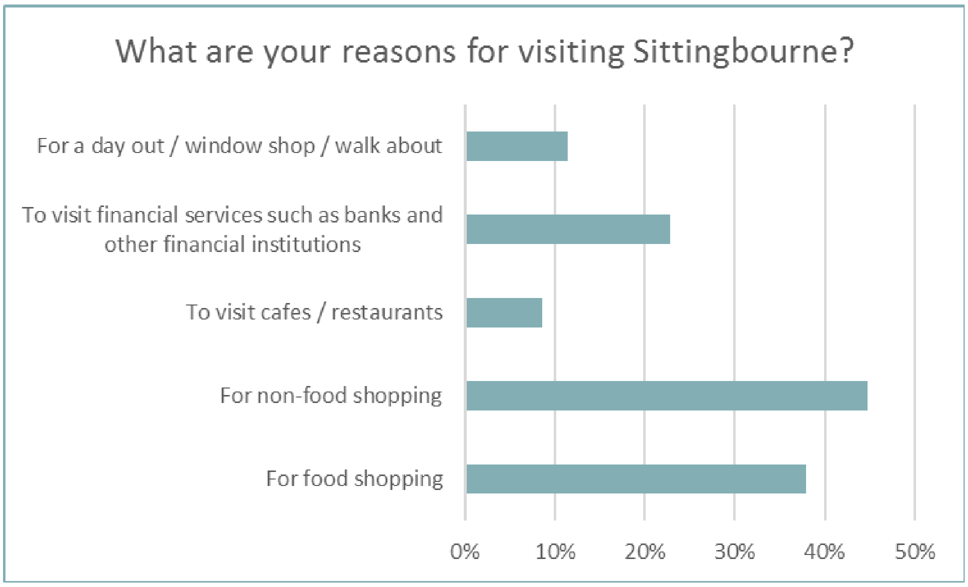
6.2.40 It is noted that respondents from the NEMS household survey did not raise any particular issues with safety/security in the town centre which supports our own views that the town centre generally felt safe during our visit in daylight hours.

Views and Behaviours

6.2.41 Using the household survey we have been able to obtain information on the main reasons why respondents visit Sittingbourne Town Centre, what they like about it and what, if anything, would encourage them to visit the centre more often.

6.2.42 Figure 6.5 below identifies that the main reasons why respondents visit the town centre is for non-food shopping (45%) and for food shopping (38%). After this, 23% identified visiting financial services as the main reason for visiting. 11% of respondents identified vising the town centre for a day out as their main reason and 9% identified visiting cafes and restaurants and the main reason for visiting.

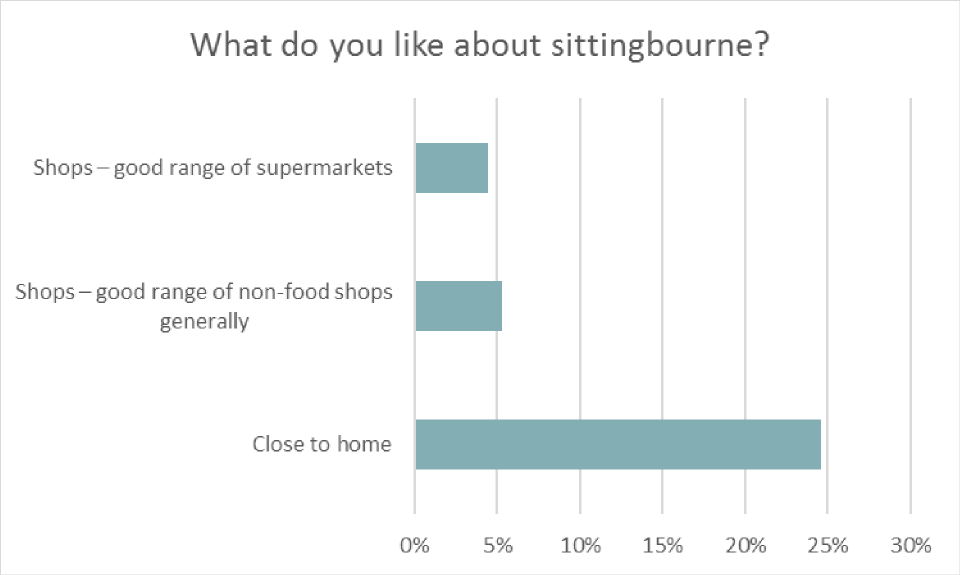
Figure 6.5: Main reason for visiting Sittingbourne Town Centre



Source: Q34a and 34b (1st and 2nd mention combined), NEMS Household Survey (September 2018)

6.2.43 When asked what they liked about Sittingbourne, 25% of respondents cited its location close to home as the main reason. The range of non-food shops (5%) and supermarkets (4%) were also given as reasons.

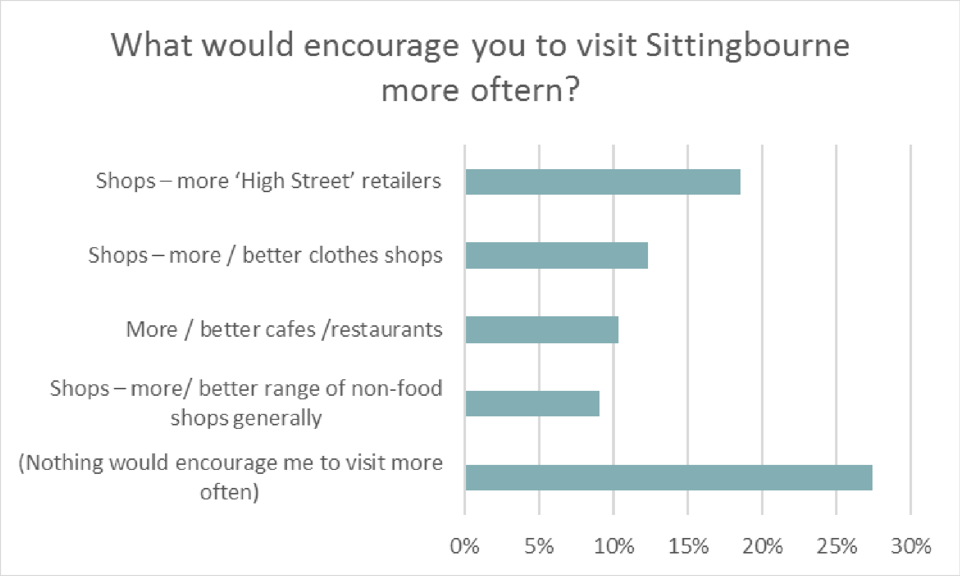
Figure 6.6: Main likes about Sittingbourne Town Centre



Source: Q35a and 35b (1st and 2nd mention combined), NEMS Household Survey (September 2018)

6.2.44 When asked what measures would encourage them to visit Sittingbourne Town Centre more often, 19% cited more 'high street' retailers as a key measure. 12% of respondents said that more/better clothes shops would encourage more frequent visits, 10% said that more/better cafes or restaurants would and 9% said that more or a better range of non-food shops in general would encourage them to visit more often. Of all the responses however, 27% of people asked indicated that nothing would encourage them to visit the centre more regularly.

Figure 6.7: Measures that would encourage visits to Sittingbourne Town Centre more often



Source: Q36a and 36b (1st and 2nd mention combined), NEMS Household Survey (September 2018)

Town Centre Environmental Quality

6.2.45 Generally, the environmental quality of the town centre is considered to be reasonable. However, overall, the public realm would benefit from improvement/modernisation with higher quality materials and landscaping.

6.2.46 At the time of our visits we did not observe much litter or graffiti and in general shopfronts are reasonably well maintained. Some shopfronts however, particularly those that are vacant or on secondary frontages are in need of improvement and detract from the appearance of the town.

6.2.47 The frontage of Wilko onto Station Road is presently a blank wall and appears somewhat oppressive when viewed from the other side of the road. Similarly, the frontage of the Lidl store onto West Street is blank and any improvements to this façade would be beneficial to this area of the town centre.

6.2.48 There are several attractive historical buildings in the town centre including St Michael's Church and the Covenant Love Chapel and the recent conversion of the old police station to a JD Wetherspoon Pub has been well realised. Some street furniture is provided in the town centre, particularly along the High Street between Station Street and Central Avenue where seating, planting and several trees contribute to the environmental quality of the centre.

6.2.49 Through traffic at either end of the High Street restricts pedestrian flows and there are limited crossing points provided in these areas.

6.3 Summary

6.3.1 Overall, Sittingbourne Town Centre is considered to display reasonable levels of vitality and viability. In particular, there is evidence of significant investor confidence in the town centre (Spirit of Sittingbourne redevelopment). Vacancies are broadly in line with the UK average with accessibility and car parking considered to be reasonable. Convenience goods retail provision is well represented whilst the comparison goods retail provision would benefit from improvement to assist in reducing the level of residents travelling to retail locations outside the Borough. More high street retailers/shops and restaurants were raised as measures to improve frequency of visits to the town centre. The environmental quality of the centre is considered to be reasonable but would benefit from improvements to public realm and landscaping.

7.0 Qualitative Assessment - Faversham Town Centre Health Check

7.1 Introduction

7.1.1 This section of the study contains the qualitative health check assessment of the vitality and viability of Faversham Town Centre to understand the health of the centre and assist in identifying any qualitative retail needs.

7.2 Vitality and Viability Town Centre Health Check

7.2.1 As per Sittingbourne, the health check assessment is based on the indicators published in NPPG to assess the vitality and viability of Faversham Town Centre. **Appendix B** contains the details of the methodology.

7.2.2 Faversham is located in the eastern part of Swale Borough, between Sittingbourne and Canterbury to the north of the A2. The town is currently designated along with Sheerness as a second-tier settlement under Policy ST2 of the adopted Local Plan.

7.2.3 Faversham Town Centre is relatively compact in nature with the primary shopping area extending around Market Street/West Street, Court Street and Preston Street, with the focal point being the historic Market Place. The southern end of Preston Street and the western extent of West street form secondary shopping frontages.

Diversity of Uses & Representation

7.2.4 The retail composition of the town centre by unit number and floorspace terms is provided in Figure 7.1 and 7.2 below. A plan illustrating the location and use of each unit in the town centre (as defined by Experian Goad) is provided at **Appendix D**.

Figure 7.1 Faversham Town Centre Diversity of Use for Commercial Units

	Faversham		UK Average
	No.	%	%
Convenience	18	10	9
Comparison	62	33	30
Retail Service	33	17	15
Leisure Service	42	22	24
Finance & Business Service	19	10	10
Vacant	15	8	11
TOTAL	**189**	**100**	**100**

Figure 7.2: Faversham Town Centre - Diversity of Use for Commercial Floorspace

	Faversham		UK Average
	Sq m	%	%
Convenience	7,430	21	15
Comparison	10,710	30	35
Retail Service	3,250	9	7
Leisure Service	8,650	24	25
Finance & Business Service	2,500	7	8
Vacant	3,270	9	10
TOTAL	**35,810**	**100**	**100**

Source: Experian Goad Survey, September 2018. UK Average is September 2018.
Notes: Figures may not add up due to rounding.
Excludes health centres, religious institutions, education institutions and offices

Convenience Goods

7.2.5 There are 18 convenience retailers within Faversham Town Centre which occupy 21% of the total floorspace (7,430 sqm), 5% higher than the national average.

7.2.6 The Tesco store on Crescent Road is the largest food retailer in the town centre providing some 4,756sq m of convenience floorspace, while the Morrisons store on North Lane, just outside of the designated town centre boundary, extends to 6,739sq m. These two large stores are supplemented by a smaller Iceland store (402sqm) and several other bakers, butchers and convenience stores. Aside from Tesco, Morrisons and Iceland, the McColl's convenience store is the only other national multiple, the rest of the convenience providers in the town centre are independent operators.

7.2.7 Additional local convenience provision is available at the Charter Market held around the Guildhall in the Market Place and along Court Street every Tuesday, Friday and Saturday. Fresh fruit and vegetables are sold, alongside other fresh bakery goods, cheese, fresh flowers and plants. Another market, The Best of Faversham Arts, Crafts and Food Market is held in Preston Street on the first and third Saturday of each month.

7.2.8 Overall, there is not considered to be any qualitative deficiencies in convenience goods provision in the town centre.

Comparison Goods

7.2.9 The town centre accommodates 62 comparison goods retailers. The proportion of units occupied by comparison goods retailers (33%) is slightly higher than the national average (30%), however, the proportion of floorspace occupied by comparison goods retailers is lower (30% compared to 35%). This suggests that the size of the units in the town centre are generally smaller than in other town centres. Indeed, it is noted that M&Co and the Multi Save store are the only comparison goods retailers to provide more than 500 sqm gross floorspace (1,180sq m and 850 sqm gross respectively).

7.2.10 In terms of the range of comparison goods in the town centre, there are 13 furniture, hardware and household goods shops, 9 clothing/fashion, accessories and jewellery retailer, 8 charity shops, 6 health & beauty/chemists, 5 booksellers and art dealers, and 5 antiques and second-hand shops. Other retailers include a cycle / cycle repair shop, toyshop, and stationers.

7.2.11 It is notable that there are only 11 national multiple retailers in the town centre, roughly 18% of the total comparison provision. These retailers include M&Co clothing, Card Factory, Specsavers and 6 national charity shops. Only 2 (Boots and Superdrug) of the key attractors identified by Experian are present in the town centre.

7.2.12 The limited number of multiple retailers present in the town centre is likely to be due, in part, to the relatively small sized units available in the town centre.

Retail Services

7.2.13 The proportion of retail service units (17%) is slightly above the UK average (15%). The town centre currently provides some 33 retail service units. The proportion of floorspace in retail service use (9%) is also slightly above the UK average (7%).

7.2.14 Retail services are heavily represented by health & beauty facilities, with 19 (59%) of the 33 units occupied by such uses. In addition to these, the centre offers opticians, vehicle repair garages, a travel agent, petrol filling station (operated by Tesco and adjacent to their foodstore), a post office, dry cleaning firm and a wedding services provider.

7.2.15 The overall level and offer of retail service provision in the town centre is considered to be reasonable.

Leisure Services

7.2.16 The leisure services available within the town centre consist of 42 units including 26 cafes, restaurants and takeaway establishments, of which all but the Domino's Pizza and Ask Italian restaurant are independently operated.

7.2.17 Other leisure uses present include 10 public houses or bars, 2 betting offices and an amusement arcade. Again all of these are independently operated except for the betting offices run by Jennings Bet and Coral. In addition to these, an independently owned and run single screen cinema, The Royal, is located on Market Place.

7.2.18 Faversham Pools Leisure Centre and The Arden Theatre are located just outside of the designated town centre boundary on Cross Lane but are included within the GOAD survey.

7.2.19 In unit and floorspace terms, the current leisure service provision within the town centre is slightly lower than the national averages. In floorspace terms 24% is occupied by leisure services (compared to a UK average of 25%) and in unit terms, 22% are occupied by leisure services (compared to UK average of 24%).

Financial & Business Services

7.2.20 For its size, the town centre provides a reasonable range of financial and business providers including 8 estate agencies, 4 banks and building societies (Natwest, Lloyds, Barclays, Nationwide), 2 solicitors, a financial advisor, accountants office, employment agency, stonemason and a locksmith.

7.2.21 The financial and business services provision in the town centre is comparable with the national average indicating that Faversham contains a reasonable choice of services.

Vacancies

7.2.22 The town centre benefits from a vacancy rate which is below the national average in both floorspace and unit terms. At the time of the GOAD survey, 15 units, totalling 3,270sq m gross floorspace, were recorded as being vacant.

7.2.23 The vacant units vary in size with the largest being the former Chinese restaurant on Preston Street, which extends to 880 sqm. The majority of the vacant units are however small ranging between 60-150 sqm. The units are interspersed across the centre, with 6 units along Preston Street, 4 on West Street, 2 on Court Street, and 1 each on Queens Parade and Market Place.

Operator Requirements

7.2.24 The 'Requirements List' identifies a total of 9 retail and commercial leisure operators currently seeking premises in the town centre. These are shown within Figure 7.3 below.

Figure 7.3: Operator Requirements for Faversham Town Centre

Name	Min Size (sq m)	Max Size (sq m)
Retail/Services		
Savers	140	280
Vets4Pets	140	186
Aldi	930	
Lidl	930	3,716
Finch House Bakery	167	325
Leisure – Food & Drink		
Subway	18.5	111
KFC	168	280
Leisure - Other		
Snap Fitness	370	930
Anytime Fitness	370	740

Source: 'The Requirements List'

Pedestrian Flows

7.2.25 Pedestrian activity was monitored during our surveys of the centre. The centre was considered to be reasonably busy with high levels of footfall observed around Market Place, Market Street and Court Street. Good levels of pedestrian activity was also observed along Preston Street with lower levels observed on West Street, Preston Street, and East Street. On the days of our visit the outdoor market was operating - the market was observed to be busy and contributed to the pedestrian activity in the town centre.

7.2.26 It was noted that, at the time of our visit, there was a reasonable level of pedestrian linkage between the two main foodstores (Morrison's and Tesco stores) and the other shops in the town centre.

Accessibility

7.2.27 Faversham Town Centre is easily accessible by public transport and is served by a railway station located at the southern end of Preston Street. The station provides mainline services to London and Dover, with stops in between. Bus services connect Faversham with Canterbury, Maidstone, Ashford, Sittingbourne and other towns in Kent with bus stops located outside the railway station, Crescent Road, Newton Road, Preston Road and South Road.

7.2.28 The town centre benefits from being mostly pedestrianised which significantly assists pedestrian movement within the centre. The NEMS household survey highlights that a large proportion (37%) of respondents who visit Faversham Town Centre do so on foot. Overall, pedestrian accessibility is considered to be very good with the town centre being accessible from the immediate surrounding residential areas.

7.2.29 The town centre benefits from good accessibility by car, being accessed off the A2 and a short distance from the M2 (Junction 7). Car parking provision in the town centre is provided primarily at the following locations:

- Central Car Park, off Leslie Smith Drive (219 spaces);
- Tesco, Crescent Road (250 spaces);
- Morrisons, North Lane (110 spaces);
- Queens Hall Car Park located near to the station (140 spaces);
- Partridge Lane (55 spaces); and
- Institute Road (47 spaces).

7.2.30 The NEMS Household survey identified that some 58% of respondents who visited Faversham Town Centre travel by car. Only 4% of respondents stated that making more parking spaces available would encourage them to visit the town centre more often. A further 4% cited that cheaper/free parking would make them visit the centre more often. The survey results suggest that residents who visit the town centre are generally satisfied with existing car parking.

Perception of Safety

7.2.31 Our visits to the centre suggested that Faversham has a good sense of safety with strong natural surveillance. A good network of CCTV cameras is provided within Faversham which assists in reducing crime related incidents.

7.2.32 Crime statistics show that there were 62 crimes recorded in the area around Faversham Town Centre in July 2018, 37 (60%) of these were associated with anti-social behaviour and 12 (19%) for public order offences. Faversham Station, with 13 crimes reported, was the most common location for crimes to be committed. Leslie Smith Drive, located just off the Primary Shopping Area was the next most common location with 5 crimes.

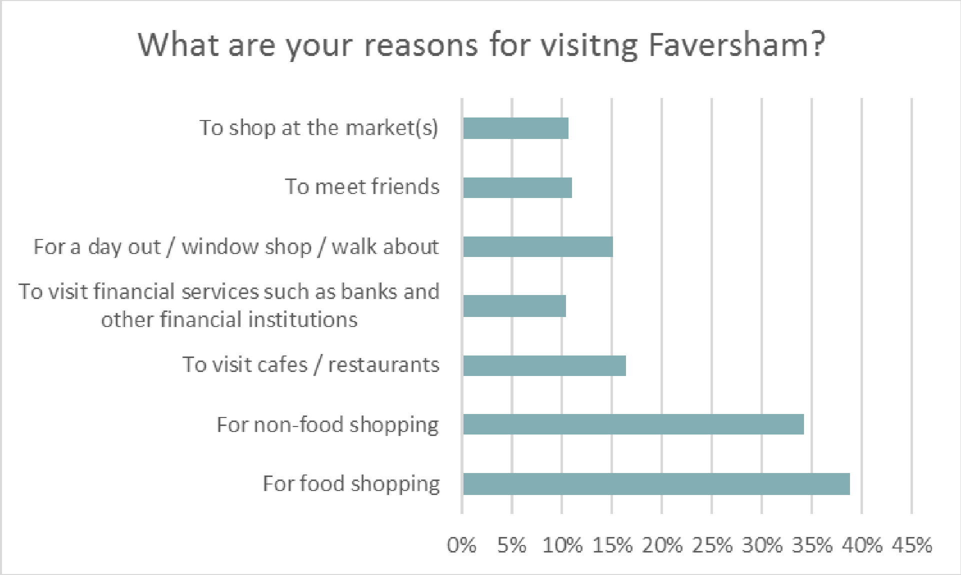
7.2.33 In terms of the residents' perception of safety within Faversham Town Centre, the NEMS household survey identified that no respondents raised better security/safety measures as a reason that would encourage them to visit the town centre more often. The survey suggests that users of the town centre generally feel safe.

Views and Behaviours

7.2.34 We have utilised the household survey to obtain the main reasons why respondents visit Faversham Town Centre, what they like about it and what, if anything, would encourage them to visit the centre more often.

7.2.35 Figure 7.4 below identifies that the main reasons why people visit Faversham Town Centre is for food shopping (39% of respondents) and for non-food shopping (34%). Other reasons for visiting include going to cafes and restaurants (16%), for a day out (15%) to meet friends (11%) and to shop at the markets (11%).

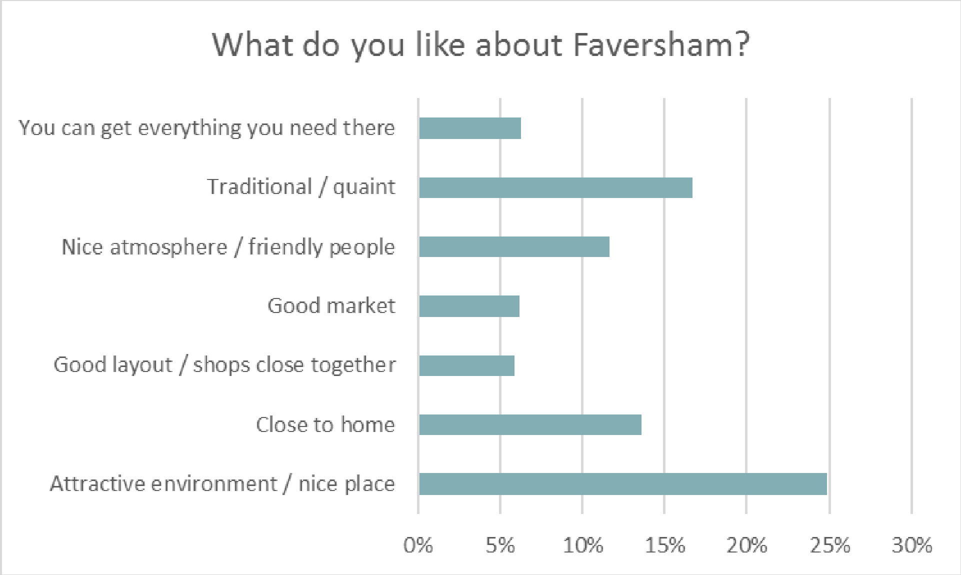
Figure 7.4: Main reason for visiting Faversham Town Centre



Source: Q34a and 34b (1st and 2nd mention combined), NEMS Household Survey (September 2018)

7.2.36 In terms of what they liked most about Faversham, 25% of respondents said its attractive environment, 17% of people liked it as it is traditional / quaint. Other responses indicated that 14% of respondents liked the fact that the town centre is close to home, whilst 12% like the nice atmosphere and friendly people.

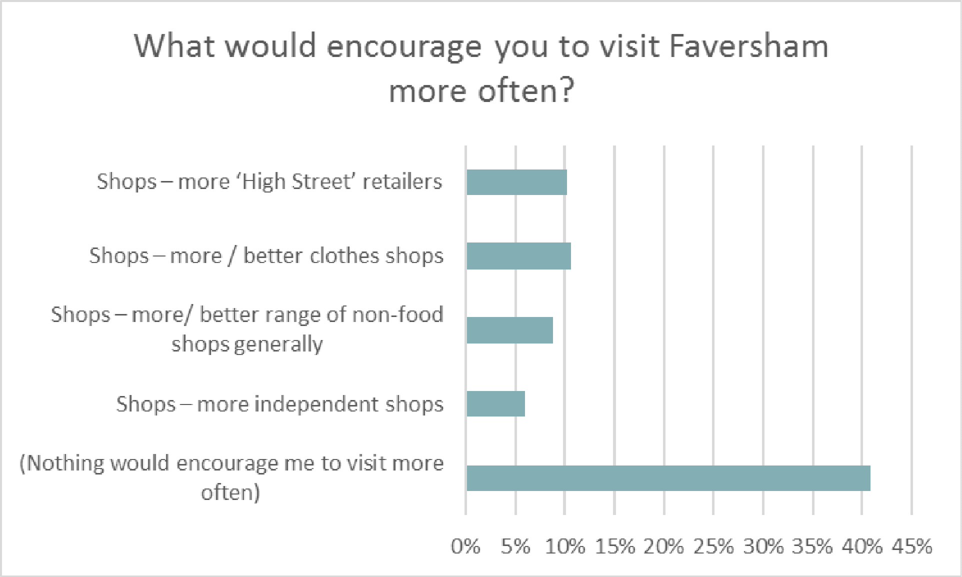
Figure 7.5: Main likes about Faversham Town Centre



Source: Q35a and 35b (1st and 2nd mention combined), NEMS Household Survey (September 2018)

7.2.37 When asked what would make respondents visit Faversham more often, 41% of respondents indicated that nothing would. The next most common answers were more/better clothes shops (11% of respondents), more 'high-street' retailers (10%) and more/a better range of non-food shops (9%), 6% of respondents indicated that more independent shops would encourage them to visit Faversham Centre more frequently.

Figure 7.6: Measures that would encourage visits to Faversham Town Centre more often



Source: Q36a and 36b (1st and 2nd mention combined), NEMS Household Survey (September 2018)

Town centre Environmental Quality

7.2.38 Overall, the environmental quality of Faversham Town Centre is considered to generally be very good. The centre benefits from many historic buildings of high-architectural quality that are well preserved. The entire town centre is covered by the Faversham Conservation Area and a high number of buildings, particularly along the main shopping streets, are listed. Shop fronts are generally of good quality, many retaining historic frontages. The environmental quality of Preston Street is of a poorer quality where a number of shop fronts and paving would benefit from improvement.

7.2.39 The centre was generally very clean and tidy, although some litter was noted towards the southern end of Preston Street, towards the station.

7.3 Summary

7.3.1 Overall, Faversham Town Centre is considered to display good levels of vitality and viability: convenience goods retail provision is well represented albeit comparison goods retail provision is limited; the market significantly contributes to town centre vitality and viability; accessibility and car parking in the town centre is considered to be good; vacancy levels are below the national average; and the town centre is attractive with a good standard of environmental quality.

8.0 Qualitative Assessment - Sheerness Town Centre Health Check

8.1 Introduction

8.1.1 Our qualitative health check assessment of the vitality and viability of Sheerness Town Centre is undertaken below. The health check assessment considers the vitality and viability of the town centre in line with the indictors published within the NPPG, following the same methodology undertaken for Sittingbourne and Faversham (detailed at **Appendix B**).

8.2 Vitality and Viability Town Centre Health Check

8.2.1 Sheerness is a coastal town located in the northern eastern part of the Isle of Sheppey. Alongside Faversham, the town is a second-tier settlement defined as an 'Other Borough Centre' within Policy ST2. The town is located at the northern end of the A249 which provides a connection to M2 and further south.

8.2.2 The town centre itself is primarily arranged around a traditional linear high street. The town centre encompasses a large Tesco Superstore located off Bridge Road to the north west, extending to the junction of the Broadway and Fonblanque Road to the east, and south to the Queens Head public house on High Street.

8.2.3 The central focal point of the main shopping area is the square forming the junction of Broadway and the High Street where there is a large clocktower. The defined Primary Shopping Area extends north and south along High Street from here. Small roads leading off High Street form secondary frontages.

Diversity of Uses & Representation

8.2.4 A review of the diversity of retail and service uses accommodated in the town centre has been undertaken and our findings are detailed below. A plan illustrating the location and use of each unit in the town centre (as defined by Experian Goad) is provided at **Appendix E**. A breakdown of the unit numbers in the town centre is shown below in Figure 8.1 and 8.2.

8.2.5 Overall, Sheerness Town Centre provides some 225 retail and leisure units, accommodating 41,600 sqm of floorspace.

Figure 8.1 – Sheerness Town Centre - Diversity of Use for Commercial Units

	Sheerness		UK Average
	No.	%	%
Convenience	23	10	9
Comparison	66	29	30
Retail Service	43	19	15
Leisure Service	52	23	24
Finance & Business Service	19	8	10
Vacant	22	10	11
TOTAL	**225**	**100**	**100**

Figure 8.2 – Sheerness Town Centre - Diversity of Use for Commercial Floorspace

	Sheerness		UK Average
	Sq m	%	%
Convenience	11,120	27	15
Comparison	10,450	25	35
Retail Service	4,900	12	7
Leisure Service	9,290	22	25
Finance & Business Service	2,940	7	8
Vacant	2,900	7	10
TOTAL	**41,600**	**100**	**100**

Source: Experian Goad Survey, September 2018. UK Average is September 2018.
Notes: Figures may not add up due to rounding.
Excludes health centres, religious institutions, education institutions and offices

Convenience Goods

8.2.6 The proportion of convenience retail units within the town centre (10%) is broadly in line with the UK average (9%). However, primarily as a result of the Tesco Extra store, in floorspace terms convenience goods provision (27%) is significantly higher than the UK average (15%).

8.2.7 The convenience offer in the town centre is anchored by the large Tesco Extra store which provides some 6,780sq m gross floorspace, approximately 61% of the total convenience floorspace within the town centre. Aldi (1,170sq m), Iceland (560sq m) and Co-Op (440sq m) are also represented in the town centre.

8.2.8 The convenience goods sector also includes several independent retailers including a baker, greengrocer, off-licence, 3 Confectionary Tobacco and News stores and a butcher. National multiple retailers in addition to Tesco, Aldi, Iceland and Co-op include Greggs and Holland & Barrett.

8.2.9 Overall, the convenience goods provision in the town centre is considered to be good.

Comparison Goods

8.2.10 Sheerness Town Centre's comparison goods offer is provided in 66 units which represents 29% of the total number of units in the town centre. Whilst the proportion of comparison goods units is broadly in line with the UK average the proportion of floorspace occupied by comparison goods retailers (25%) is significantly lower than the UK average (35%). Similar to Faversham, for its size Sheerness provides a reasonable number of comparison goods units albeit they are generally restricted in their size.

8.2.11 Of the 66 comparison goods units, 12 offer clothing and footwear including national retailers such as Peacocks, Bon Marche, Shoe Zone and New Look, and several independents. Other national comparison goods retailers include Superdrug, Savers, Boots, Poundstretcher, H Samuel and Oxfam, RSPCA, and Red Cross and Scope charity shops.

8.2.12 The town centre contains only 4 of the 31 'major retailers' which Experian consider to be key attractors, and therefore most likely to improve the attraction of the centre for consumers. The 4 retailers are Boots, Superdrug, New Look and Tesco. Whilst some of the other major retailers listed by Experian are department stores, including John Lewis and House of Fraser, which we consider too large for Sheerness to accommodate, there is a notable absence of other major retailers within Sheerness such as Burton, W H Smith, Wilko, and Carphone Warehouse.

8.2.13 The town centre provides a good number of independent retailers, with the current proportion of units representing 77% (51) of the total comparison goods units. The independent operators cover a diverse range of shop types, including furniture and homeware retailers, household goods, jewellers and pet shops. Most of these units are small and all are less than 140sq m in size.

8.2.14 Overall, Sheerness Town Centre's comparison goods retail offer is reasonably limited. The reasonably limited influence of comparison goods provision in the town centre is reflected in the results of the household survey which show that the town centre only retains a quarter of comparison goods trips from the Island.

Retail Services

8.2.15 There is a higher proportion of retail service units and floorspace within Sheerness in comparison to the national average. The town centre provides 43 units (19%), within 4,900 sq m gross floorspace (12%).

8.2.16 Whilst we consider that there is a reasonable range of retail services in the town centre, a relatively high proportion of these units (28 (65%)) are beauty salons, tattoo parlours, hairdressers or barber shops. Other services available include travel agents, opticians, 2 petrol filling stations, a post office, dog grooming parlour and funeral services.

Financial and Business Services

8.2.17 Sheerness Town Centre provides a reasonable range of financial and business services including 5 banks/building societies (TSB, Halifax, Natwest, Barclays and Nationwide), 9 estate agencies, a pawnbroker, recruitment agency, building contractor, an accountant and solicitor.

8.2.18 Overall, 19 units provide financial and business services with a total area of 2,940sq m representing 8% of the total units and 7% of the floorspace in the centre. The offer is broadly comparable with the national averages.

Leisure Services

8.2.19 The leisure service offering in Sheerness Town Centre consists of 52 units and includes cafes, fast food, takeaway outlets, and public houses. Other leisure services include betting offices, a bowling alley, bingo hall, an amusement arcade, a hotel and a social club.

8.2.20 Almost three quarters of leisure services are provided by independent operators (74%) with the only national operators being McDonald's, Subway, Domino's Pizza, bookmakers William Hill, Betfred and Ladbrokes. William Hill operate 2 betting shops within the town centre.

8.2.21 In unit and floorspace terms, the current leisure provision in the town centre is slightly below the national average (23% compared to 24% for unit provision, and 22% compared to 25% for floorspace). It is notable that there are only 3 restaurants within Sheerness, equating to 1.3% of units, well below the national average of 4.7%. In contrast, the proportion of fast food & takeaway units within the town centre (8%) is above the national average of 6% and the proportion of cafes (4%) is in line with the national average.

8.2.22 The leisure offer in the town centre is complemented by additional leisure services nearby and along the sea front. Sheppey Leisure complex is less than 300m walk from the High Street and provides a range of sports facilities, a gym and a swimming pool. Other nearby facilities include a skate park and outdoor play areas.

Vacancies

8.2.23 22 units were recorded as being vacant within the town centre at the time of the survey. The units are small in size, all measuring less than 280sq m gross. The largest vacant unit within the town centre is to the rear of the Poundstretcher unit off Hope Street (550sq m gross). On the whole, vacancies are dispersed throughout the centre although there is small concentration in the vicinity of the clocktower.

8.2.24 The proportion of units vacant within the town centre (10%) is slightly below the UK average (11%). In floorspace terms, the proportionate of vacant units (7%) is below the UK average (10%).

8.2.25 Vacancies in the town centre were not considered to notably detract from the vitality and viability of the centre. We note however 6% of respondents in the NEMS survey expressed that less empty shops would encourage them to visit the centre more often.

Operator Requirements

8.2.26 The 'Requirements List' identifies only 3 retail and commercial leisure operators currently seeking premises in the town centre, indicating a relatively low level of demand from operators seeking representation. The retailers are shown within Figure 8.3 below.

Figure 8.3: Retailer Requirements for Sheerness Town Centre

Name	Min Size (sq. m)	Max Size (sq. m)
Retail/Services		
Age UK	93	650
Vets4Pets	140	186
Leisure - Other		
Anytime Fitness	370	740

Source: 'The Requirements List'

Pedestrian Flows

8.2.27 At the time of our visits pedestrian activity within the centre was monitored to be moderate in the main shopping areas with footfall observed to be highest on High Street in vicinity of the clocktower. Reasonable levels of footfall was also monitored at the northern end of the High Street with lower levels observed at the southern end of the High Street to the South of Trinity Way and eastern part of Broadway.

8.2.28 High levels of footfall were noted at The Tesco Extra store with some linkage taking place between the foodstore and the rest of the town centre.

Accessibility

8.2.29 Given its location in the north western part of the Isle of Sheppey and the location of Sittingbourne on the mainland, Sheerness's retail and commercial leisure catchment is restricted. It's accessibility by road to the wider catchment area is therefore restricted and is generally considered to be poor.

8.2.30 The town centre benefits from a railway station located at the northern end of High Street. Train services to and from Sittingbourne operate from the station, providing connections to London and the rest of Kent. Bus services which serve Sheppey stop outside the railway station and busses to wider destinations such as Sittingbourne, Maidstone and Canterbury also stop at the town centre.

8.2.31 For its size there is a reasonable range of car parks as well a reasonable level of short-stay on-street parking available. The Tesco car park is the largest in Sheerness, providing 650 spaces, although parking is time limited. Pay and display parking include car parks at:

- Beachfields (76 spaces);
- Bridge Road (47 spaces);
- Beach Street (94 spaces);
- Cross Street (76 spaces);
- Rose Street (169 spaces);
- Trinity Place (57 spaces); and
- Trinity Road (60 spaces.

8.2.32 The NEMS survey suggests that on the whole residents are not concerned with the level of parking provision in, and accessibility to, the town centre.

Perception of Safety

8.2.33 The main shopping areas of Sheerness generally felt safe with a good level of natural surveillance. The Council's website indicates that 14 CCTV cameras are located across Sheerness Town Centre, providing a good network of coverage.

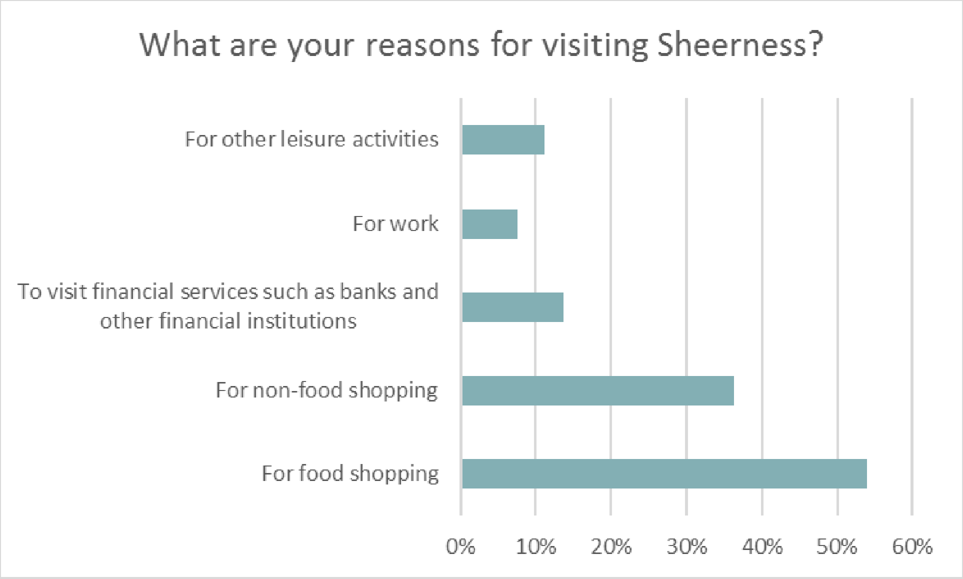
8.2.34 Published crime statistics show that 59 crimes were recorded in and around Sheerness Town Centre in July 2018. The majority of these crimes (45 instances) were anti-social behaviour offences, with a spread across the town centre rather than a single location.

8.2.35 5% of respondents in the NEMS Survey who visited Sheerness Town Centre mentioned better security/safety as a measure that would encourage them to visit the town centre more often. Whilst this is a relatively low percentage and suggests no particular overall concern by the majority of respondents, when compared to the other two towns in the Borough it is noted that no respondents indicated security/safety as a concern/measure.

Views and Behaviours

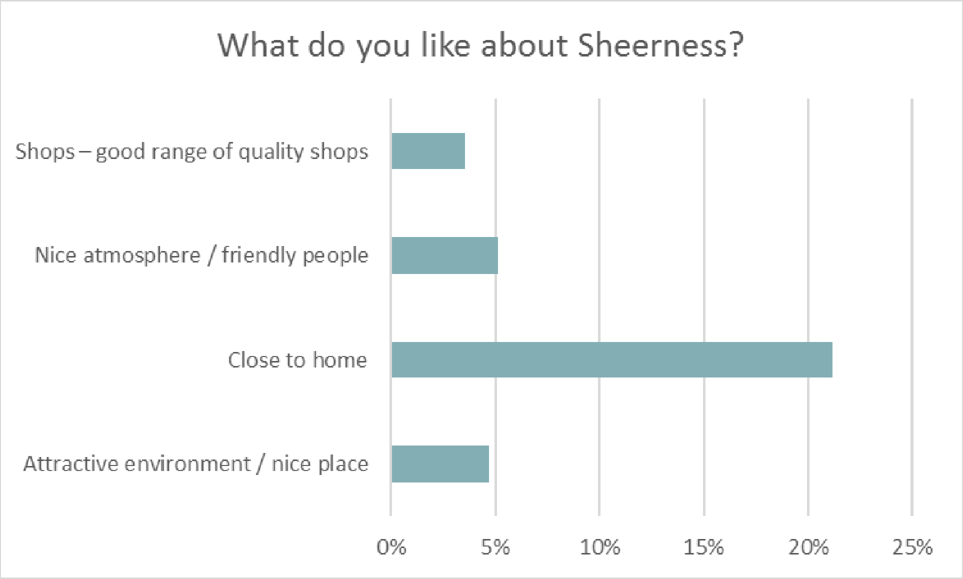
8.2.36 When asked why respondents visit Sheerness Town Centre, food shopping was the most common answer, with 54% citing this as a reason for visiting. 36% of respondents visit for non-food shopping and 14% of respondents travel to Sheerness to visit financial services.

Figure 8.4: Main reason for visiting Sheerness Town Centre



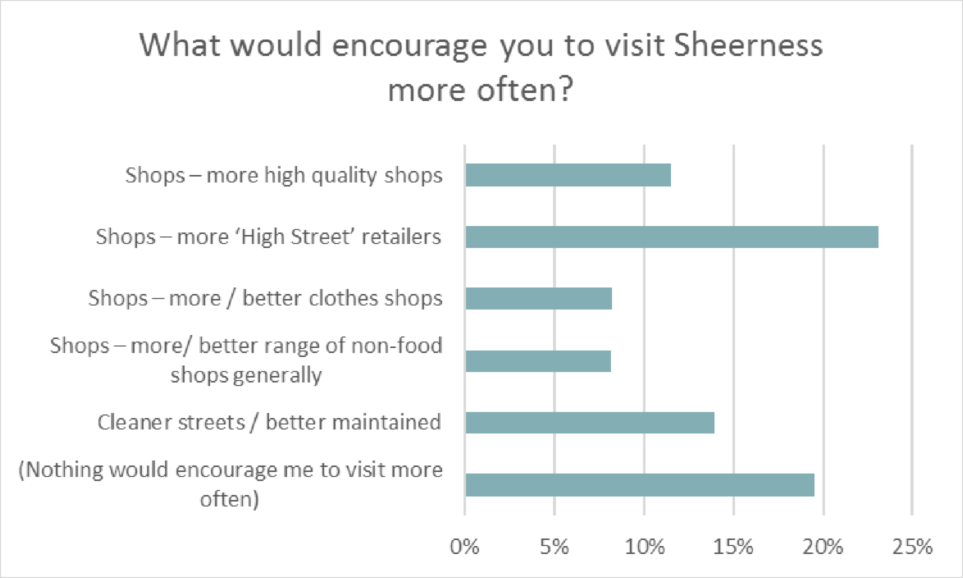
8.2.37 When asked what they liked about Sheerness, 21% of respondents like the fact it was close to their home, 5% liked the attractive environment and 5% liked the nice atmosphere / friendly people. Slightly fewer people (4%) responded that the good range of shops was what they liked about Sheerness.

Figure 8.5: Main likes about Sheerness Town Centre



8.2.38 More 'high-street' retailers was the most common response when people were asked what would encourage them to visit Sheerness more often (23% of respondents). Other common responses were that people would visit more frequently if Sheerness had cleaner streets / was better maintained (14% of respondents), if Sheerness had more high quality shops (12%) and if there was a better range of non-food shops or more/better clothes shops (8% each). 20% of respondents said that nothing would encourage them to visit Sheerness more often than they did.

Figure 8.6: Measures that would encourage visits to Sheerness Town Centre more often



Town Centre Environmental Quality

8.2.39 The main shopping area is considered to be demonstrate reasonable levels of environmental quality with a number of attractive historical buildings providing a varied street scene. However, it was noted that several shopfronts appeared in need of maintenance whilst temporary signage or unsympathetic shopfront modifications detracted from the appearance of other units.

8.2.40 The through traffic along High Street together with on-street parking are considered to mar the environmental quality of the centre. The relatively narrow pavements in the centre emphasis/prioritises vehicular traffic also. The pedestrianisation of part of the High Street and improvement in public realm would significantly enhance the environmental quality and attractiveness of the town centre and, if not already considered, should be considered in consultation with key stakeholders, traders and residents as part of the strategy for the town centre.

8.3 Summary

8.3.1 Overall, Sheerness Town Centre is considered to display reasonable levels of vitality and viability. The centre's convenience goods provision is good, it contains a low vacancy level and the centre is generally considered to be safe. However, it's environmental quality would benefit from enhancement and the comparison goods provision, albeit reasonable for its size and catchment, would also benefit from improvement.

9.0 Qualitative Assessment – Local Centres

9.1 Introduction

9.1.1 This section of the study set out the qualitative health check assessments of the vitality and viability of local centres in the Borough to understand their health and role in the hierarchy.

9.2 Summary of Local Centre Health Checks

9.1.2 Vitality and viability health check assessments for the 11 local centres are provided at **Appendix F**. Given the nature and scale of these centres, there is limited published information and our analysis therefore draws largely on data from own site visits carried out in September 2018.

9.1.3 Figure 9.1 below sets out the composition of the local centres in terms of the number of units by retail/leisure category.

Figure 9.1: Local Centre Unit Composition (No.)

Local Centre	Conv (Food)	Comp (Non-Food)	Retail Service	Leisure Service	Finance Service	Other	Vacant	Total
Queenborough	2	1	2	7	0	2	0	14
Rushenden	1	0	0	0	0	0	0	1
Minster	3	3	1	3	0	3	0	13
Halfway Houses	2	11	2	13	1	2	1	32
Eastchurch	2	1	2	2	0	1	1	9
Leysdown	2	8	1	16	1	1	1	30
Iwade	1	1	1	2	0	1	0	6
Newington	1	1	0	3	3	0	2	10
Milton Regis	1	8	7	7	0	4	3	30
Teynham	2	8	4	5	1	4	1	24
Boughton	1	0	2	3	0	0	1	7

Source: Appendix F

9.1.4 Figure 9.1 shows that the largest local centres, in terms of number of units, is Halfway Houses (32 units) and Leysdown (46 units). Both centres provide a larger proportion of comparison goods and leisure service goods. Leysdown providing a large number of amusement arcades. Rushenden is the smallest local centre and given that it now only provides one unit we consider should no longer be identified as a local centre.

9.1.5 Our health check assessments have found that all display reasonable or good levels of vitality and viability. Of particular note, are the very low (or in some cases nil) vacancy level present in the local centres.

9.1.6 Overall, the majority of centres meet 'day to day' shopping/service needs of their local communities.

9.1.7 We consider, with the exception of Rushenden, the local centres in the Borough continue to serve a complimentary role to the three town centres and are each performing the role of a local centre. We do not consider that any of the Borough's local centres require substantial retail or leisure development in order to improve their vitality and viability.

10.0 Quantitative Retail Needs Assessment

10.1 Introduction

10.1.1 This section of the study provides an assessment of retail needs. It firstly considers convenience and comparison goods quantitative needs (retail capacity) before reviewing qualitative retail needs having regard to any identified deficiencies / 'gaps' in existing provision.

10.1.2 As part of the quantitative needs assessment the current population and available expenditure (for both convenience and comparison goods) across the Study Area is reviewed and assessed.

10.2 Retail Capacity

10.2.1 We have examined the need for new convenience and comparison goods floorspace over the five year reporting periods to 2038 (i.e. at 2024, 2029, 2034 and 2038, 2038 being the end date of the next local plan period). At the outset, it is important to note that an assessment in the long term should be viewed with caution, due to the obvious difficulties inherent in predicting the performance of the economy and shopping habits over time.

10.2.2 A complete series of quantitative retail capacity tables are provided at **Appendices G-I** to provide further detail in terms of the step-by-step application of our quantitative assessment methodology.

Population & Retail Expenditure

Population

10.2.3 The base population (2016) within each postal code sector has been calculated using Experian Micromarketer MMG3 data. The baseline population data takes into consideration the findings of the 2011 Census release. At the time of writing Kent County Council (KCC) had not published Local Authority level forecast population figures to Swale Borough Council. Accordingly, in agreement with Swale Borough, for the purpose of this study, population projections figures have been derived from the Experian Micromarketer MMG3 data which uses the ONS 2014 based sub national population projections. We would recommend that an addendum to the study is produced once relevant population growth figures are published by KCC.

10.2.4 The defined Study Area is estimated to contain a resident population of approximately 151,346 people at 2017 rising to 178,788 people at 2038. This represents an increase in population within the Study Area of 27,142 people (equating to an increase of 18.1%) between 2019 to 2038.

10.2.5 Figure 10.1 provides a detailed breakdown of the forecast population change within each survey zones in each of the reporting period to 2038.

Figure 10.1: Study Area Population by Survey Zone (2019-2038)

Zone	2019	2024	2029	2034	2038
1 - Isle of Sheppey	46,412	48,688	50,710	52,477	53,860
2 – Borough West	15,004	15,864	16,664	17,429	17,928
3 - Sittingbourne	51,966	54,889	57,618	60,297	62,312
4 – Central Borough	11,519	12,139	12,664	13,110	13,520
5 - Faversham	20,833	21,857	22,789	23,601	24,175
6- Borough East	5,612	5,921	6,219	6,492	6,693
Total	**151,346**	**159,358**	**166,664**	**173,406**	**178,488**

Source: Table 1, Appendix G

Expenditure

10.2.6 In order to calculate per capita convenience and comparison goods expenditure, we have utilised Experian Micromarketer G3 data which provides detailed information on local consumer expenditure which takes into consideration the socio-economic characteristics of the local population. Experian is a widely accepted source of expenditure and population data and is regularly used by WYG and other retail/leisure planning consultants in calculating retail capacity.

10.2.7 Per capita growth forecasts have been derived from Experian Retail Planner Briefing Note 15. Appendix 3 of the Retail Planner Briefing Note identifies the following annual growth forecasts for convenience and comparison goods which inform our assessment.

Figure 10.2: Expenditure Growth Forecasts

Year	Convenience (%)	Comparison (%)
2019	-0.2	2.1
2020	0.2	2.9
2021	0.2	3.3
2022	0.1	3.4
2023	-0.1	3.4
2024	0.1	3.3
2025	0.1	3.2
2026	0.1	3.2
2027	0.1	3.1
2028	0.1	3.0
2029	0.0	3.1
2030	0.0	3.2
2031	0.2	3.4
2032	0.1	3.3
2033	0.2	3.3
2034	0.1	3.3
2035	0.2	3.3
2036	0.0	3.2
2037	0.0	3.2
2038	0.0	3.2

Source: Appendix 3, Retail Planner Briefing Note 15

10.2.8 For convenience goods, Experian forecasts growth to remain subdued with a longer term forecast per head growth of +0.1% per annum. For comparison goods, Experian identify growth to increase from 2.1% per annum to 3.4% per annum in the short term (2019-2023) with growth rates ranging between 3.0-3.4% per annum in the medium and longer term (2024-2038).

10.2.9 Experian Retail Planner Briefing Note 15 also provides a forecast as to the proportion of expenditure which will be committed through special forms of trading (comprising 'non-store retailing', such as internet sales, TV shopping and so on) over the reporting period. In accordance with retail planning standard practice, we have removed any expenditure which survey respondents indicated was committed via special forms of trading and instead have made an allowance derived from Experian's recommendation.

10.2.10 In considering special forms of trading, it should be noted that many products which are ordered online are actually sourced from a physical store's shelves or stockroom (particularly in the case of convenience goods). Accordingly, expenditure committed in this manner acts to support stores and should be considered 'available' to tangible retail destinations.

10.2.11 Accordingly, in order not to overstate the influence of expenditure committed via special forms of trading, our approach is based on Experian's 'adjusted' figure (provided at Appendix 3 Retail Planner Briefing Note 15) which makes an allowance for internet sales which are sourced from stores. The proportion of expenditure committed through special forms of trading cited below at Figure 10.3 is removed from identified expenditure as it is not available to stores within the Study Area.

Figure 10.3: Special Forms of Trading Forecasts

Year	Convenience (%)	Comparison (%)
2019	3.6	15.9
2024	4.4	17.2
2029	4.9	17.7
2034	5.2	17.9
2038	5.3	18.0

Source: Appendix 3, Retail Planner Briefing Note 15
2038 Forecast assessed to be same forecast as 2036

10.2.12 Based on the Retail Planner growth rates and special forms of trading allowances, it is possible to produce expenditure estimates for each survey zone under each population growth scenario at 2019, 2024, 2029, 2034 and 2038. In doing so, our assessment takes into account both per capita retail expenditure growth and population change.

Convenience Goods Expenditure

10.2.13 Taking into consideration the above increases in population and per capita expenditure, it is estimated that, at 2019, the resident population of the Study Area will generate some £310.1m of convenience goods expenditure. Available convenience goods expenditure is then forecast to increase to £364.6m at 2038, which represents an increase of £54.5m (or 17.6%) between 2019 and 2038.

Figure 10.4: Total Available Study Area Expenditure – Convenience Goods (£m)

2019 (£m)	2024 (£m)	2029 (£m)	2034 (£m)	2038 (£m)	Growth 2019-2024 (£m)	Growth 2019-2029 (£m)	Growth 2019-2034 (£m)	Growth 2019-2038 (£m)
310.1	324.8	339.2	353.6	364.6	14.7	29.2	43.5	54.6

Source: Table 3, Appendix G
2016 Prices

Comparison Goods Expenditure

10.2.14 For comparison goods, Figure 10.5 sets out our estimation that the resident population of the Study Area generates some £487.3m of comparison goods expenditure in 2019. Available comparison goods expenditure is then forecast to increase to £1,014m at 2038, which represents an increase of £526.8m (or 108.1%) between 2018 and 2038.

10.2.15 Whilst the identified expenditure increase is significant, the rate of growth is more modest than that previously achieved, principally because of the expectation that an ever-increasing proportion of comparison goods expenditure will be committed through internet shopping.

Figure 10.5: Total Available Study Area Expenditure – Comparison Goods (£m)

2019 (£m)	2024 (£m)	2029 (£m)	2034 (£m)	2038 (£m)	Growth 2019-2024 (£m)	Growth 2019-2029 (£m)	Growth 2019-2034 (£m)	Growth 2019-2038 (£m)
487.3	584.2	712.2	867.9	1,014	96.9	224.9	380.8	526.8

Source: Tables 5a-e, Appendix G
2016 Prices

10.2.16 For the purposes of this Study, comparison goods expenditure has been divided into 11 subcategories: 'DIY', 'Large Electrical Household Items', Small Electrical Items', and 'Furniture, Carpets & Floor Coverings' (these four categories collectively being referred to as bulky goods) and, 'Clothing & Footwear', 'CDs, DVDs and Books', 'Furnishings & Household Textiles', 'Health and Beauty/Chemist Goods', 'Small Household Goods', 'Clocks Jewellery & Watches', and 'Toys, Games, Bicycles and Recreational Goods' (collectively referred to as non-bulky goods). The proportion of expenditure directed to each sub-category is estimated by Experian on a zonal basis.

10.2.17 In considering the above, it should be noted that if an excess of expenditure manifests itself within the Study Area, this does not necessarily translate directly into a requirement for additional floorspace. In assessing quantitative need, it is also necessary to take account of:

- Existing development proposals;
- Expected changes in shopping patterns; and
- The future efficiency of retail floorspace.

Capacity Formula

10.2.18 For all types of retail capacity assessment, the conceptual approach is identical, although the data sources and assumptions may differ. The key relationship is Expenditure (£m) (allowing for population change and retail growth) less Turnover (£m) (allowing for improved 'productivity') equals Surplus or Deficit (£m).

Expenditure (£m) – The expenditure element of the above equation is calculated by taking the population within the defined catchment and then multiplying this figure by the average annual expenditure levels for various forms of retail spending per annum. The expenditure is estimated with reference to a number of factors, namely:

- Growth in population;
- Growth in expenditure per person per annum; and
- Special Forms of Trading (e.g. internet shopping, catalogue shopping and so on).

Turnover (£m) – The turnover figure relates to the annual turnover generated by existing retail facilities within the Study Area. The turnover of existing facilities is calculated using Mintel Retail Rankings and Global Data reports – independent analysis which lists the sales densities for all major multiple retailers.

Surplus/Deficit (£m) – This represents the difference between the expenditure and turnover figures outlined above. A surplus figure represents an effective under provision of retail facilities within the Study Area (which, all things being equal, would suggest that additional floorspace could be supported), whereas a deficit would suggest a quantitative overprovision of retail facilities.

10.2.19 Although a surplus figure is presented in monetary terms, it is possible to convert this figure to provide an indication of the quantum of floorspace which may be required. The level of floorspace will vary dependent on the type of retailer proposed and the type of goods traded. For example, in the case of comparison goods, non-bulky goods retailers tend to achieve higher sales densities than bulky goods retailers. However, within the bulky goods sector itself there is significant variation, with electrical retailers tending to have a much higher sales density than those selling DIY or furniture goods.

Capacity for Future Convenience Goods Floorspace

10.2.20 In order to ascertain the likely need for additional convenience floorspace in the town centres in Swale, it is first necessary to consider the performance of the current provision. Given the geography of the towns and their existing retention of convenience goods expenditure, it is assumed that the future convenience goods expenditure available to the town centres (Sittingbourne, Faversham and Sheerness) will be commensurate with their current market share.

10.2.21 Figure 10.6 sets out the current convenience goods trading position in the towns compared against the 'benchmark' (or anticipated) turnover of existing convenience goods floorspace and projects this forward to 2038. The benchmark turnover differs for each operator based on its average turnover per square metre throughout the country. Although robust up-to-date information is available in terms of the convenience goods floorspace provided by large foodstores, it can be more difficult to quantify the extent of local convenience provision as there is no single comprehensive database to rely upon. Where we have been unable to verify the exact quantum of floorspace provided by existing smaller scale convenience stores, we have assumed that stores are trading 'at equilibrium' (i.e. the survey derived turnover equates to the expected level of turnover).

10.2.22 Our assessment is based upon a 'goods based' approach, which disaggregates expenditure by category type, and it is important to recognise that major foodstore operators generally sell an element of non-food goods such as books, compact discs, clothing and household goods. To account for this, we have assessed the split in convenience/comparison goods provision in each store having regard to our own observations during store visits and the typical convenience/comparison floorspace ratio published by retail data provider, Global Data. This provides an indication of the likely sales area dedicated to the sale of convenience goods at each store.

10.2.23 Our assessment for the study area identifies that the expected benchmark turnover of existing convenience goods provision in the administrative area is £309.5m per annum at 2018, which is £16.5m more than the identified survey-derived turnover (including inflow) of £293.0m. This suggests that, taken cumulatively, existing convenience goods provision in the study area are 'under trading' when compared to expected turnover.

10.2.24 There are instances where specific facilities trade very strongly or relatively poorly. For example, the Aldi stores in Sittingbourne and Sheerness, which have an estimated benchmark turnover of £8.8m and £9.2m respectively but turn over an estimated £23.8m and £20.7m respectively are trading particularly well. In contrast, the Morrisons store at Neats Court Retail Park, Queenborough with an estimated benchmark turnover of £30.0m, but turns over an estimated £20.6m, is a lesser performing store.

10.2.25 It is necessary to consider the capacity on an individual town basis. Figure 10.6 below sets out the convenience goods expenditure capacity estimates for Sittingbourne, Faversham and Sheerness. The assessment identifies that, with the exception of Faversham, there is presently capacity for additional convenience floorspace in the towns within the Borough. The lack of capacity within Faversham is primarily due to the existing convenience goods retail provision in the town.

Figure 10.6: Quantitative Need for Convenience Goods Floorspace

Year	Benchmark Turnover (£m)	Turnover (£m)	Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq m net)
Sittingbourne					
2019	137.9	135.9	0.8	-1.3	-
2024	137.9	142.3	0.8	5.2	500
2029	138.6	148.6	0.9	10.9	1,000
2034	139.2	154.9	0.9	16.7	1,500
2038	139.9	159.8	0.9	20.8	1,900
Faversham					
2019	74.0	58.5	1.0	-14.5	-
2024	74.0	61.3	1.1	-11.6	-
2029	74.4	64.0	1.1	-9.2	-
2034	74.7	66.8	1.1	-6.8	-
2038	75.1	68.8	1.2	-5.0	-
Sheerness					
2019	89.0	86.2	1.9	-0.8	-
2024	89.0	90.3	2.0	3.4	300
2029	89.4	94.3	2.1	7.0	700
2034	89.8	98.3	2.2	10.8	1,000
2038	90.2	101.4	2.3	13.5	1,200

Source: Tables 5a, 5b, 6a, 6b, 7a, 7b, 8a & 8b of Appendix H
Floorspace Requirement - Average sales density assumed to be £10,679/sq m (@ 2019) based on the average sales density of all grocery operators - derived by Global Data
Allows for increased turnover efficiency
2016 Prices

10.2.26 The Council has confirmed that, at the time of writing, there are no convenience goods retail commitments/planning permissions in the Borough that need to be taken into account in this retail capacity assessment.

Capacity for Future Comparison Goods Floorspace

10.2.27 Turning to comparison goods capacity, it is first important to note that our methodology deviates from that which has been deployed in respect of convenience goods for two principal reasons. Firstly, it can be extremely difficult to attribute an appropriate benchmark turnover to existing comparison goods provision. Secondly, there tends to be greater disparity between the trading performance of apparently similar comparison goods provision depending on its location, the character of the area, and the nature of the catchment. As a consequence, we adopt the approach with comparison goods floorspace that it is trading ‘at equilibrium’ (i.e. our survey derived turnover estimate effectively acts as benchmark) at 2019.

10.2.28 We assume that there is therefore a nil quantitative need for any additional floorspace across the study area at 2019. For the purpose of our initial quantitative modelling exercise, it has also been assumed that the future performance of comparison goods facilities in Swale Borough will be commensurate with their current market share. Our assessment also takes into consideration the fact that the town centres, retail parks and standalone large format retail units will attract some custom from outside the Study Area. Through discussions with the Council and consideration of the previous retail study we have assumed that this is 2% (£2.3m @ 2019) of the overall turnover of comparison goods retailers in the town centre of Sittingbourne, 8% (£2.5m @ 2019) of turnovers for Faversham and 3% (£1.2m @ 2019) for Sheerness.

10.2.29 In order to ascertain the likely need for additional comparison goods floorspace within each town, we consider them independently and identify their market share below. At the time of writing, the Council has confirmed that there are no comparison goods retail commitments/planning permissions within the Borough that need to be taken into account in the retail capacity assessment.

Sittingbourne

10.2.30 Facilities in the Sittingbourne area claim £166.3m of all comparison goods expenditure generated by Swale residents at 2019 which equates to a study area market share of 34%. Our assessment 'rolls forward' this market share to examine the likely level of comparison goods floorspace required to maintain the role and function of Sittingbourne's retail facilities going forward. By 'rolling forward' this market share and making provision for inflow deriving from visitors to Sittingbourne we estimate that facilities in Sittingbourne will attract £199.4m of comparison goods expenditure at 2024, increasing to £243.1m at 2029, £296.2m at 2034, and to £346.1m at 2038.

10.2.31 Given the forecast increases in comparison goods expenditure and population and allowing for year on year increases in the productivity of existing floorspace, we estimate that by 2024 there will be expenditure surplus of £17.5m to support additional comparison goods floorspace within Sittingbourne. As set out in Figure 10.7, this surplus is forecast to increase to £40.6m at 2029, to £70.9m at 2034 and further to £100.6m at 2038. Account has been made for the turnover efficiency of existing comparison goods floorspace to increase (on the basis that operators are generally able to make their existing floorspace more productive over time). This surplus expenditure equates to a comparison goods floorspace requirement of between 2,900sq m and 5,300sq m net (depending on format and operator) by 2024, increasing to between 6,000sq and 11,100sq m net by 2029, between 9,500sq m and 17,300sq m net by 2034 and increasing further to between 12,300sq m and 22,600sq m net by 2038.

Figure 10.7: Quantitative Need for Comparison Goods Floorspace in Sittingbourne

Year	Benchmark Turnover (£m)	Sittingbourne Turnover (£m)	Sittingbourne Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq m net)	
					Min	Max
2024	184.9	199.4	3.0	17.5	2,900	5,300
2029	206.2	243.1	3.7	40.6	6,000	11,100
2034	229.9	296.2	4.5	70.9	9,500	17,300
2038	250.8	346.1	5.3	100.6	12,300	22,600

Source: Table 15a & 15b of Appendix I
Benchmark turnover to increase in line with improvements in turnover efficiency as set out in Figure 4b of Experian Retail Planner Briefing Note 15
Assumes constant market share of Study Area expenditure claimed by facilities in Sittingbourne
2016 Prices

Faversham

10.2.32 In assessing the quantitative need for additional comparison goods floorspace in Faversham, we once again adopt the position that existing facilities are trading 'in equilibrium' and that there is therefore a nil quantitative need for any additional floorspace across Faversham at 2019. It has also again been assumed for this assessment that the future performance of Faversham's comparison goods facilities will be commensurate with their current market share.

10.2.33 Through consideration of the comparison goods facilities in, and attractiveness of, the town centre to visitors/tourists, we have made an estimate of the proportion of centre/facility turnover derived from outside the Study Area. Our inflow estimates are set out in Table 14 of **Appendix I.**

10.2.34 The inflow allowance has the net effect of increasing Faversham's identified comparison goods survey derived turnover from £32.8m to £35.3m at 2019.

10.2.35 The £32.8m of comparison goods expenditure claimed from inside the Study Area at 2019 equates to a market share of 7% of all comparison goods expenditure generated by residents of the Study Area. Our assessment 'rolls forward' this market share to examine the likely level of comparison goods floorspace required to maintain the role and function of Faversham's retail facilities going forward.

10.2.36 By 'rolling forward' this market share and making provision for inflow deriving from visitors to the Study Area, we estimate that facilities in Faversham will attract £39.3m of comparison goods expenditure at 2024, increasing to £47.9m at 2029, £58.3m at 2034, and to £68.2m at 2038.

10.2.37 Given the forecast increases in comparison goods expenditure and population and allowing for year on year increases in the productivity of existing floorspace, we estimate that by 2024 there will be an expenditure surplus of £3.7m to support additional comparison goods floorspace within Faversham. As set out in Figure 10.8, this surplus is forecast to increase to £8.5m at 2029, to £14.8m at 2034 and further to £21.0m at 2038. Account has again been made for the turnover efficiency of existing comparison goods floorspace to increase.

10.2.38 This surplus expenditure equates to comparison goods floorspace capacity of between 600sq m and 1,100sq m net (depending on format and operator) by 2024, 1,300sq m and 2,300sq m net by 2029 and 2,100sq m to 3,600sq m net by 2034. By 2038, there is identified capacity for between 2,700 and 4,700sq m net comparison goods floorspace.

Figure 10.8: Quantitative Need for Comparison Goods Floorspace in Faversham

Year	Benchmark Turnover (£m)	Faversham Turnover (£m)	Faversham Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq m net)	
					Min	Max
2024	38.6	39.3	3.0	3.7	600	1,100
2029	43.1	47.9	3.7	8.5	1,300	2,300
2034	48.0	58.3	4.5	14.8	2,100	3,600
2038	52.4	68.2	5.2	21.0	2,700	4,700

Source: Table 18a & 18b of Appendix I
Benchmark turnover to increase in line with improvements in turnover efficiency as set out in Figure 4b of Experian Retail Planner Briefing Note 15
Assumes constant market share of Study Area expenditure claimed by facilities in Faversham
2016 Prices

Sheerness

10.2.39 For Sheerness, facilities in the area claim £55.7m of all comparison goods expenditure generated by residents at 2019, which equates to a market share of 11%. By 'rolling forward' this market share and making provision for inflow deriving from visitors to Sheerness, we estimate that facilities in Sheerness will attract £66.8m of comparison goods expenditure at 2024, increasing to £81.4m at 2029, £99.2m at 2034, and to £115.9m at 2038.

10.2.40 Taking into account the forecast increases in comparison goods expenditure and population and allowing for year on year increases in the productivity of existing floorspace, we estimate that by 2024 there will be surplus expenditure of £6.1m to support additional comparison goods floorspace within Sheerness. This surplus is forecast to increase to £14.2m at 2029, to £24.8m at 2034 and further to £35.3m at 2038. This surplus expenditure equates to a comparison goods floorspace requirement of between 1,100-1,900sq m net (depending on format and operator) by 2024, increasing to between 2,200-3,900 sq m net by 2029, between 3,500-6,100sq m net by 2034 and increasing further to between 4,500-7,900sq m net by 2038.

Figure 10.9: Quantitative Need for Comparison Goods Floorspace in Sheerness

Year	Benchmark Turnover (£m)	Sheerness Turnover (£m)	Sheerness Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq m net)	
					Min	Max
2024	64.8	66.8	4.2	6.1	1,100	1,900
2029	72.3	81.4	5.1	14.2	2,200	3,900
2034	80.6	99.2	6.2	24.8	3,500	6,100
2038	87.9	115.9	7.3	35.3	4,500	7,900

Source: Table 17a & 17b of Appendix I
Benchmark turnover to increase in line with improvements in turnover efficiency as set out in Figure 4b of Experian Retail Planner Briefing Note 15
Assumes constant market share of Study Area expenditure claimed by facilities in Sheerness
2016 Prices

10.3 Summary

10.3.1 The above assessment identifies that, with the exception of Faversham, there is presently capacity for additional convenience floorspace in the towns within the Borough. The lack of capacity within Faversham is primarily due to the existing convenience goods provision in the town. Our assessment has identified that most of the existing convenience goods facilities in Faversham are currently under trading which suggests that there is an overprovision of convenience goods facilities in the town.

10.3.2 Potential convenience goods capacity in Sittingbourne and Sheerness in the medium term (10 years) is modest with capacity in the longer term to potentially support a medium sized foodstore (or an extension/s to existing facility/ies) in both towns.

10.3.3 The comparison goods capacity for each town varies. As the largest town in Swale, the majority of comparison goods floorspace capacity is identified in Sittingbourne (between 12,300 and 22,600sq m net by the end of the plan period). A reasonable level of comparison goods floorspace capacity is also identified for Faversham (between 2,700 and 4,700sq m net) and Sheerness (4,500 and 7,900sq m net) by the end of the plan period.

11.0 Commercial Leisure Needs Assessment

11.1 Introduction

11.1.1 Our approach to the assessment of quantitative need in the leisure market necessarily departs from our retail methodology for a number of reasons, including the fragmentation of the market and the limited availability of accurate data. However, the household survey undertaken to inform the Study asked respondents questions about their use of commercial leisure facilities and, through reference to market share, we are therefore able to form a view as how Swale currently meets the needs of their population in relation to the bingo, cinema, ten-pin bowling, restaurant and café/coffee shop, and health and fitness gym sectors.

11.1.2 As we noted in Section 4 of the study, WYG acknowledges that there can be limitations to survey research, particularly with regard to the sample size which can be achieved and the use of contact by home telephone only. The results should therefore be taken to be a broad indication of consumer preferences.

11.1.3 We also use national statistics in respect of the typical level of provision of specific types of facilities to assist our judgement in respect of the likely future need for additional facilities in the two administrative areas. By reference to estimated increases in the Study Area population, this 'benchmarking' exercise informs our judgement in respect of the likely future needs.

11.1.4 In considering future commercial leisure provision, it should be noted that certain types of facility are often provided in locations proximate to large centres. The analysis that follows seeks to apportion future growth in commercial leisure provision on the basis of Swale's current market share, but this should be viewed with some flexibility in respect of how opportunities that come forward 'on the ground' can appropriately contribute to meeting identified needs.

11.1.5 For each leisure sector, we consider the current broad patterns of existing use, before then assessing the need for additional facilities.

11.2 Participation Leisure Activities

11.2.1 Figure 11.1 examines participation rates for a range of leisure activities (including non-commercial leisure activities) across the 6 zones of the Study Area. It is shown that the most popular single activity is to visit restaurants, which an average of 57% of Study Area respondents participate in, followed then by visiting the cinema (48% of respondents), café's and coffee shops (41%) and then pubs and bars (40% of respondents). Less popular activities include visiting nightclubs, bingo halls, indoor rock-climbing centres and trampolining.

Figure 11.1: Participation in Leisure Activities by Zone (%)

Activity	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East		Study Area Av.
	1	2	3	4	5	6		
Restaurant	54%	63%	50%	60%	76%	54%		57%
Café / coffee shop	38%	35%	38%	27%	63%	43%		41%
Indoor health & fitness	13%	12%	20%	7%	16%	15%		15%
Cinema	46%	51%	50%	33%	55%	43%		48%
Pub / bar	41%	39%	40%	34%	51%	34%		41%
Ten pin bowling	17%	17%	19%	7%	13%	7%		16%
Bingo	8%	10%	4%	13%	3%	3%		6%
Theatre / concert hall	22%	30%	29%	29%	45%	33%		30%
Museum / art galleries	15%	11%	14%	19%	39%	21%		18%
Nightclub	1%	2%	3%	1%	-	-		2%
Trampolining	3%	6%	5%	-	1%	1%		3%
Indoor rock climbing	2%	-	-	-	-	-		1%
(None of these)	20%	19%	16%	18%	3%	15%		16%

Source: Question 18 of the NEMS Household Survey

11.2.2 When comparing participation levels across each zone, a higher proportion of respondents within Zone 5 (Faversham) participate in leisure activities than those in other zones. Indeed only 3% of respondents here indicated that they didn't undertake any of the mentioned leisure activities, compared with an overall average of 16% across the Borough. Participation levels in the other mentioned activities is higher than the average, with the exception of trampolining, rock climbing, bingo and going to nightclubs.

11.2.3 Zone 1 (Isle of Sheppey) has the highest proportion of people who responded that they didn't take part in any mentioned leisure activity (20%). Zones 2 (Borough West) and 4 (Central Borough) also had similar proportion of respondents that didn't take part in any mentioned leisure activity (18-19%).

11.2.4 Of the commercial leisure facilities that people would like to see more of within the Borough, responses indicate that new cinema facilities would be the most popular (19%) with circa a quarter of respondents in Zones 1-3 indicating they would like to see this. The second and third most popular commercial leisure facilities that respondents in the Borough would like to see more of was bowling alley (8%) and restaurant/cafes (6%).

11.2.5 In terms of non-commercial leisure facilities that residents in the Borough would like to see more of the most popular response was 'more activities or facilities for children' (6%). Other responses included outdoor play areas / park facilities (5%) and more sports facilities (4%).

11.2.6 It is interesting to note that half of respondents in the Borough indicated that they would not like to see any more of the mentioned commercial leisure facilities suggesting that they are generally satisfied with the current provision available.

Figure 11.2: Leisure Facilities that respondents would like to see more of, by zone

Activity	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East		Study Area Av.
	1	2	3	4	5	6		
Bowling alley	3%	11%	17%	5%	1%	2%		8%
Cinema	26%	23%	24%	8%	3%	3%		19%
Health & fitness (gym)	3%	1%	1%	4%	3%	3%		2%
Restaurants / cafés	-	10%	12%	4%	1%	1%		6%
Swimming pool	4%	1%	6%	2%	1%	-		4%
Trampolining	-	2%	5%	-	-	-		2%
More children's facilities / activities	10%	3%	8%	4%	5%	6%		7%
Outdoor play areas / park facilities	3%	2%	1%	-	1%	4%		2%
More outdoor sports facilities	7%	1%	2%	5%	2%	7%		4%
(None)	43%	66%	44%	65%	66%	62%		51%
(Don't know)	6%	2%	6%	6%	5%	15%		6%

Source: Question 29 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.3 Restaurant & Cafés/Coffee Shops

11.3.1 Figures 11.3 summarises the proportion of restaurant trips directed to destinations inside and outside Swale, based upon the results of the household survey.

11.3.2 Figure 11.3 identifies that just under half of the total number of visits (48%) by residents across all zones are made to restaurants within Swale. Faversham attracts the greatest proportion of these (20% of the total), followed by Sittingbourne (13%) and then Sheerness (8%). It is noted that restaurants in Canterbury have an influence across Swale and in particular Zone 6 (Borough East) which is the closest zone to Canterbury. Figure 11.3 shows:

- Sittingbourne - retains just over a third (35%) of the restaurant market share from those living in the town (Zone 3) and also captures just over 10% of the market share from Zones 2 (Borough West) and 4 (Central Borough). The retention levels and influence of restaurant facilities in Sittingbourne is considered to be reasonably low for the size of the town which in part reflects an under provision of facilities in the town centre. Following the completion of the Spirit of Sittingbourne development in the town centre, we would expect that the restaurant market share captured by the town centre will increase and the identified deficiencies addressed.

- Faversham - retains the majority of restaurant trips (61%) from its zone (Zone 5) and has an influence on trips in neighbouring Zones 4 (Central Borough) and 6 (Borough East) capturing the highest proportion of trips (44% and 45% respectively) from each zone. Overall, the identified retention levels are considered to be good, with the survey results indicating that the town is an attractive destination for restaurant visits.

- Sheerness - restaurants in the town retain only a quarter of trips from the Isle of Sheppey zone (Zone 1). Some 21% of trips take place at locations outside the three main towns including Halfway House (7%), Minster on Sea (6%) and Queenborough (4%). It is noted that Maidstone and Rochester capture 18% and 13% of restaurant trips from Zone 1. Restaurant facilities in Sheerness have very little influence on the other survey zones. They survey results suggest there is a deficiency in restaurant provision in Sheerness which reflects our health check assessment of the town centre where only 3 restaurants were recorded.

Figure 11.3: Study Area Market Share for Restaurant Visits, by Zone

Zones	**Isle of Sheppey**	**Borough West**	**Sittingbourne**	**Central Borough**	**Faversham**	**Borough East**		**Total**
	1	**2**	**3**	**4**	**5**	**6**		
Inside Borough	**48%**	**28%**	**40%**	**61%**	**64%**	**48%**		**48%**
Sittingbourne Town Centre		12%	35%	11%	2%			13%
Faversham Town Centre	1%	3%	5%	44%	61%	45%		20%
Sheerness Town Centre	26%	4%						8%
Other locations inside the Borough	21%	9%		6%	1%	3%		8%
Outside Borough	**52%**	**72%**	**59%**	**38%**	**36%**	**51%**		**52%**
Bluewater Shopping Centre	4%		3%					2%
Canterbury	7%	8%	21%	25%	18%	35%		16%
Chatham		3%	5%		3%			2%
Gillingham	2%	2%	2%		6%			2%
Hempstead	3%	3%			2%			2%
Maidstone	18%	9%	13%	4%				10%
Rochester	13%	12%	1%					5%
Whitstable		3%		1%	4%	12%		2%
Other Locations outside the Borough	5%	32%	14%	8%	7%	4%		8%

Source: Question 23 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.3.3 Turning to cafes and coffee shops, Figure 11.4 shows that overall Swale retains a higher proportion of café/coffee shops visits trips (73%) within the Borough. The retention rates are highest in Zone 5 (Faversham (92%)) and Zone 1 (Isle of Sheppey (84%)) with the lowest retention levels experience in Zone 6 (Borough East (32%)) and Zone 2 (Borough West (36%)). Cafes/coffee shops in Hempstead

Valley, capturing 20% of trips, have the greatest influence in Zone 2 whilst, similar to the trip patterns for restaurants Canterbury has the greatest influence on Zone 6 (40%).

Figure 11.4: Study Area Market Share for Café/Coffee Shop Visits, by Zone

Zones	**Isle of Sheppey**	**Borough West**	**Sittingbourne**	**Central Borough**	**Faversham**	**Borough East**		**Total**
	1	**2**	**3**	**4**	**5**	**6**		
Inside Borough	**84%**	**36%**	**63%**	**66%**	**92%**	**32%**		**73%**
Sittingbourne	6%	31%	56%	21%		2%		20%
Sittingbourne Town Centre	3%	29%	45%	21%		2%		19%
Sittingbourne Other	3%	2%	11%					1%
Faversham Town Centre		2%	7%	38%	92%	27%		27%
Sheerness	66%							18%
Sheerness Town Centre	47%							13%
Neats Court Retail Park	19%							5%
Other locations inside of the Borough	12%	3%		7%		3%		7%
Outside Borough	**16%**	**64%**	**37%**	**34%**	**8%**	**68%**		**27%**
Canterbury	2%		18%	28%	7%	40%		11%
Central London		12%	3%					2%
Gillingham		6%	2%	4%				1%
Whitstable			3%	2%		26%		2%
Maidstone	14%	5%	6%					6%
Hempstead		20%						2%
Bluewater Shopping Centre		2%	4%					1%
Other Locations Outside the Borough		20%	2%		1%	2%		2%

Source: Questions 24 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.3.4 Figure 11.4 also shows that:

- Sittingbourne – retains just over half (56%) of trips from within its study zone (Zone 3), with 45% being captured by cafes/coffee shops in the town centre. The town also captures a reasonable level of trips from neighbouring Zones 2 and 4 (31% and 21% respectively). Overall, we consider the retention levels are considered to be reasonably good, and subject to the end occupiers of units in the Spirit of Sittingbourne redevelopment, are likely to be improved.

- Faversham - captures a very healthy level of café/coffee shop trips from its zone (Zone 5) with just 8% of trips leaking to facilities outside the Borough (primarily Canterbury). The town centre also draws from the wider area, attracting 38% and 27% of the market from Zone 4 (Central Borough) and Zone 6 (Borough East). Overall, the identified retention levels are considered to be very good.

- Sheerness – retains some 66% of café/coffee shop from its zone (Zone 1 (Isle of Sheppey)) with 47% of trips taking place within the town centre and 19% at Neats Court Retail Park. Café/coffee shop facilities in Sheerness do not attract any other trips from within the Borough. Given the location of Sheerness, the lack of influence across the other study zones is not surprising or a particular cause for concern. We consider that the retention levels are considered to be reasonably good.

11.4 Health and Fitness

11.4.1 As identified in Figure 11.1, the household survey indicates that 15% of respondents in the Study Area visit indoor health and fitness facilities. Of the participating respondents, the main destinations mentioned are summarised in Figure 11.5.

Figure 11.5: Study Area Market Share for Indoor Health & Fitness by Zone

Zones	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East		Total
	1	2	3	4	5	6		
Inside Borough	**100%**	**83%**	**100%**	**100%**	**96%**	**66%**		**96%**
Sittingbourne	26%	64%	96%	27%	-	14%		52%
Faversham	-	-	-	26%	62%	37%		13%
Sheerness	69%	14%	-	-	-	-		20%
Other locations inside Borough	5%	5%	4%	47%	34%	15%		11%
Outside Borough	**0%**	**17%**	**0%**	**0%**	**4%**	**34%**		**3%**

Source: Questions 19 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.4.2 Swale retains 96% of indoor health and fitness trips from within the study area with 100% trips from Zones 1, 3 and 4 being made within the Borough. Some 34% of trips in Zone 6 (Borough East) are made outside the Borough, primarily at facilities in Canterbury.

11.4.3 Figure 11.5 shows that Sittingbourne attracts 52% of all trips to health & fitness facilities within the Borough. It retains 96% of the market share from its study zone (Zone 3), but also attracts a significant proportion of trips from Zone 2 (Borough West) and exerts influence on Zones 1 (Isle of Sheppey), 4 (Central Borough) and 6 (Borough East).

11.4.4 Faversham retains 62% of the trips from its study area and it also attracts trips from adjacent zones (Central Borough and Borough East). Notably, 34% of health & fitness trips made by residents of Faversham are made to facilities outside of the main towns, with most made to Syndale Park Personal Fitness Club, a facility located just outside Faversham.

11.4.5 Sheerness attracts 20% of all trips from within Swale, the majority come from the Isle of Sheppey (Zone 1) and the remainder from Zone 2 (Borough West). Other facilities outside of the main towns within Swale attract 11% of all trips when combined.

11.4.6 In terms of improvements to health & fitness facilities in Swale, only 2% of all respondents across Swale suggested that that they would like to see more health & fitness facilities in their area (see Figure 11.2), which indicates that respondents are generally satisfied with the current provision in Swale. This being said however, we note from the 'Requirements List' that gym operators are seeking floorspace in each of the three main towns within the Borough.

11.4.7 Having regard to the projected increase in population in the Borough, there is likely to be a quantitative need for new health and fitness gym facilities. We have sought to quantify this likely requirement based on current rates of participation in Figure 11.6 below. In considering the requirements set out, it should be noted that a new modern conveniently located indoor health and fitness facility is likely to result in some new gym members and in turn an uplift in participation rates.

Figure 11.6: Health and Fitness Gym Requirement in Swale Borough

Year	Study Area Population Increase	Typical Population Required to Support New Gym	Study Area Custom Claimed by Swale Borough	Potential No. of Gyms Supported in Swale Borough
2019-2038	27,142	2,800 - 3,500	96%	7.4 - 9.3

Note: Typical population required to support new gym sourced from information published by gym operators (including company account reports/accounts)

11.4.8 The increase in population anticipated in the Study Area in the period to 2038 is anticipated to be 27,142. Applying the market share for indoor health and fitness gym facilities in Swale (96%) this identifies potential for 26,056 new gym members within the Borough.

11.4.9 Information published by a number of health and fitness operators identify that typical/average members per health and fitness gym facility ranges from 2,800 to 3,500 members. Based on the typical/average members per health and fitness facility, there could be a requirement for between 7-9 health and fitness gyms in Swale.

11.4.10 In summary, whilst there is not currently considered to be a general qualitative deficiency in existing health and fitness gym facilities in the Borough, there are outstanding requirements from gym operators seeking to open based on the current market share of existing facilities in Swale, there is likely to be a quantitative need for between 7-9 additional facilities within the plan period.

11.5 Cinema

11.5.1 Cinema provision in Swale is of a relatively small scale and is made up of three independently run cinemas:

- New Century Cinema, High Street, Sittingbourne – This independently owned cinema operates in the same building as the Gala Bingo hall. The cinema has 2 screens and shows the latest popular film releases. The cinema shows films during the afternoon and evenings throughout the week.

- Royal Cinema, Market Place, Faversham – The Royal is an independently owned and operated cinema occupying a Mock-Tudor building off Market Place. Originally built as an Odeon Cinema, it has 1 screen, typically showing 2 films per day.

- The Criterion Cinema, High Street Sheerness – A very small cinema forming part of the larger Criterion Blue Heritage Centre. The centre hosts music hall shows, theatre events and also has a giftshop and a small tea room. Classic films and musicals are shown regularly at the cinema with other film screenings held every Friday.

11.5.2 Figure 11.7 shows that across the study zones, 41% of cinema trips are made to facilities within Swale with 22% made to the New Century Cinema in Sittingbourne, 18% to the Royal Cinema in Faversham and 1% to the Criterion in Sheerness.

Figure 11.7: Study Area Market Share for Cinema Visits

Zones	**Isle of Sheppey**	**Borough West**	**Sittingbourne**	**Central Borough**	**Faversham**	**Borough East**		**Total**
	1	**2**	**3**	**4**	**5**	**6**		
Inside Borough	**28%**	**18%**	**46%**	**52%**	**77%**	**28%**		**41%**
Sittingbourne								
New Century Cinema, High Street	20%	18%	38%	6%	2%	22%		22%
Faversham								
Royal Cinema, Market Place	4%		4%	42%	73%	26%		18%
Sheerness								
Criterion Blue Town, High Street	4%							1%
Outside Borough	**71%**	**82%**	**58%**	**52%**	**25%**	**74%**		**59%**
Cineworld, Rochester	29%	24%	26%	13%	2%			21%
Odeon, Chatham	19%	44%	16%	11%	2%			17%
Cineworld, Ashford	4%		1%	14%	9%	27%		4%
Curzon, Canterbury		1%			4%	30%		2%
Gulbenkian Cinema, Canterbury			1%	4%		14%		1%
Odeon, Barker Road, Maidstone	14%	3%	3%	2%				5%
Showcase Cinema, Bluewater	9%	8%	5%	2%				5%
Other Locations outside Borough		2%	6%	6%	8%	3%		4%

Source: Questions 22 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.5.3 The New Century Cinema, Sittingbourne attracts trips from each of the survey zones, capturing between 18 and 38% of trips from Zones 1, 2, 3 and a smaller portion from Zones 4 and 5. With the exception of Zone 2, The Royal Cinema in Faversham also attracts trips from across the study zones. 73% of cinema visits from Faversham (Zone 3) are captured by The Royal.

11.5.4 In terms of the influence of more modern or multiplex cinemas outside Swale, the Cineworld at Medway Valley Leisure Park in Rochester has the largest influence, capturing 21% of trips overall and between 26% and 29% of trips originating from Zones 1-3. The Odeon in Chatham also has a significant influence capturing 44% of all trips from Zone 2 (Borough West). Cinema facilities in Canterbury (Curzon Cinema and Gulbenkian Cinema) and Ashford (Cineworld) have a particular influence on trips in Zone 6 (Borough East)

11.5.5 Mintel estimates that the UK population on average visits a cinema 2.7 times per annum and that each cinema screen attracts around 42,927 separate admissions. Applying these benchmark averages to the Study Area, we estimate that there will be 408,634 cinema admissions arising the Study Area population at 2019, increasing to 481,918 admissions by 2038. Based on the assumed number of visits per screen, we calculate that around 9.5 screens can be supported in the Study Area at 2019, increasing to 11.2 screens at 2038. Our calculations are set out below in Figure 11.8.

Figure 11.8: Cinema Screen Requirement in Study Area

Year	Study Area Population	Number of Cinema Visits Per Person	Attendance	Number of Admissions Required to Support Screen	Screens Supported
2019	151,346	2.7	408,634	42,927	9.5
2024	159,358	2.7	430,267	42,927	10.0
2029	166,664	2.7	449,993	42,927	10.5
2034	173,406	2.7	468,196	42,927	10.9
2038	178,488	2.7	481,918	42,927	11.2

11.5.6 As shown in Figure 11.9 below, based on the current market share, around 4.1 cinema screens could currently be supported in Swale Borough, increasing to around 4.8 screens at 2038. This is broadly in line with the current provision.

Figure 11.9: Cinema Screen Requirement in Swale Borough

Year	Screens Supported	Study Area Custom Claimed by Swale	No. of Additional Screens Supported in Swale
2019	9.5	43%	4.1
2024	10.0	43%	4.3
2029	10.5	43%	4.5
2034	10.9	43%	4.7
2038	11.2	43%	4.8

11.5.7 However, given the relatively low market share retention of cinema trips and in the absence of a modern cinema facility in the Borough we consider that there is a qualitative need to improve cinema provision in the Borough.

11.5.8 The planned new modern multi-screen cinema to be delivered as part of the Spirit of Sittingbourne development in Sittingbourne will enhance the qualitative provision of cinema facilities in the town and across the Borough and, we consider, will meet this qualitative deficiency.

11.6 Tenpin Bowling

11.6.1 The Swale Borough administrative area currently does not accommodate a tenpin bowling facility meaning that all bowling trips are currently made to facilities outside of the Borough.

11.6.2 Figure 11.10 shows that the Hollywood Bowl at Medway Leisure Park in Rochester attracts approximately half of bowling trips from Swale with 19% attracted to the Hollywood Bowl at Lockmeadow Entertainment Centre in Maidstone and 16% to MFA in Whitstable. Other bowling facilities which attract residents in Swale include Hollywood Bowl in Ashford and Lordswood Bowling Centre in Chatham.

Figure 11.10: Study Area Market Share for Tenpin Bowling Visits

Facility	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East		Total
	1	2	3	4	5	6		
Hollywood Bowl, Maidstone	22%	15%	27%					19%
Hollywood Bowl, Rochester	55%	66%	59%			28%		49%
Hollywood Bowl, Ashford		4%		25%	31%			5%
Lordswood Bowling Centre, Chatham	24%	6%	3%					9%
MFA Bowl, Whitstable				75%	69%	63%		16%
Other		9%				9%		1%

Source: Question 26 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.6.3 In the absence of a Tenpin Bowling facility in the Borough there could be potential for Swale to be able to accommodate a facility. However, at the current time there are no requirements from tenpin bowling operators to open a new facility in the Borough. We recommend that, should any proposals for such development be forthcoming, they are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

11.7 Bingo

11.7.1 Swale currently accommodates two permanent bingo halls, the Mecca Bingo on the High Street in Sittingbourne Town Centre and Kings Bingo, Broadway, in Sheerness Town Centre, a smaller independently run hall. We understand Bingo activities also take place in a number village halls and community centres in other the some rural areas of the Borough.

11.7.2 The household survey indicates that visiting bingo halls is not a major leisure activity for the majority of respondents living within the study area since only 6% of respondents stated that they visit these facilities. Figure 11.11 shows that of those that do participate in bingo, Mecca Bingo in Sittingbourne is the most popular bingo hall in Swale, attracting 67% of all trips from within the study area. Bingo at the Community Centre in West Faversham attracts 12% of trips, while Kings Bingo in Sheerness attracts 4%. Mecca Bingo in Sittingbourne draws residents from each of the study zones except for Zone 6, while the other facilities draw from a smaller catchment.

Figure 11.11: Study Area Market Share for Bingo Visits

Facility	Isle of Sheppey 1	Borough West 2	Sittingbourne 3	Central Borough 4	Faversham 5	Borough East 6		Total
Inside Swale Borough	**83%**	**18%**	**100%**	**100%**	**100%**	**40%**		**84%**
Mecca Bingo, Sittingbourne	73%	9%	100%	61%	29%			67%
West Faversham Community Centre				34%	71%	40%		12%
Kings Bingo, Sheerness	11%							4%
Other Locations in Swale		9%		5%				2%
Outside Swale Borough	**17%**	**83%**	**0%**	**0%**	**0%**	**60%**		**16%**
Gala Bingo, Maidstone	8%	9%						4%
Gala Bingo, Rochester	8%	74%						11%
Mecca Bingo, Broadstairs						40%		1%

Source: Question 27 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.7.3 The Study Area has a total estimated population of 151,346 at 2019, increasing to 178,488 at 2038. Mintel identify that there were 354 bingo halls in the UK in 2016, which against the 2016 population of the UK of 65.1 million, suggests that each is supported by a catchment of 183,898 persons or thereabouts. Accordingly, we estimate that the Study Area population could theoretically support 0.7 bingo clubs at 2019, increasing to 0.8 bingo clubs by 2036.

Figure 11.12: Bingo Hall Requirement in Study Area

Year	Study Area Population	Typical Population Required to Support Hall	Potential Number of Halls Supported by Study Area	Study Area Custom Claimed by Swale	Potential No. of New Halls Supported in Swale
2019	151,346	183,898	0.8	84%	0.7
2024	159,358	183,898	0.9	84%	0.8
2029	166,664	183,898	0.9	84%	0.8
2034	173,406	183,898	0.9	84%	0.8
2038	178,488	183,898	1	84%	0.8

11.7.4 It is considered that at the current time there is no demonstrable need to improve competition and choice in bingo halls in the Borough, although this will be subject to market demand from other bingo operators. Given that current trends for bingo halls show activity moving online instead of physical venues, future demand for new venues is expected to be very limited. We recommend that, if demand arises in the future, proposals for such development are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission

11.8 Arts and Cultural Activities

11.8.1 Arts and cultural activities play an important role in providing a distinct identity to places or towns, as well as being an important contributor to the local economy. Research by the Centre for Economic and Business Research (Cebr) in 2017 has quantified that every pound of GVA generated by the arts and culture industry, an addition £1.30 of GVA is generated in the wider economy through wider indirect and induced multiplier impacts of the industry. In overall terms, the arts and culture sector was estimated to have produced a turnover of £15.8 billion and was the responsible for the employment of approximately 131,200 people in the UK in 2015.

11.8.2 For the purpose of this assessment consideration is given to the provision of theatres and museum/art facilities within Swale. In addition, there are a number of cultural event spaces which are able to host a variety of events that attract visitors to the town centre. Figure 11.13 details the main cultural venues in the Borough.

11.8.3 The results of the household survey indicate that 18% of respondents from the study area (Borough) visit museums and galleries. Theatres are even more popular with some 30% of respondents taking part in these activities.

Figure 11.13: Main Museums/Cultural Venues in Swale

Activity	Venues
Museums	Eastchurch Aviation Museum, Sheerness Queenborough Guildhall Museum, Queenborough Sheerness Heritage Centre, Sheerness Sittingbourne Heritage Museum, Sittingbourne Belmont House and Gardens, Faversham Kent Police Museum, Faversham Old Forge Wartime House, Sittingbourne Milton Regis Court Hall Museum, Sittingbourne The Guildhall, Faversham Alexander Centre, Faversham Belmont House and Gardens, Faversham Fleur de Lis Heritage Centre, Faversham Shepherd Neame Brewery Visitor Centre, Faversham Chart Gunpowder Mills, Faversham The Maison Dieu, Faversham Blue Town Heritage Centre, Sheerness Rose Street Centre, Sheerness Minster Gatehouse Museum, Minster-on-Sea
Theatres	Sheppey Little Theatre, Sheppey The Avenue Theatre, Sittingbourne Arden Theatre, Faversham

11.8.4 In terms of trips to undertake art and cultural activities, as set out at in Figure 11.14, the vast majority (99%) are undertaken at attractions outside of Swale. Primarily due to: the limited size; the scale of arts and cultural facilities in the Borough; the location of the Borough to existing arts and cultural facilities in larger surrounding centres, and the fact that a large proportion of the facilities are primarily targeted for visitors/tourists (which reside outside the study area) such facilities only attract a study area market share of 1%.

11.8.5 Outside the Study Area, by far the most popular single destination for art and cultural trips originating in the Study Area is Canterbury (49% of trips), which is then followed by Central London (39% of trips). The latter results is not surprising given the greater choice of facilities/venues in the City and it being a major visitor/tourist destination.

Figure 11.14: Study Area Market Share for Theatres, Galleries & Museum

	Isle of Sheppey	Borough West	Sittingbourne	Central Borough	Faversham	Borough East		Total
	1	2	3	4	5	6		
Inside Swale	**0%**	**0%**	**0%**	**2%**	**5%**	**2%**		**1%**
Belmont House, Throwley, Faversham					1%	2%		<1%
Kent Police Museum, Faversham				2%	4%			1%
Outside Swale	**100%**	**100%**	**100%**	**98%**	**95%**	**98%**		**99%**
Central London	48%	33%	46%	14%	32%	31%		39%
Canterbury	43%	61%	42%	74%	48%	62%		49%
Brighton			10%					3%
Bromley				2%	4%			1%
Margate	1%	2%			2%	2%		
Maidstone	5%							1%
Dartford		2%	2%		1%			1%
Other Locations	3%	1%		9%	6%	3%		4%

Source: Questions 28 of the NEMS Household Survey
Notes: Figures may not add due to rounding

11.8.6 Overall, having regard to the size of the Borough and its towns the provision of arts and cultural facilities in the Borough is considered to be reasonable. Given that a large proportion of the facilities are primarily targeted for visitors/tourists (which reside outside the study area) we would recommend a more detailed review and assessment of relevant arts and culture facilities be undertaken as part of a potential Tourism Study.

12.0 Key Findings & Recommendations

12.1 Summary of Identified Need

12.1.1 The quantitative need findings identified for the Swale Borough are summarised in Figure 12.1 below.

Figure 12.1: Quantitative Capacity Summary (within plan period (2038))

Sector	Sittingbourne	Faversham	Sheerness
Convenience Goods (sq m net)	1,900	Nil	1,200
Comparison Goods (sq m net)	12,300-22,600	2,700-4,700	4,500-7,900
Health & Fitness (No.)	7-9 gyms (within Swale Borough)		
Cinema (No.)	Nil		
Bingo (No.)	Nil		
Tenpin Bowling (No.)	Nil		

Notes: Quantitative Capacity figures are post commitments/planning permissions.

Comparison Goods

12.1.2 Our study identifies that, as the largest town in Swale, the majority of comparison goods floorspace capacity over the plan period is identified in Sittingbourne and should be the main focus for future comparison goods shopping. A reasonable level of comparison goods floorspace capacity is also identified for Faversham and Sheerness by the end of the plan period.

12.1.3 Sittingbourne Town Centre provides a good level of independent retailers and for its size a reasonable range of national multiple retailers. The study identifies that there is a reasonably large level of expenditure leakage from Sittingbourne. Whilst the study indicates that there are qualitative deficiencies in the town centre's comparison goods provision, given the strength and provision in competing centres/facilities (notably Bluewater), the role and function of the centre in the sub-regional hierarchy, and the current challenging economic climate for retailers, it is considered difficult to envisage how the town centre would be able attract the quantum of retailers that would enable it to claw back this expenditure in the near future. We consider that the Council should seek to plan to improve Sittingbourne Town Centre's comparison goods market share by way of further qualitative improvements to the town centre, including, inter alia, improvements to the existing retail stock, encouraging a wider range/mix of uses, and town centre environmental improvements.

12.1.4 Whilst Faversham Town Centre benefits from a good level of independent retailers (82%), its overall comparison goods retail provision (including national multiple retailers) is not strong. The study identifies that the nearby larger town of Canterbury has a substantial influence on comparison goods shopping provision in Faversham's catchment area.

12.1.5 Turning to Sheerness Town Centre, its comparison goods retail offer is reasonably limited. The reasonably limited influence of comparison goods provision in the town centre is reflected in the results of the household survey which show that the town centre only retains a quarter of comparison goods trips from the Isle of Sheppey. Retail facilities in Sittingbourne have an influence on the comparison goods trips from the Isle of Sheppey.

Convenience Goods

12.1.6 Apart from Faversham, there is capacity for additional convenience floorspace in the towns within the Borough in the plan period. The lack of capacity within Faversham is primarily due to the existing convenience goods provision in the town. Potential convenience goods capacity in Sittingbourne and Sheerness in the medium term (10 years) is modest with capacity in the longer term to potentially support a medium sized foodstore (or an extension/s to existing facility/ies) in both towns.

12.1.7 The existing convenience goods expenditure retention rates in each of the three main towns are generally considered to be good with a good level of foodstore provision provided in each. Overall, we do not consider that there are any qualitative deficiencies in convenience goods provision in each town.

Restaurant/Café and Coffee Shop

12.1.8 The retention levels and influence of restaurant facilities in Sittingbourne are considered to be reasonably low for the size of the town which in part reflects an under provision of facilities in the town centre. In contrast the retention levels of café and coffee shops are considered to be reasonable. Following the completion of the Spirit of Sittingbourne development in the town centre, we would expect that the restaurant market share captured by the town centre will increase and the identified deficiencies addressed.

12.1.9 In terms of Faversham, overall, the identified retention levels of restaurant visits are considered to be good, with the study indicating that the town is an attractive destination for restaurant visits. For café and coffee shops, the study also identifies that retention levels of are considered to be very good with no indication of deficiencies.

12.1.10 The study indicates there is a deficiency in restaurant provision in Sheerness which reflects our health check assessment of the town centre where only 3 restaurants were recorded. In contrast, the retention levels in café and coffee shop are considered to be reasonably good.

Indoor Sport/Health & Fitness

12.1.11 Whilst there is not currently considered to be a general qualitative deficiency in existing health and fitness gym facilities in the Borough, there are outstanding requirements from gym operators seeking to open gym facilities in each of the three towns in the Borough. Based on the current market share of existing facilities in Swale, there is likely to be a quantitative need for between 7-9 additional facilities within the plan period.

12.1.12 Having regard to existing market share patterns it is recommended that the council should consider additional provision in central locations in the three Borough towns.

Cinema

12.1.13 In terms of the identified cinema needs for the borough given the relatively low market share retention of cinema trips and in the absence of a modern cinema facility in the Borough there is assessed to be a qualitative need to improve cinema provision in the Borough.

12.1.14 The planned new modern multi-screen cinema in the 'Spirit of Sittingbourne' development in Sittingbourne will enhance the provision of cinema facilities in the town and the Borough and, we consider, will meet this qualitative deficiency.

Bingo Hall

12.1.15 At the current time there is no demonstrable need to improve competition and choice in bingo halls in the Borough. Given that current trends for bingo halls show activity moving online instead of physical venues, future demand for new venues in the Borough is expected to be very limited.

Tenpin Bowling

12.1.16 The Borough does not currently accommodate a tenpin bowling facility meaning that all bowling trips are currently made to facilities outside the Borough.

12.1.17 In the absence of a bowling facility in the Borough there could be potential for Swale to be able to accommodate a facility. However, at the current time there are no requirements from tenpin bowling operators to open a new facility in the Borough.

Arts & Cultural Activities

12.1.18 In terms of arts and cultural activities (theatres and museum/art facilities), the study identifies that existing provision of the district towns is of a scale which is appropriate to their role in the hierarchy. Additional provision is likely to reflect particular opportunities related to distinct locations and the existing cultural tourism offer. Given that a large proportion of the facilities are primarily targeted at visitors/tourists (which reside outside the study area) we would recommend a more detailed review and assessment of relevant arts and cultural facilities be undertaken as part of a potential Tourism Study.

12.2 Identified Demand from Operators/Businesses

12.2.1 The identified demand from national retailers/operators for each town is summarised in Figure 12.2 below. Operators comprise convenience, comparison and commercial leisure uses. The summary table below does not include other town centre uses.

Figure 12.2: Demand from New Operators

Sittingbourne	
Aldi	Subway
Monkey Puzzle Day Nurseries	Pizza Hut Delivery
Age UK	Anytime Fitness
Faversham	
Savers	Subway
Vets4Pets	KFC
Aldi	Snap Fitness
Lidl	Anytime Fitness
Finch House Bakery	
Sheerness	
Age UK	Anytime Fitness
Vets4Pets	

Source: 'The Requirements List'

12.2.2 For their sizes and role, all three tows have a reasonably low level of demand from operators. Faversham currently has the greatest level of demand from operators with Sheerness having the lowest demand. Given the current economic climate the level of demand is not particularly surprising.

12.3 Proposed Network of Centres

12.3.1 In drawing up Local Plans, Paragraph 85 of the NPPF requests the LPA to define a network and hierarchy of centres.

12.3.2 Policy DM2 of the Adopted Local Plan identifies Sittingbourne, Faversham and Sheerness as 'town centres'. Underneath this the policy identifies 11 'local centres', these being: Queenborough, Rushenden, Minster, Halfway Houses, Eastchurch, Leysdown, Iwade, Newington, Milton Regis, Teynham, and Boughton).

12.3.3 In the absence of any definition to rely on in the NPPF and the NPPG, the definition of different tiers of the hierarchy provided by the now superseded Planning Policy Statement 4 (PPS4) remains of some relevance. In respect of the definition of town centres, district centres and local centres, PPS4 states the following:

> *"Town centres will usually be the second level of centres after city centres and, in many cases, they will be the principal centre or centres in a local authority's area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing a range of facilities and services for extensive rural catchment areas. In planning the future of town centres, local planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability. In London the 'major' and many of the 'district' centres identified in the Mayor's Spatial Development Strategy typically perform the role of town centres.*
>
> *District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.*
>
> *Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.*
>
> *Small parades of shops of purely neighbourhood significance are not regarded as centres for the purposes of this policy statement."*

12.3.4 Experian defines the multi-functional offer of a city or town as including residential, public service, leisure and entertainment, commercial and cultural facilities (amongst others) and Annex 2 of the NPPF:

> *"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."*

12.3.5 In accordance with the findings of this Study, the role and functions of the centres, and in light of these definitions, we recommend that the Council retain Sittingbourne, Faversham and Sheerness as town centres.

12.3.6 In terms of local centres, Section 9 and **Appendix F** of the study examines the health and composition of the 11 centres. The study finds, with the exception of Rushenden, the local centres continue to serve a complimentary role to the three town centres and area each performing the role of a local centre. However, it is apparent that Rushenden Local Centre, given it now only provides one small newsagent, no longer functions as a local centre. We therefore recommend that it is no longer identified as one.

12.4 Recommended Local Impact Threshold

12.4.1 In accordance with national planning policy, it is appropriate to identify locally set retail thresholds for the scale of edge-of-centre and out-of-centre development which should be subject to the assessment of the impact criteria set out by paragraph 89 of the NPPF. The NPPF sets a default impact threshold of 2,500sq m gross. The NPPG explains that gross retail floorspace is defined as *"the total built floor area measured externally which is occupied exclusively by a retailer or retailers, excluding open areas uses for the storage, display or sale of goods"* (paragraph 16).

12.4.2 Adopted Local Plan Policy DM2 (Proposals for Main Town Centre Uses) sets a borough wide blanket impact assessment threshold of 2,500sq m gross (the NPPF impact threshold). We note the set threshold relates to proposals for all main town centre uses. The NPPF advocates a floorspace threshold for retail and leisure development proposals only. We would therefore recommend the policy is re-worded so it is clear that the impact threshold applies only to retail and leisure proposals in edge-of-centre or out-of-centre locations.

12.4.3 When setting a locally appropriate threshold, the NPPG considers the following aspects important in setting a locally appropriate threshold:

- Scale of proposals relative to town centres;
- The existing viability and vitality of town centres;
- Cumulative effects of recent developments;
- Whether local town centres are vulnerable;
- Likely effects of development on any town centre strategy; and
- Impact on any other planned investment.

12.4.4 Following the assessment undertaken within this study and having regard to, *inter alia*, the current health of the town centres; performance of the town centres; unit and floorspace composition of each of the town centres; increasing competition from the internet; and availability of units in the prime shopping area capable of meeting potential national multiple occupiers in each of the centres, WYG consider that a threshold of 500sq m for retail/leisure floorspace proposed outside of designated centres is appropriate. This should provide the Council with sufficient flexibility to assess the merits and potential impact implications of edge and out-of-centre retail and leisure applications.

12.4.5 The threshold should not only apply to new floorspace, but also to changes of use and variations of condition to remove or amend restrictions on how units operate in practice.

12.4.6 It is important to stress that whilst the locally set threshold would require the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the thresholds, national guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. The level of detail would typically be agreed with planning officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.

12.5 Review of Town Centre Boundaries and Primary Shopping Areas

12.5.1 The NPPF identifies that LPA's planning policies should define the extent of town centres and primary shopping areas and set out the range of uses permitted in such locations as part of a positive strategy for the future of each centre.

12.5.2 The existing Policies Map defines the Town Centre Boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontage for each of the town centres. As part of this study, and in line with the brief, WYG has reviewed the existing town centre boundaries and primary shopping areas. Our review has had regard to our vitality and viability health check and detailed analysis of each town centre. It should be noted that in order to encourage a more positive and flexible approach to planning for the future of town centres the NPPF (2018) deleted its predecessors' requirement for LPA's to identify primary and secondary frontages.

12.5.3 In making our recommendations on the primary shopping area and town centre boundaries we have had regard to the definitions of each set out in Annex 2 of the NPPF:

> *"**Town Centre** – Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre sues within or adjacent to the primary shopping area…*
>
> ***Primary shopping area** – Defined area where retail development is concentrated."*

12.5.4 Figure 12.3 below summarise our recommendations and relevant plans showing recommended amendments are included at **Appendix J** of this study.

Figure 12.3: Recommended Town Centre Boundaries & Primary Shopping Areas

Town	Comments/Recommendations
Sittingbourne	Town Centre Boundary - apart from very minor boundary changes to include full building footprints no changes are required. Primary Shopping Area - curtailed to the west to exclude West Street. - extended to the north to include retail/leisure units proposed as part of Spirit of Sittingbourne redevelopment.
Faversham	Town Centre Boundary - extended to the west to include the Morrison's store, - curtailed to the south to remove railway station car park and residential properties to the south of Stone Street - curtailed to the east to exclude residential properties off Church Road Primary Shopping Area - apart from very minor boundary changes to include full building footprints no changes are required.
Sheerness	Town Centre Boundary - curtailed to the east to exclude residential properties to the north of Broadway and land to the rear of Sheerness Swimming Pool Primary Shopping Area - no changes required

12.5.5 In accordance with the NPPF that town centre boundaries should be kept under review, where necessary, so that future anticipated needs can be accommodated.

12.6 Recommendations in Respect of the Council's Future Retail & Commercial Leisure Strategy

12.6.1 Town centre strategies in the borough council area need to be able to support the continued development/changes in the 'high street' if they are to successfully compete. As set out in Section 3 of this study the key purpose of the town centre strategies should be to build on the existing individuality of centres, be a focus/hub for their communities, attract a mix of additional land uses beyond retail/leisure, (including residential, educational, community and office uses) and extend the 'dwell time' and spend of visitors/residents visiting the town centre and in turn the vitality and viability of the centre.

12.6.2 The recommended key retail and commercial leisure elements to each town centre strategy, as a result of the findings of this study, are set out below:

Sittingbourne Town Centre

- Maintain, and where possible, strengthen the town centre's mix of multiple and independent occupiers.
- Investigate site/unit opportunities to meet the commercial leisure and retail needs identified in this study. In doing so it will be important to take into account the need to attract a mix of additional land uses (most notably offices and residential) beyond retail/leisure to the town centre.
- Continue to engage with The Spirit of Sittingbourne team to seek the full letting of retail/leisure units proposed in the redevelopment scheme and that the overall mixed-use scheme is fully realised.
- Develop a marketing strategy to seek to improve the perception of the town centre. The marketing strategy should provide an assessment to understand potential options for further promoting existing facilities and improving marketing.
- Undertake a Parking Strategy for the Town Centre to assess whether the provision of car parks in the town meets with current and future demand. If there is a potential over supply, consider options for redeveloping for alternative uses which would support the town centre as a community hub.
- Undertake a Public Realm Assessment to investigate potential opportunities to improve the quality of the town centre environment.

Faversham Town Centre

- Identify site/unit opportunities to meet the identified (albeit limited) comparison retail goods and health and fitness needs. Again, in doing so it will be important to take into account the need to attract uses beyond retail/leisure to the town centre to enhance its role as a community hub.
- Embrace the strong independent offering in the town centre and where possible seek to enhance it, particularly the comparison goods offer.
- Undertake a review of the town centre market to ascertain whether there are potential opportunities of enhancing/promoting it.
- Investigate ways to improve the pedestrian linkage (Preston Street) between the primary shopping area and the railway station.

Sheerness Town Centre

- Investigate site/unit opportunities to meet the identified (albeit limited) comparison retail goods, restaurant, and health and fitness needs. Again, like the other two town centres, in doing so it will be important to take into account the need to attract uses beyond retail/leisure to the town centre to enhance its role as a community hub.

- Consult with owners of properties which currently detract from the environmental quality of the centre to establish potential opportunities for their enhancements.

- Undertake a public realm improvement study to investigate potential opportunities to improve the quality of the town centre environment including consideration to part pedestrianisation/ pedestrian priority zones and public realm improvements/linkages by the railway station. It will be important to engage with stakeholders, town centre occupiers and residents.

- Undertake annual monitoring composition checks of the town centre to make sure the number of takeaway outlets does not have a negative impact on its vitality and viability.

12.6.3 In addition to the above, the Council, in partnership with its stakeholders, should continue to promote the town centres in the Borough (particularly through the internet (e.g. www.Faversham.org)) as not just places to shop and eat/drink but also places to work, stay and live.

Glossary of Terms

Capacity	Retail capacity in terms of this report refers to surplus/deficit of expenditure (£m) which represents the difference between the expenditure and turnover of the identified facilities.
CTN	Shops selling Confectionary, Tobacco and newspapers
Comparison Goods	Comparison goods relate to items not obtained on a frequent basis, these include clothing, footwear, household and recreational goods.
Convenience Goods	Convenience goods relate to everyday essential items including confectionary, food, drinks, newspapers and magazines.
District Centre	District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.
Expenditure Per Capita	The average spend of each person within the defined Study Area on a variety of retail goods.
Expenditure	Expenditure is calculated by taking the population within a defined area and then multiplying this figure by average annual expenditure levels for various forms of goods.
Expenditure Forecasts	This assessment has been undertaken using the 'goods based' approach as prescribed in the Planning for Town Centres Practice Guidance. Retail expenditure forecasts have been derived from Experian Retail Planner Briefing Note 14 (November 2016).
Experian (MMG3)	The database used to identify population, expenditure and socio-economic breakdown of the Study Area population.
Gross Floorspace	Represents the level of total floorspace or footprint of a specific development (i.e. sales area, storage, checkouts, café, display, and so on).
GOAD Plans	Provide accurate information on the composition of town centres, shopping areas, out-of-town retail parks and outlet villages in the UK. Identifies the fascia name, retail category, floorspace, and exact location of all retail outlets and vacant premises.
GOAD Reports	Provide a snap-shot of the retail status or demographic make-up of Goad surveyed town centres. Provides a comprehensive breakdown of floorspace and outlet count

	for all individual trade types in the Convenience, Comparison, Retail Service, Leisure, Financial/Business Services and Vacancy sectors.
Local Centre	Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.
Net Floorspace	Represents the level of internal area devoted to the sale of goods.
Market Share	Market shares derived from the household survey results, which are based on either the proportion of shopping trips or the proportion of expenditure attracted to a particular centre/facility.
National Multiple	This is a retail or service operator which is or part of a network of nine or more outlets.
Price Base	The price base for the Study is 2016; all prices are or have been adjusted to 2016 in order to be consistent.
Rates of Productivity	This takes into account the potential for existing retail floorspace to improve their turnover productivity (e.g. smaller goods could be sold from a smaller area for more money, increased opening hours, etc.).
Sales Density	Retail capacity figures are expressed in term of floorspace, relying on the application of assumed sales density figures to the surplus expenditure identified. This is based on the typical turnover of a store by square metre/foot.
Special Forms of Trading	Defined by Experian as expenditure not directed to traditional floorspace such as the internet, mail order, party plan and vending machines and other non-store activity such as market and road-side stalls.
Study Area	This represents the household survey area, which is based on postal sectors.
Trade Draw	This refers to the level of trade attracted to a particular facility/centre.
Turnover	The turnover figure relates to the annual turnover generated by existing retail facilities.

Town Centre	A town centre will usually be the second level of centres after city centres and, in many cases, they will be the principal centre of centres in a local authority's area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing a range of facilities and services for extensive rural catchment areas. In planning the future of town centres, local planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability.

Swale Borough Council

Retail and Leisure Needs Assessment

December 2018

Volume 2 of 2 – Appendices

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Appendices

Appendix A

Experian Mosaic Summary

Mosaic UK Classifications

A City Prosperity	A01	World-Class Wealth	Global high flyers and families of privilege living luxurious lifestyles in London’s most exclusive boroughs
	A02	Uptown Elite	High status households owning elegant homes in accessible inner suburbs where they enjoy city life in comfort
	A03	Penthouse Chic	City suits renting premium-priced flats in prestige central locations where they work hard and play hard
	A04	Metro High-Flyers	Ambitious 20 and 30-somethings renting expensive apartments in highly commutable areas of major cities
B Prestige Positions	B05	Premium Fortunes	Influential families with substantial income established in distinctive, expansive homes in wealthy enclaves
	B06	Diamond Days	Retired residents in sizeable homes whose finances are secured by significant assets and generous pensions
	B07	Alpha Families	High-achieving families living fast-track lives, advancing careers, finances and their school-age kids’ development
	B08	Bank of Mum and Dad	Well-off families in upmarket suburban homes where grown-up children benefit from continued financial support
	B09	Empty-Nest Adventure	Mature couples in comfortable detached houses who have the means to enjoy their empty-nest status
C Country Living	C10	Wealthy Landowners	Prosperous owners of country houses including the rural upper class, successful farmers and second-home owners
	C11	Rural Vogue	Country-loving families pursuing a rural idyll in comfortable village homes while commuting some distance to work
	C12	Scattered Homesteads	Older households appreciating rural calm in stand-alone houses within agricultural landscapes
	C13	Village Retirement	Retirees enjoying pleasant village locations with amenities to service their social and practical needs
D Rural Reality	D14	Satellite Settlers	Mature households living in expanding developments around larger villages with good transport links
	D15	Local focus	Rural families in affordable village homes who are reliant on the local economy for jobs
	D16	Outlying Seniors	Pensioners living in inexpensive housing in out of the way locations
	D17	Far-Flung Outposts	Inter-dependent households living in the most remote communities with long travel times to larger towns

E Senior Security	E18	Legacy Elders	Time-honoured elders now mostly living alone in comfortable suburban homes on final salary pensions
	E19	Bungalow Haven	Peace-seeking seniors appreciating the calm of bungalow estates designed for the elderly
	E20	Classic Grandparents	Lifelong couples in standard suburban homes enjoying retirement through grandchildren and gardening
	E21	Solo Retirees	Senior singles whose reduced incomes are satisfactory in their affordable but pleasant owned homes
F Suburban Stability	F22	Boomerang Boarders	Long-term couples with mid-range incomes whose adult children have returned to the shelter of the family home
	F23	Family Ties	Active families with teens and adult children whose prolonged support is eating up household resources
	F24	Fledgling Free	Pre-retirement couples with respectable incomes enjoying greater space and spare cash since children left home
	F25	Dependable Me	Single mature owners settled in traditional suburban semis working in intermediate occupations
G Domestic Success	G26	Cafés and Catchments	Affluent families with growing children living in upmarket housing in city environs
	G27	Thriving Independence	Well-qualified older singles with incomes from successful professional careers in good quality housing
	G28	Modern Parents	Busy couples in modern detached homes juggling the demands of school-age children and careers
	G29	Mid-Career Convention	Professional families with children in traditional mid-range suburbs where neighbours are often older
H Aspiring Homemakers	H30	Primary Ambitions	Forward-thinking younger families who sought affordable homes in good suburbs which they may now be out-growing
	H31	Affordable Fringe	Settled families with children owning modest, 3-bed semis in areas where there's more house for less money
	H32	First-Rung Futures	Pre-family newcomers who have bought value homes with space to grow in affordable but pleasant areas
	H33	Contemporary Starts	Fashion-conscious young singles and partners setting up home in developments attractive to their peers
	H34	New Foundations	Occupants of brand new homes who are often younger singles or couples with children
	H35	Flying Solo	Bright young singles on starter salaries choosing to rent homes in family suburbs

Mosaic UK Classifications

I Family Basics	I36	Solid Economy	Stable families with children renting better quality homes from social landlords
	I37	Budget Generations	Families supporting both adult and younger children where expenditure can exceed income
	I38	Childcare Squeeze	Younger families with children who own a budget home and are striving to cover all expenses
	I39	Families with Needs	Families with many children living in areas of high deprivation and who need support
J Transient Renters	J40	Make Do & Move On	Yet to settle younger singles and couples making interim homes in low cost properties
	J41	Disconnected Youth	Young people endeavouring to gain employment footholds while renting cheap flats and terraces
	J42	Midlife Stopgap	Maturing singles in employment who are renting short-term affordable homes
	J43	Renting a Room	Transient renters of low cost accommodation often within subdivided older properties
K Municipal Challenge	K44	Inner City Stalwarts	Long-term renters of inner city social flats who have witnessed many changes
	K45	Crowded Kaleidoscope	Multi-cultural households with children renting social flats in over-crowded conditions
	K46	High Rise Residents	Renters of social flats in high rise blocks where levels of need are significant
	K47	Streetwise Singles	Hard-pressed singles in low cost social flats searching for opportunities
	K48	Low Income Workers	Older social renters settled in low value homes in communities where employment is harder to find
L Vintage Value	L49	Dependent Greys	Ageing social renters with high levels of need in centrally located developments of small units
	L50	Pocket Pensions	Penny-wise elderly singles renting in developments of compact social homes
	L51	Aided Elderly	Supported elders in specialised accommodation including retirement homes and complexes of small homes
	L52	Estate Veterans	Longstanding elderly renters of social homes who have seen neighbours change to a mix of owners and renters
	L53	Seasoned Survivors	Deep-rooted single elderly owners of low value properties whose modest home equity provides some security

M Modest Traditions	M54	Down-to-Earth Owners	Ageing couples who have owned their inexpensive home for many years while working in routine jobs
	M55	Offspring Overspill	Lower income owners whose adult children are still striving to gain independence meaning space is limited
	M56	Self Supporters	Hard-working mature singles who own budget terraces manageable within their modest wage
N Urban Cohesion	N57	Community Elders	Established older households owning city homes in diverse neighbourhoods
	N58	Cultural Comfort	Thriving families with good incomes in multi-cultural urban communities
	N59	Asian Heritage	Large extended families in neighbourhoods with a strong South Asian tradition
	N60	Ageing Access	Older residents owning small inner suburban properties with good access to amenities
O Rental Hubs	O61	Career Builders	Motivated singles and couples in their 20s and 30s progressing in their field of work from commutable properties
	O62	Central Pulse	Entertainment-seeking youngsters renting city centre flats in vibrant locations close to jobs and night life
	O63	Flexible Workforce	Self-starting young renters ready to move to follow worthwhile incomes from service sector jobs
	O64	Bus-Route Renters	Singles renting affordable private flats away from central amenities and often on main roads
	O65	Learners & Earners	Inhabitants of the university fringe where students and older residents mix in cosmopolitan locations
	O66	Student Scene	Students living in high density accommodation close to universities and educational centres

Appendix B

Vitality and Viability Health Check Methodology

1.0 NPPG Health Check Methodology

1.1 Introduction

1.1.1 This appendix contains the methodology for undertaking the vitality and viability health checks in line with national retail planning policy.

1.2 National Planning Policy Framework (NPPF)

1.2.1 The National Planning Policy Framework (NPPF) was published in July 2018. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.

1.2.2 The NPPF identifies a number of factors which are of relevance in delivering sustainable development, with one such factor being the need to ensure the vitality of town centres. Paragraph 85 of the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaption. Paragraph 85 also requires planning policies to promote the long-term viability and vitality of town centres. It notes this should be achieved by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

1.3 Ensuring the Vitality of Town Centres Planning Practice Guidance

1.3.1 Ensuring the Vitality of Town Centres National Planning Practice Guidance was published in March 2014 and replaces the previous Planning for Town Centres Practice Guidance. It provides a more concise summation of how retail and main town centre planning policy is to be applied in practice. However, the objectives of the Practice Guidance remain comparable with those of its predecessor, with there being a stated requirement for local planning authorities to plan positively and support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive and diverse places for people to want to live, visit and work.

1.2.3 Whilst the NPPF does not provide a list of indicators to be used to assess the health of a centre, such criteria have been published in the NPPG. Paragraph 005 of the Practice Guidance identifies a series of key indicators which are of relevance in assessing the health of a centre over time. Indicators which should be monitored on a regular basis in order to judge the health of a centre and its performance over time include the following:

- Diversity of uses – data on the diversity of uses was collated during fieldwork in May 2018.
- Proportion of vacant street level property – vacant properties were also identified during the undertaking of on-site surveys.
- Retailer representation – information on the current strength of the defined centres, retailer representation and retailer requirements has been derived from on-site surveys and various published sources.
- Commercial rents – where available rental data has been sourced from recognised UK property consultants.
- Pedestrian flows – general footfall and pedestrian flows were also observed during WYG's on-site surveys.
- Accessibility – consideration of access to and around the centres is informed by WYG's on-site surveys.
- Perceptions of safety and occurrence of crime – informed by our observations and initiatives present in each centre.
- Views and behaviour – Information on views is based on the NEMS household survey results and feedback from key stakeholders.
- State of town centre environmental quality – consideration of the quality of the buildings and public realm in the centre has also been informed by WYG's 'on the ground' observations.

1.4 Swale Borough Health Checks

1.4.1 For the purposes of this Study, the health check assessments are based on the Experian Goad boundary area of the town centres (surveys undertaken by Experian in September 2018). The use of the Goad boundary is helpful in allowing data on the occupation of units to be 'benchmarked' with national average Goad data. It should however be noted that the Goad Plan boundaries differ slightly to the adopted town centre boundaries and cover slightly larger areas.

Appendix C

Experian Goad Land Use Plan - Sittingbourne Town Centre

SITTINGBOURNE

SURVEYED: 10 SEPTEMBER 2018

Page 140

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Mapping sourced from Ordnance Survey

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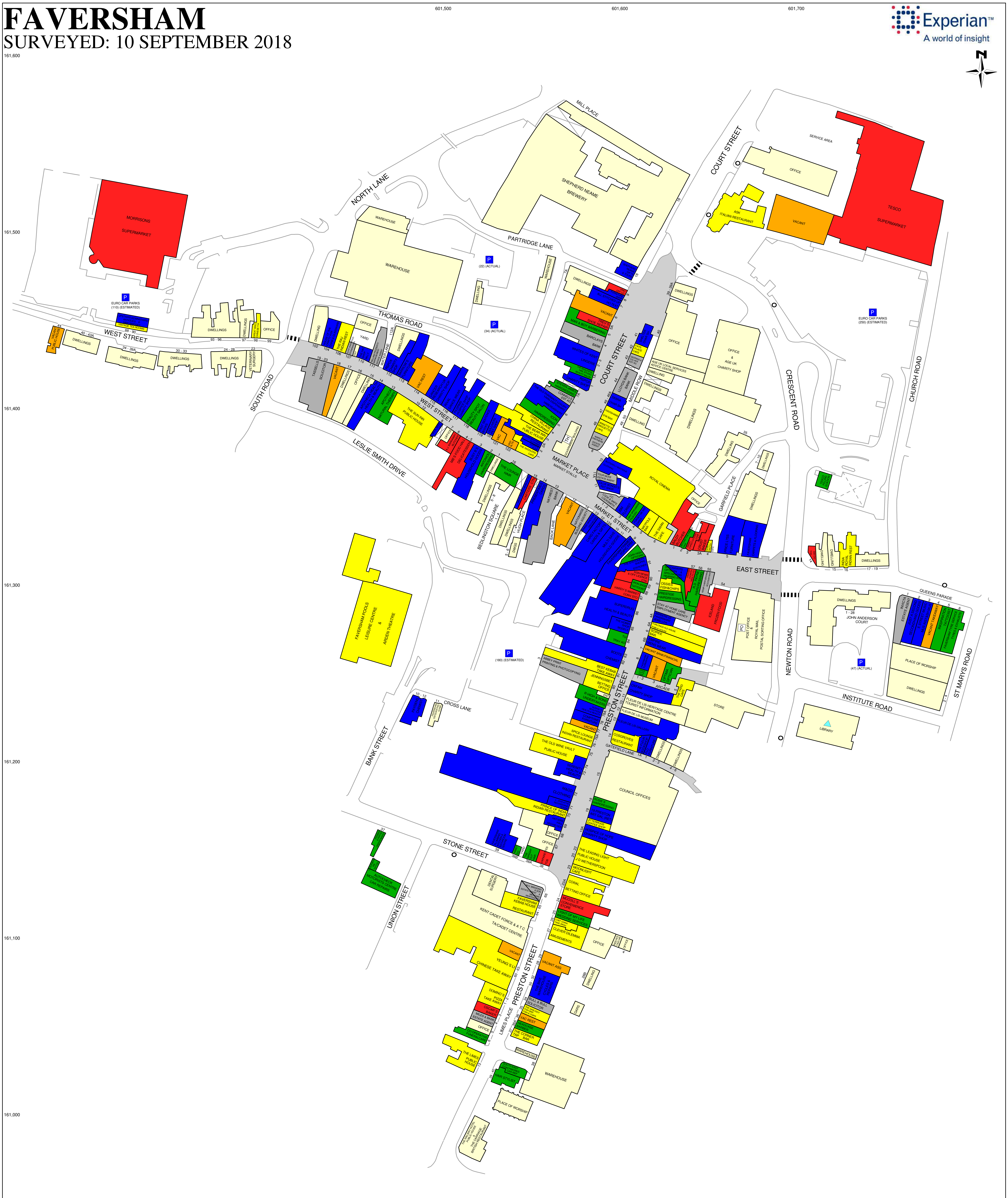
Appendix D

Experian Goad Land Use Plan - Faversham Town Centre

FAVERSHAM

SURVEYED: 10 SEPTEMBER 2018



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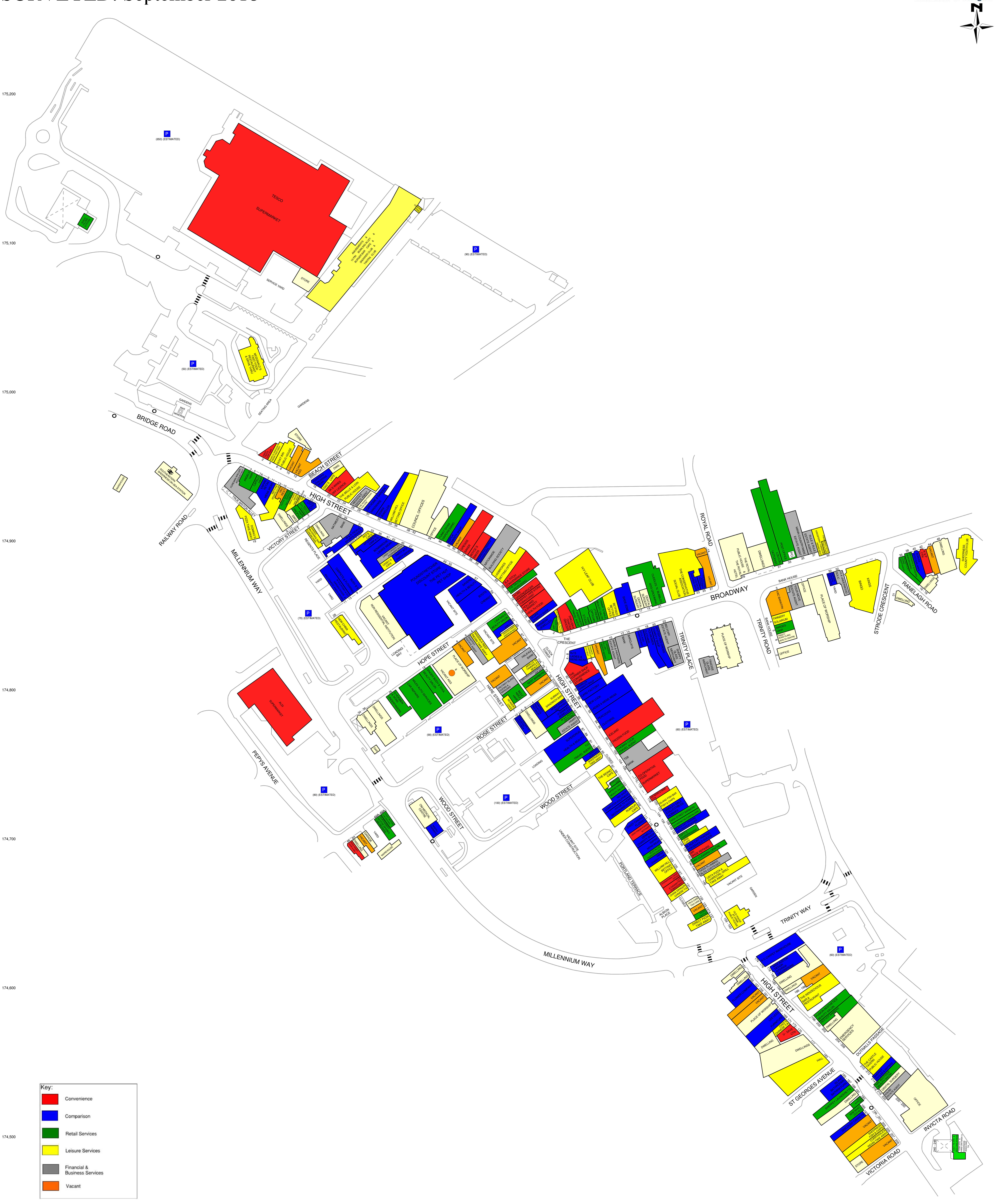
Mapping sourced from Ordnance Survey

Appendix E

Experian Goad Land Use Plan - Sheerness Town Centre

SHEERNESS

SURVEYED: September 2018



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Appendix F

Local Centre Health Checks

Centre – Boughton-under-Blean Local Centre

No. of Units

Sector	No. of Units
Convenience	1
Comparison	0
Retail Service	2
Leisure Service	3
Financial & Business Service	0
Other	0
Vacant	1
Total	**7**

Comments

Retailer/Leisure Representation – Boughton-under-Blean is a small linear centre serving a local catchment in the far east of the Borough. The centre provides 7 retail/leisure units including a small convenience store (Village Store), two hair and beauty salons/hairdressers, a café, and two public houses. The retail/leisure units are generally interspersed with residential dwellings.

Pedestrian Activity – At the time of our visits reasonable footfall was observed in the vicinity of the Village Store. Lower levels of footfall were observed towards the western end of the centre.

Vacancy Rate – At the current time the centre contained just one vacant unit: the former Garden Hotel and Vines Restaurant. The reasonably large unit has been vacant for a period of time and detracts from the environmental quality of this part of the centre

Accessibility – Car parking is limited to on-street parking only although a small private car park is provided for patrons of The Queens Head public house. Bus stops are situated along The St providing services to Sittingbourne, Faversham, and Canterbury. No cycle parking appears to be provided in the centre.

Environmental Quality – The environmental quality of the centre is generally considered to be good albeit it is slightly marred by through traffic. There was no evidence of graffiti or litter at the time of our visits and, with the exception of the former Garden Hotel and Vines Restaurant, shop fronts are well maintained.

Summary – A small linear centre serving a local catchment, Boughton-under-Blean is considered to be in reasonably good health when considered against relevant vitality and viability indicators.

Centre –Halfway Houses

No. of Units

Sector	No. of Units
Convenience	2
Comparison	11
Retail Service	2
Leisure Service	13
Financial & Business Service	1
Other	2
Vacant	1
Total	**32**

Comments

Retailer/Leisure Representation – Halfway Houses is a local centre located at the junction of Minster Road, Halfway Road, The Crescent and Queenborough Road. It benefits from being on a main route and serves both the local community and a wider catchment. Providing some 32 units Halfway House is one of the larger local centres in the Borough. For a local centre, comparison goods retail and leisure service uses are reasonably well represented with a large number of takeaways and restaurants along with several hairdressers, barbershops and a nail salon. Comparison goods retailers include a car spares centre, DIY & trade shop and tyre garage. The centre also provides two convenience shops: Premier Off Licence and a Costcutter convenience store.

Pedestrian Activity – At the time of our visits, the highest footfall was observed on the corner of Minster Road and Halfway Road, outside the Costcutter store. The lowest levels of footfall were monitored along The Crescent.

Vacancy Rate – Only one vacant unit was recorded at the time of our visit.

Accessibility – A good level of free car parking is provided by a 41-space car park accessed off Minster Road. Limited off-street parking is provided on surrounding streets. Bus services stopping along Halfway Road and Minster run to Sheerness, Sittingbourne and other nearby settlements. Whilst the centre is accessible on foot from surrounding residential area pedestrian movement/circulation in the centre is hindered by through traffic.

Environmental Quality – The environmental quality of the centre is generally good but is dominated by the Minster Road/Halfway Road traffic light road junction. The majority of shop fronts are well maintained, especially the newly opened Mem's Mezze Restaurant in the old Halfway House pub building. A number of units could benefit from investment/improvements.

Summary –Halfway Houses serves the local community and a wider catchment, overall is considered to display reasonable levels of vitality and viability.

Centre – Leysdown on Sea

No. of Units

Sector	No. of Units
Convenience	2
Comparison	8
Retail Service	1
Leisure Service	16
Financial & Business Service	1
Other	1
Vacant	1
Total	**30**

Comments

Retailer/Leisure Representation – Leysdown on Sea is located on the north east coast of the Isle of Sheppey. The retail/leisure provision in the centre primarily caters for visitors/tourists and is well served by leisure and comparison goods uses. The centre is mainly formed of amusement arcades, cafes, pubs and restaurants along The Promenade with other uses, including an estate agent, Kent Mart convenience store, William Hill bookmakers and several gift shops amongst others, situated along Leysdown Road. With the exception of William Hill and a Premier Convenience store, the centre is made up of local and independent shops and businesses.

Pedestrian Activity – Pedestrian activity in the centre varies depending on the time of the year. Whilst low levels of footfall were recorded at the time of visit, which was undertaken in off-peak holiday season time, pedestrian footfall/activity is understood to be healthy during the peak holiday season.

Vacancy Rate – One vacant unit was observed at the time of our visit, a former off-licence.

Accessibility – A large pay and display car park providing 272 spaces is located off The Promenade and 2 other car parks within the centre offer limited free parking.

Environmental Quality – The environmental quality of the centre is considered to be mixed. The environmental quality of the centre benefits from The Spinney park/garden on the western side of The Promenade, however, several of the shops along Leysdown Road showed signs of needing maintenance. There was no evidence of litter, graffiti or vandalism in the centre at the time of our visit.

Summary – Leysdown on Sea's vitality and viability varies primarily due to its function as a visitor/tourist destination. The lack of footfall and activity during off-peak periods of the year impacts on the vibrancy of the centre. The level of services/shops serving the centre is considered reasonable given its catchment size.

Centre –Milton Regis

No. of Units

Sector	No. of Units
Convenience	1
Comparison	8
Retail Service	7
Leisure Service	7
Financial & Business Service	0
Other	4
Vacant	3
Total	**30**

Comments

Retailer/Leisure Representation – Milton Regis Local Centre is situated approximately 1km north of Sittingbourne Town Centre and serves the residential areas surrounding it. It has a linear form that primarily extends along the High Street. With the exception of McColls convenience store and Lloyds Pharmacy all operators are independents. Comparison goods retailers include a kitchen and bathroom shop, a carpet retailer, a women's clothing store and several small shops selling a variety of goods. Retail service providers include 2 barber shops, a dog grooming parlour, a tattooist and a mobile phone repair shop. Leisure service include a public house and several fast food/takeaway operators. The centre also contains the attractive 15th Century Court Hall Museum which is open from April through to September.

Pedestrian Activity – Pedestrian activity was primarily centred around the central car park and the McColls convenience store.

Vacancy Rate – Three units were recorded as vacant at the time of our visit with the unit next to the Happiness Inn being most notable.

Accessibility – A small central car park provides 10 pay and display spaces with other parking available in bays along High Street and along Brewery Road. Buses to Sheerness, Sittingbourne and other surrounding towns are available from bus stops along High Street. Generally pedestrian movement in the centre is considered to be good with a conveniently located pedestrian crossing located on the High Street. A number of cycle parking hoops are also provided in the centre assisting usability of the centre by bike.

Environmental Quality – An attractive historic centre with Court Hall Museum providing an attractive focal point. The centre benefits from street furniture including bins and benches. A number of trees are also present which contribute to its environmental quality.

Summary –Milton Regis serves a predominantly local catchment and is considered to be a healthy centre. It displays reasonably good levels of vitality and viability but would benefit from the re-occupation of the three vacant units.

Centre – Eastchurch

No. of Units

Sector	No. of Units
Convenience	2
Comparison	1
Retail Service	2
Leisure Service	2
Financial & Business Service	0
Other	1
Vacant	1
Total	**9**

Comments

Retailer/Leisure Representation – Located off the B2231, Rowetts Way, Eastchurch is a compact linear centre with retail/service offerings interspersed with residential dwellings along High Street. The centre offers two convenience stores, Londis and Costcutter. Other uses include two hairdressers, The Shurland Hotel restaurant, bar gym & spa, The Castle Inn, a tyre centre and a surgery/medical centre.

Pedestrian Activity – Reasonable levels of footfall were observed across the centre.

Vacancy Rate – One vacant unit was observed at the time of our visit, a former newsagent located next to the doctor’s surgery.

Accessibility – Car parking provision is limited to on-street parking along High Street although the Castle Inn and The Shurland Hotel both have reasonably sized private car parks. Busses to Sheerness, Leysdown, Sittingbourne and Minster are available from nearby bus stops.

Environmental Quality – The centre was generally attractive and well presented at the time of our visits. The majority of shop fronts were well maintained and there was no evidence of litter or graffiti.

Summary –Eastchurch is a small local centre offering important local facilities for its catchment. Overall, the centre is considered to be in reasonably good health.

Centre – Minster

No. of Units

Sector	No. of Units
Convenience	3
Comparison	3
Retail Service	1
Leisure Service	3
Financial & Business Service	0
Other	3
Vacant	0
Total	**13**

Comments

Retailer/Leisure Representation – Minster Local Centre is located at the junction of Minster Road and The Broadway and serves a relatively wide catchment area. Overall, it provides 13 retail/leisure units. A parade of shops along The Broadway comprises a butcher, pharmacy, gift shop, fast food takeaway, fish and chip shop, newsagent and a Londis convenience store. A dentist and veterinary surgery are on the opposite side of the road to the shopping parade and a doctor's surgery is located approximately 35 metres walking distance to the north. To the south, along Minster Road is the Harps Inn public House, a florist and a Costcutter convenience store.

Pedestrian Activity – Reasonable levels of footfall were observed along The Broadway with the highest levels observed outside the Costcutter. Lower levels of pedestrian activity were observed towards the northern end of the centre.

Vacancy Rate – There were no vacant units recorded during our visits.

Accessibility – The centre has a good level of car parking provision for its size with a 15-space car park outside the Costcutter store and florist and on street parking available along The Broadway. Bus stops are situated at the northern extent of the centre on The Broadway and to the south, opposite the Harps Inn. Direct bus services are provided to Sittingbourne, Sheerness, Maidstone and other smaller settlements.

Environmental Quality – Whilst architecturally the centre is not particularly attractive, its environmental quality is generally considered to be reasonable. There was no evidence of graffiti or litter at the time of our visits and the shops were reasonably well maintained.

Summary – Minster serves a relatively wide catchment and benefits from bus services to Sheerness and Sittingbourne. The centre is considered to be vital and viable and performs reasonably well against relevant vitality and viability health check indicators.

Centre –Newington

No. of Units

Sector	No. of Units
Convenience	1
Comparison	1
Retail Service	0
Leisure Service	3
Financial & Business Service	3
Other	0
Vacant	2
Total	**10**

Comments

Retailer/Leisure Representation – Newington is a small linear centre located on the busy A2 road to the west of Sittingbourne. The centre serves a localised catchment is anchored by a small Coop convenience store and offers a public house, a Chinese and an Indian take-away. The financial and business service sector is represented by two estate and letting agencies and an accountancy office whilst the comparison goods sector is represented by Newington Pharmacy.

Pedestrian Activity – At the time of our visits, footfall was relatively low with the most activity observed outside of the Coop convenience store.

Vacancy Rate – There were two vacant units in Newington at the time of our visits.

Accessibility – Pedestrian movements are restricted due to narrow pavements and the busy main road. There is very limited parking space within the centre and although some on street parking is available on side roads, a lack of public parking space limits accessibility. Newington is served by a railway station however, with services to London Victoria and Dover Priory.

Environmental Quality – The environmental quality of the centre is marred by through traffic using the A2. However, most of the units within the centre are well maintained with several well-preserved historic buildings being present

Summary – Overall, Newington Local Centre demonstrates a reasonable level of vitality and viability. As a small centre, it serves a localised catchment area. A good range of services is provided but its environmental quality can suffer during peak traffic periods due to through traffic using the A2.

Centre – Iwade Local Centre

No. of Units

Sector	No. of Units
Convenience	1
Comparison	1
Retail Service	1
Leisure Service	2
Financial & Business Service	0
Other	1
Vacant	0
Total	**6**

Comments

Retailer/Leisure Representation – This modern purpose-built centre to the north of Sittingbourne provides 6 retail/leisure units and serves a small, local catchment. The centre is anchored by a Nisa Local store and provides a pharmacy, health and beauty salon, takeaway outlet and a café. A nursery/pre-school is also located in the centre albeit accessed directly from School Mews. A separate Costcutter store is also located approximately 100 metres walking distance to the south of the centre off Ferry Road.

Pedestrian Activity – At the time of our visits pedestrian activity was monitored to be reasonably low albeit the School Mews car park was fully occupied. The highest levels of footfall were observed in the vicinity of the Nisa Local store.

Vacancy Rate – There were no vacant units recorded at the time of our visits.

Accessibility – The centre is easily accessible on foot from the surrounding residential area with drop kerb crossings provided on both School Lane and The St. In terms of parking, a 25 space car park is provided off School Mews with a number of on-street spaces also provided on School Mews. Cycle parking is also provided at the junction of School Lane/The St, albeit it was not being used at the time of our visits. The centre benefits from bus stops on Ferry Road which provide half hourly peak/hourly off-peak services to Sheerness and Sittingbourne.

Environmental Quality – The centre provides a modern attractive environment configured around a square. The public realm and shop fronts are well maintained with the centre providing a pedestrian friendly environment. There was no evidence of litter or graffiti at the time of our visits.

Summary – Iwade serves a small local catchment to the north of Sittingbourne. Overall, it is considered to display goods levels of vitality and viability.

Centre –Teynham

No. of Units

Sector	No. of Units
Convenience	2
Comparison	8
Retail Service	4
Leisure Service	5
Financial & Business Service	1
Other	4
Vacant	1
Total	**24**

Comments

Retailer/Leisure Representation – Linear in nature and arranged on either side of the A2, Teynham Local Centre provides a reasonably good range of local services that serve the village and its surrounding rural hinterland. Units are interspersed with housing and it is evident that several former shops have undergone conversion to dwellings. Comparison goods units include a reptile and aquatics shop, an antiques centre and a model shop whilst retail services include barber shops, laundry services and a denture centre. A Co-op store and a Costcutter provide the convenience goods retail offer while leisure services are provided by 3 public houses: The Swan; The George & New Territories and; The Dover Castle Inn. In addition to these pubs, the centre also provides a Chinese takeaway and a fish and chip restaurant/takeaway.

Pedestrian Activity – At the time of our visit, footfall was reasonably low across the centre with the busiest areas observed to be outside the Co-op store and outside Crispins Fish Bar.

Vacancy Rate – An empty unit next to the Costcutter store was the only vacancy observed at the time of our visit.

Accessibility – Limited on-road parking is available but customer car parks are provided by the public houses and by Crispins Fish Bar. The Local Centre benefits from a railway station (800 walking distance metres to north) with trains running to London and Dover. Bus stops provide services to Canterbury and Faversham to the east, and Sittingbourne and Maidstone to the west.

Environmental Quality – The environmental quality of the centre is generally good although it is somewhat marred at times by through traffic using the A2. The vacant retail unit next to Costcutter also slightly detracts from this part of the centre with the unit in need of refurbishment/investment.

Summary –Teynham serves local residents and the surrounding rural hinterland. It demonstrates reasonably good levels of vitality and viability.

Appendix G

Statistical Retail Tables - Population and Expenditure

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 1: Population Growth, by Zone

Zone	2016	2019	2024	2029	2034	2038	Change 2019-2024		Change 2019-2029		Change 2019-2034		Change 2019-2038	
							No.	%	No.	%	No.	%	No.	%
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]	[14]
1 - Isle of Sheppey	45,025	46,412	48,688	50,710	52,477	53,860	2,276	4.9	4,298	9.3	6,065	13.1	7,448	16.0
2 - Borough West	14,452	15,004	15,864	16,664	17,429	17,928	860	5.7	1,660	11.1	2,425	16.2	2,924	19.5
3 - Sittingbourne	50,299	51,966	54,889	57,618	60,297	62,312	2,923	5.6	5,652	10.9	8,331	16.0	10,346	19.9
4 - Central Borough	11,140	11,519	12,139	12,664	13,110	13,520	620	5.4	1,145	9.9	1,591	13.8	2,001	17.4
5 - Faversham	20,193	20,833	21,857	22,789	23,601	24,175	1,024	4.9	1,956	9.4	2,768	13.3	3,342	16.0
6 - Borough East	5,411	5,612	5,921	6,219	6,492	6,693	309	5.5	607	10.8	880	15.7	1,081	19.3
Total	**146,520**	**151,346**	**159,358**	**166,664**	**173,406**	**178,488**	**8,012**	**5.3**	**15,318**	**10.1**	**22,060**	**14.6**	**27,142**	**18.1**

Notes:
[1] 2016 base population figure provided by Experian Retail Planner Area Profile Report for each zone (2011 Census)
[2], [3], [4], [5], [6] Population projection figures presently taken from Experian Retail Planner Area Profile Report for each zone (2011 Census)
[7] = [3] - [2]
[8] = [7] / [2]
[9] = [4] - [2]
[10] = [9] / [2]
[11] = [5] - [2]
[12] = [11] / [2]
[13] = [6] - [2]
[14] = [13] / [2]

Table 2: Per Capita Convenience Goods Expenditure, by Zone (£)

Zone	2019	2024	2029	2034	2038
1 - Isle of Sheppey	2,019	2,008	2,005	2,009	2,013
2 - Borough West	2,288	2,276	2,273	2,277	2,282
3 - Sittingbourne	1,934	1,924	1,921	1,925	1,929
4 - Central Borough	2,323	2,311	2,308	2,312	2,316
5 - Faversham	1,995	1,984	1,982	1,986	1,989
6 - Borough East	2,359	2,346	2,343	2,348	2,352

Notes
Per capita expenditure derived from Experian MMG3 data (November 2018)
Per capita expenditure projected forward using forecast growth rates taken from Experian Retail Planner Briefing Note 15
Expenditure excludes Special Forms of Trading in line with 'adjusted' allowance derived from Appendix 3 of Experian Retail Planner Briefing Note 15

2016 Prices

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 3: Total Available Convenience Expenditure, by Zone (£m)

Zone	2019	2024	2029	2034	2038	Change 2019-24		Change 2019-29		Change 2019-34		Change 2019-38	
						No.	%	No.	%	No.	%	No.	%
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]
1 - Isle of Sheppey	93.7	97.8	101.7	105.4	108.4	4.1	4.3	8.0	8.5	11.7	12.5	14.7	15.7
2 - Borough West	34.3	36.1	37.9	39.7	40.9	1.8	5.2	3.5	10.3	5.4	15.6	6.6	19.2
3 - Sittingbourne	100.5	105.6	110.7	116.1	120.2	5.1	5.1	10.2	10.1	15.6	15.5	19.7	19.6
4 - Central Borough	26.8	28.0	29.2	30.3	31.3	1.3	4.8	2.5	9.2	3.6	13.3	4.6	17.0
5 - Faversham	41.6	43.4	45.2	46.9	48.1	1.8	4.4	3.6	8.7	5.3	12.7	6.5	15.7
6 - Borough East	13.2	13.9	14.6	15.2	15.7	0.7	4.9	1.3	10.1	2.0	15.1	2.5	18.9
Total	**310.1**	**324.8**	**339.2**	**353.6**	**364.6**	**14.7**	**4.7**	**29.2**	**9.4**	**43.5**	**14.0**	**54.6**	**17.6**

Notes
[1] to [5] Calculated by multiplying population (Table 1) by per capita convenience goods expenditure (Table 2)
[6] = [2] - [1]
[7] = [2] / [1]
[8] = [3] - [1]
[9] = [3] / [1]
[10] = [4] - [1]
[11] = [4] / [1]
[12] = [5] - [1]
[13] = [5] / [1]

2016 Prices

Table 4a - Per Capita Comparison Goods Expenditure, by Category, 2016 (£)

Zone	Expenditure Category											Total Per Capita Expenditure
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings	
1 - Isle of Sheppey	759	144	130	185	102	465	336	71	245	137	175	2,749
2 - Borough West	964	215	196	274	175	633	447	81	371	206	243	3,807
3 - Sittingbourne	819	146	138	204	138	477	361	73	261	140	190	2,947
4 - Central Borough	835	210	186	247	159	623	390	85	358	214	224	3,530
5 - Faversham	825	159	142	223	145	478	377	78	276	148	200	3,052
6 - Borough East	851	228	192	275	149	635	403	80	365	218	232	3,629

Table 4b - Per Capita Comparison Goods Expenditure, by Category, 2019 (£)

Zone	Expenditure Category											Total Per Capita Expenditure
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings	
1 - Isle of Sheppey	800	151	137	195	108	490	355	75	258	144	184	2,897
2 - Borough West	1,016	227	207	289	184	667	471	86	391	217	256	4,011
3 - Sittingbourne	863	154	145	215	145	503	380	77	275	148	201	3,105
4 - Central Borough	880	221	196	260	168	656	411	89	377	225	236	3,720
5 - Faversham	870	168	149	235	153	504	397	82	291	156	211	3,216
6 - Borough East	897	241	202	290	157	669	425	85	385	230	244	3,824

Table 4c: Per Capita Comparison Goods Expenditure, by Category, 2024 (£)

Zone	Expenditure Category											Total Per Capita Expenditure
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings	
1 - Isle of Sheppey	911	172	156	222	122	558	404	85	294	164	210	3,297
2 - Borough West	1,157	258	236	329	210	759	536	98	445	247	292	4,566
3 - Sittingbourne	983	175	165	245	165	573	433	87	313	168	228	3,535
4 - Central Borough	1,001	252	223	296	191	747	468	102	430	256	269	4,234
5 - Faversham	990	191	170	268	174	574	452	93	331	177	240	3,660
6 - Borough East	1,021	274	230	330	178	762	483	96	438	261	278	4,352

Table 4d: Per Capita Comparison Goods Expenditure, by Category, 2029 (£)

Zone	Expenditure Category											Total Per Capita Expenditure
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings	
1 - Isle of Sheppey	1,062	201	181	259	143	651	470	99	342	191	244	3,843
2 - Borough West	1,348	301	274	383	244	885	625	114	519	288	340	5,322
3 - Sittingbourne	1,145	204	192	285	192	667	504	102	365	196	266	4,120
4 - Central Borough	1,167	294	260	345	222	871	545	118	501	299	313	4,935
5 - Faversham	1,154	222	198	312	203	669	527	109	386	207	279	4,266
6 - Borough East	1,190	319	268	385	208	888	563	112	510	305	324	5,072

Table 4e: Per Capita Comparison Goods Expenditure, by Category, 2034 (£)

Zone	Expenditure Category											Total Per Capita Expenditure
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings	
1 - Isle of Sheppey	1,243	235	212	303	167	762	551	116	401	224	286	4,500
2 - Borough West	1,579	353	321	449	286	1,037	732	133	608	337	398	6,232
3 - Sittingbourne	1,341	239	225	334	225	782	591	119	428	229	312	4,825
4 - Central Borough	1,367	344	304	404	261	1,020	639	139	586	350	367	5,779
5 - Faversham	1,351	261	232	365	238	783	617	127	452	242	327	4,996
6 - Borough East	1,393	374	314	450	244	1,039	660	132	598	357	380	5,940

Table 4f: Per Capita Comparison Goods Expenditure, by Category, 2038 (£)

Zone	Expenditure Category											Total Per Capita Expenditure
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings	
1 - Isle of Sheppey	1,411	267	241	344	190	865	625	132	455	254	325	5,108
2 - Borough West	1,792	400	365	510	325	1,177	831	151	690	383	452	7,074
3 - Sittingbourne	1,522	272	256	379	256	887	670	135	485	260	354	5,476
4 - Central Borough	1,551	391	346	458	296	1,157	725	158	665	397	416	6,560
5 - Faversham	1,533	296	264	415	270	889	701	145	513	275	371	5,671
6 - Borough East	1,582	424	357	511	276	1,180	749	149	678	405	431	6,743

Notes
2016 base expenditure taken from Experian MMG3 data (November 2018)
Comparison goods expenditure growth projected forward from 2016 base using the growth rates in Appendix 3 of Experian Retail Planner Briefing Note 15 .
Expenditure excludes Special Forms of Trading in line with 'adjusted' allowance derived from Appendix 3 of Experian Retail Planner Briefing Note 15.
2016 prices

Table 5a: Total Comparison Goods Expenditure, by Category, 2019 (£m)

Zone	Expenditure Category										
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings
1 - Isle of Sheppey	37.1	7.0	6.3	9.1	5.0	22.8	16.5	3.5	12.0	6.7	8.5
2 - Borough West	15.2	3.4	3.1	4.3	2.8	10.0	7.1	1.3	5.9	3.3	3.8
3 - Sittingbourne	44.9	8.0	7.5	11.2	7.5	26.1	19.8	4.0	14.3	7.7	10.4
4 - Central Borough	10.1	2.6	2.3	3.0	1.9	7.6	4.7	1.0	4.3	2.6	2.7
5 - Faversham	18.1	3.5	3.1	4.9	3.2	10.5	8.3	1.7	6.1	3.2	4.4
6 - Borough East	5.0	1.4	1.1	1.6	0.9	3.8	2.4	0.5	2.2	1.3	1.4
Total	**130.5**	**25.8**	**23.5**	**34.1**	**21.3**	**80.7**	**58.7**	**11.9**	**44.7**	**24.7**	**31.3**

Table 5b: Total Comparison Goods Expenditure, by Category, 2024 (£m)

Zone	Expenditure Category										
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings
1 - Isle of Sheppey	44.4	8.4	7.6	10.8	6.0	27.2	19.6	4.1	14.3	8.0	10.2
2 - Borough West	18.4	4.1	3.7	5.2	3.3	12.0	8.5	1.5	7.1	3.9	4.6
3 - Sittingbourne	53.9	9.6	9.1	13.4	9.1	31.4	23.7	4.8	17.2	9.2	12.5
4 - Central Borough	12.2	3.1	2.7	3.6	2.3	9.1	5.7	1.2	5.2	3.1	3.3
5 - Faversham	21.6	4.2	3.7	5.9	3.8	12.5	9.9	2.0	7.2	3.9	5.2
6 - Borough East	6.0	1.6	1.4	2.0	1.1	4.5	2.9	0.6	2.6	1.5	1.6
Total	**156.5**	**31.0**	**28.2**	**40.9**	**25.5**	**96.8**	**70.3**	**14.3**	**53.6**	**29.7**	**37.5**

Table 5c: Total Comparison Goods Expenditure, by Category, 2029 (£m)

Zone	Expenditure Category										
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings
1 - Isle of Sheppey	53.8	10.2	9.2	13.1	7.2	33.0	23.9	5.0	17.4	9.7	12.4
2 - Borough West	22.5	5.0	4.6	6.4	4.1	14.7	10.4	1.9	8.6	4.8	5.7
3 - Sittingbourne	66.0	11.8	11.1	16.4	11.1	38.5	29.1	5.9	21.0	11.3	15.3
4 - Central Borough	14.8	3.7	3.3	4.4	2.8	11.0	6.9	1.5	6.3	3.8	4.0
5 - Faversham	26.3	5.1	4.5	7.1	4.6	15.2	12.0	2.5	8.8	4.7	6.4
6 - Borough East	7.4	2.0	1.7	2.4	1.3	5.5	3.5	0.7	3.2	1.9	2.0
Total	**190.7**	**37.7**	**34.3**	**49.8**	**31.1**	**118.0**	**85.7**	**17.5**	**65.3**	**36.2**	**45.7**

Table 5d: Total Comparison Goods Expenditure, by Category, 2034 (£m)

Zone	Expenditure Category										
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings
1 - Isle of Sheppey	65.2	12.3	11.1	15.9	8.8	40.0	28.9	6.1	21.0	11.7	15.0
2 - Borough West	27.5	6.1	5.6	7.8	5.0	18.1	12.8	2.3	10.6	5.9	6.9
3 - Sittingbourne	80.9	14.4	13.6	20.2	13.6	47.1	35.6	7.2	25.8	13.8	18.8
4 - Central Borough	17.9	4.5	4.0	5.3	3.4	13.4	8.4	1.8	7.7	4.6	4.8
5 - Faversham	31.9	6.1	5.5	8.6	5.6	18.5	14.6	3.0	10.7	5.7	7.7
6 - Borough East	9.0	2.4	2.0	2.9	1.6	6.7	4.3	0.9	3.9	2.3	2.5
Total	**232.5**	**46.0**	**41.8**	**60.7**	**37.9**	**143.8**	**104.5**	**21.3**	**79.6**	**44.1**	**55.7**

Table 5e: Total Comparison Goods Expenditure, by Category, 2038 (£m)

Zone	Expenditure Category										
	Clothing & Footwear	Books/CD's/ DVD's	Furnishings & Textiles	Small Household Goods	Clocks, J'lery & Watches	Recreational Goods	Chemist Goods	Large Electrical	Small Electrical Appliances	DIY & Gardening	Furniture & Floorcoverings
1 - Isle of Sheppey	76.0	14.4	13.0	18.5	10.2	46.6	33.7	7.1	24.5	13.7	17.5
2 - Borough West	32.1	7.2	6.5	9.1	5.8	21.1	14.9	2.7	12.4	6.9	8.1
3 - Sittingbourne	94.9	16.9	15.9	23.6	15.9	55.3	41.8	8.4	30.2	16.2	22.0
4 - Central Borough	21.0	5.3	4.7	6.2	4.0	15.6	9.8	2.1	9.0	5.4	5.6
5 - Faversham	37.1	7.1	6.4	10.0	6.5	21.5	16.9	3.5	12.4	6.6	9.0
6 - Borough East	10.6	2.8	2.4	3.4	1.9	7.9	5.0	1.0	4.5	2.7	2.9
Total	**271.6**	**53.7**	**48.9**	**70.9**	**44.3**	**168.0**	**122.1**	**24.8**	**93.0**	**51.5**	**65.1**

Notes:
Total Expenditure = Population for each zone (Table 1) multiplied by per capita expenditure for each zone (Table 4b-4f)
2016 Prices

Appendix H

Statistical Retail Tables - Convenience Goods Capacity

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 1: Main and Top Up Food Shopping Market Share of Convenience Facilities by Zone, 2019 (%)

	Zone											
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East	
	Main	Top-up	Main	Top-up	Main	Top-up	Main	Top-up	Main	Top-up	Main	Top-up
INSIDE BOROUGH	**99%**	**99%**	**75%**	**88%**	**98%**	**98%**	**97%**	**93%**	**89%**	**95%**	**65%**	**73%**
Sittingbourne Town Centre	**2%**		**25%**	**24%**	**39%**	**35%**	**29%**	**19%**	**4%**		**3%**	**3%**
Sainsbury's, Avenue of Remembrance	1%		15%	14%	19%	13%	9%	14%	0%		0%	1%
Aldi, East Street	1%		7%	6%	15%	9%	18%	6%	3%		3%	2%
Lidl, West Street			2%		3%	6%	2%		0%			
Iceland, High Street				3%	1%	2%	0%					
Other				1%	0%	5%						
Sittingbourne Other	**7%**	**5%**	**34%**	**28%**	**55%**	**57%**	**15%**	**8%**	**1%**		**2%**	**5%**
Asda, Trinity Trading Estate, Mill Way	4%	1%	17%	10%	25%	17%	4%				2%	2%
Morrisons, Mill Way	2%	2%	15%	13%	24%	19%	11%	4%				3%
M&S Foodhall, Sittingbourne Retail Park	0%	2%	1%	2%	1%	3%	1%	1%	1%			
Co-op, Church Road, Murston						8%						
Co-op, Grove Park, Gadby Road			1%		2%	3%						
Co-op, The Parade, Northwood Drive				4%		2%						
Tesco Express, Canterbury Road					4%	6%		3%				
Faversham Town Centre				**1%**	**1%**		**12%**	**19%**	**39%**	**65%**	**36%**	**42%**
Tesco, Crescent Road					1%		12%	12%	38%	39%	36%	32%
Co-op, Forbes Road								2%	0%	16%		7%
Iceland, East Street				1%			0%		1%	5%		
Other								5%		6%	1%	3%
Faversham Other	**0%**		**1%**		**0%**	**1%**	**40%**	**23%**	**46%**	**30%**	**23%**	**21%**
Sainsbury's, Bysing Wood Road			1%		0%	1%	31%	22%	24%	11%	13%	3%
Morrisons, North Lane	0%		0%				9%	1%	21%	19%	10%	9%
Other Faversham							0%		1%		0%	9%
Iwade Local Centre				**2%**								
Newington Local Centre			**1%**	**9%**								
Boughton-under-Blean Local Centre												**1%**
Teynham Local Centre							**1%**	**22%**				
Other			4%	22%		5%		1%			0%	
ISLE OF SHEPPEY												
Sheerness Town Centre	**68%**	**48%**	**7%**	**2%**	**3%**				**0%**			
Tesco, Bridge Road	45%	13%	7%	2%	3%							
Aldi, Millenium Way	21%	26%							0%			
Co-op, High Street		5%										
Iceland, High Street	2%	2%										
Other		2%										
Queenborough Local Centre		**1%**										
Halfway Houses Local Centre		**10%**										
Minster-on-Sea Local Centre		**1%**										
Neats Court Retail Park, Queenborough	**21%**	**24%**	**2%**		**0%**							
Iceland, Neats Court Retail Park		1%										
Morrisons, Neats Court Retail Park	21%	23%	2%		0%							
Other	**1%**	**10%**										
OUTSIDE BOROUGH	**1%**	**1%**	**25%**	**12%**	**2%**	**2%**	**3%**	**7%**	**11%**	**5%**	**35%**	**27%**
Canterbury	0%		1%		1%	1%	1%	2%	3%	3%	15%	5%
Gillingham	0%		16%	6%	0%						1%	
Whitstable			2%				1%	4%	8%	1%	14%	16%
Maidstone			4%	3%	1%							
Rainham			3%	2%								
Ashford							1%				5%	3%
Other Outside Borough	1%	1%	0%	2%	0%	1%	1%	1%				3%
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Notes:
Main food market share figure derived from a 50:50 combined figure between Questions 1 & 2, NEMS Household Survey, September 2018
Top-up market share figure derived from Question 5, NEMS Household Survey, May 2018
Excludes responses 'don't do this', 'don't know / varies', 'abroad', and 'internet / delivered'
Figures may not add due to rounding
2016 Prices

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 2: Main and Top Up Food Shopping Turnover of Convenience Facilities, 2019 (£m)

	Zone											
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East	
	Main	Top-up	Main	Top-up	Main	Top-up	Main	Top-up	Main	Top-up	Main	Top-up
INSIDE BOROUGH	**80.0**	**12.5**	**21.7**	**4.6**	**84.0**	**14.5**	**22.7**	**3.0**	**32.6**	**4.8**	**7.4**	**1.3**
Sittingbourne Town Centre	**1.8**		**7.3**	**1.3**	**33.3**	**5.2**	**6.8**	**0.6**	**1.5**		**0.4**	**0.1**
Sainsbury's, Avenue of Remembrance	0.7		4.4	0.8	16.4	2.0	2.1	0.4	0.2		0.1	0.0
Aldi, East Street	1.1		2.2	0.3	12.9	1.3	4.2	0.2	1.2		0.3	0.0
Lidl, West Street			0.7		2.8	0.8	0.4		0.1			
Iceland, High Street				0.1	0.9	0.2	0.1					
Other				0.1	0.3	0.8						
Sittingbourne Other	**5.5**	**0.7**	**9.9**	**1.5**	**47.3**	**8.5**	**3.6**	**0.3**	**0.2**		**0.2**	**0.1**
Asda, Trinity Trading Estate, Mill Way	3.4	0.2	5.0	0.5	21.5	2.5	0.8				0.2	0.0
Morrisons, Mill Way	1.8	0.2	4.4	0.7	20.3	2.8	2.6	0.1				0.1
M&S Foodhall, Sittingbourne Retail Park	0.2	0.3	0.4	0.1	0.8	0.4	0.1	0.0	0.2			
Co-op, Church Road, Murston						1.2						
Co-op, Grove Park, Gadby Road			0.2		1.5	0.4						
Co-op, The Parade, Northwood Drive				0.2		0.3						
Tesco Express, Canterbury Road					3.3	0.9		0.1				
Faversham Town Centre				**0.0**	**0.7**		**2.8**	**0.6**	**14.1**	**3.3**	**4.2**	**0.7**
Tesco, Crescent Road					0.7		2.7	0.4	13.7	2.0	4.1	0.6
Co-op, Forbes Road								0.1	0.1	0.8		0.1
Iceland, East Street				0.0			0.1		0.2	0.2		
Other								0.2		0.3	0.1	0.1
Faversham Other	**0.2**		**0.2**		**0.2**	**0.1**	**9.4**	**0.7**	**16.6**	**1.5**	**2.6**	**0.4**
Sainsbury's, Bysing Wood Road			0.2		0.2	0.1	7.2	0.7	8.9	0.6	1.5	0.1
Morrisons, North Lane	0.2		0.1				2.2	0.0	7.5	1.0	1.1	0.2
Other Faversham							0.1		0.2		0.0	0.2
Iwade Local Centre				**0.1**								
Newington Local Centre			**0.2**	**0.5**								
Boughton-under-Blean Local Centre												**0.0**
Teynham Local Centre							**0.1**	**0.7**				
Other			1.3	1.2		0.7		0.0			0.1	
ISLE OF SHEPPEY												
Sheerness Town Centre	**54.9**	**6.0**	**2.2**	**0.1**	**2.2**				**0.2**			
Tesco, Bridge Road	36.3	1.6	2.2	0.1	2.2							
Aldi, Millenium Way	17.1	3.3							0.2			
Co-op, High Street		0.6										
Iceland, High Street	1.5	0.2										
Other		0.3										
Queenborough Local Centre		**0.2**										
Halfway Houses Local Centre		**1.3**										
Minster-on-Sea Local Centre		**0.1**										
Neats Court Retail Park, Queenborough	**16.7**	**3.0**	**0.5**		**0.4**							
Iceland, Neats Court Retail Park		0.2										
Morrisons, Neats Court Retail Park	16.7	2.9	0.5		0.4							
Other	**0.8**	**1.3**										
OUTSIDE BOROUGH	**1.0**	**0.1**	**7.4**	**0.6**	**1.7**	**0.2**	**0.8**	**0.2**	**3.9**	**0.2**	**4.1**	**0.5**
Canterbury	0.3		0.2		0.6	0.1	0.1	0.1	1.1	0.2	1.7	0.1
Gillingham	0.2		4.6	0.3	0.3						0.2	
Whitstable			0.5				0.3	0.1	2.8	0.1	1.6	0.3
Maidstone			1.1	0.1	0.6							
Rainham			0.9	0.1								
Ashford							0.1				0.6	0.1
Other Outside Borough	0.5	0.1	0.1	0.1	0.3	0.1	0.1	0.0				0.1
Total	**81.0**	**12.7**	**29.1**	**5.3**	**85.7**	**14.8**	**23.5**	**3.3**	**36.5**	**5.1**	**11.5**	**1.8**

Notes:
Total convenience goods expenditure per zone taken from Table 3
Split in Main/Top-up expenditure derived from Questions 3 and 6, NEMS Household Survey, September 2018
Excludes responses 'don't do this', 'don't know / varies', 'abroad', and 'internet / delivered'
Figures may not add due to rounding
2016 Prices

Table 3: Total Turnover of Convenience Facilities, 2019

	Zone												Total Survey Derived Turnover
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	(£m)
INSIDE BOROUGH	**99**	**92.5**	**77**	**26.3**	**98**	**98.5**	**96**	**25.8**	**90**	**37.4**	**66**	**8.7**	**289.3**
Sittingbourne Town Centre	**2**	**1.8**	**25**	**8.6**	**38**	**38.4**	**28**	**7.4**	**4**	**1.5**	**3**	**0.4**	**58.1**
Sainsbury's, Avenue of Remembrance	1	0.7	15	5.2	18	18.4	10	2.6	0	0.2	1	0.1	27.1
Aldi, East Street	1	1.1	7	2.5	14	14.3	16	4.4	3	1.2	3	0.4	23.7
Lidl, West Street			2	0.7	4	3.6	2	0.4	0	0.1			4.9
Iceland, High Street			0	0.1	1	1.1	0	0.1					1.3
Other			0	0.1	1	1.1							1.1
Sittingbourne Other	**7**	**6.2**	**33**	**11.4**	**56**	**55.8**	**14**	**3.8**	**1**	**0.2**	**3**	**0.3**	**77.8**
Asda, Trinity Trading Estate, Mill Way	4	3.6	16	5.5	24	23.9	3	0.8			2	0.3	34.2
Morrisons, Mill Way	2	2.1	15	5.1	23	23.1	10	2.7			0	0.1	33.0
M&S Foodhall, Sittingbourne Retail Park	1	0.5	1	0.4	1	1.2	1	0.2	1	0.2			2.5
Co-op, Church Road, Murston					1	1.2							1.2
Co-op, Grove Park, Gadby Road			0	0.2	2	1.9							2.1
Co-op, The Parade, Northwood Drive			1	0.2	0	0.3							0.5
Tesco Express, Canterbury Road					4	4.2	0	0.1					4.3
Faversham Town Centre			**0**	**0.0**	**1**	**0.7**	**13**	**3.4**	**42**	**17.4**	**37**	**4.9**	**26.4**
Tesco, Crescent Road					1	0.7	12	3.1	38	15.7	35	4.7	24.1
Co-op, Forbes Road							0	0.1	2	0.9	1	0.1	1.1
Iceland, East Street			0	0.0			0	0.1	1	0.5			0.6
Other							1	0.2	1	0.3	1	0.1	0.6
Faversham Other	**0**	**0.2**	**1**	**0.2**	**0**	**0.4**	**38**	**10.2**	**44**	**18.2**	**22**	**3.0**	**32.2**
Sainsbury's, Bysing Wood Road			0	0.2	0	0.4	30	7.9	23	9.4	11	1.5	19.4
Morrisons, North Lane	0	0.2	0	0.1			8	2.2	20	8.5	9	1.2	12.3
Other Faversham							0	0.1	1	0.2	2	0.2	0.5
Iwade Local Centre			**0**	**0.1**									**0.1**
Newington Local Centre			**2**	**0.7**									**0.7**
Boughton-under-Blean Local Centre											**0**	**0.0**	**0.0**
Teynham Local Centre							**3**	**0.9**					**0.9**
Other			7	2.5	1	0.7	0	0.0			0	0.1	3.3
ISLE OF SHEPPEY													
Sheerness Town Centre	**65**	**60.9**	**7**	**2.3**	**2**	**2.2**			**0**	**0.2**			**65.5**
Tesco, Bridge Road	40	37.9	7	2.3	2	2.2							42.3
Aldi, Millenium Way	22	20.4							0	0.2			20.5
Co-op, High Street	1	0.6											0.6
Iceland, High Street	2	1.8											1.8
Other	0	0.3											0.3
Queenborough Local Centre	**0**	**0.2**											**0.2**
Halfway Houses Local Centre	**1**	**1.3**											**1.3**
Minster-on-Sea Local Centre	**0**	**0.1**											**0.1**
Neats Court Retail Park, Queenborough	**21**	**19.8**	**2**	**0.5**	**0**	**0.4**							**20.7**
Iceland, Neats Court Retail Park	0	0.2											0.2
Morrisons, Neats Court Retail Park	21	19.6	2	0.5	0	0.4							20.6
Other	**2**	**2.1**											**2.1**
OUTSIDE BOROUGH	**1**	**1.2**	**23**	**8.0**	**2**	**2.0**	**4**	**1.0**	**10**	**4.2**	**34**	**4.5**	**20.8**
Canterbury	0	0.3	1	0.2	1	0.7	1	0.2	3	1.3	14	1.8	4.6
Gillingham	0	0.2	14	4.9	0	0.3					1	0.2	5.6
Whitstable			2	0.5			2	0.4	7	2.9	14	1.9	5.8
Maidstone			4	1.2	1	0.6							1.8
Rainham			3	1.0									1.0
Ashford							1	0.1			5	0.6	0.8
Other Outside Borough	1	0.6	0	0.2	0	0.4	1	0.2			0	0.1	1.4
Total	**100**	**93.7**	**100**	**34.3**	**100**	**100.5**	**100**	**26.8**	**100**	**41.6**	**100**	**13.2**	**310.1**

Notes:
Derived from Table 2
Figures may not add due to rounding.

2016 Prices

Table 4. Survey-derived performance of convenience floorspace compared to expected benchmark performance at 2019

	Gross Floorspace (sq.m)	Net Sales (sq.m)	Net Convenience Sales Area (sq m)	Sales Density (£ per sq.m)	Benchmark Convenience Goods Turnover (£m)	Survey Turnover (£m)	Estimated Turnover from Outside Survey Area (£m)	Estimated Total Turnover (£m)	Overtrading (£m)
Sittingbourne Town Centre									
Sainsbury's, Avenue of Remembrance	5,985	3,657	3,070	11,126	34.2	27.1	0.3	27.4	-6.8
Aldi, East Street	1,352	938	856	10,303	8.8	23.7	0.1	23.8	15.0
Lidl, West Street	1,475	1,045	934	9,614	9.0	4.9	0.0	4.9	-4.1
Iceland, High Street	806	377	376	6,527	2.5	1.3		1.3	-1.1
Other	-	-	-	-	1.1	1.1	0.0	1.1	
Sittingbourne Other									
Asda, Trinity Trading Estate, Mill Way	4,569	2,763	2,295	12,999	29.8	34.2	0.2	34.3	4.5
Morrisons, Mill Way	6,739	3,943	3,279	12,044	39.5	33.0	0.2	33.2	-6.3
M&S Foodhall, Sittingbourne Retail Park	1,365	819	663	9,969	6.6	2.5	0.0	2.6	-4.1
Co-op, Church Road, Murston	278	181	160	10,301	1.6	1.2		1.2	-0.5
Co-op, Grove Park, Gadby Road	148	97	85	10,301	0.9	2.1		2.1	1.2
Co-op, The Parade, Northwood Drive	308	162	143	10,301	1.5	0.5		0.5	-1.0
Tesco Express, Canterbury Road	328	214	199	12,362	2.5	4.3		4.3	1.8
Faversham Town Centre									
Tesco, Crescent Road	4,756	2,924	2,334	12,362	28.9	24.1	0.6	24.7	-4.1
Co-op, Forbes Road	241	159	140	10,301	1.4	1.1		1.1	-0.3
Iceland, East Street	402	183	182	6,527	1.2	0.6		0.6	-0.6
Other	-	-	-	-	0.6	0.6	0.1	0.7	0.1
Faversham Other									
Sainsbury's, Bysing Wood Road	4,549	2,779	2,255	11,126	25.1	19.4	0.2	19.6	-5.5
Morrisons, North Lane	2,528	1,479	1,357	12,044	16.3	12.3	0.1	12.4	-3.9
Other Faversham	-	-	-	-	0.5	0.5		0.5	
Iwade Local Centre	-	-	-	-	0.1	0.1		0.1	
Newington Local Centre	-	-	-	-	0.7	0.7		0.7	
Boughton-under-Blean Local Centre	-	-	-	-	0.0	0.0		0.0	
Teynham Local Centre	-	-	-	-	0.9	0.9		0.9	
Other	-	-	-	-	3.3	3.3		3.3	
Sheerness Town Centre									
Tesco, Bridge Road	7,004	4,305	3,437	12,362	42.5	42.3	1.3	43.6	1.1
Aldi, Millenium Way	1,409	978	892	10,303	9.2	20.5	0.2	20.7	11.6
Co-op, High Street	524	266	235	10,301	2.4	0.6		0.6	-1.8
Iceland, High Street	504	322	321	6,527	2.1	1.8		1.8	-0.3
Other	-	-	-	-	0.3	0.3	0.0	0.3	
Queenborough Local Centre	-	-	-	-	0.2	0.2		0.2	
Halfway Houses Local Centre	-	-	-	-	1.3	1.3		1.3	
Minster-on-Sea Local Centre	-	-	-	-	0.1	0.1	0.0	0.2	0.0
Neats Court Retail Park, Queenborough									
Iceland, Neats Court Retail Park	835	388	386	6,527	2.5	0.2	0.0	0.2	-2.4
Morrisons, Neats Court Retail Park	5,116	2,993	2,490	12,044	30.0	20.6	0.4	21.0	-9.0
Other	-	-	-	-	2.1	2.1		2.1	
Total					**309.5**	**289.3**	**3.8**	**293.0**	**-16.5**

Notes:
Gross floorspace derived from Retail Studies, Retail Impact Assessments, VOA website, Experian Goad or WYG assessment
Net convenience floorspace derived from above sources where available or based on WYG professional judgement having regard to Experian Goad Data/WYG visits
Sales densities derived from information provided by GlobalData.
It has been assumed that all unnamed convenience stores within a centre are 'trading at equilibrium' (i.e. their 'benchmark' turnover equates to that ientified by the survey)
Survey derived performance of stores calculated by addiing together 'main' and 'top up' turnover as set out in Table 3

2016 Prices

TABLE 5: ESTIMATED (BASELINE) CAPACITY FOR NEW CONVENIENCE GOODS PROVISION WITHIN SITTINGBOURNE

Table 5a: Estimated 'Capacity' for Convenience Goods Facilities in Sittingbourne

Year	Benchmark Turnover £m[1]	Turnover £m[2]	Estimated Inflow £m	Surplus Expenditure £m
2019	137.9	135.9	0.8	-1.3
2024	137.9	142.3	0.8	5.2
2029	138.6	148.6	0.9	10.9
2034	139.2	154.9	0.9	16.7
2038	139.9	159.8	0.9	20.8

Notes:
1. Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 15
2. Assumes constant market share claimed by Sittingbourne facilities

2016 prices

Table 5b: Quantitative Need for Additional Convenience Goods Floorspace in Sittingbourne

Year	Surplus £m	Floorspace Requirement (sq m net)
2019	-1.3	-100
2024	5.2	500
2029	10.9	1,000
2034	16.7	1,500
2038	20.8	1,900

Notes:
Average sales density assumed to be £10,679 per sq.m (@2019) based on the average sales density of all grocery operators - derived by GlobalData
Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 15
2016 prices

TABLE 6: ESTIMATED (BASELINE) CAPACITY FOR NEW CONVENIENCE GOODS PROVISION WITHIN SITTINGBOURNE

Table 6a: Estimated 'Capacity' for Convenience Goods Facilities in Faversham

Year	Benchmark Turnover £m[1]	Turnover £m[2]	Estimated Inflow £m	Surplus Expenditure £m
2019	74.0	58.5	1.0	-14.5
2024	74.0	61.3	1.1	-11.6
2029	74.4	64.0	1.1	-9.2
2034	74.7	66.8	1.1	-6.8
2038	75.1	68.8	1.2	-5.0

Notes:
1. Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 15
2. Assumes constant market share claimed by Faversham facilities

2016 prices

Table 6b: Quantitative Need for Additional Convenience Goods Floorspace in Faversham

Year	Surplus £m	Floorspace Requirement (sq m net)
2019	-14.5	-1,400
2024	-11.6	-1,100
2029	-9.2	-900
2034	-6.8	-600
2038	-5.0	-500

Notes:
Average sales density assumed to be £10,679 per sq.m (@2019) based on the average sales density of all grocery operators - derived by GlobalData
Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 15

2016 prices

TABLE 7: ESTIMATED (BASELINE) CAPACITY FOR NEW CONVENIENCE GOODS PROVISION WITHIN SHEERNESS (including Queenborough)

Table 7a: Estimated 'Capacity' for Convenience Goods Facilities in Sheerness

Year	Benchmark Turnover £m[1]	Turnover £m[2]	Estimated Inflow £m	Surplus Expenditure £m
2019	89.0	86.2	1.9	-0.8
2024	89.0	90.3	2.0	3.4
2029	89.4	94.3	2.1	7.0
2034	89.8	98.3	2.2	10.8
2038	90.2	101.4	2.3	13.5

Notes:
1. Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 15
2. Assumes constant market share claimed by Sheerness facilities

2016 prices

Table 7b: Quantitative Need for Additional Convenience Goods Floorspace in Sheerness

Year	Surplus £m	Floorspace Requirement (sq m net)
2019	-0.8	-100
2024	3.4	300
2029	7.0	700
2034	10.8	1,000
2038	13.5	1,200

Notes:
Average sales density assumed to be £10,679 per sq.m (@2019) based on the average sales density of all grocery operators - derived by GlobalData
Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 15
2016 prices

Appendix I

Statistical Retail Tables - Comparison Goods Capacity

Table 1: Expenditure pattern of clothing and footwear goods, by Zone, 2019

	Zone 1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		Total Survey Derived Turnover (£m)
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**38%**	**14.1**	**30%**	**4.5**	**23%**	**10.1**	**25%**	**2.5**	**12%**	**2.1**	**20%**	**1.0**	**34.4**
Sittingbourne	**6%**	**2.1**	**22%**	**3.4**	**22%**	**9.7**	**12%**	**1.3**	**1%**	**0.3**			**16.7**
Sittingbourne Town Centre	3%	1.0	22%	3.4	20%	8.9	7%	0.7	1%	0.3			14.3
Sittingbourne Out-of-Centre	3%	1.1			2%	0.8	5%	0.5					2.4
Faversham							**12%**	**1.2**	**10%**	**1.9**	**20%**	**1.0**	**4.1**
Faversham Town Centre							11%	1.1	10%	1.9	12%	0.6	3.5
Faversham Out-of-Centre							1%	0.1			8%	0.4	0.6
Sheerness	**32%**	**11.7**	**7%**	**1.0**									**12.8**
Sheerness Town Centre	28%	10.3	1%	0.1									10.4
Neats Court Retail Park, Queenborough	4%	1.5	6%	0.9									2.4
Local Centres			1%	0.1									0.1
Other inside Borough	1%	0.3			1%	0.4							0.7
OUTSIDE BOROUGH	**62%**	**23.0**	**71%**	**10.8**	**77%**	**34.8**	**75%**	**7.6**	**88%**	**16.0**	**80%**	**4.0**	**96.2**
Canterbury	2%	0.8	7%	1.0	12%	5.5	44%	4.5	75%	13.6	63%	3.2	28.7
Ashford	6%	2.3	2%	0.4	7%	3.4	9%	0.9	3%	0.5	4%	0.2	7.5
Gillingham			11%	1.7	7%	3.3	4%	0.4					5.4
Chatham	2%	0.8	8%	1.2	4%	1.8							3.8
Maidstone	26%	9.5	5%	0.8	11%	4.7	1%	0.1			5%	0.2	15.3
Hempstead	10%	3.6	15%	2.2	7%	3.3	1%	0.1					9.3
Aylesford											1%	0.0	0.0
Bluewater Shopping Centre	8%	3.1	17%	2.5	27%	12.3	4%	0.4	1%	0.1	2%	0.1	18.6
Lakeside					1%	0.4					2%	0.1	0.4
Central London	4%	1.5											1.5
Other	4%	1.4	6%	0.9			12%	1.3	10%	1.8	4%	0.2	5.6
Total	**100%**	**37.1**	**100%**	**15.2**	**100%**	**44.9**	**100%**	**10.1**	**100%**	**18.1**	**100%**	**5.0**	**130.5**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 2: Expenditure pattern of books, CDs and DVDs, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**66%**	**4.6**	**62%**	**2.1**	**55%**	**4.4**	**39%**	**1.0**	**43%**	**1.5**	**32%**	**0.4**	**14.1**
Sittingbourne	**6%**	**0.4**	**52%**	**1.8**	**51%**	**4.1**	**17%**	**0.4**	**3%**	**0.1**			**6.8**
Sittingbourne Town Centre	6%	0.4	52%	1.8	47%	3.8	17%	0.4	3%	0.1			6.5
Sittingbourne Out-of-Centre					4%	0.3							0.3
Faversham					**4%**	**0.3**	**23%**	**0.6**	**40%**	**1.4**	**32%**	**0.4**	**2.7**
Faversham Town Centre							18%	0.5	40%	1.4	29%	0.4	2.2
Faversham Out-of-Centre					4%	0.3	4%	0.1			3%	0.0	0.4
Sheerness	**53%**	**3.7**	**7%**	**0.2**									**4.0**
Sheerness Town Centre	51%	3.6	7%	0.2									3.8
Neats Court Retail Park, Queenborough	2%	0.2											0.2
Local Centres	7%	0.5											0.5
Other inside Borough			3%	0.1									0.1
OUTSIDE BOROUGH	**34%**	**2.4**	**38%**	**1.3**	**45%**	**3.6**	**61%**	**1.5**	**57%**	**2.0**	**68%**	**0.9**	**11.8**
Canterbury	3%	0.2	7%	0.2	31%	2.4	49%	1.2	51%	1.8	55%	0.7	6.7
Ashford													
Gillingham			3%	0.1									0.1
Chatham													
Maidstone	12%	0.8	11%	0.4	7%	0.6					7%	0.1	1.9
Hempstead	5%	0.3	2%	0.1									0.4
Aylesford											4%	0.1	0.1
Bluewater Shopping Centre	8%	0.5	11%	0.4	7%	0.6	7%	0.2					1.7
Lakeside													
Central London	5%	0.3											0.3
Other	2%	0.2	4%	0.1			4%	0.1	6%	0.2	2%	0.0	0.7
Total	**100%**	**7.0**	**100%**	**3.4**	**100%**	**8.0**	**100%**	**2.6**	**100%**	**3.5**	**100%**	**1.4**	**25.8**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 3: Expenditure pattern of furnishings and household textile goods, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**82%**	**5.2**	**57%**	**1.8**	**62%**	**4.7**	**49%**	**1.1**	**27%**	**0.9**	**3%**	**0.0**	**13.7**
Sittingbourne	**55%**	**3.5**	**52%**	**1.6**	**59%**	**4.5**	**42%**	**1.0**	**15%**	**0.5**			**11.0**
Sittingbourne Town Centre	4%	0.3	30%	0.9	35%	2.6	27%	0.6	11%	0.3			4.8
Sittingbourne Out-of-Centre	51%	3.2	22%	0.7	25%	1.9	15%	0.3	4%	0.1			6.2
Faversham							**7%**	**0.2**	**13%**	**0.4**	**3%**	**0.0**	**0.6**
Faversham Town Centre							7%	0.2	13%	0.4	3%	0.0	0.6
Faversham Out-of-Centre													
Sheerness	**28%**	**1.7**	**4%**	**0.1**									**1.9**
Sheerness Town Centre	25%	1.6											1.6
Neats Court Retail Park, Queenborough	2%	0.1	4%	0.1									0.2
Local Centres			2%	0.1									0.1
Other inside Borough					3%	0.2							0.2
OUTSIDE BOROUGH	**18%**	**1.1**	**43%**	**1.3**	**38%**	**2.9**	**51%**	**1.2**	**73%**	**2.3**	**97%**	**1.1**	**9.8**
Canterbury	3%	0.2	2%	0.1	9%	0.7	32%	0.7	58%	1.8	84%	1.0	4.5
Ashford							1%	0.0	3%	0.1	3%	0.0	0.2
Gillingham	6%	0.4			3%	0.2							0.6
Chatham									2%	0.1			0.1
Maidstone	4%	0.3	20%	0.6	6%	0.4					4%	0.0	1.4
Hempstead	3%	0.2	8%	0.2									0.5
Aylesford			1%	0.0			2%	0.1	1%	0.0			0.1
Bluewater Shopping Centre			3%	0.1	17%	1.3	1%	0.0	1%	0.0	4%	0.0	1.5
Lakeside			5%	0.2	2%	0.2	13%	0.3	2%	0.1	2%	0.0	0.7
Central London													
Other	1%	0.1	4%	0.1			1%	0.0	5%	0.1			0.4
Total	**100%**	**6.3**	**100%**	**3.1**	**100%**	**7.5**	**100%**	**2.3**	**100%**	**3.1**	**100%**	**1.1**	**23.5**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 4: Expenditure pattern of small household goods such as glassware and utensils, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**79%**	**7.1**	**55%**	**2.4**	**67%**	**7.5**	**60%**	**1.8**	**30%**	**1.4**	**17%**	**0.3**	**20.6**
Sittingbourne	**39%**	**3.5**	**55%**	**2.4**	**65%**	**7.2**	**27%**	**0.8**	**7%**	**0.4**			**14.3**
Sittingbourne Town Centre	8%	0.7	31%	1.4	50%	5.6	21%	0.6	2%	0.1			8.3
Sittingbourne Out-of-Centre	31%	2.8	23%	1.0	15%	1.7	6%	0.2	6%	0.3			6.0
Faversham							**33%**	**1.0**	**22%**	**1.1**	**17%**	**0.3**	**2.4**
Faversham Town Centre							33%	1.0	22%	1.1	17%	0.3	2.4
Faversham Out-of-Centre													
Sheerness	**40%**	**3.6**											**3.6**
Sheerness Town Centre	36%	3.3											3.3
Neats Court Retail Park, Queenborough	4%	0.3											0.3
Local Centres													
Other inside Borough					3%	0.3							0.3
OUTSIDE BOROUGH	**21%**	**1.9**	**45%**	**2.0**	**33%**	**3.7**	**40%**	**1.2**	**70%**	**3.4**	**83%**	**1.3**	**13.5**
Canterbury	1%	0.1	1%	0.0	4%	0.5	19%	0.6	56%	2.7	52%	0.8	4.7
Ashford							2%	0.1	5%	0.3	9%	0.1	0.5
Gillingham	2%	0.1	5%	0.2									0.3
Chatham	2%	0.2	6%	0.3	1%	0.1							0.6
Maidstone	8%	0.7	6%	0.3	1%	0.1							1.1
Hempstead	2%	0.1	7%	0.3			4%	0.1			4%	0.1	0.6
Aylesford													
Bluewater Shopping Centre	4%	0.3	15%	0.7	16%	1.8	3%	0.1	3%	0.1	2%	0.0	3.0
Lakeside	2%	0.2	5%	0.2	5%	0.5	4%	0.1	4%	0.2	6%	0.1	1.3
Central London											2%	0.0	0.0
Other	1%	0.1			6%	0.6	8%	0.2	3%	0.2	8%	0.1	1.3
Total	**100%**	**9.1**	**100%**	**4.3**	**100%**	**11.2**	**100%**	**3.0**	**100%**	**4.9**	**100%**	**1.6**	**34.1**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 5: Expenditure pattern of clocks, jewellery and watches, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**45%**	**2.3**	**24%**	**0.7**	**33%**	**2.5**	**55%**	**1.1**	**33%**	**1.1**	**14%**	**0.1**	**7.7**
Sittingbourne	**7%**	**0.3**	**24%**	**0.7**	**32%**	**2.4**	**33%**	**0.6**	**12%**	**0.4**			**4.4**
Sittingbourne Town Centre	7%	0.3	20%	0.5	32%	2.4	22%	0.4	12%	0.4			4.1
Sittingbourne Out-of-Centre			4%	0.1			11%	0.2					0.3
Faversham							**21%**	**0.4**	**21%**	**0.7**	**14%**	**0.1**	**1.2**
Faversham Town Centre							21%	0.4	21%	0.7	14%	0.1	1.2
Faversham Out-of-Centre													
Sheerness	**39%**	**1.9**			**1%**	**0.1**							**2.0**
Sheerness Town Centre	39%	1.9			1%	0.1							2.0
Neats Court Retail Park, Queenborough													
Local Centres													
Other inside Borough													
OUTSIDE BOROUGH	**55%**	**2.7**	**76%**	**2.1**	**67%**	**5.0**	**45%**	**0.9**	**67%**	**2.1**	**86%**	**0.8**	**13.6**
Canterbury	2%	0.1			9%	0.6	30%	0.6	55%	1.8	45%	0.4	3.5
Ashford													
Gillingham	5%	0.2	3%	0.1	3%	0.2							0.5
Chatham			4%	0.1	3%	0.3							0.4
Maidstone	6%	0.3	10%	0.3	6%	0.5	2%	0.0			10%	0.1	1.2
Hempstead	6%	0.3	12%	0.3	8%	0.6	3%	0.1	3%	0.1			1.4
Aylesford													
Bluewater Shopping Centre	25%	1.2	31%	0.9	34%	2.5	10%	0.2	4%	0.1	14%	0.1	5.1
Lakeside													
Central London			1%	0.0	3%	0.3			3%	0.1	3%	0.0	0.4
Other	12%	0.6	13%	0.4					3%	0.1	14%	0.1	1.2
Total	**100%**	**5.0**	**100%**	**2.8**	**100%**	**7.5**	**100%**	**1.9**	**100%**	**3.2**	**100%**	**0.9**	**21.3**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 6: Expenditure pattern of toys, games, bicycles and other recreational / sports goods, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**58%**	**13.2**	**69%**	**6.9**	**67%**	**17.6**	**19%**	**1.4**	**27%**	**2.8**	**31%**	**1.2**	**43.1**
Sittingbourne	**19%**	**4.3**	**49%**	**4.9**	**67%**	**17.6**	**11%**	**0.8**	**13%**	**1.3**			**28.9**
Sittingbourne Town Centre	16%	3.6	16%	1.6	58%	15.2	11%	0.8	9%	0.9			22.2
Sittingbourne Out-of-Centre	3%	0.6	34%	3.4	9%	2.3			4%	0.4			6.7
Faversham							**8%**	**0.6**	**14%**	**1.5**	**31%**	**1.2**	**3.3**
Faversham Town Centre							8%	0.6	14%	1.5	31%	1.2	3.3
Faversham Out-of-Centre													
Sheerness	**39%**	**8.9**	**11%**	**1.1**									**10.0**
Sheerness Town Centre	22%	5.0	8%	0.8									5.8
Neats Court Retail Park, Queenborough	17%	3.9	4%	0.4									4.3
Local Centres													
Other inside Borough			9%	0.9									0.9
OUTSIDE BOROUGH	**42%**	**9.6**	**31%**	**3.1**	**33%**	**8.6**	**81%**	**6.1**	**73%**	**7.7**	**69%**	**2.6**	**37.7**
Canterbury	2%	0.5	5%	0.5	4%	1.0	53%	4.0	65%	6.8	55%	2.1	14.8
Ashford									5%	0.5	2%	0.1	0.6
Gillingham	3%	0.6	3%	0.3									0.9
Chatham	4%	0.9	8%	0.8	3%	0.9			2%	0.3			2.8
Maidstone	8%	1.8	1%	0.1	5%	1.2	8%	0.6			5%	0.2	4.0
Hempstead			4%	0.4	1%	0.4							0.8
Aylesford	17%	3.8	1%	0.1	1%	0.3	8%	0.6					4.9
Bluewater Shopping Centre	6%	1.5	8%	0.8	15%	3.8	4%	0.3					6.3
Lakeside									1%	0.1			0.1
Central London													
Other	2%	0.5	1%	0.1	4%	1.0	8%	0.6			7%	0.3	2.5
Total	**100%**	**22.8**	**100%**	**10.0**	**100%**	**26.1**	**100%**	**7.6**	**100%**	**10.5**	**100%**	**3.8**	**80.7**

Notes:

Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 7: Expenditure pattern of chemist goods (including health and beauty products), by Zone, 2018

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**92%**	**15.1**	**63%**	**4.4**	**91%**	**18.0**	**89%**	**4.2**	**97%**	**8.0**	**62%**	**1.5**	**51.2**
Sittingbourne	**10%**	**1.6**	**45%**	**3.2**	**91%**	**17.9**	**18%**	**0.8**	**5%**	**0.4**			**23.9**
Sittingbourne Town Centre	9%	1.4	41%	2.9	89%	17.5	18%	0.8	5%	0.4			23.1
Sittingbourne Out-of-Centre	1%	0.1	4%	0.3	2%	0.4							0.8
Faversham	**1%**	**0.1**	**1%**	**0.0**			**52%**	**2.4**	**92%**	**7.6**	**62%**	**1.5**	**11.7**
Faversham Town Centre	1%	0.1	1%	0.0			51%	2.4	91%	7.6	60%	1.4	11.6
Faversham Out-of-Centre							1%	0.0	1%	0.1	2%	0.0	0.1
Sheerness	**67%**	**11.1**	**2%**	**0.1**									**11.2**
Sheerness Town Centre	63%	10.3	2%	0.1									10.5
Neats Court Retail Park, Queenborough	5%	0.8											0.8
Local Centres	13%	2.1	14%	1.0			20%	0.9					4.0
Other inside Borough	1%	0.1	1%	0.0	1%	0.1							0.3
OUTSIDE BOROUGH	**8%**	**1.4**	**37%**	**2.6**	**9%**	**1.8**	**11%**	**0.5**	**3%**	**0.3**	**38%**	**0.9**	**7.5**
Canterbury			2%	0.2	5%	1.0	6%	0.3	2%	0.2	24%	0.6	2.2
Ashford													
Gillingham			3%	0.2	1%	0.1	1%	0.1					0.4
Chatham													
Maidstone	4%	0.6	4%	0.3							2%	0.1	1.0
Hempstead	2%	0.3	9%	0.6	1%	0.2							1.0
Aylesford													
Bluewater Shopping Centre	2%	0.4	3%	0.2	1%	0.2	2%	0.1					0.8
Lakeside													
Central London													
Other	1%	0.1	16%	1.1	2%	0.4	2%	0.1	1%	0.1	12%	0.3	2.1
Total	**100%**	**16.5**	**100%**	**7.1**	**100%**	**19.8**	**100%**	**4.7**	**100%**	**8.3**	**100%**	**2.4**	**58.7**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 8: Expenditure pattern of large household electrical items (white goods), by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**98%**	**3.4**	**75%**	**1.0**	**87%**	**3.5**	**69%**	**0.7**	**28%**	**0.5**	**12%**	**0.1**	**9**
Sittingbourne	**82%**	**2.9**	**73%**	**0.9**	**86%**	**3.4**	**64%**	**0.7**	**8%**	**0.1**	**5%**	**0.0**	**8**
Sittingbourne Town Centre	33%	1.1	24%	0.3	30%	1.2	27%	0.3	4%	0.1	5%	0.0	3.0
Sittingbourne Out-of-Centre	49%	1.7	49%	0.6	56%	2.2	37%	0.4	4%	0.1			5
Faversham							**6%**	**0.1**	**20%**	**0.3**	**8%**	**0.0**	**0**
Faversham Town Centre							6%	0.1	20%	0.3	8%	0.0	0
Faversham Out-of-Centre													
Sheerness	**16%**	**0.5**	**2%**	**0.0**									**1**
Sheerness Town Centre	16%	0.5	2%	0.0									1
Neats Court Retail Park, Queenborough													
Local Centres					1%	0.0							0
Other inside Borough													
OUTSIDE BOROUGH	**2%**	**0.1**	**25%**	**0.3**	**13%**	**0.5**	**31%**	**0.3**	**72%**	**1.2**	**88%**	**0.4**	**3**
Canterbury			1%	0.0	2%	0.1	19%	0.2	65%	1.1	70%	0.3	2
Ashford							9%	0.1	3%	0.0	3%	0.0	0
Gillingham			2%	0.0									0
Chatham	1%	0.0	4%	0.0	5%	0.2	1%	0.0	1%	0.0			0
Maidstone			2%	0.0	3%	0.1			1%	0.0	2%	0.0	0
Hempstead			4%	0.0									0
Aylesford					1%	0.1					3%	0.0	0
Bluewater Shopping Centre	1%	0.0	7%	0.1	1%	0.0	2%	0.0			10%	0.0	0.2
Lakeside													
Central London													
Other			4%	0.1					1%	0.0			0
Total	**100%**	**3.5**	**100%**	**1.3**	**100%**	**4.0**	**100%**	**1.0**	**100%**	**1.7**	**100%**	**0.5**	**11.9**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 9: Expenditure pattern of small electrical goods (cameras, tablets, hairdryers, blenders), by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**95%**	**11.4**	**62%**	**3.7**	**87%**	**12.4**	**77%**	**3.4**	**38%**	**2.3**	**15%**	**0.3**	**33.5**
Sittingbourne	**51%**	**6.1**	**60%**	**3.5**	**85%**	**12.1**	**55%**	**2.4**	**5%**	**0.3**	**4%**	**0.1**	**24.5**
Sittingbourne Town Centre	27%	3.3	35%	2.1	51%	7.3	24%	1.0	5%	0.3	4%	0.1	14.0
Sittingbourne Out-of-Centre	23%	2.8	25%	1.5	34%	4.9	31%	1.3					10.5
Faversham							**22%**	**1.0**	**33%**	**2.0**	**11%**	**0.2**	**3.2**
Faversham Town Centre							17%	0.7	29%	1.8	11%	0.2	2.8
Faversham Out-of-Centre							5%	0.2	3%	0.2			0.4
Sheerness	**45%**	**5.3**	**2%**	**0.1**	**1%**	**0.2**							**5.6**
Sheerness Town Centre	44%	5.2	2%	0.1									5.3
Neats Court Retail Park, Queenborough	1%	0.1			1%	0.2							0.3
Local Centres													
Other inside Borough					1%	0.1							0.1
OUTSIDE BOROUGH	**5%**	**0.6**	**38%**	**2.2**	**13%**	**1.9**	**23%**	**1.0**	**62%**	**3.8**	**85%**	**1.8**	**11.2**
Canterbury	2%	0.3	1%	0.1	2%	0.3	18%	0.8	55%	3.3	65%	1.4	6.2
Ashford							3%	0.1	3%	0.2	3%	0.1	0.4
Gillingham			1%	0.1									0.1
Chatham			2%	0.1			2%	0.1	1%	0.1			0.3
Maidstone					3%	0.4					9%	0.2	0.6
Hempstead			11%	0.7	3%	0.4							1.1
Aylesford											3%	0.1	0.1
Bluewater Shopping Centre	1%	0.1	19%	1.1	5%	0.7					1%	0.0	2.0
Lakeside													
Central London											2%	0.0	0.0
Other	1%	0.2	3%	0.2					3%	0.2	2%	0.0	0.6
Total	**100%**	**12.0**	**100%**	**5.9**	**100%**	**14.3**	**100%**	**4.3**	**100%**	**6.1**	**100%**	**2.2**	**44.7**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 10: Expenditure pattern of furniture, carpets and floor coverings, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**53%**	**4.5**	**53%**	**2.0**	**68%**	**7.1**	**43%**	**1.2**	**47%**	**2.1**	**13%**	**0.2**	**17.1**
Sittingbourne	**15%**	**1.3**	**53%**	**2.0**	**67%**	**7.0**	**30%**	**0.8**	**8%**	**0.3**	**5%**	**0.1**	**11.5**
Sittingbourne Town Centre	10%	0.9	27%	1.0	40%	4.2	13%	0.4	6%	0.3	5%	0.1	6.7
Sittingbourne Out-of-Centre	5%	0.4	26%	1.0	27%	2.8	17%	0.5	2%	0.1			4.8
Faversham							**9%**	**0.2**	**39%**	**1.7**	**9%**	**0.1**	**2.1**
Faversham Town Centre							9%	0.2	39%	1.7	9%	0.1	2.1
Faversham Out-of-Centre													
Sheerness	**35%**	**3.0**											**3.0**
Sheerness Town Centre	35%	3.0											3.0
Neats Court Retail Park, Queenborough													
Local Centres	2%	0.2			1%	0.1	5%	0.1					0.4
Other inside Borough													
OUTSIDE BOROUGH	**47%**	**4.0**	**47%**	**1.8**	**32%**	**3.3**	**57%**	**1.5**	**53%**	**2.3**	**87%**	**1.2**	**14.2**
Canterbury	2%	0.2	4%	0.2	3%	0.3	28%	0.8	43%	1.9	56%	0.8	4.1
Ashford			4%	0.2			3%	0.1			3%	0.0	0.3
Gillingham	16%	1.3	7%	0.3	14%	1.4	10%	0.3					3.3
Chatham			1%	0.0					2%	0.1			0.1
Maidstone	16%	1.3	21%	0.8	7%	0.7	8%	0.2	1%	0.1			3.1
Hempstead			1%	0.0									0.0
Aylesford	9%	0.8											0.8
Bluewater Shopping Centre	1%	0.1			1%	0.1	2%	0.1			1%	0.0	0.3
Lakeside			1%	0.0	3%	0.3			2%	0.1			0.4
Central London													
Other	3%	0.3	8%	0.3	4%	0.4	6%	0.1	5%	0.2	27%	0.4	1.7
Total	**100%**	**8.5**	**100%**	**3.8**	**100%**	**10.4**	**100%**	**2.7**	**100%**	**4.4**	**100%**	**1.4**	**31.3**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

SWALE BOROUGH COUNCIL
RETAIL AND LEISURE NEEDS ASSESSMENT

Table 11: Expenditure pattern of DIY (including gardening) goods, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**86%**	**5.7**	**73%**	**2.4**	**95%**	**7.3**	**77%**	**2.0**	**41%**	**1.3**	**18%**	**0.2**	**19.0**
Sittingbourne	**70%**	**4.7**	**72%**	**2.3**	**90%**	**6.9**	**65%**	**1.7**	**18%**	**0.6**	**5%**	**0.1**	**16.3**
Sittingbourne Town Centre	18%	1.2	23%	0.8	40%	3.1	34%	0.9	3%	0.1	5%	0.1	6.0
Sittingbourne Out-of-Centre	53%	3.5	49%	1.6	50%	3.8	31%	0.8	15%	0.5			10.2
Faversham					**1%**	**0.0**	**10%**	**0.3**	**21%**	**0.7**	**9%**	**0.1**	**1.1**
Faversham Town Centre					1%	0.0	10%	0.3	21%	0.7	9%	0.1	1.1
Faversham Out-of-Centre													
Sheerness	**14%**	**0.9**											**0.9**
Sheerness Town Centre	13%	0.8											0.8
Neats Court Retail Park, Queenborough	1%	0.1											0.1
Local Centres	1%	0.1			4%	0.3	1%	0.0			2%	0.0	0.4
Other inside Borough			1%	0.0			1%	0.0	2%	0.1	2%	0.0	0.2
OUTSIDE BOROUGH	**14%**	**1.0**	**27%**	**0.9**	**5%**	**0.4**	**23%**	**0.6**	**59%**	**1.9**	**82%**	**1.1**	**5.8**
Canterbury	1%	0.1	1%	0.0			8%	0.2	40%	1.3	59%	0.8	2.3
Ashford					1%	0.1	6%	0.2			6%	0.1	0.3
Gillingham	10%	0.7	21%	0.7	3%	0.3	4%	0.1	1%	0.0			1.8
Chatham			3%	0.1					1%	0.0			0.1
Maidstone			2%	0.1			1%	0.0			2%	0.0	0.1
Hempstead									2%	0.0			0.0
Aylesford											2%	0.0	0.0
Bluewater Shopping Centre													
Lakeside													
Central London													
Other	3%	0.2	1%	0.0	1%	0.0	4%	0.1	16%	0.5	14%	0.2	1.1
Total	**100%**	**6.7**	**100%**	**3.3**	**100%**	**7.7**	**100%**	**2.6**	**100%**	**3.2**	**100%**	**1.3**	**24.7**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 12: Comparison Goods Expenditure Pattern - Bulky Goods, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**73**	**13.6**	**64**	**5.4**	**81**	**17.9**	**61**	**3.9**	**42**	**3.9**	**15**	**0.5**	**45.1**
Sittingbourne	**47**	**8.9**	**63**	**5.3**	**79**	**17.3**	**50**	**3.2**	**11**	**1.1**	**5**	**0.1**	**35.9**
Sittingbourne Town Centre	17	3.2	25	2.1	38	8.5	24	1.5	4	0.4	5	0.1	15.8
Sittingbourne Out-of-Centre	30	5.7	39	3.2	40	8.9	26	1.6	7	0.7			20.1
Faversham					**0**	**0.0**	**9**	**0.5**	**30**	**2.8**	**9**	**0.3**	**3.6**
Faversham Town Centre					0	0.0	9	0.5	30	2.8	9	0.3	3.6
Faversham Out-of-Centre													
Sheerness	**24**	**4.5**	**0**	**0.0**									**4.5**
Sheerness Town Centre	24	4.4	0	0.0									4.4
Neats Court Retail Park, Queenborough	1	0.1											0.1
Local Centres	1	0.2			2	0.5	2	0.1			1	0.0	0.9
Other inside Borough			1	0.0			0	0.0	1	0.1	1	0.0	0.2
OUTSIDE BOROUGH	**27**	**5.1**	**36**	**3.0**	**19**	**4.2**	**39**	**2.5**	**58**	**5.4**	**85**	**2.7**	**22.8**
Canterbury	1	0.2	3	0.2	2	0.4	18	1.2	46	4.3	59	1.9	8.1
Ashford			2	0.2	0	0.1	5	0.3	1	0.0	4	0.1	0.7
Gillingham	11	2.0	12	1.0	8	1.7	6	0.4	0	0.0			5.1
Chatham	0	0.0	2	0.2	1	0.2	0	0.0	1	0.1			0.6
Maidstone	7	1.3	11	0.9	4	0.8	4	0.3	1	0.1	1	0.0	3.5
Hempstead			1	0.1					1	0.0			0.1
Aylesford	4	0.8			0	0.1					1	0.0	0.9
Bluewater Shopping Centre	1	0.1	1	0.1	1	0.2	1	0.1			2	0.1	0.5
Lakeside			1	0.0	1	0.3			1	0.1			0.4
Central London													
Other	3	0.5	4	0.4	2	0.4	4	0.2	8	0.7	17	0.5	2.8
Total	**100**	**18.7**	**100**	**8.4**	**100**	**22.1**	**100**	**6.3**	**100**	**9.3**	**100**	**3.1**	**68.0**

Notes:
Market share figures derived from NEMS Household Survey, September 2018
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 13: Comparison Goods Expenditure Pattern - Non-Bulky Goods (excluding Clothing & Footwear), by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East		
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	
INSIDE BOROUGH	**75**	**58.9**	**60**	**21.9**	**71**	**67.1**	**53**	**13.9**	**45**	**18.0**	**29**	**3.9**	**183.7**
Sittingbourne	**25**	**19.6**	**49**	**18.1**	**70**	**65.8**	**26**	**6.9**	**8**	**3.3**	**1**	**0.1**	**113.8**
Sittingbourne Town Centre	13	10.0	30	11.1	58	54.4	18	4.8	6	2.5	1	0.1	82.9
Sittingbourne Out-of-Centre	12	9.6	19	6.9	12	11.4	8	2.1	2	0.8			30.8
Faversham	**0**	**0.1**	**0**	**0.0**	**0**	**0.3**	**23**	**6.2**	**37**	**14.6**	**28**	**3.8**	**25.0**
Faversham Town Centre	0	0.1	0	0.0			22	5.8	36	14.3	28	3.7	24.0
Faversham Out-of-Centre					0	0.3	1	0.4	1	0.3	1	0.1	1.0
Sheerness	**46**	**36.4**	**5**	**1.8**	**0**	**0.3**							**38.4**
Sheerness Town Centre	39	30.9	4	1.3	0	0.1							32.3
Neats Court Retail Park, Queenborough	7	5.4	1	0.5	0	0.2							6.1
Local Centres	3	2.6	3	1.1			4	0.9					4.6
Other inside Borough	0	0.1	3	1.0	1	0.7							1.9
OUTSIDE BOROUGH	**25**	**19.7**	**40**	**14.6**	**29**	**27.4**	**47**	**12.4**	**55**	**21.6**	**71**	**9.4**	**105.1**
Canterbury	2	1.3	3	1.1	7	6.6	31	8.2	47	18.4	53	7.0	42.5
Ashford							1	0.2	3	1.0	2	0.3	1.6
Gillingham	2	1.4	2	0.9	1	0.5	0	0.1					2.9
Chatham	1	1.1	4	1.3	1	1.2	0	0.1	1	0.4			4.1
Maidstone	6	4.6	5	2.0	3	3.3	2	0.6			5	0.7	11.1
Hempstead	2	1.3	7	2.6	2	1.6	1	0.2	0	0.1	0	0.1	5.8
Aylesford	5	3.8	0	0.2	0	0.3	3	0.7	0	0.0	1	0.1	5.1
Bluewater Shopping Centre	5	4.0	11	4.1	12	10.9	3	0.9	1	0.3	2	0.2	20.4
Lakeside	0	0.2	1	0.4	1	0.7	2	0.4	1	0.4	1	0.1	2.2
Central London	0	0.3	0	0.0	0	0.3			0	0.1	1	0.1	0.8
Other	2	1.7	6	2.1	2	2.0	4	1.1	2	0.9	6	0.9	8.6
Total	**100**	**78.6**	**100**	**36.6**	**100**	**94.4**	**100**	**26.4**	**100**	**39.5**	**100**	**13.3**	**288.8**

Notes:
Derived from Tables 8, 10, 11, 12
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

Table 14: Comparison Goods Expenditure Pattern - Combined, by Zone, 2019

	Zone												Total Survey Derived Turnover (£m)		Inflow	
	1 Isle of Sheppey		2 Borough West		3 Sittingbourne		4 Central Borough		5 Faversham		6 Borough East					
	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	%	£m	(%)	(£m)
INSIDE BOROUGH	**64**	**86.7**	**53**	**31.8**	**59**	**95.1**	**47**	**20.3**	**36**	**24.0**	**25**	**5.3**	**54**	**263.2**		
Sittingbourne	**23**	**30.5**	**44**	**26.7**	**58**	**92.9**	**26**	**11.3**	**7**	**4.7**	**1**	**0.2**	**34**	**166.3**		
Sittingbourne Town Centre	11	14.2	28	16.6	44	71.8	16	7.0	5	3.2	1	0.2	23	113.0	2	2.3
Sittingbourne Out-of-Centre	12	16.3	17	10.2	13	21.1	10	4.3	2	1.5			11	53.3	1	0.3
Faversham	**0**	**0.1**	**0**	**0.0**	**0**	**0.3**	**19**	**7.9**	**29**	**19.2**	**24**	**5.1**	**7**	**32.8**		
Faversham Town Centre	0	0.1	0	0.0	0	0.0	17	7.4	28	19.0	21	4.6	6	31.2	8	2.5
Faversham Out-of-Centre					0	0.3	1	0.5	0	0.3	2	0.5	0	1.6	1	0.0
Sheerness	**39**	**52.6**	**5**	**2.8**	**0**	**0.3**							**11**	**55.7**		
Sheerness Town Centre	34	45.6	2	1.4	0	0.1							10	47.1	3	1.2
Neats Court Retail Park, Queenborough	5	7.0	2	1.4	0	0.2							2	8.6	1	0.1
Local Centres	2	2.9	2	1.2	0	0.5	3	1.1			0	0.0	1	5.6		
Other inside Borough	0	0.5	2	1.1	1	1.1	0	0.0	0	0.1	0	0.0	1	2.8		
OUTSIDE BOROUGH	**36**	**47.8**	**47**	**28.4**	**41**	**66.3**	**53**	**22.5**	**64**	**43.0**	**75**	**16.1**	**46**	**224.1**		
Canterbury	2	2.3	4	2.3	8	12.5	32	13.8	54	36.3	56	12.0	16	79.3		
Ashford	2	2.3	1	0.5	2	3.4	3	1.4	2	1.6	3	0.6	2	9.8		
Gillingham	3	3.4	6	3.6	3	5.6	2	0.8	0	0.0			3	13.4		
Chatham	1	1.9	4	2.6	2	3.3	0	0.1	1	0.5			2	8.4		
Maidstone	11	15.4	6	3.7	5	8.9	2	1.0	0	0.1	4	0.9	6	29.9		
Hempstead	4	4.9	8	4.9	3	4.9	1	0.3	0	0.1	0	0.1	3	15.2		
Aylesford	3	4.6	0	0.2	0	0.3	2	0.7	0	0.0	1	0.2	1	6.1		
Bluewater Shopping Centre	5	7.3	11	6.8	14	23.4	3	1.4	1	0.4	2	0.4	8	39.6		
Lakeside	0	0.2	1	0.4	1	1.4	1	0.4	1	0.5	1	0.2	1	3.1		
Central London	1	1.8	0	0.0	0	0.3			0	0.1	0	0.1	0	2.3		
Other	3	3.6	6	3.4	2	2.4	6	2.6	5	3.4	7	1.6	3	17.0		
Total	**100**	**134.4**	**100**	**60.2**	**100**	**161.4**	**100**	**42.8**	**100**	**67.0**	**100**	**21.5**	**100**	**487.3**		

Notes:
Derived from Tables 2, 3, 4, 5, 6, 7, 9
Excludes responses Special Forms of Trading, 'Don't do this, 'Don't know / varies', and 'Other'
Figures may not add due to rounding

2016 Prices

TABLE 15: ESTIMATED (BASELINE) CAPACITY FOR NEW COMPARISON GOODS PROVISION WITHIN SITTINGBOURNE

Table 15a: Estimated 'Capacity' for Comparison Goods Facilities in Sittingbourne

Year	Benchmark Turnover £m[1]	Turnover - £m[2]	Estimated Inflow - £m	Surplus Expenditure - £m
2019	168.8	166.3	2.5	0.0
2024	184.9	199.4	3.0	17.5
2029	206.2	243.1	3.7	40.6
2034	229.9	296.2	4.5	70.9
2038	250.8	346.1	5.3	100.6

Notes:

1. Allows for increased turnover efficiency as set out in Table 4b Experian Retail Planner 15
2. Assumes constant market share claimed by Sittingbourne facilities from Study Area

2016 prices

Table 15b: Quantitative Need for Additional Comparison Goods Floorspace in Sittingbourne

Year	Surplus £m	Floorspace Requirement	
		Min[1]	Max[2]
2019	0.0	0	0
2024	17.5	2,900	5,300
2029	40.6	6,000	11,100
2034	70.9	9,500	17,300
2038	100.6	12,300	22,600

Notes:

1. Average sales density assumed to be £5,500 per sq.m which WYG considers to be towards the higher end of what could be achieved in Sittingbourne
2. Average sales density assumed to be £3,000 per sq.m which WYG considers to be towards the lower end of what could be achieved in Sittingbourne

Allows for increased turnover efficiency as set out in Table 4b Experian Retail Planner 15

2016 prices

TABLE 16: ESTIMATED (BASELINE) CAPACITY FOR NEW COMPARISON GOODS PROVISION WITHIN FAVERSHAM

Table 16a: Estimated 'Capacity' for Comparison Goods Facilities in Faversham

Year	Benchmark Turnover £m[1]	Turnover - £m[2]	Estimated Inflow - £m	Surplus Expenditure - £m
2019	35.3	32.8	2.5	0.0
2024	38.6	39.3	3.0	3.7
2029	43.1	47.9	3.7	8.5
2034	48.0	58.3	4.5	14.8
2038	52.4	68.2	5.2	21.0

Notes:

1. Allows for increased turnover efficiency as set out in Table 4b Experian Retail Planner 15
2. Assumes constant market share claimed by Faversham facilities from Study Area

2016 prices

Table 16b: Quantitative Need for Additional Comparison Goods Floorspace in Faversham

Year	Surplus £m	Floorspace Requirement	
		Min[1]	Max[2]
2019	0.0	0	0
2024	3.7	600	1,100
2029	8.5	1,300	2,300
2034	14.8	2,100	3,600
2038	21.0	2,700	4,700

Notes:

1. Average sales density assumed to be £5,250 per sq.m which WYG considers to be towards the higher end of what could be achieved in Faversham
2. Average sales density assumed to be £3,000 per sq.m which WYG considers to be towards the lower end of what could be achieved in Faversham

Allows for increased turnover efficiency as set out in Table 4b Experian Retail Planner 15

2016 prices

TABLE 17: ESTIMATED (BASELINE) CAPACITY FOR NEW COMPARISON GOODS PROVISION WITHIN SHEERNESS

Table 17a: Estimated 'Capacity' for Comparison Goods Facilities in Sheerness

Year	Benchmark Turnover £m[1]	Turnover - £m[2]	Estimated Inflow - £m	Surplus Expenditure - £m
2019	59.2	55.7	3.5	0.0
2024	64.8	66.8	4.2	6.1
2029	72.3	81.4	5.1	14.2
2034	80.6	99.2	6.2	24.8
2038	87.9	115.9	7.3	35.3

Notes:
1. Allows for increased turnover efficiency as set out in Table 4b Experian Retail Planner 15
2. Assumes constant market share claimed by Faversham facilities from Study Area

2016 prices

Table 17b: Quantitative Need for Additional Comparison Goods Floorspace in Sheerness

Year	Surplus	Floorspace Requirement	
	£m	Min[1]	Max[2]
2019	0.0	0	0
2024	6.1	1,100	1,900
2029	14.2	2,200	3,900
2034	24.8	3,500	6,100
2038	35.3	4,500	7,900

Notes:
1. Average sales density assumed to be £5,250 per sq.m which WYG considers to be towards the higher end of what could be achieved in Sheerness
2. Average sales density assumed to be £3,000 per sq.m which WYG considers to be towards the lower end of what could be achieved in Sheerness

Allows for increased turnover efficiency as set out in Table 4b Experian Retail Planner 15

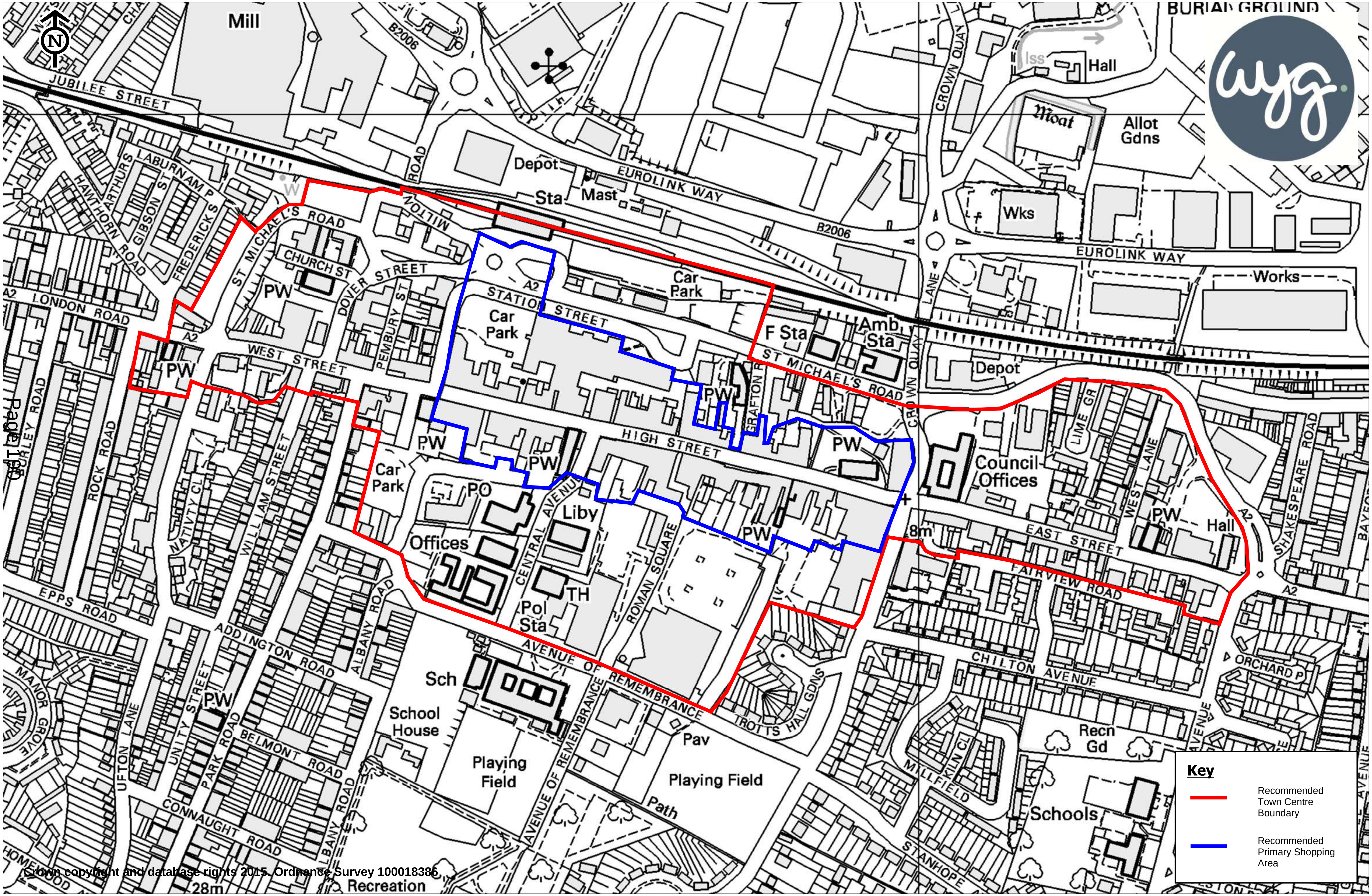
2016 prices

Appendix J

Recommended Town Centre Boundaries and Primary Shopping Area

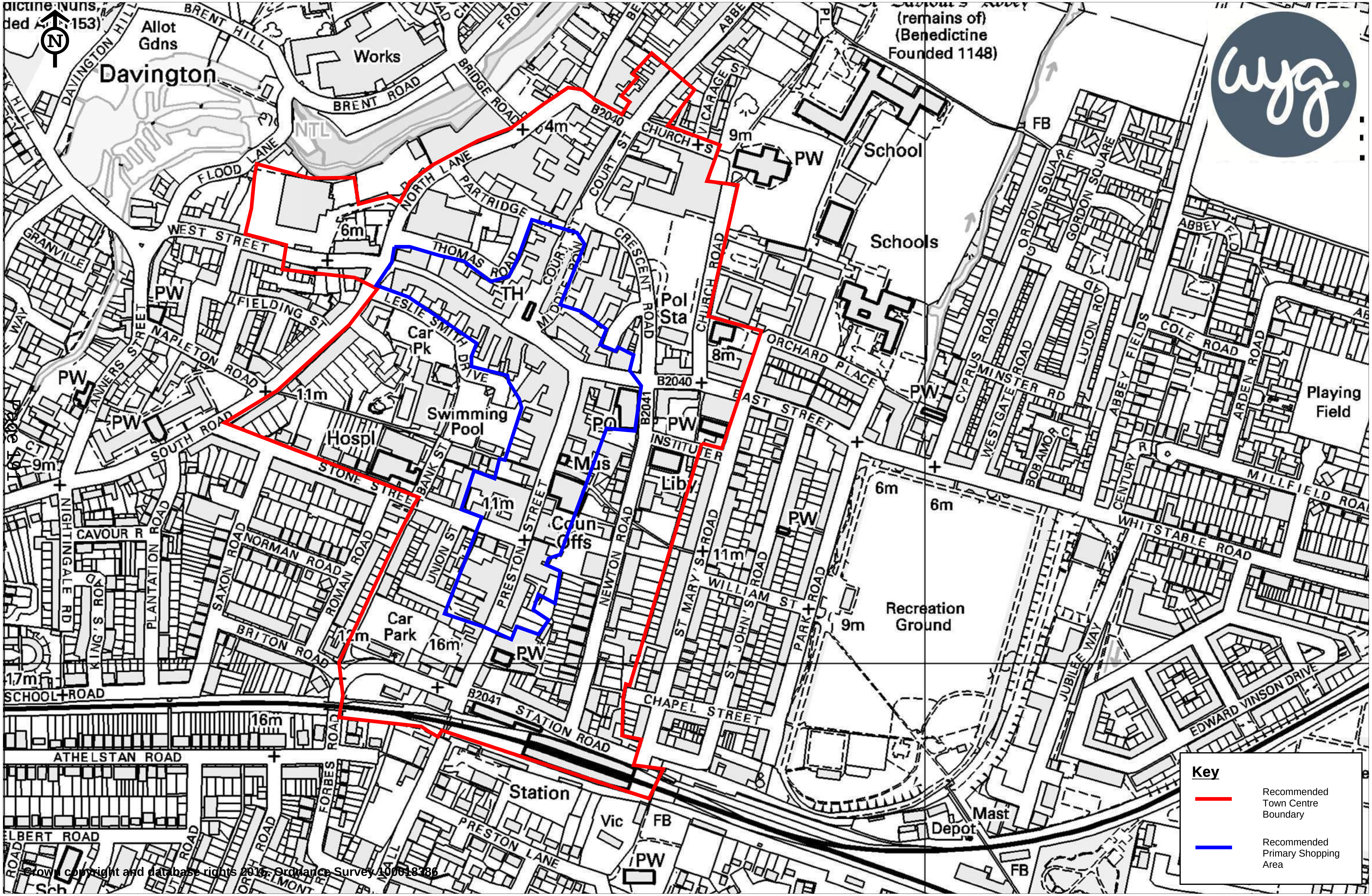
Sittingbourne Town Centre

Scale: NTS



Faversham Town Centre

Scale: NTS

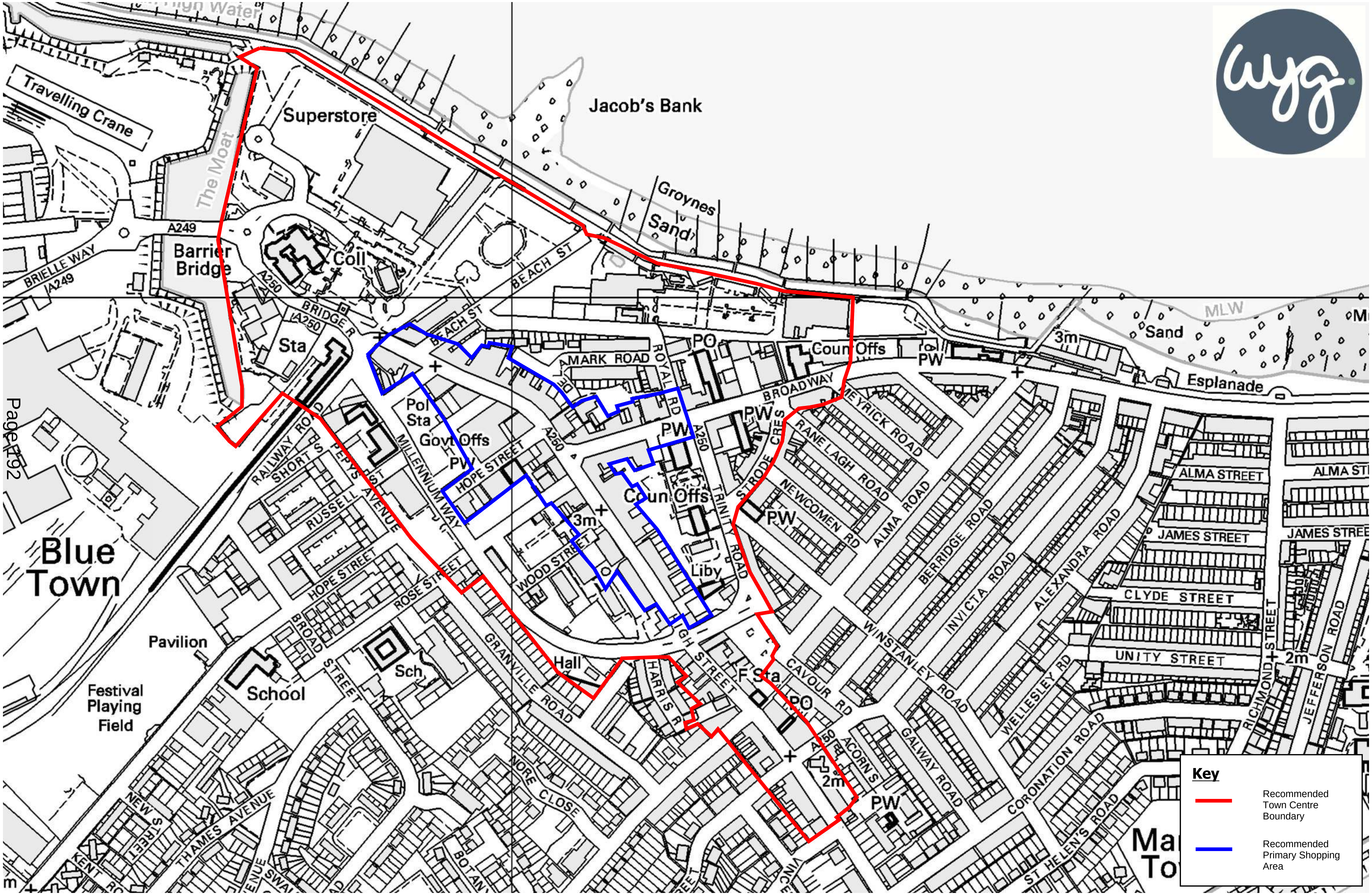


Key

🟥 Recommended Town Centre Boundary

🟦 Recommended Primary Shopping Area

Sheerness Town Centre | **Scale: NTS**



Local Plan Panel Meeting	Agenda Item:
Meeting Date	14 March 2019
Report Title	Considering the role of new garden communities within the Local Plan Review
Cabinet Member	Cllr Gerry Lewin, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Gill Harris
Key Decision	Yes
Classification	Open
Recommendations	That the Panel is requested to: (a) Note the draft technical assessment material in Appendix I and II and agree its finalisation and publication; (b) Recommend to Cabinet that work on new garden communities continue in order that their position be considered as a potential option(s) for the Local Plan Review process; and (c) Consider whether to recommend to Cabinet a resolution on new garden communities for decision making purposes.

1 Purpose of Report and Executive Summary

1.1 The Council has been considering the role that new garden communities, in particular, ‘garden’ communities, should play in the Local Plan review. It has tested the appetite from landowners and developers via its own Prospectus and this has led to the submission of four proposals. At the same time, early community views were sought, via the document ‘*Looking Ahead*’ (reported to Panel in September 2018), on the general role that new garden communities might play in meeting Swale’s future development needs. The submitted schemes have been subjected to on-going enquiry and technical assessment and this report presents the current state of this work undertaken by officers and consultants PBA and LUC (included as Appendix I and II). The report seeks, in effect, a steer on whether work on new garden communities should continue.

1.2 The early steer sought by this report is necessary because:

- This work stream is a significant resource, both for planning policy and, potentially, corporately and thus it is prudent to check progress and to avoid unnecessary work;
- There are considerable lead in times involved and work needs to be progressed early; and
- There is a need to send appropriate signals to landowners and developers to give them confidence to make further potential investment.

1.3 The report considers the risks and opportunities associated with pursuing new garden communities in Swale. Whilst the technical assessments (Appendix I and II) highlight some risks, opportunities and uncertainties, there are no concerns at this point that are of such severity as to cast sufficient doubt on the concept of new garden communities in Swale as a reasonable alternative. Instead, the matters identified, some of which are important, are for further evaluation and future management.

1.4 Although the technical assessments are fairly site specific, Members are not being asked to consider and resolve the future of any specific scheme at this stage; rather they are asked to draw upon the draft assessment to consider in a broader, more conceptual fashion, their overall capabilities in terms of their likely suitability, implementation and delivery.

1.5 In view of the technical assessments, the report asks the Panel to recommend to Cabinet that work on new garden communities continue and that in due course their progress would be considered in the context of a potential alternatives/option(s) for the Local Plan Review, which would then be subject to wider consultation.

1.6 Members are also being asked to consider whether to recommend to Cabinet a specific resolution that would give the new garden communities the status of a ‘material consideration’ in decision making.

1.7 If the recommendations are agreed, officers will continue to undertake assessment work and present a further report to a Panel meeting in the summer, which will seek Members views in respect of all the possible spatial development options that should be considered by the Local Plan Review. These in turn will form part of a future document presented to Members that would, if agreed, be subject to public consultation in autumn/winter 2019.

2 Background

2.1 Since commencing their Local Plan review, Members have wished to ensure that all reasonable alternatives are being considered to meet the challenges ahead – most notably those associated with higher housing targets and difficult transport and air quality conditions, particularly on the A2. One of the matters that have been considered is the possibility that new communities, particularly those planned on ‘garden’ principles lines, could have a role to play. Government is particularly encouraging local authorities to explore their potential (NPPF para. 72c).

2.2 The Council’s explorations of new garden communities have so far included:

- A Member workshop in November 2017.
- Consideration of the report prepared by consultants PBA ‘Choices for Housing Growth’ February 2018.
- Publication of a Swale New Garden Communities Prospectus April 2018, which set out the Council’s expectations if new garden communities were to be considered. The Prospectus intended to establish whether landowners and developers had the appetite to propose new garden community proposals for consideration as part of the Local Plan process.
- Community consultation via ‘*Looking Ahead*’ in April-June 2018 (See Section 5).
- Workshops with landowners/developers, infrastructure providers, environmental and heritage bodies, rural organisations in April-June 2018.
- A Member Q&A session with the Prospectus promoters, September 2018.
- Specific responses from key organisations.
- A Member coach tour to Cambridgeshire, to view new community examples, at the start of October 2018.

2.3 The Prospectus ‘call for sites’ produced four proposals (submissions available via these links):

1. SE Sittingbourne: 618 ha, circa 11,500 homes (inc. 10% affordable housing), 120,000 sq. m commercial space, community uses (local retail space within 4 district centres), GP surgeries, education (up to 4 primary schools, secondary school, possible FE), sport and leisure, natural and semi-natural open space and amenity greenspace. New motorway junction and M2/A2 link road to be provided.
2. Bobbing: 226 ha, circa 2,500 homes (up to 40% affordable housing), 100 ha of open space, community facilities including primary school, health centre, local centre, village hall and sports pitches, 3 ha of employment floorspace, stopping up/re-alignment of Sheppey Way. *NB it is understood that these proposals are currently being revised and will be subject to further assessment moving forward*.
3. SE Faversham: 131 ha, circa 2,500 homes (inc. aim for 40% affordable housing), up to 20,000 sq. m of commercial space. Community uses (4 local centres, health centre), education (primary school), sport and leisure (inc. possible relocation of cricket club and football ground), network of habitats, spaces.
4. North Street, Sheldwich, Faversham: 317 ha, circa 5,000 homes (a ‘strong emphasis’ on affordable housing). No precise details, but indicated as additionally included employment provision, a High Street for retail/mixed use and market hall, primary and secondary school, community uses, allotments, community orchard, playing fields and areas, together with open space and woodland. Re-alignment of the A251 through the site is indicated, together with improvements at J6.

2.4 The submissions made to the Prospectus have also been included in the Members Room for information.

2.5 In November 2018, a bid was submitted by the Council to join the Government's Garden Communities Programme. If successful, it will secure extra resources to support the assessment of schemes and, if appropriate, delivery of them. A decision is currently expected at the end of March 2019.

2.6 There have also been early explorations as to how such a major process would be managed and resourced in terms of the Council's various corporate, plan making and decision making roles. The decision made in respect of this report is important in determining whether this work will continue, but also because the lead in times for the delivery of schemes is significant and as a signal of confidence to landowners and developers about the investment needed to evidence their proposals.

2.7 Some canvassing on the role of new garden communities was gathered from the 2018 '*Looking Ahead*' consultation and its associated questionnaire (See Section 5). However, as at this point, the focus in this report is upon the reasonableness, realism and deliverability of new garden communities in Swale, as opposed to the views of existing local communities on possible locations. If the Council were to move further forward, then a number of such consultation opportunities will be available and will be an essential part of the process (See Section 5) before any final decisions are reached.

2.8 Of the submitted Prospectus schemes, officers and consultants have been engaged in a number of additional activities intended to inform the preparation of a draft assessment. These have included:

- Significant dialogue with the scheme promoters to obtain further information and clarification and to bring the schemes to a point where they can be assessed on a reasonably level playing field, whilst recognising that some schemes are more developed than others.
- 'Challenge' questions to promoters about claims made within their submissions.
- Formal interviews/meetings with scheme promoters.
- Dialogue with environmental, utility and infrastructure providers, both about individual schemes, but also their potential cumulative impacts.
- Broad landscape and visual analysis reports undertaken by consultants LUC (see Appendix II).

2.9 Members also took part in a presentation and Q+A session with the scheme promoters in November 2018.

The Technical Assessments (Appendix I and II)

2.10 Consultants have been supporting the Council during this process. Appendix I includes a draft assessment and appendices, prepared by PBA and officers, which outlines the opportunities and risks associated with the pursuit of new garden communities in Swale. This has also been informed by interim landscape work undertaken by Land Use Consultants (included as Appendix II).

2.11 These assessments will be part of an iterative process. Members will no doubt have views upon the work as will scheme promoters, who will be encouraged to respond to the issues being raised.

2.12 The PBA work comprises a main report, which flags up the main common themes and big issues affecting the submitted schemes, before making a series of recommendations, whilst in an Appendix, PBA consider, via a matrix, the progress being made from the scheme promoter responses to each of the questions posed by the Council's Prospectus. PBA will be present at the meeting to outline their work and answer questions arising.

2.13 To support PBA and the Council, Land Use Consultants were asked to specifically consider landscape sensitivity around the four submitted schemes. Their site reports are included as Appendix II. All the schemes raise landscape issues which will need to be responded to by the scheme promoters. Two schemes – NS1 at SE Sittingbourne and NS5 at North Street, Faversham have issues that will need particular attention. These relate to their presence either within and/or within the setting to the Kent Downs AONB and because of other wider landscape (inc. biodiversity) impacts. These issues arise not only because of their location, but because of the unprecedented scale of them and the potentially challenging opportunities for mitigation.

2.14 The PBA work confirms that the process has successfully encouraged schemes which could, if promoted by the Council, make a significant contribution to meeting the future needs of Swale. The process has also had benefits both to the Council and promoters, both in terms of learning and because it has enabled issues to be explored which are not usually possible as part of the normal plan making process.

2.15 The PBA assessment identifies a number of cross-cutting themes as needing to be further developed across the schemes:

- Commitment to garden community principles and design principles with a need to embed them into schemes.
- A need to provide more detail and realism on lead in times and overall timescales, alongside exploring how to speed up delivery, including in relation to boosting delivery beyond the volume housebuilder options including affordable housing provision, private rented, custom build and encouraging SME local housebuilders.
- A need to respond to the LUC findings and conclusions and to specifically address the issues raised provisionally by the Kent Downs AONB Unit.
- A need to address the long term stewardship of community assets, their maintenance and management.
- More and continued engagement with local communities, all stakeholders and interested parties.
- Clarification of site boundaries and how these may need to be adjusted.

- The need for a detailed formal response on transport issues and other infrastructure and utility issues, as well as needing to address any transport modelling conclusions.
- The submission of detailed viability information that can be then tested.

2.16 Considering the opportunities and risks for the schemes themselves, the PBA work identifies a number of matters, but to assist Members, Table 1 below presents officer's simplified summary of the more 'bigger ticket' items.

Table 1 SBC assessment of major scheme opportunities and risks

Scheme	Opportunities	Risks/uncertainties
NS1 SE Sittingbourne	• Transformational housing, employment and community facility offer. • Area wide transportation changes.	• Challenging delivery model for major infrastructure and build out trajectories. • Affordable housing offer. • Environmental challenges.
NS3 Bobbing	• Significant uplift of community and employment provision for existing community. • Some localised transport relief to village.	• Junctions on the A249/M2J5. • Location of open space. • Integration with existing community.
NS4 SE Faversham	• Strong design and community engagement ethos. • Strong mixed use emphasis.	• Junction 7 of M2. • Viability yet to be demonstrated. • Possible pace of delivery.
NS5 North Street, Sheldwich	• Significant uplift of community and employment provision for existing community. • Some localised transport relief to communities.	• Junction 6 of the M2 and A251. • Environmental challenges.

2.17 In their conclusions, PBA consider that all the proposals carry opportunities as well as risks, some of which could present difficulties if not addressed, but all provide the prospect of delivering benefits to Swale and its residents, be it in the form of new market and affordable housing, improved transport access and air quality, employment opportunities and social and infrastructure needs. In other words, there are no 'showstoppers' at this stage. If the Council proceeds with the schemes into the Local Plan process, there will though inevitably be a future decision making balance to be struck between the benefits arising and any adverse environmental impacts which have not been adequately mitigated.

2.18 PBA further conclude that the assessment process has allowed the Council to identify the issues associated with each proposal which will need to be addressed going forward. This will allow the Council to commission further work and hold discussions with each of the promoters to address the key issues, opportunities and risks that have been identified.

2.19 PBA's recommendations to the Council include that:

- Work is progressed and discussions continue with the promoters to further clarify and remove the potential risks identified in this assessment.
- The use of a resolution recognising that the broad locations will be a material consideration in any development management decisions on surrounding land.
- Detailed viability assessment of each of the proposals to be undertaken.
- Scrutiny of trajectory and market capacity as well as exploration of what interventions can be used to increase the rate of delivery as well as the type of homes provided.
- Early masterplanning support to explore the most appropriate layout in relation to the landscape, sensitive locations and relationships with existing communities, which is then followed up with the use of SPD or masterplan in due course to direct design parameters of any preferred options.
- Further work is undertaken to understand the implications of proposed jobs numbers, employment land issues relating to cross boundary issues of commuting, labour supply and competition implications within the context of the overall job numbers and how the Local Plan should address this.
- Continued liaison with stakeholders and technical consultees, particularly relating to transport issues.
- Clarification about the delivery of Northern Relief Road as part of the NS1 proposal or how it is achieved separately, but before the completion of NS1.
- A Utility working group is established to address cumulative issues and timing.
- Dedicated engagement support to achieve sustained community involvement in the concepts and through to their development.

Members consideration of the Technical Assessments

2.20 Despite the site specific nature of much of the PBA/LUC work, the decision requested by this report is not about the merits of individual schemes or locations. At this stage, Members need only draw on the submitted schemes and the technical assessment in so far as necessary to enable consideration of new garden communities in a broader, more conceptual fashion, having regard to their overall capabilities in terms of their likely suitability, implementation and delivery.

2.21 In due course, all of the Council’s strategic alternatives for addressing development needs will be subject to environmental assessment regulations and guidance via its Sustainability Appraisal. For this process, any alternative being considered will need to be ‘reasonable’. Even though Members are not formally considering a specific spatial alternative at this point, it is sensible to approach the decision required for this report on the same basis, i.e. whether new garden communities conceptually are an alternative that is reasonable for the Local Plan to consider? Reasonable alternatives are defined through regulations and guidance as the different realistic options considered by the plan-maker when developing the policies in its plan. Any alternative should be sufficiently distinct from possible others to highlight the different sustainability implications of each so that meaningful comparisons can then be made. Any alternative must also be realistic and deliverable.

2.22 At this point Members are only considering the role of one possible alternative approach, but, in due course, the full range of Local Plan reasonable alternatives will be identified and assessed via the process of preparing a Sustainability appraisal (inc. a Strategic Environmental Assessment) of the Local Plan. It is intended that there will be a Panel meeting in the summer where Members will be asked to provide officers with a steer on the inclusion of the all the alternatives that they intend to consider, which, in turn, will be informed by an initial Sustainability Appraisal. These alternatives are likely to be more geographically specific.

2.23 So the question to firstly consider at this is point is whether new garden communities are a distinctive alternative? Drawing upon the draft assessment and principles long established by the Town and Country Planning Association (TCPA), new garden communities can be tested distinctly from other alternatives due to their principles. Their fundamental point of difference to other spatial development alternatives like urban extensions, brownfield regeneration or village dispersal, is their aim of curbing urban sprawl and avoiding the incremental extension of existing settlements. These are sometimes critiqued as eroding the quality of life for existing communities and placing strain by the accumulating demands of new residents on existing physical and community infrastructure.

2.24 Although other development alternatives can potentially replicate elements of new garden community principles, in general, new garden communities can be viewed as distinct by the way firstly that land is assembled and then in the way that they are then planned. Reference to the TCPA principles demonstrates this distinctiveness. Whilst individual schemes may challenge some of these distinct qualities, these are matters for consideration later, but at this point, it is sufficient to conclude that new garden communities are a distinct alternative.

2.25 The second question for Members to consider is whether new garden communities are reasonable? As part of this, Members should also consider whether they could potentially be realistic and deliverable in Swale. Planning Guidance advises that to do this, consideration should be given to their suitability, availability and achievability (inc. viability and deliverability). It will ultimately be the task of the Council’s Strategic Housing Land Availability to determine this for purposes of potentially allocating any given new settlement, but for this report, the paragraphs below provide some comment as to the suitability, availability and achievability of new settlements in the Swale context.

2.26 **Suitability**: Although this would need to be further tested, the work undertaken by PBA in its February 2018 ‘Choices for Housing Growth’ report indicated that there was high level evidence to illustrate that there was sufficient land outside of the ‘big hitting’ national constraints (e.g. AONB/SPA/SAC/SSSI) that could physically accommodate options for new communities. This does not mean that there are no constraints within these areas that might be determined as problems at a future point, or that there may not be some issues affecting the national constraints, but they may equally be matters which are capable of acceptable mitigation. Many such issues are not unique to new garden communities.

2.27 At this moment in time, the PBA technical assessment, whilst highlighting issues that might impact upon the detailed consideration of a location's suitability later in the process, does not indicate 'showstopper' suitability constraints of such significance as to stop the consideration of new garden communities now. Instead, they are matters for further assessment and for scheme promoters to action and respond to.

2.28 Given the landscape and visual evidence impacts associated with two of the schemes, officers have specifically considered whether they indicate a 'showstopper' at this point. However, these are matters not affecting Members decision at this point as they are site specific matters. However this is not to say that if left unattended by the scheme promoters, they may not have the potential to become significant matters at a later date. However, although these are matters for later further consideration, officers and PBA take the view that these are matters that the scheme promoter's should particularly note and give attention to as they move forward.

2.29 The findings of Local Plan transport modelling may also present challenges for any scheme (new community or not). However, this has yet to be determined. In addition, and as with other issues, it is too early to indicate the extent of the challenge for new garden communities as a spatial alternative, without first determining the degree to which public transport, junction and other interventions are able to address any issues that the model may throw up. Again, these will be strong markers for further work.

2.30 One site specific matter that will be further considered, should the Council agree the recommendations in this report, are the suitability of the boundaries to the submitted sites (the 'red lines'), i.e. whether boundaries properly reflect the relationship with nearby settlements and/or whether they appropriately respond to constraints and any potential need for mitigation. There are specific risks associated with the fact that scheme promoters have no control over adjacent land that could otherwise be subject to their own development pressures and also whether there is sufficiently adaptability within proposals that can enable their site boundaries to flex in response to changes that might be required. It is clear from the technical assessment that these issues will require further discussions in the coming months.

2.31 **Availability**: The Council's Prospectus has established that sites are available, with willing landowners and developers.

2.32 **Achievability**: This will ultimately be dependent upon individual schemes, although it is clear that nationally new garden communities are delivering, albeit some are having difficult starts. The key issues in Swale (and elsewhere) is whether they can deliver at the point in time and at the rate that they originally envisaged, or whether they would be affected by delays in infrastructure and utility provision. The technical assessment has raised a number of infrastructure delivery challenges facing all of the schemes, although these are matters for scheme promoters to now address; rather than as 'showstoppers' at this stage to the principle of new garden communities. A related matter that will also require further work will be on the timing of their delivery and the rate at which housing can be delivered each year. An over-optimistic forecast of delivery will leave the schemes (and the Council) vulnerable to challenge from other developers, whilst schemes that might not deliver until much later in the plan period might leave gaps in the early years of the land supply.

2.33 To demonstrate achievability, viability also needs to be considered. Currently it is known from the assessment process that schemes have come forward in the more viable parts of the Borough. As a result, all scheme promoters are currently claiming positive viability and at this stage there is no evidence to suggest that new garden communities will be unviable in Swale. However, viability is an evolving process likely to involve assessments at each key stage and as such the evidence so far can only be regarded as a high level snapshot, which will need further analysis before any decisions about the allocation of a given location is made (as will in fact be the case for all such allocations).

Conclusions

2.34 Officers agree with the broad assessment and recommendations made by both PBA and LUC. Whilst overall the technical evidence and the above assessments shows a need for much further work, there is no overwhelming reason revealed at this stage as to why work on this alternative (or any of the schemes themselves) should end now in principle; furthermore, the PBA assessment has sufficiently shown that new garden communities are a reasonable alternative that is both distinct and potentially suitable, available and achievable.

2.35 The risks identified are those that could materialise further down the line – both generic, as outlined in para. 2.15 and site specifically set out in Table 1. Progress will be needed in a number of areas before final decisions can be made.

3 Proposals

3.1 The Prospectus process has shown that new garden communities in Swale have the potential to be a distinct alternative from others that might be identified and that the risks identified, both conceptually and within the schemes themselves, do not amount to being potential showstoppers to the process in principle at this point. As a result, new garden communities conceptually are potentially suitable, available and achievable. Members are therefore asked to agree the recommendation that will enable work by both the Council and scheme promoters to continue.

3.2 Members are also requested to note and agree the finalisation and publication of the assessments in Appendix I and II.

Next steps

3.3 There will be further opportunities to consider the specifics of the locations in question, potentially, firstly at the Panel meeting in the summer and again in the autumn. As yet, no account has been taken of the views of local communities, some of whom, as revealed by the '*Looking Ahead*' consultation, are very unreceptive to the idea of new garden communities (see Section 5).

3.4 In the meantime, officers will continue to work with scheme promoters and also explore the corporate issues that could arise should one or more new garden communities ultimately be allocated by the Local Plan.

3.5 Promoters of the schemes will be expected to respond to the Council's technical assessments and will be invited to amend their submissions before consideration by the Council in the summer.

3.6 So what might Members reasonably expect new garden community promoters (and officers) to have achieved at key points in the Local Plan process (subject to the recommendations in this report and others at later stages)?

3.7 Table 2 below tentatively sets out some broad indicative milestones that Members might expect to be in place at key points, assuming any scheme in question is still 'in the frame' at the point in question. Hopefully this will help Members visualise the process and give the promoters a guide as to what might be expected by a given point.

Table 2 Milestones and expectations for new garden community schemes in the Local Plan process

Topic	Summer 2019 steer on spatial alternatives	Autumn 2019 agreement to spatial alternatives consultation	Pre-submission stage of Local Plan winter 2020
Master Planning	• Outline timetable for master planning in place.	• Master Planning work commenced, with supporting evidence and strategies (see below).	• Draft master plan in place informed by published strategies (see below).
Transport (inc. air quality)	• Promoters in dialogue with transport and air quality bodies. • Outline timetable for preparation of evidence in place leading to ultimate preparation of relevant strategies.	• Modelling shows 'no showstoppers'. • Transport and air quality interventions identified. • Transport and air quality strategies commenced to inform master plan.	• Draft bespoke new garden community transport and air quality strategies in place. • Statements of common ground with transport authorities and Council and other local authorities if necessary.
Site boundaries	• Boundary issues identified and discussions with promoters ongoing.	• Indicative site boundaries drafted.	• Final boundaries to allocations addressed.
Environmental mitigation	• Promoters in dialogue with main environmental bodies. • Outline timetable for preparation of evidence in place leading to ultimate preparation of	• Mitigation proposals that responds to constraints. • Commencement of biodiversity strategy to inform master plan. • Commencement of landscape strategy to	• Statements of common ground with environmental bodies. • Bespoke new garden community biodiversity strategies in place to achieve net gains in

Topic	Summer 2019 steer on spatial alternatives	Autumn 2019 agreement to spatial alternatives consultation	Pre-submission stage of Local Plan winter 2020
	relevant strategies.	inform master plan.	biodiversity supporting overall master plan. • Bespoke new garden community landscape strategies in place supporting overall master plan.
Housing	• Initial delivery trajectories emerging.	• Delivery trajectories confirm meaningful housing contribution within plan period and contribution to overall spatial alternative and housing target.	• Bespoke garden community housing trajectories in place. • Mix and type of housing agreed. • Strategy to manage risks to delivery and housing type in place supporting overall master plan.
Economic	• Promoters in discussion with economic stakeholders. • Outline timetable for preparation of evidence in place leading to ultimate preparation of relevant strategies.	• Economic studies demonstrate deliverability and scope of Duty to Co-operate discussions (if necessary). • Employment quanta agreed. • Supporting economic strategy being prepared.	• Mix of employment agreed. • Statement of common ground if necessary. • Bespoke new garden community economic strategies in place supporting overall master plan.
Community infrastructure	• Initial discussions with providers taken place.	• Social community infrastructure identified.	• Bespoke community infrastructure delivery plans in place supporting overall master plan.
Utilities (inc. water)	• Initial discussions with providers taken place. • Outline timetable for preparation of evidence in place leading to ultimate preparation of relevant strategies.	• No utility showstoppers. • Commencement of utilities strategy (inc. water cycle strategy) to inform master plan.	• Bespoke new garden community utility delivery plans in place supporting overall master plan.
Green	• Initial discussions with	• Green infrastructure	• Bespoke new garden

Topic	Summer 2019 steer on spatial alternatives	Autumn 2019 agreement to spatial alternatives consultation	Pre-submission stage of Local Plan winter 2020
Infrastructure	key stakeholders. • Outline timetable for preparation of evidence in place leading to ultimate preparation of relevant strategies.	strategy preparation in progress to inform master plan.	community green infrastructure strategies in place supporting overall master plan.
Heritage	• Initial discussions with key stakeholders. • Outline timetable for preparation of evidence in place leading to ultimate preparation of relevant strategies.	• No heritage 'showstoppers' identified. • Heritage strategy in preparation.	• Bespoke new garden community heritage strategies in place supporting overall master plan.
Design	• Agree approach to securing design standards and their control. • Scope design codes/housing manual. • Initial discussions with key stakeholders.	• Design codes or similar under preparation.	• Bespoke design codes or similar in place supporting developer agreements and overall master plan.
Health	• Initial discussions with key stakeholders. • Outline timetable for preparation of evidence in place leading to ultimate preparation of relevant strategies.	• Health strategy preparation in progress to inform master plan.	• Bespoke new garden community health strategies in place supporting overall master plan.
Community Engagement	• Outline table for programme of community engagement.	• Community engagement strategies in place. • Meaningful community engagement commenced.	• Bespoke new garden community statements of community involvement in place supporting overall master plan.
Delivery model	• Appropriate delivery vehicle identified.	• Delivery vehicle structure and terms of reference agreed.	• Delivery vehicles in operation.
Stewardship model	• Appropriate stewardship vehicle identified.	• Stewardship vehicle structure and terms of	• Stewardship bodies in place with draft

Topic	Summer 2019 steer on spatial alternatives	Autumn 2019 agreement to spatial alternatives consultation	Pre-submission stage of Local Plan winter 2020
		reference agreed.	business plan in place.
Viability	• Timetable for viability checks determined.	• Independent review of viability under-way.	• Viability of schemes confirmed.
Development standards (inc. sustainability)	• Timetable established to determine deliverability of Prospectus standards.	• Confirmation of standards to be adopted by scheme promoters. • Energy strategy under preparation and informing master plan.	• Council agrees standards to be applied as part of Master Plan (inc. resources (inc. energy) strategy).
Prospectus	• Submissions refreshed in the light of 2018-19 assessment process.	• Any final Prospectus submissions made.	• Council satisfied as to whether schemes meet garden community principles as far as practically possible.
Sustainability Appraisal decision making (undertaken by SBC)	• Interim draft SA	• SA of spatial alternatives for consultation.	• SA of preferred option.
Overall decision required by Council	• Steer on whether new garden communities should be part of spatial alternatives process.	• Agreement to locations and new community headlines as spatial alternatives.	• Council agrees its preferred option on the basis that the adverse impacts of proceeding would significantly and demonstrably outweigh the benefits. • Council agrees to new garden community policy wording and boundary to allocation(s).

3.8 Before the Local Plan is submitted for Examination (in whatever form it emerges), there may be issues that arise in respect of planning applications being submitted in the areas within or close to the proposed new garden community sites which may prejudice the Council’s consideration of the new community and/or the proper planning of the area. There may therefore be merit in the Council considering a resolution to guide decision making. Such a resolution would:

a) Reinforce the importance of the Local Plan process as the means to lead the new community process;

b) Set out the position to those who may seek to pre-empt the process or the ability of the Council to identify the most appropriate site;

c) Ensure that the most appropriate boundaries for new garden communities is properly considered and not prejudiced by other landowners and developers; and

d) Send a clear message to landowners and the development industry about expectations both within and beyond the submission areas.

3.9 The Panel could therefore consider recommending to Cabinet a resolution as follows:

"The Council is assessing the potential of new garden communities in Swale via its Local Plan review. Although the review is at an early stage, the ability to bring forward new garden communities in a comprehensive may be an important feature. Both the Council and those promoting new garden communities are investing considerable effort in assembling evidence and positively engaging to demonstrate whether proposals could form part of the Local Plan strategy. To this end, until the next Local Plan is adopted or the Council has dismissed a new community in the relevant location, the Council will consider the schemes submitted to and accepted as part of the Council's New Garden Communities Prospectus as material considerations (but in the clear context of a Local Plan led process) when considering planning applications on or around these sites."

3.10 Members are asked to consider whether to recommend to Cabinet that the above resolution (or other wording as agreed) is made.

4 Alternative Options

4.1 Members could agree at this point not to progress new garden communities in principle in the Local Plan review. Clear reasons would need to be given as to why such an approach was not reasonable. This is not recommended, as explained in the report; the case for their continued inclusion and assessment is clear and would not support this alternative view. Such a decision would also be premature without the full picture that would be offered by the completion of the entire evidence base, including the Strategic Housing Land Availability Assessment and Sustainability Appraisal.

4.2 Members could determine to reduce the number of schemes. This would be premature as it would potentially rule out sites before the Council has determined the full extent of the development challenges and the key evidence (see above) that will need to be in place before it decides on which sites that it will need to allocate. In any event, there would be insufficient evidence to rule any scheme out at this stage and such a decision would risk challenges further down the line to the Council's approach.

4.3 Members could also decide to defer their decision. However, not providing even a high level steer at this point risks losing valuable time in terms of further assessment work and in giving scheme promoters the necessary confidence to also progress their work. Given that there are several points remaining in the process where Members will be able to review their decision, deferral is not considered necessary and would only serve to make the Council less well prepared should it subsequently agree to take specific new garden communities forward for consultation.

4.4 Finally, Members could decide not to recommend adoption of the resolution from paragraph 3.9 above. A resolution would be no guarantee of securing a decision in the way the Council wished, however, it could help mitigate against the views that the possibility of new garden communities in Swale should be given no weight in decision making due to the early stage of the Local Plan process, or the possibility that scheme promoters themselves may choose to prematurely submit their planning applications. Even if the Council does not proceed with new garden communities at all (or some and not others), it is highly likely that some of the scheme promoters will continue to pursue their proposals via the Local Plan process, or failing this planning applications.

5 Consultation Undertaken or Proposed

5.1 Other than via the 'Looking Ahead' consultation, there has to date been no Council led community consultation on new garden communities. Some consultations have taken place with landowners, developers, infrastructure and utility providers, environmental and rural bodies.

5.2 Some scheme promoters have already, or intend to, undertake their own community consultations.

5.3 Should in due course the Council proceed with this spatial alternative, then it is likely that bespoke consultation events will be necessary to support the general Local Plan consultation that would be otherwise done. Such events would be required from autumn/winter 2019 onwards.

5.4 It is envisaged that individual community engagement strategies for the proposals would be prepared, with statements of community involvement prepared by the time the Local Plan is submitted.

6 Implications

Issue	**Implications**
Corporate Plan	Supports the Council's corporate priorities for delivering regeneration and delivering improved quality of life.
Financial, Resource and Property	New community work related to the Local Plan is funded from within the Local Plan budget. However, if work progresses this may place additional demands upon the budget. Although the Council has made a bid for support to the Government's Garden Communities Programme, the Council may need to consider further resources to support both its plan making and corporate responsibilities on this issue. Planning Performance Agreements are being sought from the submitters to support the Council's costs towards considering their schemes through the Local Plan process.
Legal and Statutory	The Local Plan is prepared under the Planning and Compulsory Purchase Act 2004 (as amended); and in accordance with the Town and Country Planning (Local Planning) (England)

	Regulations 2012 (Statutory Instrument 2012 No.767) (as amended by SI 1244, Dec 2017).
Crime and Disorder	None anticipated at this time.
Sustainability	The Local Plan process will be subject to Sustainability Appraisal at key stages.
Health and Wellbeing	None at this time.
Risk Management and Health and Safety	None anticipated at this time.
Equality and Diversity	The Local Plan process will be subject to a Community Impact Assessments at appropriate points.

7 Appendices

7.1 Appendix I: Draft Peter Brett Associates Initial Assessment of New Community Proposals.
Appendix II: Land Use Consultants Landscape assessment and recommendations.

8 Background Papers

8.1 Choices for Housing Growth, PBA February 2018, New Garden Communities Prospectus SBC April 2018.

8.2 New Garden Community Submissions (in Members Room).

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Swale Borough Council

New Garden Communities
Assessment of submissions

Peter Brett Associates
[Second Draft] February 2019

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For and on behalf of Peter Brett Associates LLP				

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CONTENTS

FIGURES

1 INTRODUCTION

1.1 Peter Brett Associates LLP (PBA), now part of Stantec, is working with Swale Borough Council (SBC) to assess the proposals submitted as a response to its New Garden Communities Prospectus. Following the issue of the Prospectus on 25th April 2018 and a workshop with landowners and developers, a two-stage process has been followed to gather proposals for new garden communities.

1.2 This started with Expressions of Interest submitted by 8th June 2018, at which 5 proposals were submitted. The second stage involved the final submission of detailed proposals by 3rd August 2018 for 4 potential new garden communities.

1.3 PBA and SBC have developed an initial assessment proforma using the Prospectus questions to assess each of the proposals. This involved identifying whether the response fully addressed the questions, the extent to which it represented a sound answer, what gaps exist, the extent to which the proposal is moving towards or away from the objective, and which issues are still to be addressed as well as highlighting any risks associated with the proposal.

1.4 The assessment was undertaken not to rank or score the proposals but rather to identify the key elements and to inform the setting of questions to inform discussions with each of the promoters.

1.5 This assessment is the first stage of a longer process which has included interviews with the scheme promoters and presentations by them to Council members. There has also been input from utility providers, Highways England and Kent County Council and the Kent Downs AONB Unit.

1.6 As will become clear, not all promoters are able to provide full answers to the questions posed in the Prospectus. But this is to be expected – providing technical evidence is expensive and, at the moment, there is no certainty that the Council will continue to consider new garden communities are part of the strategy going forward. Therefore, we need to take a balanced and proportionate approach as part of this assessment.

1.7 It is also the case that some key parts of the evidence base, most obviously the Boroughs transport model is not yet (at the time of writing) available to PBA or scheme promoters. Without this vital piece of evidence, it is impossible for promoters (or the Council) to assess the transport impact of their schemes and how best to mitigate them. We understand that the model will be available shortly. [Note this is not a criticism of the Council or their Transport consultants – the timetable for this work is driven by the Plan review and not the new garden community process].

1.8 In addition to this report, further work has been undertaken by Land Use Consulting, who have provided an overview of the landscape context and sensitivities of each of the proposals. Their work is referred to here but is published separately.

1.9 The aim of this report, and the ongoing evaluation process, is to assess whether the proposals are appropriate for further assessment and whether they are appropriate to be further considered via the Local Plan process. This is very different to the Council endorsing the proposals as part of the next plan strategy.

1.10 This balanced and stepped approach is helpful to the plan process because it allows the Council to shape and influence the proposals that may be put forward as candidate sites in the next plan. This is as opposed to the more conventional route whereby sites are offered as part of the plan process, at which point the Council has much less opportunity to influence them.

1.11 There is evidence that this process is providing positive results with a number of the proposals submitted already being amended following feedback. Most obviously two of the promoters have increased their affordable housing offer and a number have offered to amend their ‘red lines’ to increase the amount of landscaping / open space or provide a better potential settlement edge. Such an iterative process is much more difficult as part of the plan making process.

1.12 A further benefit has been the learning process for all parties. As some parties have begun to understand better the issues involved, their approach has adjusted positively, particularly around such matters as long-term stewardship and local delivery vehicles. Again, this is not something one would expect in the normal process of plan making.

1.13 While we provide some emerging conclusions, care is needed before treating these as final. As noted above, throughout this process, each prospective developer has responded in an iterative fashion to queries and flexed proposals as requested. There is also obviously a significant amount of further technical work needed to support the schemes. Very importantly, the Council will need to secure a firm commitment, including independently verified ‘open book’ viability assessments, confirming that what is being offered is achievable.

1.14 This report is structured as follows: chapter 2 considers the assessment process; chapter 3 the Garden Community Principles and design; Chapter 4 the other issues such as transport, infrastructure, delivery and viability, and chapters 6 to 9 summarise the individual proposals and the key issues, opportunities and risks associated with each one. Chapter 10 provides a general conclusion and Chapter 11 sets out our recommendations.

2 ASSESSMENT PROCESS

2.1 In this section we briefly outline the process that has been undertaken to date. The assessment of the proposals is covered in section 3 onwards that follows.

Stage 1 - Expression of Interest

2.2 In June 2018 5 'Expression of Interest'; proposals were received. These submissions responded to the Councils Choices for Housing Growth document and the associated 'prospectus' document.

2.3 These five expressions of interest were:

- NS1: South East Sittingbourne
- NS2: Land South of Rushehden
- NS3: Land at Bobbing, West of Sittingbourne
- NS4: South East Faversham
- NS5: Land at Ashford Road, South of Faversham

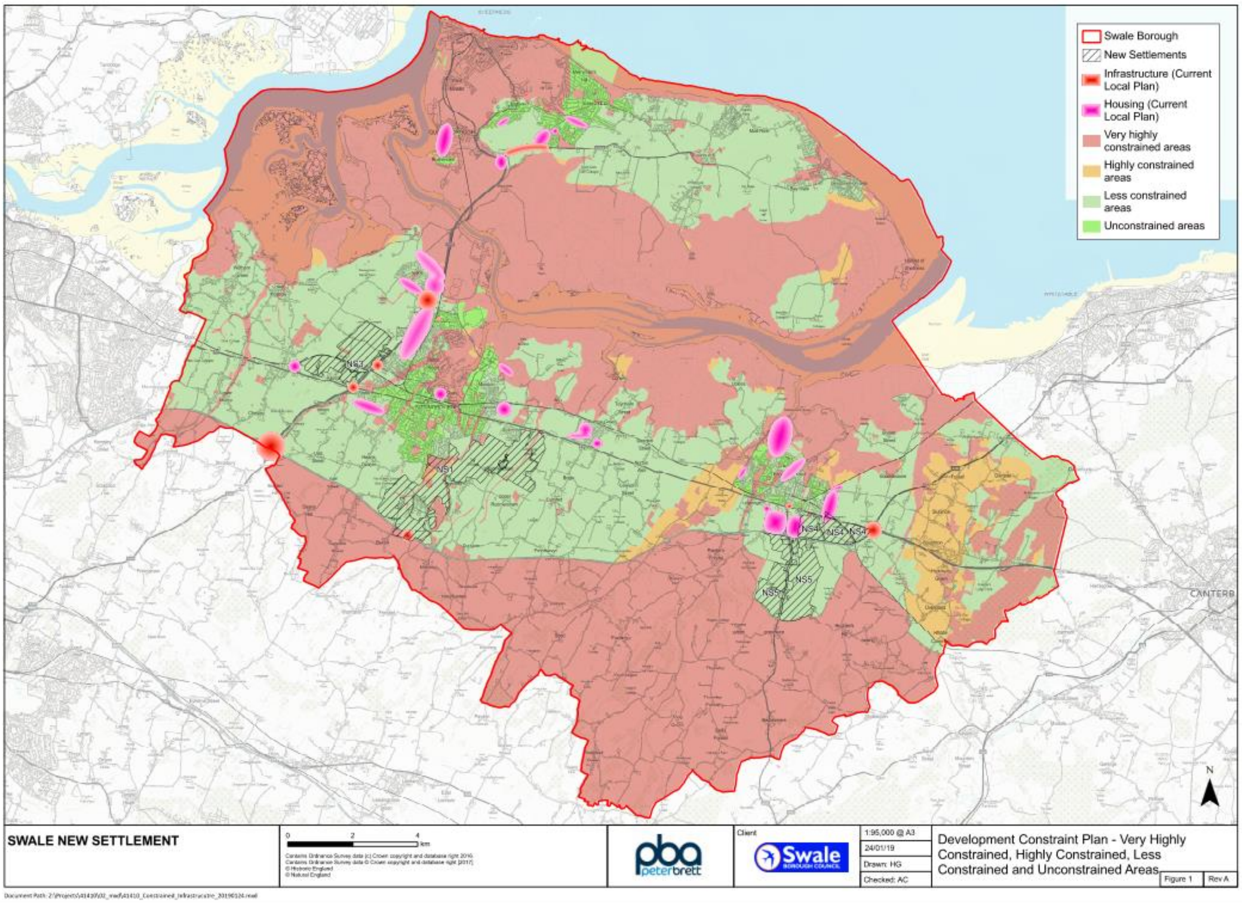
2.4 In addition, a few smaller sites were submitted but these were below the size threshold required to be considered as new garden communities. The Council advised those promoters to submit their sites as local plan candidate sites – outside this process.

2.5 Following initial feedback from the Council, four more detailed proposals were submitted by 3 August 2018.

2.6 While site NS2 was promoted at the Expression of Interest Stage no detailed submission was received. It was therefore considered to be withdrawn from this process and the promoters were advised accordingly.

2.7 We understand that the land in question may (in whole or part) be promoted through the normal plan making process. No inference concerning the merits of the land as a prospective local plan allocation should be drawn from the withdrawal of the land from this process.

Figure 1: New Garden Community Submission sites, constraints, housing and infrastructure



Note – Site NS2 is not shown.

Stage 2 – detailed submissions

Initial Review and Feedback

2.8 Following the receipt of the detailed submissions PBA, with the Council, undertook a rapid assessment of the information received.

2.9 Meetings with each promoter were held on 10th September 2018 with:

- DHA Planning on behalf of Crabtree and Crabtree Ltd
- Quinn Estates
- Duchy of Cornwall
- Gladman Developments Ltd

2.10 As part of these meeting gaps in evidence were identified and the site promoters given the opportunity to address these.

2.11 The prompters were also invited to present their proposals to Members in September 2018. Comments and feedback from Members has been used to inform the more detailed assessment process.

Detailed assessment

2.12 To guide the detailed assessment – which we report in the next sections of this report – we draw on the questions posed in the Prospectus document.

2.13 This sets out clear questions on a range of topics including:

- About the scheme
- About environmental constraints and opportunities
- About delivering the design principles
- About infrastructure

2.14 In the assessment, consideration has been given to each of the prospectus questions and the responses to them. The aim of the assessment has not been to rank the proposals or test how appropriate they are against a set of criteria. Rather the approach has been to understand what each can deliver, how this will be achieved, to identify the positive opportunities and issues that each face as well as any potential risks and questions that are raised by them. In the matrix the cells are coloured to represent the degree to which the question has been answered by the promoter so far.

2.15 A matrix was devised which sets out each of prospectus questions and indicates, the direction of travel of each proposal to achieving the objectives. A summary of the proposal together with comments are included within a table for each of the submissions. These matrix tables are included at Appendix 1.

3 GARDEN COMMUNITY PRICIPLES AND DESIGN

Introduction

3.1 The Council's Prospectus expects the proposals to create a development that is well designed delivering a superb environment in which to live, work and play. This means using the TCPA garden community principles as a general guide.

3.2 The principles mean that there are expectations that the development will need to be master planned, designed and plan-led to the highest standards to deliver a safe, secure, vibrant, inclusive, healthy and locally distinctive self-contained community, with local ownership of community assets. As part of this, the Council's own Prospectus vision is for meeting high standards of design that includes use of Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards.

- ***TCPA Garden Community Principles:***
- *Land value capture for the benefit of the community.*
- *Strong vision, leadership and community engagement.*
- *Community ownership of land and long-term stewardship of assets.*
- *Mixed-tenure homes and housing types that are genuinely affordable.*
- *A wide range of local jobs in the Garden City within easy commuting distance of homes.*
- *Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.*
- *Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.*
- *Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.*

3.3 It is essential that the 'garden community' is not just used as a label but is properly integrated into the design at an early stage to set the context for a landscape led approach which ensures the principles are taken through to the detailed design. The Government in their own New Garden Communities Prospectus is clear that "successful proposals will demonstrate how they are hard-wiring these qualities in from the start, supported by long term legacy and stewardship arrangements".

3.4 At this stage, three of the proposals commit to deliver development in line with the TCPA principles as their guide. An exception are the promoters of NS4 who have a strong and established model they have experience of delivering. This 'Poundbury' model is very similar to the TCPA and practically their preference is of little material concern.

3.5 From the detailed TCPA principles, we have identified a number of cross cutting themes. These are considered below and relate directly to the questions and objectives identified in the New Garden Communities Prospectus. They include:

- Land Value Capture
- Ensuring high quality design
- Promoting community stewardship
- Providing social and community infrastructure
- A wide range of jobs in the Garden Community
- Housing mix and affordability

3.6 In the next few sections we look at how the proposals have addressed the key elements of the TCPA principles.

Land Value Capture

3.7 One of the most important aspect of the Principles, which all four proposals apply, is that the significant infrastructure (social and physical) should be paid for from the value of the land ('land value capture') as opposed to be paid for as a 'residual' – i.e. after the landowner has taken full profit including 'hope value'.

3.8 The fact that these proposals (with the possible exception of NS4) are outside the current and well-established plan strategy, has allowed the sites to be assembled on the basis that, unless the schemes comply with the Prospectus, the land is only worth agricultural land value.

3.9 So, simply put, a landowner will accept a lower uplift over agricultural value per hectare because, in return they secure this lower uplift over more land. The 'gap' pays for the infrastructure. The Council has asked all four promoters to provide viability evidence to support their proposals going forward (see later).

Ensuing high quality design

3.10 High quality design is a key element of the Prospectus and one that the Council are keen to ensure is delivered as part of any new Garden Community.

3.11 All four promoters intend to deliver their schemes as 'master developers'. This should allow the promoter to control each land parcel as it is designed and subsequently delivered by later delivery partners. In essence the Master Developer 'signs off' each land parcel and undertakes responsibility for the delivered quality. It also allows the Master Developer to co-ordinate the delivery of infrastructure.

3.12 The Council, as the development management authority, only receives detailed applications for development where the Master Developer considers they conform to the agreed design specification and other relevant policies.

3.13 This Master Developer model is established and used elsewhere in the UK (for example at Alconbury, Cambs), but is not common because it generally only applies to very large schemes. In this case, not all the promoters appear to have extensive experience of delivering in this model. NS4 is the obvious exception.

3.14 It is the case that for three of the schemes (NS4 excepted) there is a lack of detail provided about how these design principles will be implemented and maintained throughout the life of the development. While there is some reference to the different standards raised in the prospectus, none of the proposals make a categorical commitment and there is no clear demonstration of how this will be achieved. More recent responses (NS1, NS3 and NS5) have referred to the use of Design codes.

3.15 This is an area of evidence three proposals need to better formulate and where further information will be required over time. Even NS4 that has its own model of ensuring design quality, will need further development.

3.16 Given that the four proposals promote the Master Developer model, we think it vital that the Council takes an active role in assisting with scoping the design principles as early as possible. At the development management stage it is much harder for the Council to influence good design and so the correct stage to ensure good design is at the plan making stage. This may include the Council working with the developers to draw up, and subsequently adopt as a development plan document, the design guidance to be applied later; either independently, or as part of the overall master planning process.

Promoting community stewardship

3.17 There is limited detail available about long term stewardship in all four proposals. So there are few specifics about how the built-out community will be managed by the new residents after the schemes are delivered.

3.18 As part of the iterative process, some of the promoters have started to discuss commitments to work towards long term stewardship of community assets via bodies such as Land Trusts. But, more detail and commitment will be needed in due course, not least how such bodies will be funded and the implication of this upon scheme viability.

3.19 One obvious challenge for all four promoters is that the prospective new garden communities don’t yet exist and so cannot yet help to formulate how this arrangement should work. There is a role for existing communities to influence this process – but they also don’t represent potential new residents and so cannot be expected to direct such a process.

3.20 There is therefore a role for the Council to engage more proactively in the process – to represent the prospective future residents who don’t yet have a voice in shaping development and future stewardship.

3.21 At this stage of the process, we don’t consider that the promoters’ lack of design detail, or firm view about how the long term stewardship elements of their proposal will work, are significant problems. All four proposals are still dealing with the ‘big’ issues around deliverability of these schemes. However, they are important matters which will rapidly come up the ‘batting order’ of importance as schemes progress.

Providing Social and Community Infrastructure

3.22 All four schemes commit to deliver their social and community infrastructure in full. This was a core component of the Prospectus and the TCPA principles.

3.23 Further details will be needed, following discussions with the various providers over their detailed needs, requirements and standards, but in principle all four schemes will deliver the required school places, healthcare provision and other associated community / social infrastructure.

3.24 One area we have asked some promoters to look at is around open space provision.

3.25 As currently drafted NS4 provides only 33.6% open space and while in NS3 the proposed layout means that the provision is remote from the new dwellings and so may not function as intended. We have asked the promoter to consider increasing provision around the new homes – including whether changes should be made to the 'red line'.

3.26 Related to open space is that NS1, as currently drawn, leaves some land between the 'red line' and existing settlements. This is land outside the promoters control but where its future status is not clear. The land is not formally included within proposals for development, or for open space provision and is (as far as the development plan concerned) 'white land'. We have asked the promotor to look in detail at these land parcels. Should the promoter not be able to secure them, the Council may need to act to ensure that they are managed in some way. There is a risk that the owners promote new housing, outside the new garden community process, or the land is left isolated without any management. We have also noted that, as submitted, the NS1 site boundary, in some plans, does not appear to extend up to the A2. The Council needs to be satisfied that there are no 'ransom' strips that could cause delivery issues at later stages.

3.27 All four promoters accept that there may be a case for 'tidying up' their red line boundaries. There are other examples in the other schemes where small gaps exist between existing villages or properties and the promoted land. There are also other boundary issues affecting some schemes relating to environmental mitigation that are considered in the next section.

3.28 For the site promoters, and the Council in general, is the risk that neighbouring parcels come forward as stand-alone developments which undermine the comprehensive new garden community vision. In practical terms, this means that development comes forward in the area that does not make any meaningful contribution to the very significant infrastructure costs (and benefits) that the new garden community is promoting.

3.29 Raising these issues now, as part of this process, provides all concerned the opportunity to do this – an opportunity that may not exist via the normal plan making route or via planning application.

A wide range of local jobs in the Garden Community

3.30 The TCPA suggests new jobs should be provided 1:1 with new homes.

3.31 The intention is that new jobs are readily available to new residents, ideally as part of the new garden communities. So minimising the need to travel and assisting delivery of vibrant, mixed-use, new communities. Whilst the guidance is useful to re-inforce this principle, in the Swale context, this is one the most technically difficult parts of the guidance to apply in terms of its treatment by the Local Plan.

3.32 For Swale, most of the new homes we need to build are not to accommodate a new and growing population, but instead to manage changes in household structure. So it is not the case here that each new house needs a new job.

3.33 As currently submitted only NS1 and NS4 promote a 1:1 ratio.

3.34 Both NS3 and NS5 provide fewer jobs but both sites are well related to the existing (and growing) employment areas in their respective towns. Providing these can be accessed sustainably, we don’t think this gives rise to any concerns and new homes and labour supply could be viewed as complimentary to the existing employment areas.

3.35 We acknowledge the risk that the type and scale of employment being suggested at NS4 may complete with the nearby town centre. The town centre may be a more appropriate place to grow a more significant critical mass and the interrelationship between the scale and quality of offer provided in NS4 may need to consider this as a risk to be mitigated and balanced with the need to create mixed use communities.

Floorspace or Land

3.36 One factor to be aware of is that no promoter can ‘deliver’ the jobs. They can only provide the land or floorspace which, if the market takes it up, will accommodate the jobs suggested in their submission.

3.37 In this regard, it is important to note that three of the proposals commit to deliver the required floorspace to accommodate the jobs. But NS1 only commits to provide the serviced land. i.e. there is no firm commitment to provide the floorspace to accommodate the jobs.

3.38 The Council has asked all four promoters to provide viability evidence to support their proposals going forward (see later). For NS1 it will be important that they can demonstrate that the proposed floorspace is viable to deliver in addition to simply servicing the land. If the floorspace is not viable to deliver as part of the new garden community proposal, then no reliance can be placed on any job estimates or commitment to deliver a number of jobs.

3.39 At this stage, it is also fair to note that we had expressed some concern that the proposal is too heavily reliant on higher density office jobs to meet its claim of 10,500 jobs on 120,000 sqm of floorspace. Accepting that other components of the scheme (retail & schools for example) will provide some jobs, the required ‘job density’ still appears to high unless most of the floorspace is provided as offices. Regarding viability, we know that higher (job) density offices struggle to be viable in this market – whereas lower (job) density light industrial and business units are more viable.

3.40 This concern is not a 'show stopper' – because we are not sure 10,500 new jobs are technically needed to meet future housing needs. A lower density form of employment may be more viable and so policy preferable. But we note that, at the moment, there does not appear to be the evidence to support the 10,500 job claim being made.

3.41 This is especially important for NS1 because this scheme is promoted largely on its economic credentials.

The Kent Science Park

3.42 We cannot discuss jobs without commenting on The Kent Science Park. NS1 is inextricably linked to the Science Park but we need to note that the Science Park estate, counter to early expectations, has been removed / omitted from the 'red line' of NS1.

3.43 Therefore, as currently proposed, NS1 does not commit to any new development on the existing estate. The scheme instead promotes alternative land for employment.

3.44 In the PBA Employment Land Review (2018) we discuss the Science Park proposals at length. In summary, we considered that a significant increase in the scale of the Science Park was reasonably high risk. This is because of the very competitive nature of the sector and its small scale. But this does not mean that the Council should not aspire for this step change – only that it should do so understanding the risks.

3.45 At the moment, it is unclear how the new space (actually land) promoted inside NS1 will work alongside the Science Park estate. One risk is that the new land competes with the science park and undermines its longer term viability.

3.46 Another risk is that by not including the Science Park within NS1, the opportunity is lost to use the new garden community proposal to enhance the estate. For example using funds that are (indicatively) set aside to pay for servicing the new land proposed in NS1 to instead invest on the Park.

3.47 The worst case scenario is that the Science Park fails to prosper; partly because a significant new land allocation is provided as part of NS1 that diverts market interest. A future risk is that in order to invest on the park 'enabling' development is needed (i.e. homes) and these are provided outside the comprehensive new garden community masterplan.

3.48 Our opinion is that every effort should be made to include the Science Park within the NS1 proposal.

Housing mix and affordability

3.49 The Prospectus, and the TCPA, expects the proposals to create a variety of flexible housing products for everyone and achieve greater levels of affordable housing. Specifically, this means catering for a diversity of housing provision including a diverse mix of types and tenures, self-build and affordable at 40%. Achieving affordable housing, together with an appropriate mix and tenure, are important objectives for the Council to ensure it meets its local housing needs. Policy often 'sets out the stall' and developers work back from this, considering the impact on scheme viability. However, the approach should be to consider the whole package of housing delivery and meeting housing needs. This would mean discussions should take place to look at options for off-setting overall affordable housing provision depending on type e.g. social housing versus affordable rent and promoting small sites for small housebuilders, custom build, private rented and discount housing etc.

3.50 All the proposals are alive to the need to provide a new and innovative mix of housing, including self-build and a range of unit sizes. These are not fixed at the moment and many are expressed as concepts to be tested at later stages – which are understandable. However one element we have been very clear to confirm with the promoters is what their ‘affordable’ offer may be. This is particularly because we know from experience that this is an element of many proposals which is often ‘squeezed’ but hope that that land value capture models should allow the sites to make a much more meaningful contribution.

3.51 Two of the original proposals did not include a commitment to deliver the prospectuses affordable and social housing. Both NS1 and NS4 were originally non-committal on the amount to be provided.

3.52 For the Borough, under provision on potential new garden communities is of key concern. This is because in the future one or more of these schemes may deliver a significant share of future housing targets in the area. So if these sites fail to deliver affordable targets in full, there is little opportunity to ‘make up’ any deficiency elsewhere.

3.53 Regarding NS4 the Council expressed surprise that NS4 proposal could not deliver its affordable housing expectation in full, partly because the site does not appear to carry significant abnormal costs. In response, the promoter has reconsidered their offer, and now seeks to provide in in full subject to the definitions, tenure and mix.

3.54 Regarding NS1, we understand the difficulty given the significant abnormal costs associated with the infrastructure package needed to deliver the scheme. The scheme promoter is, at the moment, suggesting the Council can expect around 20-25% affordable (To be confirmed – dependent on tenures and definitions). This an improvement on the 10% originally suggested. We note that this provision is higher than has been seen on other schemes in the area.

3.55 This is a very difficult dilemma for the Council to consider. The circumstance arises because the scheme lacks public subsidy to pay for the infrastructure – infrastructure that in other cases may be part funded by Central Government.

3.56 Our view is that without a significant offer of affordable housing, it is difficult to see how the proposal as a whole conforms to the TCPA principles. In turn this may challenge notions of sustainable development or whether it would be able to generate wider Government support – outside of those with a transport remit. Also for NS1, because of its scale, it will make such a significant contribution to the Borough’s future supply, any significant under provision will be very detrimental to Sittingbourne in years to come. However, the Council needs to be pragmatic and may need to balance the competing demands of transport infrastructure and affordable housing. If 20-25% is all that the scheme can viably deliver it will be vital that this is comprehensively secured via binding legal agreements of for the reasons discussed above. This also applies to other proposals but is paramount here due to the scale of the proposal.

3.57 On the more positive side - it is recognised that the provision of the new southern relief road and linked with the delivery of the northern relief road, may improve values in the town and thereby making the achievement of higher levels of affordable housing in future housing schemes around the town more likely.

3.58 It is noted that NS3 commits to 40% affordable in full - but this is subject to testing. More information, particularly for NS5, would be helpful. In addition, it is surprising and unfortunate that NS4, as a well-developed proposal using a 'template' approach, lacked any detail or commitment to affordable housing early in the process, however, they are now committing to meeting this policy requirement subject to caveats which will require further discussion.

Summary – Garden Community Principles

3.59 All four proposals are committed to deliver, in some form, the TCPA principles – although NS4 prefer a slightly different *flavour* modelled on Poundbury. We don’t consider this of material concern, and this could be viewed as an advantage given their demonstrable experience.

3.60 Most importantly, all schemes propose to meet their full social and physical infrastructure need through some form of land capture. This model, as opposed to a more traditional land sale and promotion models, provides a better opportunity to secure the infrastructure – in the mutual interest of the Council, the landowner and the new garden community.

3.61 The most significant departure from the TCPA guide is the employment offer on some of the sites, which would lead to fewer jobs proposed than the 1:1 ratio. But although it remains useful as an ambition to secure mixed use schemes, we don’t, in the context of Swale, consider this a significant issue, provided the schemes can be made accessible to the Borough’s existing, and growing, employment estates.

3.62 None of the schemes are as yet fully formulated and there are ‘red line’ issues with a number, where additional land could be included to deliver more open space, environmental mitigation or better ‘rounded’ proposals. There is also the question that the Science Park is currently excluded from the ‘red line’ in NS1. The success of the Park is a pivotal part of the ‘package’ being promoted and the rationale for the new road network in this area.

3.63 In our opinion overall, none of these issues are, as yet, ‘show stoppers’; the Prospectus process has allowed the promoters to assemble the land so far and as planning certainly increases we would hope these issues can be resolved before they become more critical to progression of the schemes in question.

3.64 For all four schemes, the mix of homes has evolved so that they broadly match prospectus expectations – and the TCPA guidance. When first received by the Council the proposed mix in one or two of the schemes meant that we could not consider that they met the terms of the prospectus. But, as noted above, these have now evolved.

4 OTHER FACTORS

4.1 Above we have considered a range of factors related to the Garden Community Principles as set out in the TCPA guidance. Here we address a number of other related factors, but which also arise from the Prospectus that we have included in our assessment.

4.2 This includes:

- Delivery
- Engagement
- Environmental Constraints
- Landscape and securing net gains in biodiversity
- Viability
- Transport

Delivery

4.3 The Prospectus expects the proposals to deliver a high number of housing completions and start delivering new homes as soon as possible, ideally by 2026, reaching an annual rate of at least 150-250 dwellings per year using innovative approaches to increase delivery throughout the rest of the new plan period and beyond. This is important because Swale needs to be confident that the site can deliver housing to meet its needs. There are two components of delivery to explore - the delivery vehicle and timing.

Delivery Vehicle

4.4 It is notable that all the proposals do not consider it necessary to work with the Council to use compulsory purchase powers, a Local Development Order, or a Locally Led Development Corporation. As submitted all four proposals favour the Master Delivery model.

4.5 This is however under review with NS4 suggesting that this may be helpful, and for reasons related to transport (discussed below) more involved public sector support *may* be needed to deliver NS1 than original envisaged.

4.6 It is recommended that further work is undertaken to explore what type of Local Delivery Vehicle (LDV) could be established to bring these forward, even if this is just an informal approach. For example, we understand the Council have agreed for NS4 to use a steering group with terms of reference which will have a series of topic groups and which will evolve as appropriate over time. This might be described as an embryonic informal LDV, which might be an appropriate model for all the schemes.

4.7 As noted above, there is a lack of detail about long term stewardship (i.e. how the community will be managed post-delivery). There is some recognition that community assets and open space would be transferred to a trust, parish, company to assume responsibility and retain in perpetuity. More recent information on NS1 and NS3 indicates that they are considering community trusts to ensure the long-term legacy for relevant areas and at least one is in discussions with the Land Trust. This will need further discussion and clarification in due course as the proposals are developed further. More detail has also been received from NS5 on stewardship.

Timing

4.8 We discuss timing in more detail in the matrices in appendix 1 of this report. But we note there is an issue with the timing, phasing and delivery of new garden communities in general, because they often require considerable up-front infrastructure and have long lead in times.

4.9 Actual trajectories have been provided by NS1 and NS4, but all commit to deliver housing in line with the timescales in the Prospectus.

4.10 However, these claims all appear optimistic. Our opinion is that the Council would be wise to allow significant 'contingency' in any development trajectory. As the schemes and evidence has evolved this has become particularly important for transport.

4.11 In general, we understand that improvements to J5 are well advanced to the benefit of both Sittingbourne proposals. But recent correspondence from Highways England expresses concern about the timing of the new junction J5a. We discuss this in more detail later.

4.12 Around Faversham, we understand Highways England are cautious about the impact of the new communities on junction 7. Unlike J5 there are no advanced proposals here.

4.13 For the new garden communities we need to be aware that such concerns relate to any significant new development around either town – whether new garden community or local plan allocations. So care is needed before dismissing any new garden community proposal on highways grounds – the same concerns may be raised with more traditional local plan allocations. And we know that Government policy allowed limited flexibility for Councils to underprovide new homes citing transport constraints – most Councils in the wider South East have similar constraint issues.

4.14 Unlike smaller scale allocations the new garden communities are better able to provide the critical mass to address strategic constraints than a collection of traditional local plan allocation sites.

4.15 As noted above we return to transport later.

4.16 Although not strictly related to delivery as a topic we are concerned that utility provides have not yet considered the cumulative impact of these proposals. We note that some promoters have engaged with the providers to demonstrate utility infrastructure is not a constraint. But further work is needed to ensure the cumulative needs of a new garden community, and 'business as usual' growth is met.

4.17 When questioned about this, we were referred to their statutory duty to serve the level of development allocated in the next plan. But we think further work is needed to ensue their infrastructure does not act as a timing constraint to delivery.

4.18 It is recommended that a Utility Working Group is set up to consider these proposals in more detail.

Engagement

4.19 The Prospectus expects the proposals to proactively engage the existing and new garden community in positively planning for the future. In addition, it is envisaged that the proposals will be delivered through a partnership approach and managed through a long term community controlled stewardship structure.

4.20 There has been engagement with technical stakeholders by some of the promoters of the proposals. This early consultation has been useful and starts the process of working to understand the key issues. These communications are being followed up by the Council who are keen to ensure that the cumulative issues on utilities and transport infrastructure are also properly considered by providers and those responsible for their operation. While we note the NS1 has consulted on utilities and infrastructure in particular, there has been much more limited engagement with environmental bodies, the design review process and wider community. This is surprising given how far it has been developed and this may lead to implications for the site boundaries, such as in relation to the impact on environmentally constrained areas, which may in turn lead to site boundaries needing to ‘flex’ further down the line.

4.21 It is not unexpected that there has been little community engagement in the proposals so far, with the exception of NS4. However, we expect full participation and community engagement to be a key part of the proposals going forward and it is necessary for all proposals to address this in detail. More recent information on NS1 indicates that Design South East has been engaged and will be involved in the consultation process. It is important that that timescales and resources as well as political expectations are aligned to provide integration with the Council’s processes. There is currently limited detail on the type, process and timing of engagement with local communities, parish councils and other interested parties. Engagement strategies will need to be put in place as a key next step.

Environmental constraints

4.22 The Prospectus expects the proposals to be located in an appropriate, suitable and sustainable location. This means avoiding inappropriately constrained areas and responding appropriately to constraints, particularly environmental ones such as Areas of Outstanding Natural Beauty and Ancient Woodland.

4.23 Both NS1 and NS5 have impacts on the Area of Outstanding Natural Beauty. For NS1 this relates to the location of the new junction in particular, but also to its setting. Although outside of the AONB, NS5 needs to address setting issues; made the more difficult due to the AONB boundary wrapping around the site on three sides.

4.24 The AONB Planning Unit has considered these impacts and has provided initial provisional comments. The provisional views expressed set out objections to both NS1 and NS5. In relation to NS1, they have confirmed that the proposals would constitute major development which will need to be addressed for its national planning policy implications, as well as its potential to affect the timing of the delivery of the junction. While we would not necessarily consider these to be showstoppers at this stage, it will be necessary for the promoters to respond to these comments and consider the implications for their proposals if these are not to be major issue further down the line.

4.25 NS1, NS3 and NS5 all have ancient woodland issues; although it is NS1 again where there may be actual loss and/or a current inability to provide the appropriate buffers to them. For NS1, the environmental issues, for both the road and built development, are compounded by the presence of several local wildlife designations and an Area of High Landscape Value which runs through the site (see also landscape below). Development is included within these areas and, overall, there is little suggestion of the scheme adequately responding to these issues at this stage. These are matters that, in turn, feed into site boundary questions, as discussed below.

4.26 Whilst there will always be a mix of adverse impacts to be weighed against the benefits arising from a proposal, this will be particularly so for NS1 and NS5 where, even after mitigation efforts, there may be significant environmental issues outstanding needing to be weighed in the balance by the Council.

Landscape and securing net gains in biodiversity

4.27 The Prospectus expects the proposals to achieve strong environmental protection and real and significant net gains in biodiversity, to support economic prosperity, health and well-being. This means delivering and maintaining extensive landscaping and multifunctional green infrastructure over a significant percentage of the land area through a comprehensive network of open spaces, habitats and green corridors.

4.28 To support this assessment, Land Use Consulting has undertaken an overview and evaluation of the landscape, visual context and sensitivities of each of the proposals. The full work is published separately, but the conclusions are included in the subsequent sections relating to each proposal. It is necessary for the proposals, and particularly NS1 and NS5, to consider the findings of these assessments and respond to the observations and recommendations in relation to the detailed design and masterplanning of each scheme and the relationship with the landscape character and features both in the sites and their surroundings.

4.29 As indicated under 'environmental constraints' above, in broad terms, NS3 and NS4 have lesser landscape challenges than NS1 and NS5. The design and layout of NS1 is based primarily on the road alignment, which in turn is dictated by the presence of the Science Park and the need to connect with the proposed Sittingbourne Northern Relief Road. Consequently, despite claims that it is, the scheme is not obviously a landscape led one, and there will be considerable landscape and visual adverse impacts needing to be addressed. These will present real challenges given the above pre-determined issues and the existing site boundary.

4.30 NS5 has similar challenges, but site boundaries and ownerships may have a better ability to ‘flex’ to those challenges., however, for both schemes, some imaginative approaches may need to be considered.

4.31 There is a wider question relating to the provision of green infrastructure in general, particularly given TCPA principles. The proposals all deal with these issues in different ways; with open space largely concentrated into a single area of the site (NS3 and NS5), as buffers around existing villages (NS1), or spread within the layout (NS4), although in that case, to a limited extent overall because they only provide 33.6% open space. While all purport to follow a landscape led approach, this is not obviously demonstrated by NS1 and less developed in NS3 and NS5, where there are conflicts between the location of open space and pylons on those sites, as well as the question of whether locating it all in one location or on a separated parcel represents the most appropriate and accessible layout (NS3). NS4 could potentially include additional land to the south of the M2 for purposes of increasing public access to the wider countryside.

4.32 While all the proposals repeat the concept of a “net gain in biodiversity”, it is unclear how this will be achieved in practice and none of the proposals are committing to the biodiversity standards set out in the Prospectus. However, NS4 has the most developed proposals relating to biodiversity. Whilst the lack of detail at this stage might be expected, given the current Government consultation on Biodiversity Net Gain (closes on 10th February 2019), this is a topic which will need to be taken seriously. While this objective is a challenge, there is an opportunity to address this in a comprehensive way early on the process, linked to the masterplanning and wider design of the site. This will need to be considered further as, when and if the sites progress.

Viability

4.33 Sites must be market viable to proceed and developers prefer to develop in an area where the sales price of housing is high. An assessment of sales values, which are a good proxy for housing viability, demonstrates that the areas in the south and east of the Borough and south of Sittingbourne are likely to be viable. Land to the west of Sittingbourne may support lower values overall. However, all the proposals are located within parts of the Borough considered to have good market values and in the normal course of events schemes in these locations would be expected to be viable.

4.34 Nevertheless, for this assessment and the plan making process more generally, viability evidence to support the proposals is seen as critical.

4.35 There is a risk, particularly for NS1, given the significant ‘abnormal’ cost associated with a privately funded Motorway junction, that developers over promise the new garden community package. Failures to identify these abnormal costs early enough mean the possibility that benefits fail to materialise later. A specific issue with new garden communities is the stewardship arrangements for the transfer of community assets. These would normally require a financial endowment to support the body charged with their stewardship, which should be built into costings early on. However, the new garden community process has been designed to mitigate these risks as far as possible, but it is still important that the Council and the public are satisfied that schemes can deliver in full.

4.36 The Council is in the process of collecting viability evidence from the site promoters. But it is fair to say that this area of evidence is currently controversial across the development industry in England and not only in Swale.

4.37 National planning policy has recently changed and the new NPPF (supported by Planning Policy Guidance; both 2018) now requires ‘open book’ viability evidence and the use of ‘existing use value plus’ (EUV+) to assess the land value[1] unless there are ‘exceptional circumstances’.[2]

4.38 Paragraph 57 of the 2018 NPPF states:

> *“All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available”*

4.39 To date three assessments have been provided. The forth, (NS4) has not yet been made available.

4.40 We understand that where full (open) evidence has not been provided, it is necessary for the promoters suggest the exceptional circumstances that should apply. Part of this may relate to commitments given to landowners before the new NPPF when viability evidence was not automatically public and that it takes time for the respective parties to amend these agreements.

4.41 The Council is minded to take the view that new garden community schemes, with their specific approach toward land value capture, are unlikely to demonstrate that exceptional circumstances should apply, especially given the strength of the new policy.

4.42 It is noticeable that a significant hindrance in applying the policy is that Government had committed to provide a national ‘template’ for the development industry to universally apply. This was due in ‘autumn 2018’ but has not yet been published.

4.43 Whilst we have not assessed the viability assessments received in detail, they do not appear to raise any fundamental issues, although, it is too early to draw firm conclusions. Future assessments will need to be independently reviewed by specialists. The Council will also need to ensure that all components being offered by the promoters are included and fairly costed.

Transport

4.44 Transport is perhaps Swale’s biggest challenge. Contributing to improvements to the network, alongside the new homes, is also one the biggest benefits the new garden communities may bring.

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[1] ‘The ‘plus’ element of the assessment provides developer profit which is judged to sufficient to incentivise the landowner to sell the site for development. This may be very different to the price paid or previous expectations of what the land could be sold for.

[2] PPG - Paragraph: 021 Reference ID: 10-021-20180724

4.45 The Prospectus expects the proposals to deliver sustainable and long-term solutions to the transport issues, particularly in relation to congestion and air quality. It is essential to make a positive contribution to the existing transport situation incorporating necessary infrastructure improvements and latest technology.

4.46 Each of the four proposals have been passed to both Kent County Council and Highways England for comment.

4.47 We received feedback from both Highways England and Kent County Council shortly before this report was issued. We have used this to inform this report but we note these are only provisional views and obviously limited in weight because much is dependent on detailed modelling and costing.

4.48 The feedback has been shared with the promoters and we are aware that some are questioning the various views expressed (sometimes because they have more detailed data as well as a difference of opinion) and so the reader should be aware that transport and any mitigation that may or may not be needed is not fixed. We suggest that once all parties have been able to consider feedback in more detail the Council updates members with a more final view from Kent County Council and Highways England.

4.49 The approach we have taken in this assessment is that it is not for PBA (or the Council) to consider who is right or wrong. Certainty, in the case of the strategic road network, the only body able to provide a robust opinion are Highways England. They own and operate the route and so have absolute final say over their network.

4.50 That said, our opinion of the correspondence is that neither Highways England nor KCC have identified a 'showstopper' at this point.

4.51 Both have expressed concerns about all four schemes and it is the case that any additional traffic on the motorway network and its junctions raises some 'concern' from Highways England. But they are, as can be seen, willing to work positively to address these.

4.52 In our experience, because any major development will have some impact on the network it is normal for concerns such as these to be raised. For this process it is very helpful because it gives all parties much more time to address them than may be the case via the local plan route. This applies to both Kent County Council and Highways England.

4.53 Most of the Kent County Council comments are highly dependent on the results of transport modelling and the Boroughs model is not yet finalised. So, what off site works may be needed are not certain – but in all four cases some works will be needed. For NS5 local works may be more extensive given the possible need to improve the local network running from Faversham, through the proposal site and on southwards. So this will mean much more joint working with neighbouring councils than the other proposals.

4.54 The County is pushing for high quality public transport links across all four proposals and all four promotors are willing to deliver. However detailed questions have been raised about how this may be 'connected' between the new garden community and town centres – for example how the rapid transport network promoted by NS3 will address the already congested route into town down Key Street or via an alterative route.

4.55 We are aware of some concerns about the NS4 proposed 'calming' of the A2 London Road/Canterbury Road. While there are advantages to this, including making the development site much more accessible to the town centre, it brings significant 'externalities' to existing users of the route given this is (and will remain) the primary access to all of Faversham from the East. To address these concerns there may be merit in 'de coupling' these improvements from the scheme so the wider community of Faversham can consider the positives and negatives independently of the new garden community in more general.

4.56 A possible showstopper that could emerge over time relates to NS1. It is fair to state that Highways England preference may be for a design which is far more extensive that that proposed by the NS1 promoter. In summary, they are concerned that the route between J5 and J5a would be attractive to local traffic and undermine the robustness of the M2 as a strategic link. So their preference is for a new 'local' road in addition to J5a for local traffic to the use.

4.57 This is only expressed as a 'preference' at the moment. But the Council needs to be aware that should this be elevated to a requirement then this could be a 'show stopper'. The build cost of such as new local road could cost at least £2m per KM and possibly more given the topography – so possibly circa £10m [this is provided only to illustrate the possible scale of the costs involved and no way should be taken to suggest we have undertaken a costing of the proposal]. The land would also need to be purchased and possibly the impact on the AONB assessed.

4.58 There are also concerns raised around the delivery model being promoted for NS1. The claim being made is that the proposal, by being privately funded, can be delivered quicker and more efficiently than a public model. There is some merit in this – many major road schemes are delayed not for engineering reasons but waiting Government funding rounds. However, it would be wrong not to flag the significant challenges in delivering a new junction and Highways England suggest that the administrative hurdles of delivering the junction may be greater than are being assumed.

4.59 Also related to the junction (and the scheme in general) and its timing is the risk of objections arising from possible adverse impacts on the AONB – the scheme requires land within the designated AONB. We would hope that given the strategic significance of the junction to Sittingbourne (assuming that case is made) this can be addressed, but it may add delay, given the requirements of national planning policy in respect of the national designation.

4.60 In addition, the Southern Relief Road may well only work effectively with the completion of the Northern Relief Road so as to provide a comprehensive solution around the town. The absence of this piece of the jigsaw from NS1 is a cause for concern and will need to be addressed as part of ongoing discussions.

4.61 We appreciate that this commentary focuses on NS1 and the challenges in delivering the scheme. This is inevitable given the scale of the proposal and the much more strategic issues raised by a new junction and significant supporting infrastructure. To add ‘balance’ to this commentary we need to stress that while NS1 is undoubtably challenging and the transport case has yet to be made to Highway England’s satisfaction, if delivered, NS 1 provides the greatest potential improvement to the network for the whole Borough and especially Sittingbourne. Coupled with a northern link road it offers external benefits to the towns’ residents far in excess of the other three proposals. It ‘unlocks’ not only the Science Park but also Eurolink and provides the villages to the East a new route to the Motorway avoiding Sittingbourne. So any seemingly negative comments above must be seen in this context.

4.62 Our main transport concern relates to timing, and the risk that over optimistic timing assumptions means NS1 delivers later than promoted. The risk here is greater given the ‘strategic’ nature of the works involved when compared to the other proposals.

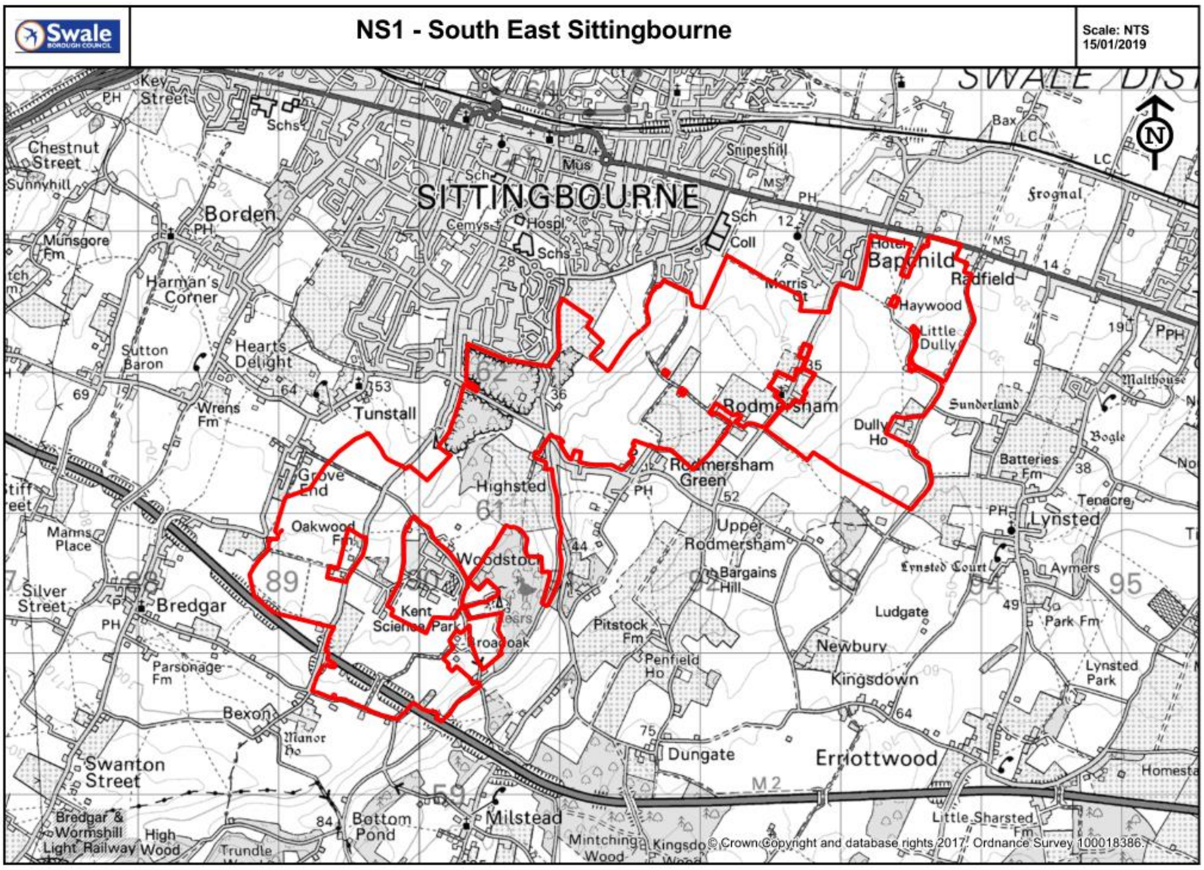
5 NS1: SOUTH EAST SITTINGBOURNE

Summary

5.1 The site at South East Sittingbourne is promoted as Highsted Park by Quinn Estates for 11,500 homes with 120,000 sqm of new commercial space which is expected to generate 10,500 jobs around the existing Kent Science Park. The proposal includes 4 district centres to include nurseries, pharmacy, pubs/restaurants, medical facilities in line with CCG requirements, 4 new primary schools and a 6-form entry secondary school including 6th form and further education. Sport and leisure amenities include a new facility for Sittingbourne Football Club.

5.2 The proposal is predicated on the delivery of a new A2/M2 southern relief road, proposed as a dual carriageway which, together with a new motorway junction (J5a), would be paid for in full by the development. The design concept is a necklace of villages linked together by the new road.

Figure 2: NS1: South East Sittingbourne site location plan



Key issues, opportunities and risks

5.3 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- New road and junction
- Delivery and timing
- The location of development and the road alignment and their impact on environmental constraints
- Affordable housing
- Jobs and recalling commuters
- Site boundaries and relationship with existing settlements
- The football club

New road and junction

5.4 It is not clear that the road scheme is deliverable, given the constraints they must deal with, yet further modelling work is also required to prove the case. Fundamentally, there is concern that the northern relief road scheme is not included within the NS1 boundary, and this is a significant concern. It is recommended that this is part of the scheme or linked to it so that it is delivered before the completion of the new garden community.

5.5 In relation to these issues, it is essential to understand further:

- how many homes could be delivered without junction 5A?
- the differential cost between a single and dualing of the road and what is actually required to serve transport needs?
- the road alignment and some of the development parcels currently impinge significantly on local environmental designations and ancient woodland - how will the impact on these be minimised and mitigated?
- if the scheme promoters are fully funding the motorway junction and road privately how this will happen and most importantly that they own all the land right up to the A2 and M2. It is understood that a business case and further evidence about the delivery is being prepared.
- what the benefits are of the southern relief road only and exactly what the relationship is with the northern link road.
- what is the nature of the public transport package that will support this development and how reliant will it be on the public purse of transport operators to support it?

Delivery and timing

5.6 The proposal commits to start delivering in 2022/23 for 20 years achieving up to 700 per year through a range of outlets and approaches, however, this timescale is dependent on the road infrastructure being in place to ensure it is frontloaded. Given the comments from Highways England, who doubt the timescales and believe it will take 5-7 years, we do not think it will allow completions by 2022.

The location of development and the road alignment and their impact on environmental constraints

5.7 Detailed scrutiny of these timescales is required together with which elements will come forward in phase 1. It will be necessary for the Council to make realistic assumptions about the timescales is uses for the Local Plan. The design concept appears to be largely a result of land ownership, rather than a coherent landscape led consideration of the best way to achieve a new garden community. The current road alignment and a number of development parcels appear to intrude on sensitive areas, such as Highsted Wood. For this to work, it will need careful consideration of existing settlements and designations and consideration as to how they should be integrated and buffered. There are opportunities for existing and new landscape and biodiversity assets to inform the masterplan, however, there will be challenges to achieving this within their site boundary.

5.8 The conclusions from Land Use Consultants are set out below. They are significant for this site and will need to be considered and addressed.

This is a very challenging site for development of a road and residential development of the scale proposed. In landscape terms much of the area is highly sensitive including part of the Kent Downs AONB and its immediate setting and representing special qualities (dry valley) extending out from the AONB boundary. The landscape quality is recognised by the local landscape designation. Within Swale there is no precedent for urban development climbing the dip slope transition between the coastal plain, fruit belt and chalk downs of the AONB or extending within the dry valleys. It is very difficult to achieve a scheme which is landscape-led in this context and there are limited opportunities to fully mitigate impacts in this location of high landscape sensitivity.

If a development of the size and scale proposed in this location were to be progressed, significant adverse landscape impacts would need to be accepted. At a minimum any scheme in this location would require:

- *Exploration of all possible route options for the desired link road to minimise its extent and impact and maximise opportunities for integration;*
- *Extended site boundaries to permanently secure areas of landscape buffer/green gaps and/or mitigation for visual/landscape impacts;*
- *Reduced residential development areas to avoid the most sensitive locations (as set out above);*
- *Clear identification of measures to minimise impact on the AONB including reduced extent of commercial development;*
- *A single carriageway with reduced access onto the local rural road network.*

5.9 Initial comments have been received from the AONB planning unit, who consider that Highsted Valley and land surrounding the Science Park form part of the setting of the AONB. They also consider that the new motorway junction would constitute major development. It is their view that as such, there is a presumption against the new junction, which would need to be assessed against the second part of paragraph 172 of the NPPF and demonstrated that the proposal represents both exceptional circumstances and is in the public interest.

Affordable housing

5.10 An original commitment was given to provide 10% affordable housing due to viability issues associated with the cost of the junction and road provision. However, following the submission of a draft further review of costs and the use of creative tenure split, there is now a revised offer of 20-25% affordable housing. Viability will be subject to separate detailed and ongoing testing.

Jobs and recalling commuters

5.11 The delivery of 10,500 jobs is predicated on the whole employment area being used for B1a uses which may be difficult to achieve. It is unclear whether there is market demand/capacity for so much B1a space. There is also likely to be pressure for other employment uses due to the strong demand for industrial and warehousing. In addition, if it is delivered on this basis, it runs the risk of competing with / undermining the Kent Science Park and other Sittingbourne sites and the wider employment supply as well as having implications for the delivery of the Town Centre regeneration aspirations. This is because provision of larger modern units in this location will be more attractive than other, older sites. As considered above, the relationship with Kent Science Park is currently unclear in terms of the relationship between the two sites and how they will work together or separately in the future. There does not appear to be any commitment to deliver an improved Science Park, or any acknowledgement of whether there will be any change to it. Clarification of this is required and the relationship and implications will need to be explored further.

5.12 The proposal suggests a strategy of re-calling commuters, and although laudable, this will be challenging. This is notoriously difficult to achieve a change in commuting patterns and if pursued is likely to have Duty to Cooperate issues which will need to be considered. This quantum of space may need to be considered in the sub-regional/regional context and consequently it is likely to require work to be undertaken to show how this level of growth could be delivered and be competitive in the wider market. It is recommended that further work is undertaken to understand the implications of proposed jobs numbers and the cross-boundary implications within the context of the overall jobs numbers and how the Local Plan should address this.

Site boundaries and relationship with existing settlements

5.13 The location of the site should provide the opportunity for integration and access into Sittingbourne and to enhance relationships to the town centre and out to the countryside, particularly in relation to walking and cycling routes and particularly east and west across the area. However, these do not appear to have been exploited so far and there are a number of gaps in terms of ‘missing fields’ between existing settlements and the proposed new garden community. Further consideration could be given to what role these fields could play and whether they should be included within the site boundary. It is also likely that any continued reliance on the existing site boundaries will ultimately produce a conflict with what can be achieved due to the need for mitigation and buffers etc.

The football club

5.14 There appears to be an opportunity for the relocation and improvement of Sittingbourne Football Ground, however, this needs further investigation and clarification. It is also not clear what engagement has taken place with the football club.

Matrix of emerging information

5.15 Following the identification of these issues and risks we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

5.16 In this table and others we refer to some of the transport evidence as 'tbc' – as noted above we have only recently received comments from KCC and Highways England and have given the promoters time to respond.

Further information	Action	Result	Comments
Viability	Financial information requested	Provided.	Will be subject to more detailed and ongoing testing
Highways England	Letter sent 13 Nov 2018. Clarification from HE about the reasonableness and timing of the junction and road.	High level comments indicate significant investment is required. TBC	Uncertainty about the timing and consequent phasing of the housing. This remains a risk.
Kent County Council	Letter sent 15 Nov 2018. Implications of relationship with northern relief road.	TBC	
Landscape	Assessment of impact of road alignment and other important landscape issues.	LUC produced assessments.	Significant issues to be addressed.
AONB	Junction location/relationship with North Downs designation and wider	AONB Planning Unit provided initial provisional response	Significant issues to address. Highsted Valley and dip slope form part of the setting

	setting issues.		of AONB. New motorway Junction will be 'Major' development.
Utilities	Email sent 9 Nov 2018. Assessment of implications.	Still awaiting a response.	
Southern Water	Email sent 9 Nov 2018.	Feasibility studies for water supply undertaken. Upgrades required for WTW and reinforcement of sewer network.	Likely that any issues could be overcome through working with developers and network modelling.

Conclusions

5.17 This proposal is making progress towards the requirement within the prospectus and has the potential to be sustainable and deliverable, subject to a number of caveats, some of which are potentially significant. The significant issue is the relationship to the AONB and the impacts on this and other environmental assets and the degree to which they can be addressed within the current site boundaries. The AONB question will also have timing issues in particular for the delivery of the junction, road and development. There are also unresolved issues to be addressed relating to the case for the road, the untested nature of its delivery model and the essential linkages with the northern relief road.

5.18 There is much work to be done. First and foremost, it is recommended that further work is undertaken to test the road and development assumptions via an independent masterplanning process. However, it is clear that both the benefits and impacts of the scheme need to be fully understood. In particular, the degree to which environmental mitigation can be undertaken either within or with changed site boundaries needs to be understood before the Council considers its formal role within the Local Plan. Although the economic, housing and transport benefits may ultimately be shown to be significant, it may not be impossible that the Council will be left with significant environmental issues outstanding (despite mitigation efforts) and that may ultimately need to weigh these in the balance.

5.19 However, despite the challenges, no 'showstoppers' have been identified at this stage and the scheme promoters should progress with their work to respond to the issues raised by this report.

6 NS3: LAND AT BOBBING, WEST OF SITTINGBOURNE

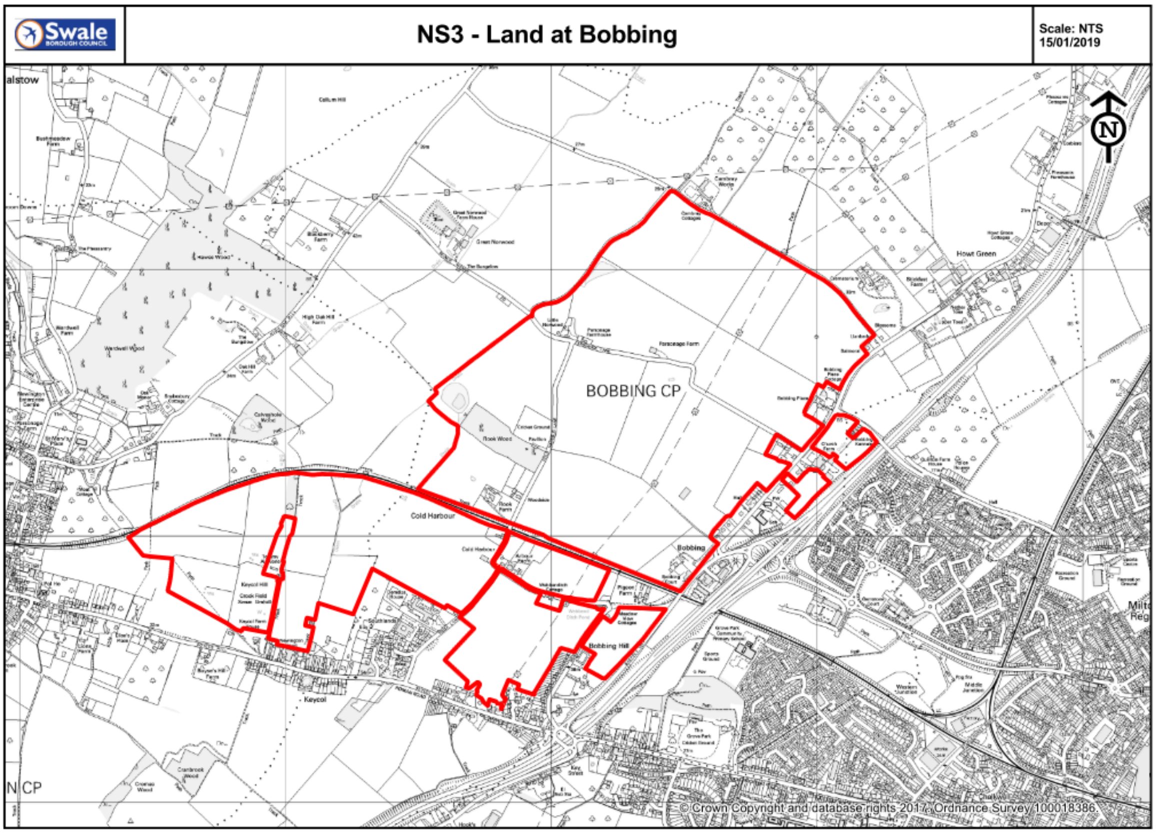
Summary

6.1 The site at Bobbing, West of Sittingbourne is promoted by DHL Planning on behalf of Crabtree and Crabtree Ltd. The initial proposal is for 226 ha, of which 87ha are promoted for residential development for 2,500 homes. The proposal includes 6ha of community facilities including a 3-form entry primary school, new village hall and nursery, village retail parade, pub, health centre, play area within a village green and enhanced cricket pitch and pavilion. In addition, it proposes 3ha of flexible commercial space including pop-up art and cultural use.

6.2 The proposal is predicated on the improvements and benefits provided at and for Bobbing village. These include:

- Realigning Sheppey Way to reduce speed and alleviate traffic from high street, improve setting and highway safety as well as air quality
- Improvements to A249 Key Street junction
- Pedestrianisation of the SW end of village and to provide dedicated school parking and drop off facilities

Figure 3: NS3: Land at Bobbing site location plan



Key issues, opportunities and risks

6.3 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- Highway issues
- Garden principles and design work
- Enveloping the village and masterplanning
- Social and employment space and numbers
- Open space, landscape and net biodiversity gain
- Constraints

Highway issues

6.4 There are a number of highway issues that are likely to require significant investment. Specially there are issues with the A249 Bobbing junction and at A2 Key Street, as well as possible capacity constraints within the new motorway M2 Junction 5 scheme. It is also unclear whether these improvements are likely to solve existing congestion issues in Sittingbourne. Both Kent CC and Highways England identify existing constraints at Grovehurst, Bobbing and Key junctions and the requirements for improvements. Further written advice is required about these junction proposals and J5 improvements.

6.5 While a new rail station is mentioned, we question the likelihood of this being delivered so close to Sittingbourne and Newington. Likewise, the reliance on a fast track bus service requires more information to ensure that it is achievable and how it will be implemented as it relies on a local road network which is at capacity.

Garden principles and design work

6.6 The proposal is to use Supplementary Planning Guidance to guide the development which will be delivered themselves through a master developer model. While the promoters reference their experience at Chilmington Green Ashford, it is not clear how applicable and transferable this example is and further clarification is required.

6.7 The opportunity exists to provide a local interpretation of the design principles; however, it is currently unclear what design work has been undertaken, and how the village of Bobbing will be dealt with, specifically in relation to visual coalescence. There is also the issue of how the opportunity to enhance provision for existing residents will be achieved. Further information submitted indicates that Appin would assume the role of master developer. They state that they would expect to adhere to strict masterplanning principles and development brief, but that they would also expect to allow an element of ‘freedom’ in terms of architectural detailing. This does raise some doubts in terms of demonstrating commitment to high quality design. They however recognise that there is an important role for a Local Delivery Vehicle and therefore this and the design issue will need to be further considered.

Enveloping the village and masterplanning

6.8 The proposal creates the issue that the new garden community would almost entirely envelop the existing village, so this would require careful masterplanning. While there is an opportunity to strengthen the existing village, it could be said to supplement it with a new centre to the north west. The question is whether the two could coexist?

Social and employment space and numbers

6.9 The proposal provides a commitment to 40% affordable housing (with a potential role for the Council), independent living and self/custom build, whilst recognising the need to meet all tenure requirements as set out in NPPF. However, they recognise that the use of a trust to manage and maintain land has not yet been accounted for within their viability work. A viability appraisal has been submitted and will be subject to separate detailed and ongoing testing.

6.10 More detail is required about the flexible commercial, pop up art and cultural space and the number of jobs needs confirming as this seems low, although the site is close to Eurolink site, so not providing for all jobs on site is realistic. There appears to be an inconsistency between the numbers set out in the proposal which identifies 1 job per household but elsewhere at figure 7 states that 526 jobs will be generated. This will need to be considered further in due course, but given its location close to the strategic road network, there may be a case for more generous employment provision.

6.11 Further information and clarification about the school size is required and it is important that engagement and liaison with the education providers takes place as part of the process.

Open space, landscape and net biodiversity gain

6.12 The initial site plan includes a large parcel of open space to be ‘gifted’ to the community, but it is not necessarily in the right location to be useable by the new residents and existing community. The parcels are very much split north and south and the red line boundary also excludes an obvious finger in the southern parcel. It is necessary to consider what the optimal location for development is and whether any additional land is needed and should be included and if necessary whether there is a role for the Council. Further consideration should be given to the boundaries and relationships with Bobbing, Sittingbourne and the surrounding area. Without this open space it is questionable whether there is enough greenspace and landscaping included within the main development area and whether the issue of achieving net biodiversity gain has been properly addressed.

Constraints

6.13 The conclusions from Land Use Consultants are set out below. The landscape is of moderate sensitivity and should be considered in the development of a more detailed masterplan for the scheme. Landscape issues do not suggest an overriding constraint at this stage.

6.14 *This site does not contain any national or local landscape designations and overall is considered to be moderately sensitive. It is considered that the site could accommodate a degree of development providing the above guidance is implemented to respect the key sensitivities and minimise landscape and visual impacts, including the site's relationship with neighbouring settlements, and its function and value as a rural setting and buffer. Further work is required to develop the masterplan for the site in line with the above guidance and a comprehensive landscape and visual impact assessment is required to guide the master planning process, including opportunities for mitigation and enhancement. There may be some significant landscape and visual impacts, although these are likely to relate to local landscape features and views.*

6.15 It is recognised that this scheme is very early in its preparation. There are a number of constraints which are identified but without any detail or identifying solutions having yet been provided. These include how an ancient woodland, rural lanes and pylons can be incorporated into the design. In addition, foul water management has not yet been addressed with Southern Water. Clarification is required about the use of SUDS, which the proposal says in one place is unsuitable, whilst elsewhere we are told that the approach will be used.

6.16 Early delivery would appear to be possible because it is not dependent on such significant infrastructure improvements, although the A249 and A2 issues will need to be resolved satisfactorily if they are not to provide future 'showstoppers'. J5 improvements may also be a constraint and could affect the phasing of the scheme. Consideration will need to be given about how much development can be delivered before the improvements take place, however, given the situation the Council faces with Highways England in respect of its current allocations, the answer to this question may well be 'none'.

6.17 The promoters acknowledge that there is additional land to the north and east which has the potential to be utilised, together with other sites that have been submitted to the SHLAA process. This has been confirmed by a very late submission from an adjacent landowner to the north who has confirmed their wish to support the proposal and to work with the promoters. This issue of the relationship with adjacent additional land and the boundaries of the most appropriate site will need to be further addressed and further detail provided.

Matrix of emerging information

6.18 Following the identification of these issues and risks we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

Further information	Action	Result	Comments
Viability	Financial information requested.	Details provided.	Will be subject to more detailed and ongoing testing.

Highways England	Letter sent 13 Nov 2018.	High level comments indicate likely impact on A249 junctions and M2 J5. TBC.	
Kent County Council	Letter sent 15 Nov 2018. A249 junction improvements, air quality and question of whether there are sustainable solutions.	TBC	
Landscape	Assessment of impact.	LUC produced assessments.	Moderately sensitive with issues to be addressed.
Utilities	Email sent 9 Nov 2018. Assessment of implications and pylons.	Still awaiting a response	
Southern Water	Email sent 9 Nov 2018.	No specific discussions yet on this scheme. Upgrades required for WTW and reinforcement of sewer network.	Likely that any issues could be overcome through working with developers and network modelling.

Conclusion

6.19 This is possibly the least developed of the four schemes; however, there would appear to be capable of meeting the prospectus requirements, to produce a sustainable and deliverable scheme, subject to resolution of the highways issues, the consideration of boundary issues and landscape comments into the masterplan. Although transport issues could be a significant issue moving forward, there are no showstoppers identified yet and satisfactory progress is being made to address emerging and unresolved issues.

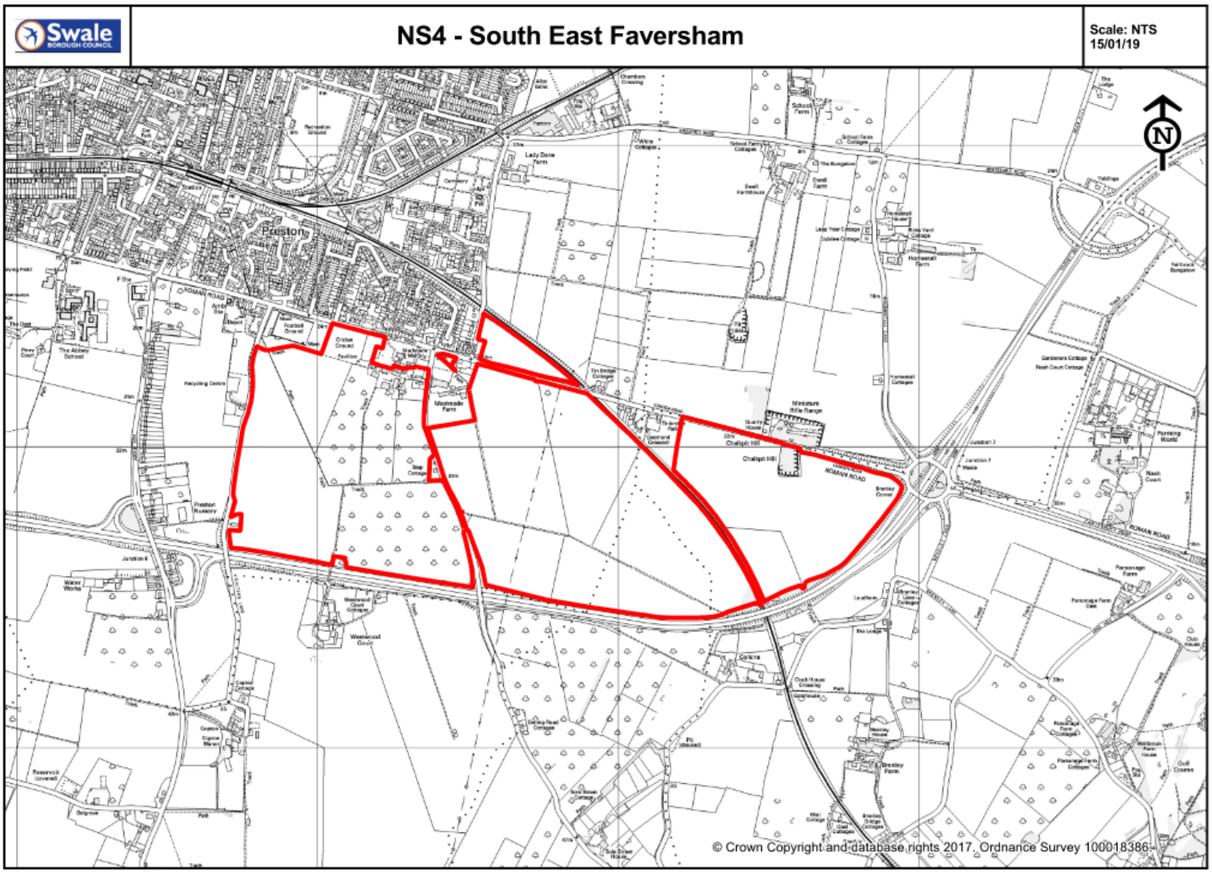
7 NS4: SOUTH EAST FAVERSHAM

Summary

7.1 The site at South East of Faversham is promoted by Duchy of Cornwall and covers an area of 131ha and proposes the delivery of 2,550 homes with approx. 15-20,000 sqm of business/commercial/retail space, which is expected to provide 2,500 jobs. In addition, a local centre (or 2?) is to be provided with open space as well as the off-site benefit of traffic calming the A2. It is the intention to develop a high-quality extension to the town using the Price of Wales Principles for Sustainable Urban Growth that will also have regard to the scale and character of Faversham. These principles have been applied in other locations, notably Poundbury in Dorset and more recently Newquay in Cornwall.

7.2 The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail. This model brings in developer partners and grants them licences or development agreements, subject to strict adherence to a pattern book/design codes. As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards. In this respect, it is worth considering whether this model would allow for the use of a Local Development Order in support of the scheme.

Figure 4: NS4: South East Faversham site location plan



Key issues, opportunities and risks

7.3 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- Traffic calming of A2, access through to the west and capacity of M2 J7
- Duchy principles versus garden community principles
- Landscaping and biodiversity net gain
- Partnership working
- Delivery
- Employment
- Affordable Housing
- Viability
- Relationship with adjacent sites

Traffic calming of A2, access through to the west and capacity of M2 J7

7.4 The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any 'calming' may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved and secured as part of this scheme. It will need further consideration and work with Kent County Council to explore the interventions necessary and how they can be practically implemented. The securing of air quality improvements along this corridor also needs further investigating but encouraging the greater use of diversion route and/or the M2 itself, could be of considerable benefit both to congestion and air quality.

7.5 There are references to an analysis of movement patterns to identify opportunities to improve cycle and car parking at the station, and the links through to the West which would ensure traffic would not have to go back onto the A2.

7.6 The proposal appears to rely on the upgrades to Brenley Corner, however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated by the promoter. Highways England identify that there are existing and forecast congestion issues on the network which need to be considered and a longer-term scheme providing greater capacity is likely to be required at this location. It will be necessary to understand what the modelling shows about the capacity here and what timing implications this will have on the delivery of this scheme.

Duchy principles versus garden community principles

7.7 Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust, which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues.

Landscaping and biodiversity net gain

7.8 Work has been undertaken to explore how net gains and improvements in biodiversity can be achieved, based on the understanding of distribution of soils and early landscape evidence, using contours and ensuring the retention of hedgerows and trees. However, only 33.6% is open space and it is not entirely clear whether this would lead to net gain being achieved and how much of the site is landscaped open space, whether there would be adequate green infrastructure and how closely it would accord with TCPA principles. However, references to the use of natural food in scheme, is a key TCPA principle, which has only been grasped by NS4.

7.9 The conclusions from Land Use Consultants are set out below. The landscape is of moderate/low-moderate sensitivity and issues should be considered further.

> *It is considered that overall landscape sensitivity of this area is moderate/low–moderate. It does not contain any national or local landscape designations, although is in proximity to the AONB to the south of the M2. Should the above opportunities be implemented, it could potentially be possible to mitigate many of the landscape and visual impacts of a development in this location, although there may remain some significant impacts on the local landscape features and views. Nevertheless, a development of this size would significantly alter the relationship of Faversham with its rural setting and potentially impinge on the setting of the AONB. The site would function more as an urban extension than a discrete garden settlement (albeit that it is capable of being planned on 'garden' principles). The impact on the character of the historic market town of Faversham has not been considered as part of this study. The cumulative impact of this new settlement with other developments on the south and east edges of the town would be a key issue to be considered in developing the proposal.*

Partnership working

7.10 The Duchy recognises the need to work in partnership with the Council and work is ongoing to establish an informal steering group with the Council. However, there is no formal Local Delivery Vehicle proposed and they intend to use their own approach to bring forward the new garden community using a traditional estate model with sales and control by covenants and retention of a perpetual interest.

Delivery

7.11 The proposal envisages an expected start date of 2023, from 120 dpa to 180dpa, however, we are aware that Poundbury demonstrated a slow start, and even if this level of completions was achieved early on, it is anticipated that it would not be completed until 2038. This rate of delivery is slow, even though limited major infrastructure is required, such as the A2 calming. However, this is caveated by the position in respect of the Brenley Corner (J7) improvements and it will be necessary to determine what level of development could start ahead of these improvements. It is recognised that this proposal is more about quality than quantity of homes, but that is not to suggest that steps should not be taken to understand how delivery rates could be increased.

Employment

7.12 The proposal seeks to deliver 2,500 jobs which is a ratio of 1:1 and we have given some general observations concerning this elsewhere. Despite this, such an objective remains useful as a means to underpin the promoter's objectives of securing a genuinely mixed use scheme. Considerable work has been done by the site promoters, based on research at Poundbury. Whilst the assumptions seem largely reasonable, we have noted elsewhere the differences between Faversham and Dorchester. Whilst there is useful recognition about the mix of employment uses and relationship with what currently exists in Faversham, it is important to also understand the range and type of economic development envisaged so that it complements the town's offer. It is also important to consider how this mixed approach including the considerable FTE homeworkers can be achieved and to ensure that these are not delivered at the expense of other jobs elsewhere. Whilst the position of Faversham relative to Canterbury and Whitstable might suggest the possibility of NS4 attracting the type of uses seen on other Duchy schemes, we are interested to know what the fall-back position would be if the traditional Duchy approach of using workshops and other mixed uses is not ultimately seen to be deliverable or attractive to the local Swale market. As with NS1, it is recommended that further work is required to test the job numbers, the implications for the Swale economy and other employment land, as well as cross boundary relationships

7.13 A more detailed point is that clarification is required about the number of local centres to be provided as there are inconsistencies between the framework and the trajectory.

7.14 The masterplan identifies options for new training facilities for the football club and cricket club and/or their possible relocation to extend the site frontage. It would be useful to understand what discussions have taken place and how this is likely to work. In the case of the cricket club, its current location on a designated Local Green Space may present policy problems with regard to any potential re-use of the site once the club had been relocated.

Affordable Housing

7.15 While the Duchy recognises the wish for 40% affordable housing, it considers there is a need for further assessment and debate about the tenure mix. Clarification is therefore required about the amount and type of affordable housing to be provided in terms of the mix of tenure and how this will accord with the policy requirement. If there are costs which would prevent the site from meetings this policy requirement, it needs to be specified, and particularly why the other garden community obligations may mean this is challenging and what, if any, trade-offs are proposed.

Viability

7.16 The promoter is confident that financing will not be a problem. However, a viability assessment has not been provided so it is not possible to confirm this position, particularly with regard as to what proportion of the Brenley Corner upgrade and A2 taming is going to be funded by this promoter. Mention is made of the likelihood of requiring an upgrade of waste water treatments works, which would need to be agreed with South West Water to implement and fund. As has been set out above, there has been considerable reluctance to share this viability information at this early stage, and as such it is not possible to conclude on this issue, other than to assume that the scheme is generally viable, but will need to be subject to detailed further information.

Relationship with adjacent sites

7.17 Whilst the site is a standalone site, adjacent sites to the north of A2 have been separately proposed by Prudential Assurance Company Ltd and Vinson Trust. If the Council felt they would need to bring forward additional land they would need to consider how these sites would, or would not, work together and whether they should be designed to be complimentary, or not. This may be an issue of timing and may not necessarily preclude both coming forward.

Matrix of emerging information

7.18 Following the identification of these issues and risks, we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

Further information	Action	Result	Comments
Viability	Financial information requested.	Still awaiting detailed figures.	Not yet able to conclude on viability of scheme.
Highways England	Letter sent 13 Nov 2018. Implications for M2 J6 & 7.	High level comments indicate that greater capacity is likely to be required. TBC	
Kent County Council	Letter send 15 Nov 2018. A2/A251 constraint and rural roads.	TBC	
Landscape	Assessment of impact.	LUC produced assessments.	Moderate/low-moderate sensitivity - issues to be considered.
Utilities	Email sent 9 Nov 2018. Assessment of implications.	Still awaiting a response.	
South East Water	Email sent 9 Nov 2018.	Awaiting a more detailed response.	

Conclusion

7.19 The proposal largely accords with the objectives in the Prospectus and is generally making good progress towards their requirements. Despite using different design principles, it should be able to provide a sustainable (inc. probably genuinely mixed use) and deliverable garden suburb extension to Faversham, without the same environmental tensions raised by other schemes. If allocated, the Council should consider how such a scheme is 'badged' in policy terms, i.e. whether it is promoted as an urban extension (albeit one planned on 'garden' principles), or as a new garden community. As an urban extension, the proposals make more policy sense in our view.

7.20 There may be an issue with timing if the transport modelling shows that there is no capacity at Junction 7 and the Council may not be able to rely upon a significant level of delivery. It is recommended that clarification is sought on securing the route through to the west to the A251 and further work is undertaken to test the employment assumptions and deliverability. In addition, the lack of viability information remains a concern as it will continue to raise a question mark as to what will be achieved until such times as it is provided.

8 NS5: LAND AT ASHFORD RD, SOUTH OF FAVERSHAM

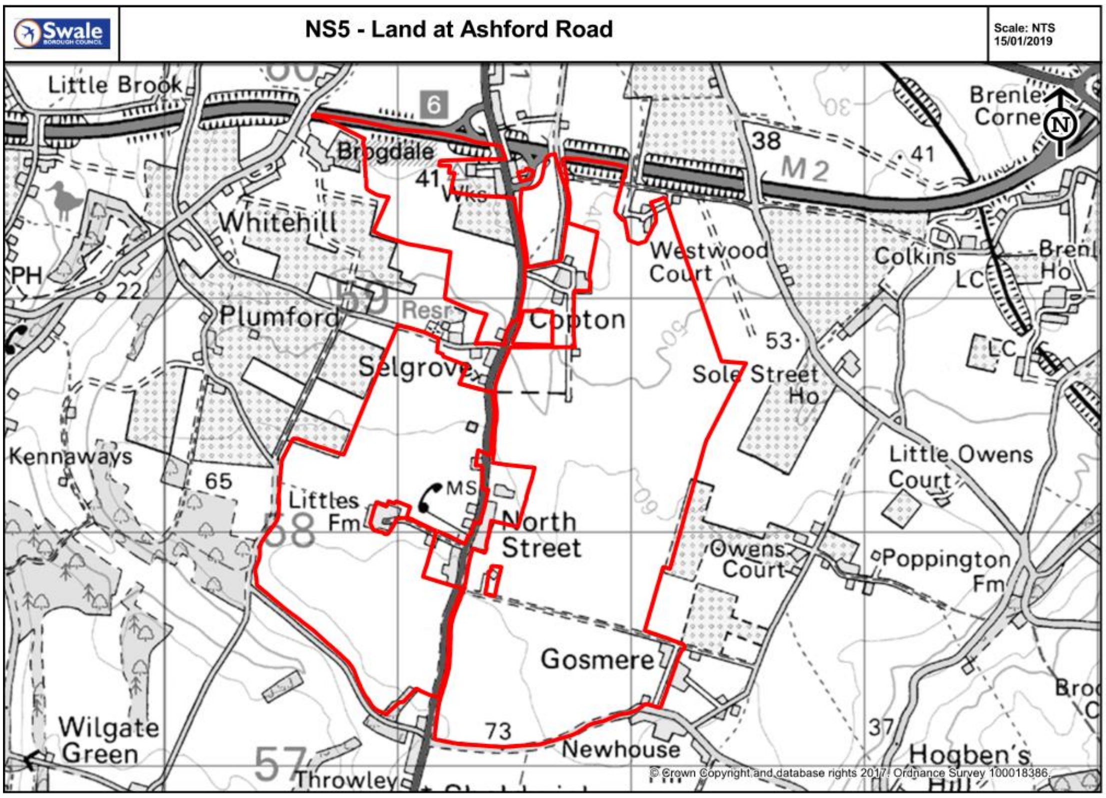
Summary

8.1 The site at Ashford Road, South of Faversham, also known as North Street, is promoted by Gladman Development Ltd and covers an area of 317ha and proposes delivery of 5,000 homes in 5 neighbourhoods, with a high street, 2 community hubs with super market, multi-functional library, estate agent, pharmacy, shops, gym, hotel and a variety of professional services and trades as well as a secondary school and a burial ground. In addition, 3 primary schools, playing fields and a village green will be provided within each neighbourhood. Three different employment areas are proposed to include a high density retail in high street, low density rural hamlet employment on east and medium/high density office development on northern edge within a traditional business cluster close to M2.

8.2 The proposal is in its early stages and promises a range of retail as well as a new GP, burial ground and numerous community facilities, hubs and open space. It has the potential to offer the opportunity to be a stand-alone community with its own identity.

8.3 This is a new approach by Gladman, who are exploring a new way of providing homes. This change and opportunity to work collaboratively is welcomed. Lord Matthew Taylor is retained in advisory capacity, as an independent member of the design team, to shape proposals and be a sounding board to ensure the garden community principles are properly incorporated.

Figure 5: NS5: Land at Ashford Road, South of Faversham site location plan



Key issues, opportunities and risks

8.4 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- Accessibility
- Employment mix, type and location
- Site boundaries
- Landscape, open space
- AONB
- Other Constraints
- Affordable Housing
- Delivery

Accessibility

8.5 It would be expected that a new garden community of this size would create the need and justification for new bus links and as such for routes to be provided as part of the delivery of the new homes. We would expect this approach to be taken rather than relying on current poor bus links. It is currently unclear how a fast connection to Faversham will be achieved, given that it relies on the existing (and congested) local transport network.

8.6 New cycle and pedestrian links are provided, however, it is not clear how these will link north into Faversham. The opportunity to provide sustainable links into the town centre should be taken and further details are required of how this can be achieved.

8.7 It is necessary to consider the relationship with NS4 and its implications on junction 6 and 7 of the M2 and the junction of A2/A251; both in terms of highway capacity issues and at what point these would present a constraint on capacity. It is recognised that further improvements of junctions and a realigned A251 will need detailed technical appraisals. It is also understood that Highways England are currently concerned about the performance of the A251 and the existing situation whereby traffic queues back from the A2 / A251 junction almost as far back as the M2 junction 6. Here additional queueing could increase tailbacks towards the M2 Junction 6 coast bound off-slip. In addition, Highways England indicate that the improvements required to J6 may be more extensive than that proposed by the scheme promoters. This will need to be tested.

Employment mix, type and location

8.8 Further consideration is required of the mix and type of employment proposed and how this fits with the demand and also the relationship of any new provision to the science park. This is discussed extensively elsewhere in this report.

Site boundaries

8.9 The site boundaries are dictated by ownerships which give rise to gaps and currently the proposal surrounds a number of hamlets and isolated dwellings. These will need careful consideration about the extent to which new development simply envelops them and how it is integrated with them, or whether buffers are properly planned in. It is necessary to consider what the optimal location for development is and whether any additional land is needed and should be included and if necessary whether there is a role for the Council. It may also be worth considering whether a bigger gap is required to the north, so that it becomes its own settlement rather than functioning as an extension to Faversham.

Landscape, open space

8.10 Whilst there is a commitment to open space and a landscape strategy, the opportunities for linkages and access to the countryside have not yet been explored. We note that the formal sports pitches are all located in the very south, which may not represent the most accessible location.

8.11 There is little evidence that the proposal takes a landscape led approach. The conclusions from Land Use Consultants are set out below. They are significant for this site and will need to be considered and addressed if the scheme is to be taken forward.

This is a challenging site for a new garden village development being both in the setting of the AONB and within a local landscape designation. It is considered to be a landscape of moderate-high sensitivity, as well as being visually exposed. In Swale, there is no precedent of urban development climbing the dip slope transition between the coastal plain, fruit belt and chalk downs of the AONB. Currently urban development is limited to the North Kent Plain, relating to the Thames Estuary-Medway/Swale edge (Medway Towns, Sittingbourne and

Faversham). A development of this size in this location would introduce urban features in an otherwise open, visually exposed rural landscape. Even if all the guidance outlined above was implemented, there would remain the substantive issue of the effective loss of the rural landscape separation and setting between Faversham and the AONB, and development within an area locally designated for its landscape value. It is likely that such a development would generate significant landscape impacts with relatively limited opportunities for mitigation.

AONB

8.12 The site is adjacent to and surrounded on three sides by the North Downs Area of Outstanding Natural Beauty and consequently it will be necessary to consider whether there would be any significant adverse impacts. This location sets a challenge for the development, but also provides an opportunity to link with it through the provision of a country park to the south of the site (requiring additional land) and to retain and enhance existing features within the landscape framework. It may be necessary to further consider the impact of views into and out of the AONB from and to this site. We understand that Lees Court Estate own considerable land within the AONB, which could be made available.

8.13 The AONB unit's initial provisional comments are that *"the scale of the proposals would result in significant and adverse change to landscape character that would also be visually damaging and that they would be strongly opposed to the development of a new garden community in this location".* They believe there will be a significant impact on the sensitive setting of the AONB, the scale of which is not capable of being mitigated. It will be necessary for all parties to consider this further.

Other Constraints

8.14 The site falls within an Area of High Landscape Value – a local landscape designation – noted for it being a distinctive rural landscape south of the M2 on the edge and approach to the AONB. Parts of the scheme would be highly visible and impacts may be a challenge to mitigate. This may require adjustments to site boundaries, changes in land uses, better integration of ancient woodland and, potentially, the management of adjacent land for purposes of mitigation.

8.15 Whilst these matters may not be 'showstoppers' at this stage, they are matters that need considerable early attention.

8.16 It is noted that electricity transmissions pylons currently cross site from west to east, however, these are not accounted for in the current masterplan. It is recognised that upgrades to services are required, such as water issues, however, there is little detail provided.

Affordable Housing

8.17 The proposal provides a commitment to 40% affordable housing, independent living and self/custom build and recognise need to meet all tenure requirements as set out in NPPF. A viability appraisal has been submitted and will be subject to separate detailed and ongoing testing.

Delivery

8.18 Little detail is provided about the delivery rates beyond recognition that this will be phased. While there is reference to a phasing plan, one has yet to be provided. As part of this it will be necessary to consider how this proposal relates to other proposals, particularly NS4 and what the compound effect will be on infrastructure, particularly relating to Junction 6 and the junction to the A2. There will need to be more certainty about the whole package and how deliverable it is. It is recognised that due to the early stage of the process, the masterplan will need considerable evolution to address the landscape and environmental constraints among other things.

Matrix of emerging information

8.19 Following the identification of these issues and risks, we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

Further information	Action	Result	Comments
Viability	Financial information requested.	Details provided.	Will be subject to more detailed and ongoing testing.
Highways England	Letter sent 13 Nov 2018. Implications for Junction J6 & J7.	High level response indicates concern over A251 queueing back to M2 J6. Further detail to be provided. TBC	
Kent County Council	Letter sent 15 Nov 2018. Implications for A2/A251 junction	TBC	
Landscape	Assessment of impact.	LUC produced assessments.	Significant issues to be addressed.
AONB	Impact on North Downs	AONB Planning Unit provided initial provisional response.	Object – consider there would be a significant impact which could not be mitigated.
Utilities	Email sent 9 Nov 2018. Assessment of implications and pylons.	Still awaiting a response.	

South East Water	Email sent 9 Nov 2018.	Awaiting a more detailed response.

Conclusion

8.20 This proposal is at an early stage and is the least developed; however, it is making reasonably satisfactory progress and could have the potential to accord with the prospectus, as a free standing sustainable and deliverable scheme, especially in the long term. However, transport issues and its location within the setting of the AONB provide considerable challenges, as do other landscape and visual impacts, all of which will need to be addressed if ‘showstoppers’ are not to subsequently emerge. Likewise, transport issues will also need to make further progress.

9 CONCLUSIONS

9.1 The Council's prospectus has successfully encouraged schemes to come forward and potentially be considered as options in the next plan. It has opened up options that may not have been available had this process not have been undertaken.

9.2 However; all engaged in the process have done so on the understanding that there is no commitment from the Council to take forward any of the proposals submitted.

9.3 Of perhaps greatest significance is that the process has yielded four proposals where significant new garden community infrastructure is paid for via land value capture. There is the opportunity to for these schemes to make a much more meaningful contribution to the infrastructure needs to current and future residents of Swale than may otherwise have been the case.

9.4 The four submitted proposals are all within the area of search identified in the PBA report Choices for Housing Growth https://services.swale.gov.uk/meetings/documents/s8862/Appendix%20I%20to%20PBA%20Report%20Item%208Feb18.pdf.

9.5 The assessment process has been used to identify issues and inform the discussion with the promoters. Consequently, many of the issues, opportunities and risks have been raised and in some cases clarification and further information has been provided. This iterative process is another benefit of this process; the Council has far more opportunity to scope and shape the proposals than may have been the case otherwise.

9.6 There are some issues that need to be addressed by all the proposals, and some, where the schemes are more developed, to a lesser extent. These include:

- Commitment to garden community principles and need to embed these into the scheme and where other deign principles are proposed address these further and clarify the relationship
- Over ambitious delivery claims and need to provide more detail on the realistic lead in times and overall timescales, and conversely in the case of NS4 how to speed up delivery
- A need to provide more detail and realism on lead in times and overall timescales, alongside exploring how to speed up delivery, including in relation to boosting delivery beyond the volume housebuilder options including affordable housing provision, private rented, custom build and encouraging SME local housebuilders.
- Need to respond to the LUC findings and conclusions and specifically address the issues raised by the AONB unit
- Need to address long term stewardship of community assets, their maintenance and management
- More and continued engagement with local communities, all stakeholders and interested parties
- Clarification of site boundaries and how these may need to be adjusted in response to the issues above

- All require a detailed formal response on highway issues and other infrastructure and utility issues as well as conclusions on transport modelling; and
- All require detailed assessment of the viability information that has been submitted

9.7 The most important of these gaps relates to viability. It is vital that each proposal is robustly viability tested at a point when the Council (and the promoter) is satisfied that the scheme is reasonably 'fixed'. This will need to be independently verified using costs agreed from the stakeholders including Highways England. All components that the promoters are offering will need to be included.

9.8 The proposals are not yet advanced enough for this detailed work – but we would hope this report provides a direction and illustrates the gaps that need filling to allow this process at a later date.

9.9 We consider it important that this viability assessment is 'public' to provide the Council and the residents of the Borough the confidence that any successful scheme will be delivered as promoted.

9.10 The Council will also need to consider what legal options are available to ensure delivery as outlined in each proposal.

9.11 We are also not yet convinced that the utilities companies have sufficiently grappled with the implications of these schemes and their cumulative requirements and the impacts this may have for the timing and delivery.

9.12 While it is not appropriate for us to rank or score these benefits and risks, the assessment process allows us to identify the issues associated with each proposal which will need to be addressed going forward and identify whether there are any showstoppers. This will allow the Council to commission further work and hold discussions with each of the promoters to address the key issues, opportunities and risks that have been identified.

9.13 Considerable work is being undertaken by SBC to investigate these proposals to ensure that they could, if necessary, be included as part of the Local Plan. If sites are to be included, they will need to be sustainable and deliverable, accord with the principles set out in the Prospectus and be consistent with the wider Council objectives and, of course, national planning policy and guidance. As part of the ongoing work a detailed Sustainability Appraisal of locations and options will be undertaken in due course to assess each proposal in terms of sustainability objectives, and these will be assessed alongside other options.

9.14 The Government have launched a Garden Communities prospectus inviting bids of ambitious, locally supported, proposals for new garden communities with a clear identity at scale. This is a good chance to attract funding to undertake work which would assist the process, such as funding staff, expertise and studies, working with communities to develop a locally supported vision, and providing bespoke support such as addressing any risks or accelerating delivery. The Council have submitted a bid to the Government (with the support of all four scheme promoters) under this scheme for funding to progress and support this garden community process. All the promoters have confirmed that they are willing to work with the Council and Gladman

Developments Ltd have also submitted their own bid. It is understood that the Government will make an announcement in Spring 2019.

Summary

9.15 Our very provisional conclusion about the scale of risk is as follows.

9.16 No one scheme is, at the moment, a 'non-starter'. All four have some element of risk but warrant further work if 'showstoppers' at to be avoided further down the line.

9.17 All are dependent on being found to be deliverable, viable and to have satisfactorily resolved their associated environmental and transport issues.

9.18 For the four schemes promoted - NS4 is clearly the lowest 'risk'. It is more developed than the other three schemes and has fewer significant barriers to delivery within a short timetable. However, the delivery rates are quite slow, and this offers a risk to the delivery of housing in the short term. It may not deliver at the pace the Council would ideally like.

9.19 NS3 and NS5 schemes carry medium-high risks – especially related to transport and connectivity. NS3 will benefit from significant investment in the network around Junction 5, but there will be possible capacity issues there and elsewhere on the strategic and local road networks. NS5 suggest they only need minor works at junction 6, which might not reflect what may be required by Highways England. Both have significant hurdles to address as regards the local network around each location. Likewise, they will both result in very significant changes for the villages in their respective locations – although not uniquely so. For both schemes, it is not realistic to expect significant numbers of new homes to be delivered until well into the next plan period.

9.20 However, in the shorter term NS3 would appear to be a more deliverable, partly because it is not so dependent on improving such a large extent of the local highway network. NS3 though may require a considerable redesign of the local network within this part of Swale and further afield and this may yet prove to be a difficulty for them.

9.21 NS5 is more at risk because it has more significant landscape issues to address, particularly relating to its location in the setting to the AONB. However, for Faversham it provides an opportunity to provide new housing which is not a further extension to the town. As such it provides a route to meet the growth needs in this part of the Borough, while maintaining Faversham as a smaller sized market town.

9.22 It is clear that NS1 is a high risk but also high reward option. It is the most aspirational of the proposals and provides the greatest number of new homes in total, but also the opportunity for more aspirational job growth and a step change in transport connectivity.

9.23 Of all proposals received it has the possibility to provide the greatest benefit, not only to the residents of the new garden community, but the Borough as a whole. This is particularly the case for Sittingbourne when coupled with the Northern Relief Road.

9.24 However, it also carries the greatest risks. There are AONB concerns, although they may not be as significant as for NS5, however, the scale of landscape, visual, biodiversity impacts generally, alongside the relationship of the scheme with existing settlements, are such that considerable effort will be needed to address them – including how site boundaries may need to adjust. Site boundary concerns also feed into matters such as the relationship with the existing Kent Science Park and the Sittingbourne Northern Relief Road.

9.25 The risks may also be present within the delivery model, especially if the Council chooses to rely in it to deliver a significant number of new homes in the next plan. We consider that it would be unwise to rely on houses being delivered within the short term because of the reliance on highway infrastructure being in place by 2022.

9.26 In the last few weeks Highways England has suggested more significant highway improvements may be needed that the promoter envisages. But this is far from a final view – it is only a warning that further work is still needed. It not yet a ‘showstopper’.

9.27 Although the transport issues are entirely dependent upon appropriate support for the approach from Highways England. The same recommendation applies across all four sites but here the risk profile is obviously greater.

9.28 The Council needs to be alive to the risks of this scheme, but because of the possible benefits, the Council’s efforts should be focused on de-risking the timing, and delivery and environmental impacts of the scheme. Ways to include the Science Park within the proposal should be actively encouraged.

9.29 While the promoter is committed to a private led model – should this falter, perhaps because the cost of carrying the full delivery risks becomes too great – the Council, if convinced of the overall benefits may wish to look to a different delivery route where the risk is carried by the public and private sector. We would suggest that discussions should take place with the promotor and public sector agencies (MHCLG, Homes England, DfT and Homes England) in order to consider the delivery issues surrounding this scheme.

10 RECOMMENDATIONS

10.1 If the option of new garden communities is going to be supported and consulted upon, further work will be required. We recommend that this further work includes:

- work is progressed and discussions continue with the promoters to further clarify and remove the potential risks identified in this assessment
- the use of a resolution recognising that the broad locations will be a material consideration in any development management decisions on surrounding land
- detailed viability assessment of each of the proposals
- scrutiny of trajectory and market capacity as well as exploration of what interventions can be used to increase the rate of delivery as well as the type of homes provided
- early masterplanning support to explore the most appropriate layout in relation to the landscape, sensitive locations and relationships with existing communities which is then followed up with the use of SPD or masterplan in due course to direct design parameters of any preferred options
- further work is undertaken to understand the implications of proposed jobs numbers, employment land issues relating to cross boundary issues of commuting, labour supply and competition implications within the context of the overall job numbers and how the Local Plan should address this
- continued liaison with stakeholders and technical consultees, particularly relating to highway issues
- clarification about the delivery of Northern relief road as part of the NS1 proposal or how it is achieved separately but before the completion of NS1
- establishing a Utility working group addressing cumulative issues and timing
- dedicated engagement support to achieve sustained community involvement in the concepts and through to their development

NS1 – South East Sittingbourne

Question 1 – About the Scheme?			
Question 1a: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Responds to the Councils SHMA which sets out the profile of homes needed	Simply saying will provide an appropriate mix etc.	The proposal sets out to provide mixed communities as a necklace of villages (character areas) providing 11,500 new homes connected by a green network. Originally there was no commitment to any affordable housing, but this was subsequently explained as an assumption of 10% affordable housing. The affordable housing officer has now been increased to 20-25%, on the basis of creative interpretation of tenure – this will need further consideration, including testing of the viability assumptions. The proposal mentions specialist and extra care, private rented and serviced sites for self and custom build so it is considered that a flexible and diverse basis for housing will be delivered. The proposal is unable to offer the tenure or mix of homes expected in the Prospectus, however, we understand that a significant number of new homes (several thousand) are expected to be 'built to [market] rent' i.e. let without any market discount. This model is used partly because it allows the site promoter to forward fund some of the infrastructure needed. Without judging the competing merits of build to rent vs build to buy, the Council needs to be aware of the product being offered. The increase in affordable provision is welcomed but it still may pose a challenge to make much contribution to 'affordable need', which given the scale of the proposal could mean little affordable housing is delivered in Sittingbourne (and Swale) for a whole plan period.	Further information required, including testing of viability assessment.
Other ownership and site optimisation issues	Not owning/controlling the site	The promoted land is within their control, and it is noted that the ‘red line’ reflects land under option as opposed to necessarily reflecting a sensible land area. It also excludes Kent Science Park (KSP) and some sites between their proposal and Sittingbourne and other settlements which are considered as 'missing fields'. There is a risk that the ‘missing fields’ between Sittingbourne and the proposal cease to function as efficient agricultural land, or quality amenity space (if left undeveloped), or alternatively come under pressure as new housing sites outside the wider masterplan approach. Other boundary changes may need to be considered if it becomes necessary for the scheme to ‘flex’ in response to environmental challenges and any mitigation that may be required. There may be a role for Swale BC to help assemble land into a better parcel, and we understand this issue is being considered. One real issue is that the Kent Science Park (KSP) is excluded. The proposal delivers no new space on KSP itself, net additional or improved, and it is noted that all the employment space offered is adjacent and potentially competing. Further information is required to understand the relationship and working arrangements with KSP, given their exclusion from the site. These issues need further discussion to ensure a robust development area.	Further information required, including follow up and clarification of adjacent land parcels, as well as rationale for land which has been included.

Question 1b: What mix of other uses is proposed?

Note – this could be broken down by use- i.e. commercial, retail, leisure etc.

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the New Settlement Study which outlines the Council’s expectations (land balance). Or provides alternative evidence to support an alternative mix	Fails to commit to the outline provided in the New Settlement Study	The proposal is for 11,500 homes with 120,000sqm new commercial space and 10,500 jobs around the existing KSP and is predicated on the delivery of a A2/M2 southern relief road and new Junction 5A. It includes district centres (4) to include nurseries, pharmacy, pubs/restaurants, medical facilities in lines with CCG requirements, 4 new primary schools, secondary including 6th form and further education, sport and leisure including new facility for Sittingbourne FC. The social infrastructure is as expected. However, it is not clear what the relationship is with the football club (are they relocating, selling old site etc.?) and what do they expect from the scheme? However, as an employment led proposal there is little detail about the employment offer. While they are trying to respond to the 1:1 jobs requirement, there are a number of issues these include the relationship with Science Park, the qualitative offer and type of jobs, and the fact that unlike the others they do not commit to providing the floorspace, just serviced land, which means the viability to build this is far more important because there is less opportunity to cross subsidise. We consider that only a small minority of the jobs will be science park type jobs but there will be strong demand for other uses – including warehousing and industrial. However at the employment densities suggested (158,000 sqm and 11,500 jobs (from follow up letter) this makes the delivery of anything other than main B1(a) office space very unlikely. This would needs an average employment density of 13.8sqm per worker, which is within the realm of B1a but not B1(c), B2 or B8. HCA Guidance states that R&D needs 40-60 sqm. On these numbers, it is difficult to see how the proposal would be viable. The Promoter’s also build their case on re-calling outward commuters – this may have some merit but runs into Duty to Cooperate issues and is notoriously hard to achieve. Because of the quantum of space, further work would be required to consider: the sub regional /regional context and how this could deliver or compete in that market; to clarify the market demand for Ba(a) space; and ensure it does undermine KSP or other Sittingbourne sites and supply. Further work is required to check and clarify the employment work and the viability appraisal will need to be subject to detailed testing.	Further work required on employment assumptions and testing of viability work.

Question 1c: Outline the proposed trajectory

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideally delivers early.	Fails to demonstrate the site can start delivering in a meaningful (shortish) period.	The proposal seeks to deliver 11,500 new homes – from 2022/23 for 20 years and achieving up to 700 per year. Accelerated by a range of suppliers and approaches, 4 national housebuilders, serviced developments, PRS, self-build, extra care and retirement homes. This is well thought through - with evidence that the proposal has a number of different outlets and routes to market on site, which will support overall delivery. However, we query whether 700 dpa is deliverable in Sittingbourne – possible with other sites alongside. Our understanding was that the homes to rent would forward fund the infrastructure, but this suggests the commercial will come first, which given the uncertainties we have raised under 1b, may be questionable, despite its desirability from a sustainability point of view. Further information to test this will be required. It is not very clear what can be delivered without J5a, and this means there is a risk that the site requires Junction 5a to be delivered at record pace will be difficult given the likely need for a DCO. More information is required to clarify the delivery timetable and the implications of the highway requirements, particularly in view of AONB issues and the detailed matters raised by Highways England in their comments of 12/02/19.	Timing issues which requires further work and highways clarification.

Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	The proposal suggests that the strategic infrastructure works will commence in 2022 with housing upfront delivery before housing in 2022/23, whilst the commercial land near the M2 will commence early. This includes water upgrades likely to be required in medium term, beyond 2025, which will need to be phased. Southern Water have confirmed that also require work to provide any more than 3,500 homes. It is also noted that approx. 4km of underground cables will be required for electricity provision. The proposal considers Sittingbourne is a separate housing market and that both areas could support level of demand in their own right. However, this will need testing. There are also a number of unanswered issues relating to the timescales, and trigger points such as how many homes can be delivered without the J5a and what the implication and relationship is with the Northern Relief Road. Initial comments from Kent Count Council (KCC) advise caution about the proposed delivery timescale and recognise the volume of work and availability of resource as constraints on delivering at accelerated pace. Initial comments from Highways England (HE) confirms that although they cannot commit without knowledge of the type of junction and land take and detailed drawings, a DCO will be highly probably, and that there would be a minimum of 7 years from allocation within the HE programme to the junction opening. There is considerable doubt about the timescales and this is the most significant issue and challenge facing this proposal.	Timing issues which requires further work and highways clarification.

Question 1d: Outline the benefits (Social, Economic, Financial)

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New Settlement Study.	The proposal expects the infrastructure to be provided and funded in full by the development through land value capture at the outset. It also commits to providing education, health, community and open space for sports and open space. It recognises that there will be Council tax and GVA benefits. However, these benefits accrue per new dwelling and are not unique, although for Swale, the overall scale on offer is. Little consideration is given to the long term stewardship issues, or social benefits. Given the scale of the proposal it is surprising that there is not more information picking up wider benefits for Sittingbourne and Swale in general. However, there may be two barriers to wider benefits: a) not investing in the KSP; and b) without a Northern Relief Road, J5a benefits cannot spread around Sittingbourne efficiently.	Further clarification is required relating to the KSP and northern relief road.
Provides evidence to demonstrate that the benefits are achievable	Little or no evidence provided.	Costings were not included within the initial submissions. However, some details have now been provided.	Requires further evidence that benefits can be achieved. Viability will be subject to testing.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic.	The proposal places heavy reliance on the reduction in out-commuting. The robustness of this assumption needs to be tested and it is important to understand where the market is for this scale of development. In our experience, local plans based on this kind of adjustment are vulnerable to Duty to Cooperate and general soundness challenges. Further information on this is required.	Further information about out commuting is required.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits.	This is not provided and needs further exploring in relation to the Northern Relief Road and how and when it is to be delivered. There could also be more recognition of any dis-benefits arising from the scheme, notably on environmental issues.	Requires further consideration of any dis-benefits, particularly the relationship with the Northern Relief Road.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough	Benefits only relate to this proposal.	The road is proposed as a Swale wide benefit. The transport modelling will need to test this assertion in detail. However, it is noted that the Northern relief road is not included within the submission and this is a significant issue, which reduces the off-site advantages which would unlock Sittingbourne and improve the town all round. Initial comments from KCC recognise that there are benefits to the A2 with the suggested improvements, although increased traffic will be diverted onto the motorway. These concerns are reflected in the initial HE comments which state that ‘significant infrastructure investment could include link capacity improvements, including potentially (subject to all assessments and approvals) a parallel link to accommodate traffic other than that which is destined for the M2/A2’	Requires further information resulting from HE comments and the relationship with a new parallel road and the northern relief road and its delivery.

Question 2: Abnormals			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	The proposal intends to fully fund the motorway junction and road privately. Whist this may be possible, no costs are provided and the technical case for the junction has yet to be made. There is a discrepancy between the red lines on the plans on page 25, and page 27. 23 and 22 in terms of whether all the land is included all the way up to the A2. Therefore, it is necessary to confirm that they own or control land right up to A2 and M2, as well as any potential parallel link road to ensure that all the works can be undertaken. Further work required to clarify land ownership and relationship with the Northern Relief Road as well as testing the costs and implications of Highways England comments, in particular, any need for a parallel road next to the M2.	Further work required to test costs and implications of highways works.
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. *We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.*	Or over optimistic assessment.	Costings were not included within the initial submissions. However, some details have now been provided.	Requires further evidence that delivery can be achieved, with viability costs tested.

Question 3: Joint working			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promoter would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	The proposal sets out how they envisage the Council being a partner and how they also want to involve Kent Wildlife Trust and Natural England. They explain how they have already engaged with KCC education and highways HE, CCG, Sport England, Kent Downs AONB and draws on support from Thames Estuary 2050 Growth Commission Vision. It is clear that there has been joint working on the Swale wide Transport Model, and whilst some work has been undertaken with transport infrastructure providers and utilities, little has been done to consider environmental issues and implications. While there is a recognition that these are to be undertaken, it would be expected that more would have been achieved. This is important due to the impacts of the road alignment and certain development parcels upon designated landscapes, ancient woodland and nature conservation sites. There is also a lack of detail in relation to local community engagement. Further information has been received addressing some of these points, particularly how the community and Design South East will be used via a combination of approaches. It is also understood that a PPA is being discussed. There are therefore signs of progress, but joint working will need to be developed further as the scheme progresses to ensure robust engagement at the relevant time with the right people.	Satisfactory progress with further work required on engagement.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc).	No acknowledgement of need for resources.	This was not initially addressed and has been probed further via letter. The response in Jan 2019 indicates they are supportive of the Local Plan process and willing to sign up to a PPA. This will need to be explored further at the next stages. There is little acceptance currently of the need for intervention on site boundaries, particularly those areas falling outside of the scheme and existing settlements.	Satisfactory progress. Will require further details as the scheme progresses.
Outline when intervention or action is needed and what form they would like this to take (timetable,	No timetable or detailed plan given.	There is a good recognition that further evidence is required. Specific mention is made of the need for a water cycle strategy to be prepared to inform the masterplan. However, no detailed timetabling is provided and this will require further consideration at the next stages. There is a general need to consider what additional evidence is required and what action will result from this.	Satisfactory progress, with further work required to detail how and when they will work with the Council.

Question 3: Joint working			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
consideration of policies needed in Swale or wider).			
Demonstrates this action plan aligns with the next local plan. And outlines what polices may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail is provided, however, they appear committed to the plan timescale and willing to sign up to a PPA.	Further work required to agree the policy approach.
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	The promoters are happy to discuss alternatives to partnering, delivery and stewardship, but clearly wish to undertake the delivery of the scheme themselves. Further clarification in January 2019 has revealed that they are willing to work with Council in a number of ways, although they don't see them as essential to the success of the project. However, they are happy to discuss further and this is to be welcomed.	Satisfactory progress with further work required to agree the best way to work together.

Question 4: Delivery vehicle			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Discusses various delivery models, weighs up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	Initially no clear arrangements were specified, however, there is now clarification that Quinn Estates would take the role of Master Builder. Already have land owner agreements in place and 4 housebuilders to provide 6,000 homes. Some examples are provided of who they would work with, however little detail is provided in relation to delivery models. This was further clarified in the January 2019 response which states they no not envisage using a LDV for the scheme; however they are not averse to discussing this further. Clarification regarding delivery vehicle will be required and options explored in more detail.	Satisfactory progress with further work required, particularly relating to exactly what model will be used.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	This is not addressed, however further detail is provided in relation to stewardship – see below.	Further information required.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	This level of information is not provided, and this route is not proposed. The lack of reference to LLDCs and other mechanisms or changing government policy is not necessarily a problem, but the Council may want to explore different mechanisms with them. Consideration will need to be given to emerging Government proposals for net-biodiversity gain.	Further information is required about details of the mechanism going forward.
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples	The promoters rely on their track record citing Connect 38, Sittingbourne town centre and relationship with Barratts and Redrow Homes. However, it is not clear that they have any experience of acting as a master developer at this scale. Further consideration of how these examples are appropriate would be helpful.	Further clarification required to ascertain how relevant and transferable the examples are.

Question 4: Delivery vehicle			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	The proposal sets out principles for planning for long term stewardship, paying for it and running a stewardship body. It seeks to involve of range of groups, depending on assets and most appropriate approach. While initially little detail was provided, this has been expanded upon in Jan 2019 response. This commits to considering community trusts, the use of an overarching board with relevant interested parties. A flexible approach and discussions with the Land Trust have been suggested as well as use of endowments to seed fund the stewardship vehicle. This will need to be explored in more detail to ensure it is factored into the process at an early stage and any cost implications properly accounted for.	Further detail of how this would work in practice and testing required to ensure costs have been included.

Question 5: Advice	What specific advice do you require and what technical research will you undertake should the bid be successful?		
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	The proposal is a self-contained document which does not explore the question of what advice and research is required, which either means it is confident all issues are covered, or it has not been considered in detail. Clarification can be sought.	Further information required to progress scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response. (e.g. we need a Borough wide Water Cycle Study to help develop our scheme)	No acknowledgement of the need for further work	There is a good recognition that further evidence is required and they expect a water cycle strategy is to be prepared to inform the masterplan. However, no detailed timetabling is provided, and this will require further consideration at the next stages. There is a general need to consider what additional evidence is required and what action will result from this.	Satisfactory progress with further work required on how and when they will work with the Council.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.)	Highlights problems or data issues with no positive way forward.	This is not addressed in any detail. There are potentially significant issues relate to transport and landscape needing to be clarified, with specific reference to the initial provisional views from AONB Unit and also from Highways England and KCC.	Further work required to address AONB, Highways England and KCC comments.

Question 6: Environmental Opportunities			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Clearly identifies the net gains or improvements under the five broad areas	Fails to move beyond prospectus and New Settlement Study.	The proposal states that it has engaged with a range of stakeholders to inform approach, but it is not clear exactly who has been involved and how the comments have been addressed. There is little detail on the stakeholders contacted and how any input has directly informed the development of the masterplan and layout, particularly in relation to the road alignment and the approach to environmental enhancement/constraints. The proposal claims that there will be improvements in air quality – scale of relative reduction is anticipated to be higher than generation from import of development itself. This will need to be explored in more detail and evidence provided and tested. This does not appear to be a landscape led scheme, which takes advantages of the opportunities available and has been based upon an understanding of landscape and the influence of AONB. Despite landscape evidence having been prepared, initial work by LUC indicates potential concerns. Their conclusions will need to be addressed. The AONB Unit has also submitted initial provisional comments which will also need to be responded to.	Further information required including a response to LUC and AONB unit comments.
Provides evidence to demonstrate that these are achievable	Little or no evidence provided.	A number of reports have been provided as part of submission, which is helpful. Landscape work has been assessed by LUC and their comments (together those provided by the AONB Unit) will need to be considered and responded to.	Satisfactory progress, but further information is required in response to LUC and AONB Unit comments.
Provides evidence that they have been realistically assessed	Concern that they may be too optimistic.	Reports provided as part of submission, but as yet there is little acknowledgement of potential concerns. Landscape work has been assessed by LUC and comments will need to be considered and responded to, together with the initial provisional views of the AONB Unit.	Further information required to provide a response to LUC and AONB Unit comments.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible)	Lack of recognition of any negative impact.	Net biodiversity gain is mentioned but is not considered in any detail. Further detail is required about how this will be achieved, especially in view of the current road alignment and the siting of some development parcels and their impacts on landscape and wildlife sites. This issue would benefit from being considered as part of the masterplan review.	Further information is required to demonstrate how net biodiversity gain will be achieved. It is recommended that the scheme is also subject to masterplan review.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough	Improvements only relate to this proposal.	There are significant 'green' areas identified, however, their significance in terms of their overall benefit and relative to the other implications of the scheme are not clear due to environmental issues highlighted above and in Question 7.	Further information is required to develop the environmental opportunities arising from the scheme.

Question 7: Environmental Constraints			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	The proposal includes an initial assessment which provides list of higher sensitivity features. Conservation areas and heritage assets are identified with opportunity to use these to inform masterplan through clear principles. This includes prehistoric and roman archaeological sites present – intend to undertake pre application surveys and mitigation arranged. Consideration has been given to flood risk, ground water, surface water and foul water, as well as agricultural land most of which is grade 2 as well as mineral geology. A suite of ecological surveys have been undertaken by Aspect Ecology - phase 1 habitat: concept plan seeking to retain and strengthen habitats and provide buffers. A reasonable start has been made to understand the constraints, however, it does not appear that this is a landscape led scheme, which takes advantages of the constraints and been based upon an understanding of landscape and influence of AONB. The line of the road is also a concern in terms of its relationship with the constraints of the ancient woodland and quarry. The work by LUC raises a number of issues of concern arising from the location of the site, specific impacts on environmental assets, such as landscape designations, woodland and quarries, and about how any understanding of the site has been used to inform the masterplan. Likewise, initial provisional views from the AONB Unit express concern about the implications of the scheme for the AONB and its setting. The scheme is likely to be judged as ‘major’ development within the AONB for the purposes of para. 172 of the NPPF. The implications of the NPPF will need to be considered, as will the issues raised by both LUC and the AONB Unit. Overall, this scheme would benefit from additional masterplanning review and input to see how the constraints can be addressed, particularly relating to the road alignment.	Further information required on the constraints and comments received. It is recommended that this site is subject to masterplanning review.
Provides reasonable confidence that the ‘long list’ (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	The proposal addresses the key issues and provides a variety of supporting evidence is submitted. Comments on this by LUC and initial views of the AONB Unit need to be addressed and it is likely that and others such as England Nature will also require further information. Their formal views will be needed.	Satisfactory progress, but further response to LUC and AONB Unit comments are required.
Where constraints are identified provides a ‘action plan’ outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc.	No mitigation strategy – or over optimistic.	The proposal identifies principles which inform masterplan and aim to identify opportunities and improvements (see page 26). There is recognition of key issues such as integration of existing development, avoiding skyline development, and network of green spaces. However, it is not clear how these have been translated into the scheme itself. There is some acknowledgement of the partial loss of Quarries that is to be off-set by the use of ecology hubs within schemes, and the damage/loss to the woodland which is to be compensated for through replanting (see page 35). The mitigation and compensation measures are not detailed and there appears to be the implication that the quarry and wood are not so valuable that they need to be preserved. This issue will need to be clarified and tested. Further work relating to the damage/loss to important sites, or mitigation should be further considered and commissioned.	Further information required in respect of mitigation.
Considers off site (close proximity) constraints and provides a realistic view to managing these.	No consideration or inadequate approach to management.	The site plan is based on ownership and means that there are potential areas which are not included. There are concerns about missing fields, the need for buffers or the ability of the schemes boundaries to ‘flex’ in order to avoid or mitigate constraints. There is also little information provided about the integration and access to Sittingbourne and the relationship the scheme will have with it, especially in relation to the gap between existing and proposed development. Site boundary issues need to be addressed to ensure the most logical and appropriate sites are included.	Further information required relating to site boundary issues.

Question 8: Delivering the design principles

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	The proposal is clear that it wants to agree set of principles based on key themes, and that it accepts and sets out design principles. Whilst there is general recognition of good design and the use of design principles, no detail is set out. Further information provided in Jan 2019 envisages a masterplan for the site with disposal contracts which could reflect the ethos of these documents. It recognises the Council will still want control and suggest using conditions attached to individual elements as a way of achieving this. However, it is now clear exactly how design quality will be achieved using this approach. To achieve high quality design the approach will need to go further and require discussion and agreement to the approach.	Further details required on how the design principles have been used and good design will be delivered.
Recognises the TCPA principles and met these in a meaningful way	References them but with no detail or reasons for departure.	The proposal commits to embracing these principles and interprets them in a way that is relevant. It considered that it sets green infrastructure and self-contained communities at the heart of the scheme. However, while there is recognition of the principles, their interpretation does not go as far as the TCPA objectives. It is not clear that this is a landscape led strategy or how will cycling and walking be achieved due to the large road splitting the site. This will need to be addressed in more detail.	Further detail required to demonstrate how these have informed the masterplan.
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	Further information provided in January 2019 demonstrates that the promoters had previously engaged with Design South East to ensure masterplanning are subject to peer review. This approach is welcomed, but it is not clear what the outcomes were and how this enabled the scheme to evolve taking account: the constraints; the need to involve stakeholders; and whether there are to be any changes in the scheme as a result of this engagement process. Further commitment to delivering these principles is required.	Further detailed required on the design work and how this has informed the masterplan.
Shows that the proposal responds to landscape context (accepting limited detail may be available)	Lack of recognition of landscape within and surrounding the site.	The proposal claims to be landscape led – uses green grid strategy approach and believes that the AONB has been considered, with elements to be retained through country parks and open spaces. However, the layout appears to be strongly influenced on land ownership and the road alignment, both of which have significant implications and may not represent the most appropriate design. The Green infrastructure masterplan is difficult to read and discern the different elements (page 22) This will need further interrogation/evidence. As stated above, there are issues about the impacts on environmental designations, together with a lack of 'green' links through to Sittingbourne. The landscape impact has been considered by LUC and there is a need to respond to their comments. It may also be necessary for further visual impact evidence at the next stage.	Further detail required and specifically their response to the LUC comments.
Provides a 'action plan' outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	The proposal makes reference to engagement, however, limited detail is provided. The January 2019 response states that they will engage with a variety of local groups through numerous events and that "the events and feedback are a key driver for the proposals and seek to pull strands together to ensure a coherent overall proposal which reflects inputs". Further detail and commitment to this element of the design principles will be required.	Satisfactory progress. Further information required to set out the process.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	See above. An engagement strategy will be required moving forward.	Further information required to include an engagement strategy.
Agree with community land ownership and stewardship – ideally	Fails to commit to community land ownership	The proposal initially included little detail and no examples of successful use had been provided. However this has been expanded upon in the January 2019 response, which commits to considering community trusts, the use of an	Satisfactory progress, subject to further detail about land ownership and stewardship

Question 8: Delivering the design principles			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
with details and examples	and stewardship.	overarching board with relevant interested parties. A flexible approach and discussions with the Land Trust have been suggested as well as an endowment approach to seed fund any community vehicle. Further information will be required as the scheme progresses.	being agreed.

Question 9: Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direct of travel**
Outlines what infrastructure. is proposed and why	No consideration of what is required or failure to commit.	The proposal commits to providing: • 4 primary schools, 1 (6 FE) secondary plus 6th form, exploring nursery and FE facility. • New sports facilities for Sittingbourne FC, Health provision and healthy living in line with CCG requirements. The promoters state that discussions have taken place with Southern Water with respect to foul and supply and that there is capacity without upgrades in the short term. Also with utility providers who confirm services can be provided, subject to phasing and upgrades and electricity requires 4km of underground cables. Fibre to the area can be achieved. The proposal is quite well advanced in terms of the infrastructure requirements and a commitment is given to meeting all its own needs. It is noted that there may be an issue getting power to the site because the high voltage line is some distance to the north. It is understood that the costs will be covered by the developer, but there may there may be timing implications. We recommend that it is checked that this has been included in the costs and viability appraisal. Further discussion will be required with the education authority and the clinical commissioning group in relation to provision. Further evidence and information is required about the detail and costs to ensure these are robustly established and properly costed.	Good progress but further work required to address electricity supply, type of community and employment space and other infrastructure requirements.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of the proposal. Further detail will be required if the scheme progresses.	Satisfactory progress and further information required.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided. Given the importance of timing for this proposal and the significant infrastructure provision required, it would be useful to set up a Utility working group to consider cumulative impact and timing issues.	Further information required. It is recommended that a Utility working group is established to consider cumulative issues and timing.

Question 9: Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direct of travel**
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided. However, it will be required for the viability assessments which will need to be tested and will evolve throughout the process.	Further testing required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposals are potentially transformational from an infrastructure perspective, in particular in terms of transport. There is though little reference to Sittingbourne residents or those being impacted upon by development in terms of the benefits that they too could receive. In this respect, the promoters could be said to have underplayed this question. In general terms, these issues and people will need to be considered, particularly in terms of the villages that are enveloped by the proposal and their engagement in the process, as well as the infrastructure improvements required.	Further information required, particularly on how the existing communities are dealt with.

Question 10: Transport			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what infrastructure is proposed and why	No consideration of what is required or failure to commit	The proposal considers that the Southern Relief Road is a major goal for the area and a solution to existing problems. Proposes to link into new junctions and provide enhanced bus routes and sets out walking and cycling strategy with clear links into Sittingbourne. This includes the reallocation of road space to buses, and use of Highsted Road as a non car only connection. The case for the road and junction needs to be made and there are a number of questions to be addressed, such as capacity issues on the road corridors. The need for the junction and operation of relief road on Sittingbourne, and the link with and delivery of the northern relief road is also essential and needs to be properly addressed. It will be necessary to check how far the Southern relief road is dependent on the delivery of the rest of the Northern Relief Road? Will it bring benefits on its own? There are a number of other issues to be addressed, including the type of road used because there appears to be a discrepancy about its size (single carriageway or dual). There is a lack of detail and feasibility about how links into the town will be achieved and whether the scheme will be accessible to rail. There are also issues about linkages with the existing road network, especially rural lanes. This is a scheme that will require a significant public transport intervention. Whilst there is an outline of a potentially innovative scheme indicated, considerable further work will be needed to determine firstly how it will be implemented and, secondly, its likely effectiveness in off-setting considerable car usage. Considerable further information is required to address the fundamental element of the scheme. Initial comments from Highways England confirm that a junction could be accommodated in this location, however they are concerned that due to congestion, significant infrastructure investment is required that could potentially include a parallel link to the M2 to accommodate local traffic not destined for the A2/M2. They also consider that a DCO will be required and that the scheme is likely to take 5-7 years from allocation within the programme. These comments do not reflect the current submission and masterplan and further discussions/clarifications will be required. Initial comments from Kent County Council also state that while there are likely to be benefits for the A2, more traffic will be diverted onto the M2. While they are happy for development to proceed from both ends, further modelling would be required to demonstrate the extent of development that could occur without the completed link and they are keen to test alternatives to the absolute need for a dual carriageway. They recognise that there are accessibility implications for both Sittingbourne residents and rural communities via the rural lanes modelling is required to ascertain whether measures will be needed to prevent vehicle access from the new development onto these lanes. They are happy to assist and investigate the bus only link via Highsted Road.	Further information required relating to highways and public transport issues and specifically a response provided to the HE and KCC comments.

Question 10: Transport			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	Air quality and congestion improvements are a driving motivation for the proposal. Modelling is being done in conjunction with HE and KCC and transport work has been done and an air quality technical note produced. All the evidence submitted will need to be reviewed and considered in detail as the scheme progresses. Initial comments have been provided by KCC and HE (see above). The key issues they raise have implications for the masterplan and will need to be addressed going forward	Further information required relating to highways and specifically a response provided to the HE and KCC comments.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	The proposal commits to the delivery of the road and new junction within 2 years of construction commencement on site (2022). It is stated that this is informed by initial discussions with HE and at higher levels of Government. It is understood that a business case and further evidence is being prepared. Timescales are considered very optimistic given the process to be followed. We consider that the new junction and road layout will probably require a DCO and as such the timescales will be much longer given the HE view. There is therefore a risk in terms of timing should the Council rely on the delivery of this site in the short term. The issue of timing is given more weight in the light of the initial provisional views of the AONB Unit who regard the junction as major development. A response to these comments will be required. Initial comments from KCC express caution at the proposed delivery timescale and support HE initial comments that the junction would not take a minimum of 5-7 years from allocation in their programme to junction opening. Detailed consideration will need to be given to formal responses from Highways England and Kent County Council and a realistic timetable agreed.	Timing issues and further information required relating to highways and in response to the AONB Unit's comments.
Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities. (e.g. HA re J5a or Faversham junctions).	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	The proposal states that the J5a junction distance is 4km from J5 and is therefore acceptable. It is claimed that clarification from HE has confirmed that a DCO is not required and that the S278 process can be used instead. It is expected that work can start work from both the north and south to open up sites for delivery. Initial comments from HE confirms that a junction could be accommodated in this location and KCC confirm in principle that development can proceed from both ends, subject to modelling to demonstrate the extent of development that could occur without the completed link. However, there are a number of discrepancies between the promoter and the HE in terms of the use of a DCO and the overall timings. We have above expressed caution about the timings and the likelihood of needing a DCO. This position has been confirmed by both KCC and HE who state that a DCO is highly probable and believe that it would take a minimum of 5-7 years from its formal allocation. Importantly, HE also believes that a parallel road to the M2 may be required to accommodate local traffic. Further consideration will need to be given to the results of the transport modelling and the highways comments and their implications for the masterplan.	Further information required relating to highways and specifically a response provided to the HE and KCC comments.
Any calculations and modelling clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the minimum need for the new community.	The proposal is predicated on the delivery of a new junction and southern relief road, which may be of considerable wider benefit to the area. However, this needs to be tested, particularly in terms of how it works with the northern relief road and its delivery. The initial comments from KCC recognise that there are some benefits to the local roads and particularly the A2 and that flows would increase on the M2. There may also be additional benefits from the bus routes, but these would need to be modelled. Initial comments from HE raise the potential need for a parallel road next to the M2 for local traffic, which appears not to have been accounted for in the submission. These comments will need to be addressed and a response provided.	Further testing required and a response to highway comments.

Question 11: Open Space and Green Infrastructure.

A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Outlines what green infrastructure is proposed and why.	No consideration of what is required or failure to commit.	The proposal is based on the concept of a necklace of villages along the new road. However, this layout appears strongly to be a result of land ownerships and the proposed road alignment, rather than led by an analysis and provision of green infrastructure. The proposal does not appear to be green infrastructure/landscape led and further work is required to address LUC comments, environmental constraints and whether amendments are required. This scheme would benefit from additional masterplanning review and input to see how the constraints can be addressed, particularly relating to the road alignment.	Satisfactory progress, but further masterplan review is recommended.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	The proposal includes 3 components of green infrastructure: focused around AHLV dry valley features; Bapchild/Rodmersham Church; and along the new link road. However, it is not clear how the green infrastructure will work crossing the road to ensure accessibility east to west, particularly if it is not publically managed. Links to the wider green infrastructure network off-site are also not especially explored. LUC have assessed the landscape evidence submitted, and their comments should be considered. In addition, there is a role for green infrastructure and linkages across the road and out to Sittingbourne to be considered within a masterplanning review process.	Further information required to address the LUC comments and recommend further masterplan review.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing of risks (Question 1b).	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. Whilst this is not surprising, it will need to be considered further.	Further information required.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	This is not provided in any detail and it is currently unclear as to whether the green infrastructure is of wider benefit and if so how this will be achieved. Further information is required and green infrastructure requirements should be considered as part of a wider review of the masterplan.	Further consideration required of landscaping, buffers and green infrastructure as part of a masterplan review.

Question 12: Sustainability

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideas set out but also evidenced with a reasonable prospect of	Commits to sustainable design and delivery but no	No detail provided. Further work on sustainability and adherence to specific principles needs to be addressed.	Needs further development to address sustainability issues

Question 12: Sustainability			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
delivery and ideally examples.	details provided.		
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed	Fails to move beyond simply acknowledging they are within the prospectus.	There is some reference to exploring neat networks/district heating with a commitment to prepare an energy statement. However, no detail has been provided on high standards of design including Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards. It will be important that these are agreed early in the process to ensure that costs are fully factored in. Given a potential commitment to a district heating system, it will be important to explore this opportunity as it will have major implications that need early understanding. It is not clear whether these sustainability issues have been costed and included within the viability appraisal.	Needs further development, particularly around standards and a district heating system. Viability work will be subject to detailed testing and should include the standards to be adopted by the scheme.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

NS3 – Land at Bobbing, West of Sittingbourne

Question 1 – About the Scheme?			
Question 1a: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Responds to the Councils SHMA which sets out the profile of homes needed.	Simply saying will provide an appropriate mix etc.	The proposal includes 2,500 homes with 40% affordable, independent living and self/custom build, as well as the possibility to giving land to the Council to build affordable homes. They recognise need to meet all tenure requirements as set out in NPPF. The proposal meets expectations and offers viability work to confirm that this is achievable. A viability appraisal has been submitted and further detailed assessment of this is required.	Satisfactory progress, subject to viability assessment.
Other ownership and site optimisation issues.	Not owning/controlling the site	Proposal is in two large parcels with smaller infill around Bobbing. There are additional SHLAA sites promoted close to this and the adjacent landowners have expressed support for the site and any potential expansion northwards. *NB: It is understood that further submissions are expected to the master plan proposals. However, these will be subject to assessment at a later date.* A reasonably sensible red line, although open space is effectively being provided ‘off site’ in the southern parcel. There is however, limited buffering with the existing village, which is almost entirely enveloped. It is slightly unclear whether the indicative proposal strengthens the existing village or supplements it with a new settlement centre to the north west - in which case there is a question about whether the two can co-exist. Options as to how best to secure a sensible relationship between existing and new communities should be explored through masterplanning. No significant questions are raised about ownership, but in an ideal world the layout would not be fractured between the two north and south parcels. It would be useful to understand why the two parcels are proposed and why the tongue of land is omitted in the south. Consideration should be given to a larger northern parcel for open space which would possibly allow the open space to buffer the settlement into the wider landscape. Other land might be available to provide this and/or any compensatory development land that might also be required.	Further information required. Follow up and clarification of adjacent land parcels, as well as the rationale for land which has been included.

Question 1b: What mix of other uses is proposed?			
Note – this could be broken down by use- i.e. commercial, retail, leisure etc			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Responds to the New Settlement Study which outlines the Council's expectations (land balance). Or provides alternative evidence to support an alternative mix.	Fails to commit to the outline provided in the New Settlement Study	The Proposal covers 226 ha of land (subject to further amendment) because it includes open space. Within this, 87ha of residential development for 2,500 homes is proposed, 6ha of community facilities including a 3FE primary school, new village hall and nursery, village retail parade, pub, play area within a village green. 3ha of flexible commercial space, pop up art and culture space is also proposed. A full package is proposed. While less than 1:1 employment is proposed, this appears credible and the job yield is probably reasonably realistic – 3ha equates to approximately 1,000 B space jobs (if it is offices, but less if it is warehousing.) The site is close to Eurolink site, so not providing for all jobs on site is realistic, especially given that demand in the area has been warehousing which would be difficult to incorporate into the settlement. However, given the potential available access to the A249, there may be an opportunity to increase provision. More information is required about the flexible commercial space and what this means. Other social infrastructure is provided as expected. There is a discrepancy between the plan and the letter about school size and this needs to be clarified. A large parcel of open space is to be 'gifted' to the community, but as noted elsewhere, it is not clear that this land is in the right place to be useable by new residents; rather it appears to be a buffer. It is not clear if any 'externally' benefiting uses are proposed, although it is noted that there would be onsite infrastructure benefits for Bobbing village.	Satisfactory progress, subject to viability check.

Question 1c: Outline the proposed trajectory			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Ideally delivers early.	Fails to demonstrate the site can start delivering in a meaningful (shortish) period	Early delivery as not dependent on significant infrastructure, but recognises that J5 improvements may be a constraint, and it is likely that the junction to the A249 could be a future problem. Seek to start in 2021 to link with 2022 improvements of motorway. The response from HE broadly confirms these timescales however, it is clear that no additional capacity should be assumed and that further detailed analysis is needed. Housing delivery is proposed as 50-100 dpa in first year, 100-150 in second and rising to 200 dpa up to completion by 2032. Developed by Crabtree and Jarvis homes. There is a risk with J5 and the constraint that this imposes, as well as issues with the A249 junction. This is out of their control, but clarification of what progress and delivery can be made on site before J5 improvements are required. However, for the Council, any development at Sittingbourne is likely to be caught by the same trigger point, so this will need to be considered in the round with all the sites across the town. The delivery rate appears quite slow, but there may be ways to increase this, although it is not clear whether this includes the affordable housing element.	Requires further work and highways clarification.
Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	Trigger points to be agreed. There is an unknown risk in terms of the timescale and capacity of the J5 improvements. See above.	Requires further work and highways clarification.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New Settlement Study	Proposal refers to 1 job per house and recognises the environmental sector as a key growth area but then lists in fig 7 a total of 526 jobs. A new school is proposed together with community facilities, possible health centre, new village hall and nursery, village parade and public house. The number of jobs needs confirming. A range of social facilities are proposed, which will be paid for by the development. It does not currently suggest any wider (off site) benefits for Sittingbourne. The additional information provided in January 2019 makes reference to investigating the provision of a new health facility and recognises that additional funding may be required through S106 or other sources.	Requires clarification of the job figures and exact nature of what is provided including health facility.
Provides evidence to demonstrate that the benefits are achievable.	Little or no evidence provided.	Not provided at this early stage. It will be necessary for further evidence to provided which sets out how the benefits will be delivered.	Requires further evidence that benefits can be achieved.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic	Initial viability costing was provided and further details have been submitted. Viability work will be subject to detailed testing	Satisfactory progress – will require ongoing viability testing and the scheme moves forward.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits	Not provided. It will be necessary for further consideration to be given about the trade-offs that may be required	Requires further consideration of any di-benefits.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough.	Benefits only relate to this proposal.	The proposal refers to the new school drop off area and road realignment as a wider benefit; however, it is not clear that this has district wide benefit. Open space levels might also be said to be of wider benefit, but this is unclear due to its proposed location.	Further information required to ascertain the extent to which there are wider benefits.

Question 2: Abnormals			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	No abnormals are identified and proposal considers that all infrastructure costs are met through the provision of residential development. However, the A249 junction is an issue which needs to be addressed and could be considered an abnormal. It is noted that that there are pylons on site and these will need to be considered. The additional information in January 2019 makes reference to a health facility which may need additional funding.	Further work required on the junction, how the pylons are dealt with through masterplanning and taking the health centre forward.

Question 2: Abnormals			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. *We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.*	Or over optimistic assessment	The viability appraisal uses cash flow model and Argus Developer, with headline figures, but states that these are commercially sensitive. Further detailed viability work has been requested and received and a detailed assessment and testing will be undertaken.	Satisfactory progress – further testing required.

Question 3: Joint working			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promoter would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	The proposal sets out that the developer will be responsible for delivery, in collaboration with range of others and supported by a consultant team led by DHA. The proposal indicates that they have spoken to KCC about education. This proposal is at an early stage so it is not surprising that a model is undeveloped and limited engagement has taken place. It is not clear whether this Master Developer approach has been done before and if the examples are entirely transferable. There is recognition that engagement will be required and further work. The further information submitted in Jan 2019 recognise that there will be a role for external support in ensuring that the performance of the proposals against garden community principles.	Satisfactory progress with further work required on engagement.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc.).	No acknowledgement of need for resources.	The proposal makes clear that they would like to discuss supporting infrastructure and employment/commercial development with the Council to inform layout and viability. While limited information is provided, this is not surprising at this early stage and the promoters seem keen to engage with the LPA and others.	Satisfactory progress with further discussion about infrastructure and employment issues.
Outline when intervention or action is needed and what form they would like this to take (timetable, consideration of policies needed in Swale or wider).	No timetable or detailed plan given.	The proposal suggests that an SPD would be used, which would set parameters and design codes for development. They also recognise that it would be helpful to use a PPA to work together and shape proposal. The proposal addresses this issue well and recognises the need for joint working and clear design codes. Further information submitted in January 2019 suggests that they would support the Council with the evidence base and fund officer attendance at consultation events.	Satisfactory progress with further work required on how and when they will work with/fund the Council.
Demonstrates this action plan aligns with the next local plan. And outlines what polices may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail is provided, however they are committed to the plan timescale. Further discussion will be required to consider what policy approach will be most appropriate.	Satisfactory progress with further work required to agree the policy approach.

Question 3: Joint working			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	Additional information provided in January 2019 suggests there is a strong role for the Council to play in the delivery of affordable housing on the site and in wider partnership. This would require further discussion.	Good progress with further work required to agree the best way to work together to delivery housing on site.

Question 4: Delivery vehicle			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Discusses various delivery models, weighs up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	The developer (Crabtree and Crabtree Ltd) would be responsible for delivery and take the role of master developer, supported by consultant team led by DHA. This proposal is at an early stage so it is not surprising that a model is undeveloped and limited engagement has taken place. This was further clarified in the January 2019 response which set out that Appin would take on the role of Master Developer. They also now recognise the role of the Council and intend for the LPA to have a stake in the development, either delivering or managing housing. They expect any developer to have an element of 'freedom' in terms of architectural detailing, with most issues being dealt with as part of the landowner/promoter agreement which will ensure adherence to the design brief and control to ensure quality on the ground. This will need further clarification because there appears to be a disconnect between the agreement in principle and the commitment to control the design process in practice. There is though little detail on the proposed delivery body itself and, at this stage, whether some form of steering group would be established.	Satisfactory progress with further work required, particularly relating to exactly how the master developer will ensure control of the design process and the nature of the delivery vehicle itself.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	The proposal includes a commitment to work closely with stakeholders, and with parish and council to identify what is required and how can be managed. This is at a very early stage, so it is not surprising that an inclusive model of community involvement is not included. The commitment to engagement will need to be explored further with an engagement strategy in due course, as will the detail on the delivery body itself. Further information provided in January 2019 recognises that should the principle of these new communities be agreed, a full consultation exercise with LPA involvement will be undertaken. The process would include design workshops, Q&A, drop in sessions, and engagement with local groups within the village including the school and church. Consideration will need to be given about how best to fully engage with the wider community, prospective occupiers and through the development of an engagement strategy.	Further work required in due course to provide a detailed engagement strategy and the nature of the delivery vehicle itself.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	This level of information is not provided, and this route is not proposed. The lack of reference to LLDCs and other mechanisms or changing government policy is not necessarily a problem, but the Council may want to explore different mechanisms with them. It will also be important here to consider such matters as the Government's consultation in respect of net biodiversity gain.	Further information required about details of the mechanism going forward.
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples.	Reference is made to Chilmington Green is referred to as an example. It is not clear whether a delivery vehicle has been used before and if the examples are entirely transferable, and this will need to be discussed further.	Further clarification required to ascertain how relevant and transferable the example is.
Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	Limited consideration is given to stewardship and the long term management of facilities, however, this has been expanded upon in the Jan 2019 response which anticipates that a Trust would be set up in order to manage and maintain the land. It is notable that the cost of this has not been included within the viability work and it will be important that it is properly costed. There is also reference to SUDs, which are considered elsewhere. This needs clarifying because there is reference to the approach not necessarily being appropriate.	Further detail and testing required.

Question 5: Advice	What specific advice do you require and what technical research will you undertake should the bid be successful?		
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**PBA Simple**
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	The proposal recognises the need for a considerable amount of evidence and working together. A useful response which recognises the considerable need for additional research to undertake further work.	Good response, for the stage reached, with further work required in due course to satisfactorily progress the scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response. (e.g. we need a Borough wide Water Cycle Study to help develop our scheme).	No acknowledgement of the need for further work	The proposal recognises that it is at an early stage, that EIA is required and includes a long list of research and supporting studies which will be needed. It is not surprising that further work is required give the very early stage of the proposal and it is helpful to have a comprehensive list set out so clearly. Clarification of what work could be undertaken when, by whom and addressing cumulative issues is required moving forward.	Good response, for the stage reached, with further work required to be undertaken, including cumulative impact.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.).	Highlights problems or data issues with no positive way forward.	The proposal seeks to rely on the Council's evidence, but recognises the need to work together with Highways England and others to explore what is needed. The issue of the J5 capacity and improvements is important and needs to be addressed. In addition, the A249 junction needs assessment and clarification of what is required. Highways England have responded that the upgrade of junction 5 is due to start in 2020, but that no more capacity is available than assumed for local plan schemes, however, they are in discussions with promoter and will require detailed analysis of capacity of improvements. We are still awaiting modelling information from Kent County Council and these will then need to be taken into account.	Satisfactory progress subject to further work required and Highways England comments.

Question 6: Environmental Opportunities			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Clearly identifies the net gains or improvements under the five broad areas.	Fails to move beyond prospectus and New Settlement Study	The proposal includes: • 100 ha of open space (although there are questions as to its location) • Retain and enhance historic character of Bobbing through green buffer and materials • Retain and enhance the rural lane • Woodland to be surveyed and enhanced and improve existing resource (although not obviously so from the indicative masterplan). • Seeks to celebrate and improve setting of heritage assets, through village green and community facilities etc. • New Green Infrastructure and space in corridors formed by existing rights of way • New hedgerows, planting etc particularly in open eastern part of the site. • New watercourses There is potential for a good approach to environmental issues. A variety of environmental opportunities are identified which have the potential for biodiversity net gain. Little detail is provided but this is not surprising given the early stage of the proposal. LUC have commented on these proposal and these conclusions will need to be addressed	Satisfactory progress, response to LUC comments required.
Provides evidence to demonstrate that these are achievable.	Little or no evidence provided.	Not provided. It will be necessary for this to be explored in more detail.	Further information required.

Question 6: Environmental Opportunities			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Provides evidence that they have been realistically assessed.	Concern that they may be too optimistic	Not provided. A response to the LUC comments is required.	Further information required to provide a response to LUC comments.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible).	Lack of recognition of any negative impact.	The proposal sets out the relationship with existing provision and new areas. Little detail is provided but this is not surprising given the early stage of the proposal. It is not clear how much of the new Green Infrastructure is outside the main residential area below the railway. There may be an opportunity to optimise the landscaping provision through dealing with the red lines which can be considered through a masterplanning review process.	Satisfactory progress, subject to masterplanning review.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough.	Improvements only relate to this proposal.	The proposal includes considerable open space which may be considered a wider benefit, specifically relating to the separation of the settlements and protection/enhancement of the landscape. However, this issue needs further explanation of how this would work and the relationship with the open space within the layout.	Further information required about how this would be delivered as a wider benefit.

Question 7: Environmental Constraints			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	The proposal recognises the constraints and states that there are none which are overriding constraints. 2km to SPA, so recognises need to provide natural green space for dog walking secured in perpetuity and financial contribution to the monitoring strategy There is recognition of the Pylons NE to SW are a major visual detractor and will require an easement and which will need careful design. The proposal does recognise that parts are identified as an important local countryside gap, but only 2 small areas of site within this. Suggests this is used as open space to uphold the gap. Open space north of Newington will protect area from development and retain views of Newington church. There is recognition that there is likely to be noise from A249 and the railway and that this will require attenuation and careful orientation, but nothing out of ordinary required. Within flood zone 1, recognises that infiltration based SUDs may be unsuitable, but then proposes the use of SUDs techniques. This will require clarification. There is good recognition of the key constraints and provides good level of detail given the early stage of the proposal. There are no constraints which mean development could not proceed in principle. Further development of the masterplan to ensure the best layout of open space and the relationship with surrounding landscape. Consideration will be required of LUC conclusions relating to landscape issues.	Satisfactory progress, subject to further information on the constraints and development of how these will be incorporated into the masterplan.
Provides reasonable confidence that the 'long list' (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	See above. Requires further consideration and a response to the LUC comments.	Further information required to provide a response to the LUC comments.
Where constraints are identified provides a 'action plan' outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc.	No mitigation strategy – or over optimistic.	Not provided at this early stage. Whilst this is not surprising, it will need to be considered further.	Further information required.
Considers off site (close proximity) constraints and provides a realistic view to managing these.	No consideration or inadequate approach to management	The proposal states that the relationship with Bobbing Village with Bobbing and Sittingbourne would remain substantially unchanged. It will be important to consider how the village of Bobbing is dealt with in terms of the links with the development and this will need to be considered in more detail in the masterplan.	Satisfactory progress subject to further detail about the relationship with Bobbing Village.

Question 8: Delivering the design principles			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	The proposal accepts the principles and states that the emerging masterplan has been assessed against them. There appears to be acceptance of the design principles, which are repeated with acknowledgement that they will be used to assess the proposal. However, it is not developed enough to assess whether these principles have been demonstrably used to inform the scheme. Further information is the January 2019 response which commits to delivering a high-quality development and anticipates the need for a detailed masterplan, design brief and strict criteria. There is recognition that design standards are maintained in order to generate/retain values throughout the development, and that the LDV will take a strong lead.	Satisfactory progress subject to further detail on how the design principles have been used.
Recognises the TCPA principles and met these in a meaningful way	References them but with no detail or reasons for departure.	Seeks to achieve TCPA principles while retaining qualities of Bobbing. Makes specific reference to how each will be achieved on site, linking the old and new, improving level crossings, linear green and blue park, village green and sports provision, open to a range of densities and 2/3 storey development, reflecting the vernacular and linking new with the old village. Satisfactory early approach which appears to show commitment to the principles. Further work will be required to translate these into the masterplan.	Satisfactory progress subject to further detail to demonstrate how these have informed the masterplan.
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	Provides specific local interpretation and actions that will be incorporated in responding to the principles. The approach is reasonably well developed for the early stage. More detail will need to be provided setting out what design work and input has been provided.	Satisfactory progress subject to further detail on the design work and how this has informed the masterplan.
Shows that the proposal responds to landscape context (accepting limited detail may be available).	Lack of recognition of landscape within and surrounding the site.	The proposal states that it understands the character and its ability to accommodate change. Recognises there will be an effect on views and ensures key landscape elements and features will be integrated and retained to limit adverse effects, ensure mitigation. A visual assessment has been undertaken, and will be further developed alongside a parameter plan. The proposal states there will be no visual coalescence. Whilst this is not yet a well-developed landscape led proposal, it recognises the importance of landscape and seeks to address the key issues. There are clearly opportunities which could be exploited and some concern about linkages between the parkland and housing, particularly over the railway line and also how the increased volumes of traffic will be controlled along the lanes to conserve their rural character. LUC advice appears to indicate that there are no showstoppers and that the landscape is only moderately sensitive. At next stages it will be necessary to address their comments and conclusions in order to better exploit environmental opportunities.	Satisfactory progress subject to further detail and specifically to respond to the LUC comments.
Provides a 'action plan' outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	The proposal seeks to undertake a series of workshops at an early stage. Recognises the need to engage with all, young, families and elderly. Sets out a consultation strategy which will be ongoing and evolve throughout next stages. Good commitment to engagement principles, although this has not yet occurred given the early stages of the proposal.	Satisfactory progress. Further information and an engagement strategy required.
Agree with community land ownership and	Fails to commit to community land ownership	It concludes that a model has not yet been decided upon, but is aware of options and will compare and ensure most appropriate one used.	Further detail required about land ownership and stewardship

Question 8: Delivering the design principles			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
stewardship – ideally with details and examples.	and stewardship.	It is not surprising that little detail is provided. Further detail is provided in the January 2019 response, which anticipates that a Trust would be set up in order to manage and maintain the land.	is addressed.

Question 9: Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what infrastructure. is proposed and why.	No consideration of what is required or failure to commit.	The proposal sets out what will be provided including: • New school, Health centre – engage with CCG, Local retail convenience shopping • Community centre – relocated village hall, would free up plot and provide better parking turning for existing village school • Open space – considerable increase. Asserts that there is apparently not much existing open space in the area. Good recognition of what is required, although little developed in relation to transport. Further clarification required about the level of open space and the relationship with local area and quantity and quality that exists. It is not clear whether there has there been any discussion about foul water management with Southern Water. A formal response from them is required – however an initial email states that upgrades are required and any issues are likely to be overcome through working with the developers.	Satisfactory progress but further work required to address transport issues, open space, type of community and employment space and other infrastructure requirements.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of the proposal. Further detail will be required.	Further information required.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required. It is recommended that a Utility working group is established to consider cumulative issues and timing.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed. (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 9: Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The promoters believe that a key element is the opportunity to enhance provision for existing residents - Bobbing village, traffic, school and community facilities. Whilst there is evidence that this scheme has been thought through and could lead to benefits, subject to the road realignment being realised, it is debateable whether this goes over and above what is needed. Concern has been raised by Kent County Council about the A249 junctions.	Further information required, particularly on the highway issues.

Question 10: Transport			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what infrastructure is proposed and why.	No consideration of what is required or failure to commit.	The proposal includes construction of 2 new roundabouts along the main road through Bobbing, linked with the realignment of Sheppey Way. It seeks possible improvements to A249 Key Street junction. It sets out the options to investigate potential of new rail station and suggests out a fast track bus service between Sittingbourne and Rainham. Further detail and justification is required to understand the highway requirements, including those relating to the capacity of the A249 junction at Bobbing. A key question is the extent to which there is capacity on J5 to bring forward development of the site. Highways England have responded that the upgrade of junction 5 is due to start in 2020, but that no more capacity is available than assumed for local plan schemes. However, they are in discussions with promoter and will require detailed analysis of capacity of improvements. It is not clear whether the railway station is really an option and more detail is required relating to any fast track bus service and how it could operate using the same road network. KCC have provided initial comments and are very concerned about the A249 junctions but have not modelled this proposal so are uncertain of the exact impact. They also consider it likely that some of the rural lanes would not have capacity and that careful consideration would be required in respect of any movements towards the Westbound A2. They are also unclear how fast track bus route could be achieved. It will be necessary to respond to these transport comments.	Further information required relating to transport and the claims made about junctions and the proposed fast track bus service.
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	The proposal recognises air quality as an issue in Sittingbourne and proposes various measures for Electric vehicles and low emissions. Solutions include reduces speeds and alleviate through traffic from Bobbing, improving setting and highway safety. While some interesting ideas are included, there is little detail provided, and particularly not enough information is provided yet about the A249 junctions.	Further information required relating to highways.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	The proposal recognises that it is reliant on J5 motorway improvements to increase capacity. The capacity needs to be identified and this issue resolved. Highways England have responded that the upgrade of junction 5 is due to start in 2020, but that no more capacity is available than assumed for local plan schemes. However, they are in discussions with the promoter and will require detailed analysis of capacity of improvements. This has been confirmed by initial comments from KCC who are very concerned about the A249 junctions and Sheppey Way and its approach to Key Street. Although they have not modelled this proposal so are uncertain of the exact impact. However, they consider it likely that some of the rural lanes would not have capacity and that careful consideration would be required in respect of any movements towards the Westbound A2. It will be necessary for these comments to be considered and a response provided.	Further information required relating to highways and a response provided to the initial comments of HE and KCC.

Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities (e.g. HA re J5a or Faversham junctions).	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	The proposal states that Kent County Council and Highways England have been contacted but that the promoters have not received any information. Despite this, the proposal recognises the links with various junction improvements at Bobbing A249 and at Grovehurst and that it will require further advice relating to A249/A2 Key Street junctions. KCC have provided initial comments, but do not go into any detail because the modelling has not considered the impacts of any development above that in the Local Plan. Further work will be required to understand the capacity and implications and respond to the initial comments provided.	Further information required relating to highways.
Any calculations and modelling clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the minimum need for the new community.	The proposal suggests the realignment of Sheppey Way to allow pedestrianisation of SW end of village, however, this is not really considered to be of wider benefit. This solution is creative and will need to be tested. The open space could be of benefit, but is currently not in the right location. There is also the potential opportunity to make more of the open spaces proximity to Newington station and routes through. It is suggested that this needs to be considered further and thinking about this could evolve further.	Further information required and subject to further testing.

Question 11: Open Space and Green Infrastructure.

A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Outlines what green infrastructure. is proposed and why.	No consideration of what is required or failure to commit	The proposal sets out that there will be 50% open space. It provides different GI areas and purposes, with majority gifted to the community and to prevent coalescence with Newington. While this is not a landscape led proposal, a large amount of open space is provided. However, it is debatable whether it is in the right place, and whether it is properly spread throughout the development for use by the potential residents. It is suggested that further consideration is given to the open space and landscaping through the use of a masterplanning review process.	Satisfactory progress but further masterplan review is recommended.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	Landscape is provided as a buffer and there is recognition of the neighbouring countryside and existing pylons. The approach is pragmatic, but potential improvements may be appropriate. In addition, consideration should be made to the conclusions and comments provided by LUC, particularly as there appears to be scope for enhancement.	Further information required to address the LUC comments.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing of risks (Question 1b).	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 11: Open Space and Green Infrastructure.			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposal suggests that the southern buffer does provide a general benefit. Consideration should be given to the most appropriate approach to the surrounding countryside and to ensure the most appropriate site boundaries are included.	Satisfactory progress but further consideration required of land area, landscaping and buffers.

Question 12: Sustainability			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Ideas set out but also evidenced with a reasonable prospect of delivery and ideally examples.	Commits to sustainable design and delivery but no details provided.	The proposal states that the developers will incorporate sustainable construction technologies. The proposal repeats the design principles in the prospectus and does not provide any more detailed information.	Needs further development to address sustainability issues.
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed.	Fails to move beyond simply acknowledging they are within the prospectus.	Design standards are repeated from the prospectus. No detail has been provided on high standards of design including Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards. It will be important that these are agreed early in the process to ensure that costs are fully factored in. It is not clear whether these have been costed and included within the viability appraisal.	Needs further development. Viability work will be subject to detailed testing.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.

NS4- South East Faversham

Q1 – About the Scheme?			
Question 1b: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Responds to the Councils SHMA which sets out the profile of homes needed.	Simply saying will provide an appropriate mix etc.	The proposal provides detail on affordable, rather than the general mix and states that mixed tenure homes and housing types is fundamental to the Duchy's approach. It gives examples of what has been done in Poundbury, but limited detail is provided for Faversham. While it recognises the wish for 40% affordable housing, it considers there is a need for further assessment and debate about the tenure mix etc. This is the most well advanced and comprehensive proposal. One of the strengths of the proposal is that is offers a 'template model' which reduces risk and demonstrates to Swale what the proposal could look like. Given this is the approach they have taken, the lack of clarity or commitment to the type and scale of affordable housing and lack of detail is disappointing. It is unclear why the promoter cannot commit to meet the policy expectation. It is necessary to understand what other potential costs prevent the site meeting its policy obligations and if so what are they likely to be (so the Council can understand what trade-offs may be needed).	Satisfactory progress subject to further detail.
Other ownership and site optimisation issues.	Not owning/controlling the site.	This proposal is promoted as a sensible extension site. The land is in single ownership and can be delivered without significant offsite works or other land parcels being bought in. There is a need to understand how this site relates to other adjacent additional land which has been promoted (NS5). It is not proposed that these additional sites would be developed together but it will be necessary to explore the issues and how they could compliment rather than compete. The two garden community proposals, as well as additional northern sites, provide a critical mass and may have infrastructure issues to address (positive and negative). It is also important to understand the relationship with the land to the west which may offer an opportunity to access through the site without going back onto the A2. There is also land in the same Duchy ownership to the south of the M2 with linkages to the scheme. Discussions are required as to whether the land may play a role in facilitating access to the wider countryside.	Satisfactory progress, further detail required relating to the links to M2.

Question 1b: What mix of other uses is proposed?

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the New Settlement Study which outlines the Councils expectations (land balance). Or provides alternative evidence to support an alternative mix.	Fails to commit to the outline provided in the New Settlement Study.	The proposal is for 131ha, 2500 homes, 15-20,000sqm of business/commercial/retail space for 2,500 jobs, off site benefits of calming the A2 and the provision of a local centre. It is unclear how many local centres are to be provided – framework shows one but trajectory mentions two. It will also be important not to compete with the town centre and further assessment of this may be required. This is a well-rounded proposal package. Some thought has gone into the commercial offer, but it will need to ensure that it integrates the proposal with Faversham to complement the towns offer. The job numbers look reasonable and the mix credible as most space is needed for B1c which we would agree with. Of the 2,500 new jobs, 500 are proposed to be FTE home workers – this will need more assessment in relation to job densities and how achievable this may be here. More information is required about their approach to mixing industrial with homes, and more certainty (beyond Poundbury) that this is actually in demand in Faversham. In Faversham occupiers have a wider choice of standard industrial offer nearby, so it may be appropriate to explore the scope for a more conventional 'fall-back' position of what is best located here. If a mixed Poundbury style offer does not work in phase 1 – can later phases offer something more conventional? Further information is required to consider the employment issues and implications	Satisfactory progress. Further information required to assess implications of the type of employment which is likely to be delivered.

Question 1c: Outline the proposed trajectory

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideally delivers early	Fails to demonstrate the site can start delivering in a meaningful (shortish) period.	The proposal provides for 2500 homes over 16 year period with an expected start of 2023. These levels are taken directly from their experience at Poundbury which demonstrates a slow start and possibly up to 120 per year. This would mean it would be delivered over 20 years using specialist and local developers. The approach is predicated on the statement that "the proposal is more about quality than the quantity of homes" (para 2.4 Propernomics report). They are however investigating how to increase delivery. This a much slower than other sites being offered and 120 dpa may not meet the Councils expectations, given this will only be about 7% of target. This would not meet the test of giving a 'boost' to delivery in the Borough. Given the limited infrastructure needed and a buoyant market we question whether this rate is too slow. It is recognised that the increases to 180 is better, but these are long term and take a while to ramp up to. The trade-off is potentially the quality product that would be achieved. The risk would then be that it could slow delivery even more on this site. It is suggested that there are further discussions about the delivery rates and how this could be increased.	Further information required to explore how delivery could be speeded up.
Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	The proposal identifies 3 main phases 2023-27, ramping up to 180, then 180 per year between 2028-37, with the final year mopping up the rest in 2038 (See Fig 17). The trajectory recognises that local centre, A2 taming and Brenley corner improvements are required early in first 3 years with second local centre and school starting in year 6. This is more developed than most and sets a clear timeline; however, it is necessary to understand what existing infrastructure capacity exists and also how NS4 & NS5 could come along together and with what effect and requirements, particularly in relation to junction 7.	Satisfactory progress, subject to further information and detail about accelerated delivery.

Question 1d: Outline the benefits (Social, Economic, Financial)

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New	The proposal seeks to provide 2,500 jobs with a scenario which sets out 52,000sqm of B class space and 3,000sqm of retail/leisure through enterprise centre and flexible space and the provision of a school and local centres. General benefits of business rates, council	Good progress, subject to further clarification on jobs,

Question 1d: Outline the benefits (Social, Economic, Financial)

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
	Settlement Study.	tax, new homes bonus, S106 re also mentioned. A good evidence base is provided to support the proposal. The job numbers look reasonable and the mix credible as most space is needed for B1c which we would agree with. Of the 2,500 new jobs, 500 are proposed to be FTE home workers – this will need more assessment in relation to job densities and may be exaggerated. More information is required about their approach to mixing industrial with homes, and more certainty (beyond Poundbury) that this is actually in demand in Faversham would be helpful. In Faversham occupiers have a wider choice of standard industrial offer nearby, so it may be appropriate to explore the scope for a more conventional 'fall back'. If a mixed Poundbury style offer does not work in phase 1 – can later phases offer something more conventional? There is an inconsistency between Propernomics work on size and that in para 9.2 (1). It will also be important to understand how the long term future of the commercial/retail/local space would be secured. There is little detail provided about social and health provision, which appears to be subject to further consultation and not much information provided on open space and retail provision. For example, how many local centres are to be provided? The framework shows one, whilst the trajectory mentions two.	and local centres.
Provides evidence to demonstrate that the benefits are achievable.	Little or no evidence provided.	No costings or viability information provided, so while there is reasonable evidence of appropriate and sensible employment mix, the costings are not available and little detail of other items is provided. It is noted however that in broad terms the site is within a location with good values.	Further information required on viability.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic.	Not provided. The implication of not providing viability costings means that it is not possible to identify what has been included and whether the calculations are reasonable.	Further information on viability is required.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits.	Not provided. It will be necessary for further consideration to be given about the trade-offs that may be required, specifically affordable housing tenure.	Required further consideration of any dis-benefits.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough.	Benefits only relate to this proposal.	The taming of A2 is considered a considerable off site benefit. This will need to be considered in more detail with Kent County Council. There is also mention of new training facilities for football club or possible relocation to extend site frontage. However, no detail is included and it is unclear what discussions have been held.	Further information required.

Question 2: Abnormals

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	There are no abnormals identified. While the proposal mentions that likely to require the upgrading of waste water treatment works, this will be dealt with by South East Water, from whom we are still awaiting a response. There will be also be an issue with J7 which is considered in the transport section below.	Satisfactory progress. Further information required from SE Water and relating to Junction 7.
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. *We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.*	Or over optimistic assessment.	The proposal gives a commitment to nearly 40% affordable housing and a school, but it is vague and does not seek to fully fund anything else. Even A2 taming refers to contributions from others and equitable apportionment. The Duchy confirms the proposal is viable, but no information is provided. Consequently, it is not possible to test the viability in detail or confirm this. It is noted however that in broad terms the site is within a location with good values.	Further information required.

Question 3: Joint working

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promoter would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	The Duchy states that they would be pleased to work in partnership. They are also in discussion with the Council over a PPA and they appear willing to support further professional work by the Council provided it is properly related to its proposed development scheme. They are also happy to share with the Council the technical work that has been undertaken by our professional team, and further technical work that will be done in the future. Recently, a steering group has been established with the Council. In respect of scheme development and community consultation, the Duchy has their own Enquiry by Design approach and the proposal appears to be responding to the issues raised by this process. Joint working is an important element and will need to be further considered to ensure its satisfactory delivery.	Good progress. Further details will be required about joint working going forward.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc.).	No acknowledgement of need for resources.	While the Duchy are not expecting anything, the most recent response (Dec 2018) states that they would certainly be receptive to public sector support, including: resourcing of the Council's evidence; contributing to infrastructure funding (e.g. to road improvements in the wider area); facilitating co-operation by public sector and other stakeholders (such as a steering group for sports clubs and facilities); and making development finance available on favourable terms, if required by our developer partners. A PPA is being developed with the Council and there is now a steering group in place to take forward the process.	Satisfactory progress. Further clarification of resources will be required going forward.
Outline when intervention or action is needed and what form they would like this to take (timetable, consideration of policies needed in Swale or wider).	No timetable or detailed plan given.	The proposal says that want to work with Council to help persuade Highways England to bring forward upgrade of Brenley Corner. However, this potentially overlooks the problem of highway capacity ahead of any such improvements. They also intend to work with the SBC and KCC to secure improvement to air quality along the A2 corridor. The proposal potentially requires relocation of the cricket and football clubs within their site boundary but it is not clear whether there been any discussion about this with them. There is little detail or timetable included and further information is required to address the outstanding issues.	Further information required specifically to address the relocations of the football and cricket clubs.

Question 3: Joint working

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Demonstrates this action plan aligns with the next local plan. And outlines what polices may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail is provided, however they are committed to the plan timescale. Further discussion will be required to consider what approach will be most appropriate.	Satisfactory progress with further work required to agree the policy approach.
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	Propose the use of their own approach as in Poundbury and their other projects. This is not entirely in line with a joint approach envisaged by the garden community principles, particularly in respect of the possible delivery vehicle. However, a PPA is being developed with the Council and there are emerging proposals for a steering group to take forward the process.	Good progress. Further clarification required about how this is taken forward.

Question 4: Delivery vehicle

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Discusses various delivery models, weights up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	The proposal envisages a traditional estate model with sales and control by covenants and retention of a perpetual interest, as in Poundbury. The Duchy rely on their well proven approach, which brings in carefully assessed partner developers, and grants them building licences or development agreements, subject to strict adherence to design codes. Thereafter, properties completed to an acceptable standard may be sold to households and registered providers, with the Duchy retaining ownership of certain infrastructure. This provides control through the ability to enforce ongoing covenants over design quality and estate management standards. There is reliance on their model as the only approach and there does not appear to be any openness to use other models. However, the model in question has the potential to deliver, although some partnership arrangement with the Council and others would be advisable and appears to be emerging.	Satisfactory progress. However, further work required in relation to how the partnership will work.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	The Duchy has a clearly established approached to the way it will develop the site, its approach to the wider process and stewardship. It has a long term vision and expects to be the delivery vehicle or master developer which will ensure it maintains control. One element of this is through the use of the Enquiry by Design process, which they consider a fundamental part of a highly proactive and inclusive stakeholder engagement strategy. They expect to pursue this strategy throughout the planning process. It will be important that this is inclusive and seeks ongoing involvement from a range of interested parties and the community. The Duchy proposes to either to retain ownership and work with local community representatives to manage the estate, or transfer to a community based organisation to maintain and enforce covenants directly. Further details on how this will be achieved would be helpful.	Satisfactory progress. However, further information is required on the general stewardship issues.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	This level of information is not provided, and this route is not proposed. The lack of reference to LLDCs and other mechanisms or changing government policy is not necessarily a problem, but the Council may want to explore different mechanisms with them.	Satisfactory progress with further discussion about details of the mechanism going forward.

Question 4: Delivery vehicle			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples.	The Duchy is committed to leading by example. Indeed, Poundbury, Nansledan, Tregunnel Hill and the Duchy's other new community projects are primarily intended to be exemplar national role models, although this is concentrated on design. It proposes the use of same model as Poundbury and of their experience in Cornwall. They believe they are well placed to use a master plan and design code, which they would enforce quality control through its land disposal mechanisms (building licence or development agreement). Applicability to Faversham will need to be further explored. There is little consideration about the wider role of the delivery vehicle and how this might work in practice.	Good progress, subject to details on how this will work in the context of Faversham and wider delivery vehicle issues.
Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	As the single site landowner with a long term commitment to sustainable land stewardship, the Duchy sets out in its most recent letter Dec 2018 that it has a long term vision and expects to be the delivery vehicle or master developer, as it is on its other strategic development projects in Poundbury and Nansledan. Reliance is given to their proven track record, however, little detail is provided, particularly in terms of stewardship generally. Although this is perhaps to be expected for some developers, as the approach has been rolled out elsewhere, some further detail on long term stewardship might have been expected and further details will need to be provided.	Satisfactory however further detail required.

Question 5: Advice	**What specific advice do you require and what technical research will you undertake should the bid be successful?**		
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	The Duchy considers this as a standalone project. Although it will work with the Councils and stakeholders, it is not reliant on them. This is perhaps under-played given the transport issues surrounding the scheme. It expects to be the long term freeholder of the main infrastructure, and to be proactive in enforcing covenants and maintaining the appearance, estate management and general functioning of the new community. Little advice is sought, but the Duchy wishes to work proactively together to progress the scheme.	Satisfactory progress with further work required in due course to satisfactorily progress the scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response. (e.g. we need a Borough wide Water Cycle Study to help develop our scheme).	No acknowledgement of the need for further work.	The proposal recognises some of the key issues that still need to be addressed, including air quality. It intends to work with the SBC and KCC to secure improvement to air quality along corridor. There is likely to be other additional issues to be addressed which will require further work. Specifically it will be necessary to understand the capacity of the junction and road network, together with more detail about the calming of the A2 and access through to the west. Highways England have provided initial comments, which state that the interim work on M2 J7 comprises signals and a pedestrian crossing and is not designed to increase capacity. Initial comments from Kent County Council states that the junction of A2/A251 remains a concern and that modelling has been done which will be reported separately. These comments should be reviewed and addressed to inform the next stage of the process.	Further information required to address the highways comments received from KCC and HE.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.).	Highlights problems or data issues with no positive way forward.	The proposal and subsequent information provides a considerable amount of evidence and commits to sharing this and others, as it develops, with the Council. Transport issues are perhaps now the main priority.	Satisfactory progress, subject to highways issues.
Question 6: Environmental Opportunities			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Clearly identifies the net gains or improvements under the	Fails to move beyond prospectus and New	The proposal identifies local lanes and other landscape opportunities in its preliminary appraisal. The masterplan retains hedgerows and trees based on arboricultural survey and early landscape evidence. Ecological surveys have been undertaken by EPR who have met with KCC, RSPB and Natural England. LDA Design has undertaken a preliminary landscape and visual appraisal which is relatively	Satisfactory progress with need for further work on net gain and a response to LUC

Question 5: Advice	What specific advice do you require and what technical research will you undertake should the bid be successful?		
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
five broad areas.	Settlement Study.	detailed and provides a good level of background. LUC have undertaken an initial appraisal and make some useful comments which should be considered as part of the development of the masterplan. However, the actual extent of net gains has yet to be quantified, although there are good prospects.	comments.
Provides evidence to demonstrate that these are achievable.	Little or no evidence provided.	Evidence is provided by external consultants who have started to address these issues. Further details will need to be provided in due course.	Good progress. Subject to more detail being provided in due course.
Provides evidence that they have been realistically assessed	Concern that they may be too optimistic	Evidence is provided by external consultants who have started to address these issues. Further details will need to be provided in due course.	Good progress. Subject to more detail being provided in due course.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible).	Lack of recognition of any negative impact.	This proposal identifies improvements to secure biodiversity net gain based on the understanding of the distribution of soils. Ideas include restoring old chalk quarry adjacent to A2, providing orchards, swift bricks on 1:1 ratio. Biodiversity net gain would be integral and measured through Integrated Annual Reporting. Although this is a well-developed proposal which has the capability of addressing the key issues, the extent of actual gains needs to be quantified, particularly within the area of green infrastructure.	Satisfactory progress with the need for further work on net gain.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough.	Improvements only relate to this proposal.	The taming of A2 may well be considered an off-site benefit. This will need to be considered in more detail with Kent County Council. This is a well-developed approach, but there may need to be further consideration of environmental benefits.	Satisfactory progress subject to further consideration of how benefits will be delivered.

Question 7: Environmental Constraints			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	The proposal submits a detailed plan of agricultural land classification. The majority of the site (58%) is high quality land. It recognises the presence of rural lanes and seeks to maintain and enhance these. Three built heritage constraints are identified in Briefing Note (Orion Heritage), together with potential archaeological remains. It considered that noise from the motorway will need to be mitigated and solutions are suggested. However, the presence of a Local Green Space (the cricket ground) has not been fully acknowledged. This is a well-developed and evidence assessment which sets out the key issues. The LUC assessment notes that the evidence is detailed and helpful. However, it raises a number of issues which can be addressed in the masterplan moving forward.	Satisfactory progress, with further work required and specifically a response to LUC comments.

Question 7: Environmental Constraints			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Provides reasonable confidence that the 'long list' (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	Evidence is provided which lists all the key issues in relation to environmental constraints and begins to deal with them. Further detail will be required as the masterplan develops, but there are good prospects that constraints can be addressed.	Good progress.
Where constraints are identified provides a 'action plan' outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc.	No mitigation strategy – or over optimistic.	Some issues are dealt with in more detail. This includes a programme of archaeological works agreed with KCC to test results. It also set out mitigation strategy which is helpful. The recommendations made by LUC should be further considered. Given that there are options to relocate the cricket club, consideration should be given as to how the existing Local Green Space designation on the site can be addressed in any re-use of the land.	Satisfactory progress, with further work required specifically to respond to LUC comments.
Considers off site (close proximity) constraints and provides a realistic view to managing these.	No consideration or inadequate approach to management.	The proposal recognises that the site is adjacent to AHLV – but no further detailed consideration is given. There is also recognition of the opportunity to connect and improve the interface with Preston-Next-Faversham Conservation Area. The scheme also suggests the need to work with cricket and football clubs, however, little detail is provided, particularly in respect of the Local Green Space designation. The site is outside of the AONB; however, there is Duchy land to the south of the motorway in the AONB with connections into the scheme. Some further consideration of using this land to improve links to the wider countryside could be explored.	Satisfactory progress and further information required.

Question 8: Delivering the design principles			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	The proposal promotes the use of its own design principles the Prince of Wales Principles for Sustainable urban growth and sets out specifically how they will be followed for this site. Specifically, it will consider how scale and harmony will be included consistent with Kent country towns. They promote the idea of establishing a detailed masterplan, linked to a pattern book and design code, They have a design team working on this, including Ben Pentreath Architects and Ben Bolgar of The Prince's Foundation. This is a well-developed scheme. It seeks to use its own design principles, which will need to be considered in terms of their relationship with the garden community design principles, to consider where tensions may exist. While it is not for us to question to the specific approach to design, the issue of relationship with the local area is important and there may be a role for the potential use of contemporary design.	Good progress. Further consideration of the design approach and how it reflects the local character is required.
Recognises the TCPA principles and met these in a meaningful way.	References them but with no detail or reasons for departure.	The proposal considers that while these are worthy, they not necessarily applicable because the site is not large enough to be a garden city – it is to be seen as an extension rather than a free standing settlement. This however does not mean that the principles are not applicable. Nevertheless, detail is provided about how they will be applied to the site that shows there is some synergy between TCPA and Duchy principles. The scheme, uniquely amongst all the submissions, considers the question of local food production. There may be an issue the relationship with Faversham and the extent to which the design principles properly reflect the design vernacular and character of Faversham and properly deliver a garden style community.	Good progress. Further consideration of the design approach and how it reflects the local character is required.

Question 8: Delivering the design principles

A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	The proposal provides a schedule of its own principles and application – proposes these are addressed by the BIMBY housing manual. It states that it has undertaken an analysis of place to identify the character of Faversham to influence design. In addition is says that it has done an analysis of movement patterns which identifies opportunities. Further discussion will be required to ensure that the design code is appropriate for the location and demonstrates close synergy with TCPA principles, and how these relate to the masterplan.	Satisfactory progress. It may be useful to consider further how these have informed the masterplan.
Shows that the proposal responds to landscape context (accepting limited detail may be available).	Lack of recognition of landscape within and surrounding the site.	Landscape is included within their principle 1 and seeks to provide development which is sited to flow within the natural contours. Will include a food growing strategy and edible streets. Duchy has provided a preliminary Landscape appraisal which would form the basis of the landscape proposals, green infrastructure and other relevant elements of the proposal. The specific recommendations from that have been used in the Framework. LUC comment that the evidence provided is detailed and helpful and address the key issues. It makes some helpful comments about elements that can be addressed at the next stage of the work.	Good progress. Further work required specifically to respond to LUC comments.
Provides a 'action plan' outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	The proposal provides a summary of Enquiry by Design (EbD) process and output report and identifies the next steps of creating a BIMBY Housing Manual. Further engagement is required to ensure the continuing engagement of the local community and stakeholders.	Good progress. Further information is required to produce an engagement strategy.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	The process the Duchy has used and envisages is an EbD led by the Princes Trust. Considerable interaction has already taken place. Key issues have been identified and this will need to be continued as the scheme progresses.	Good progress. Further detail of how the key issues will be incorporated into an engagement strategy.
Agree with community land ownership and stewardship – ideally with details and examples.	Fails to commit to community land ownership and stewardship (Pass/Fail?).	Propose either to retain ownership and work with local community representatives to manage the estate, or transfer to a community based organisation to maintain and enforce covenants directly. Previous schemes have levied an Estate charge with each resident having a share and voting rights to become directors of the management company. The most recent correspondence states that the Duchy expects to be the long term freeholder of the main infrastructure, and to be proactive in enforcing covenants and maintaining the appearance, estate management and general functioning of the new community. It is recognised that they are the single site landowner with a long term commitment to sustainable land stewardship a long term vision and expectation of using a delivery vehicle or being the master developer. The eventual in-use supervision of the new development is likely to be integrated with the long-term management of the extensive agricultural estate. Although there is detail on the Duchy model itself, their attitudes to community ownership of assets is apparently absent.	Satisfactory progress. Further discussions needed, particularly relating to community ownership.

Question 9: Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	The proposal includes provision for a Primary school, health centre, mixed use centre and a range of employment space. They mention at paragraph 8.5 that it is likely to require the upgrading of waste water treatment works. Comments are awaited from South East Water which will provide further information about this. Further detail will be required as the scheme progresses.	Satisfactory progress – further information required.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of development proposed. Further detail will be required.	Satisfactory progress and further information required.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	The Duchy states that they have a great deal of experience of financing social and physical infrastructure, and it is an entity with considerable covenant strength. They believe it is too early to say quite how different elements of the Faversham scheme would be financed, but The Duchy is confident that financing will not be a problem. No costs provided. Even though the site is located within an area of good values, it is not possible to see what has been included in the costs calculations and therefore whether the proposal is viable.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposal is based on the quality offered by the Duchy model and approach. The taming of the A2 is provided as a wider benefit, however, it is unclear as to whether this would be fully funded by the development. Kent County Council have provided initial comments which do not specifically address the A2 calming. Their modelling in the Faversham area in particular is flagging up some issues in terms of junction capacities and as such they are keen to investigate the possibility of car free development. This issue will need to be considered in more detail.	Satisfactory progress subject to further detail in relation to the potential option and benefits of a car free development.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	The pedestrian is envisaged at the centre of the proposal and this is held up as the most important principle. The Manual for Streets principles are embedded into framework plan. The proposal seeks to encourage more people onto cycles with links out to Faversham and AONB, although limited detail of this is provided. Proposes a range of measures and network of streets and spaces achieving 20mph and bus route around area and into town centre. However, further work is required in respect of wider transport infrastructure, i.e. J7 improvements and capacity ahead of this, A2 'calming' and links to the A251/J6 to the west. Initial comments have been received from KCC who are concerned about the Faversham junctions and who are supportive of a link between A251 and A2 via Preston Fields, subject to modelling. They are also keen to investigate the possibility of car free development. A response to these comments and more detailed work will be required to assess capacity and whether a cap on occupancy is required before enhancement schemes are implemented, as suggested by the initial HE response.	Further information required relating to transport and a response to highway comments from KCC and HE.
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	The proposal recognises congestion issues and sees the A2 as a barrier. It seeks to incorporate it into the development, whilst 'taming it'. However, it is not entirely clear exactly what would be done, how it would be achieved, what it would cost and who would pay. There is mention of work with KCC to upgrade and through interventions to slow traffic down. More information is required about how practical this is and what impact it would have on Faversham as a town, given this is the key route. Kent County Council have provided initial comments and do not comment on the calming of the A2 as a concept they are concerned about the Faversham junctions. They are generally supportive of a link between A251 and A2 via Preston Fields, subject to modelling and are keen to investigate the possibility of car free development are as well as what else may be required to address the cumulative implications. There is some acknowledgement by the promoters of the capacity issues at Brenley Corner – but no solution has been proposed yet or any understanding demonstrated as yet of capacity ahead of improvements. Highways England are clear in their initial response that the interim improvements work due to commence in 2020 are not intended to increase capacity or deliver spare capacity over the existing situation. They acknowledge that if capacity enhancement schemes are required these could take 2 years before commencement of construction works and may require a cap on occupancy. The proposal provides evidence of an Air Quality strategy and appraisal which is helpful but will need further consideration.	Further information required relating to highways.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	A Transport strategy is provided, but sets out what will be explored and identified rather than committing to them. It states that work will be undertaken to persuade Highways England to bring forward the upgrading of Brenley Corner, but a more pro-active recognition of the need to model and determine capacity would be helpful. Reference is made to identifying ways of improving the links to the town centre and countryside, but not detail is provided. Following the comments from HE and KCC, set out above, a response to and further development of these issues will be required and specifically relating to the timescales.	Further information required relating to timescale following the highways comments.
Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities. (e.g. HA re J5a or Faversham junctions).	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	The proposal indicates that they are already engaging but no detail provided. There is recognition that it would be beneficial to improve cycle access and parking at Faversham station but no commitment to fund this. Again lots of good intentions however, little detail provided.	Further detail required to address sustainable transport modes and relationship with the station.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence	Fails to explain why the infrastructure package is proposed and how it will be delivered.	No costs provided. It is not possible to see what has been included in the cost calculations and therefore whether the proposal is viable.	Further information required.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
where needed).			
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	Possibility of removing the overbridge to The Abbey School and replace it with dedicated pedestrian crossing. Links to adjacent employer Macknade Fine Foods. Also opportunity to link through to west and onto A251 and J6. It is understood that this is being considered and discussions are taking place. This will have significant implications and could provide an important additional benefit if it can be achieved. More information is required and this will need to be addressed in more detail.	Further information required about the adjacent sites and access through to A251.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	The proposal provides a network of green corridors, tree lined avenues and verges throughout, as well as greens, squares and pocket parks and the percentage of open space is 33.6%. However, whilst there is landscaping it may be less than expected as it is not clear whether there is enough more formal open space for play, with much of the landscaping appearing to be buffers to the railway and motorway. There is also a good recognition of links with food growing. Further clarification will though be required as to its compliance with TCPA principles. LUC have assessed the proposal and make some useful comments in relation to the footpaths, rural lanes, severance by the railway line and relationship with the AONB, which should be taken account of in the masterplan. This will need to be considered in more detail as the scheme progresses.	Further information required to consider a more landscape let approach and address LUC comments and landscaping issues.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	The Landscape and visual appraisal evidence provided is detailed and helpful and responds to the site context. LUC have assessed it and the site and provided helpful comments which should be addressed going forward in the development of the masterplan.	Satisfactory progress. LUC comments should be addressed.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing of risks (Question 1b).	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	There is reference to Faversham football club and the opportunity to enhance it by providing new training facilities or consider a new location. However, this is not explored in detail and further information is required. The links out to Faversham and the AONB also need further detail, as suggested by LUC.	Further information required specifically relating to the football club.

Question 12: Sustainability			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Ideas set out but also evidenced with a reasonable prospect of delivery and ideally examples.	Commits to sustainable design and delivery but no details provided.	The proposal is based on walkable neighbourhoods. It suggests a variety of solutions for energy efficiency low to zero carbon buildings. Included as part of the evidence is a Low carbon energy note with a variety of measures. The scheme draws heavily on the experience in Poundbury. This is a well-developed proposal which goes further than most and has experience that is can bring to the scheme.	Good progress.
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed.	Fails to move beyond simply acknowledging they are within the prospectus.	The proposal says these are all matters for a later stage and this is fair up to a point, however, a commitment to work toward these standards would have been helpful. Instead, they rely on its reputation, and will seek, energy efficient building fabric, all electric homes, renewable building practices, energy efficient management systems, storage and distribution and smart meters. While this is more developed than others, which draws upon specific experience, further information is required to specify exactly what will be provided. The lack of costs and any viability information means it is not possible to see what has been included and to test these costs and whether these are viable.	Further information about exactly what is to be provided and specifically how this has been costed.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Examples are provided which demonstrates what they have done elsewhere. However, further detail is required to explain how these will be translated into practical solutions here.	Satisfactory progress subject to further information required about what is proposed on site.

NS5 – South of Faversham

Question 1 – About the Scheme?			
Question 1a: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
Question 1a: Outline the proposed trajectory			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Responds to the Councils SHMA which sets out the profile of homes needed.	Simply saying will provide an appropriate mix etc.	The proposal includes 5,000 new homes, high quality, affordable in line with policy and specialised with a mix of types and tenures, affordable, starter homes, key worker, self- build, and for older people delivered through a range of house builders. In general, everything appears to be covered, but due to the early stage there is a lack of detail about exactly what is being offered and to what extent the promoters think they can comply with policy and prospectus. Pragmatically this is understandable given the stage, but given that the promoters appear to be working up a suite of similar proposals, we would have expected some clearer 'headlines'. The risk here is that it is not clear where the compromises may be and that there may be some 'glossing' over these questions – saying the right things but not actually committing. This issue can hopefully be addressed with further detail at the subsequent stages.	Satisfactory progress and further work required to provide more detail.
Other ownership and site optimisation issues.	Not owning/controlling the site	The large area has a number of owners and gaps in sites and ownership around existing hamlets and dwellings. There are issues which need to be resolved around the red lines and that the proposed land simply envelops the hamlets / villages. The question is how will this work in practice and can it be made attractive to existing residents? What is the optimal location for development and is any additional land needed? Could the Council help manage this process? In terms of location this has the possible benefit of extending Faversham while not impacting too directly on the town. There are significant issues in relation to the location surrounded by the AONB, together with other landscape issues (to be discussed below), but which have potential implications for boundaries. Further work is required on boundaries to better understand how this layout would work with the existing dwellings / hamlets/AONB/landscape impacts. Further information submitted in January 2019 recognises these issues and the impact on individual homes owners around the site. The scheme promoters are committed to working with them to best mitigate the impact.	Further information required to confirm boundaries.

Question 1b: What mix of other uses is proposed?			
Note – this could be broken down by use- i.e. commercial, retail, leisure etc.			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Responds to the New Settlement Study which outlines the Councils expectations (land balance). Or provides alternative evidence to support an alternative mix.	Fails to commit to the outline provided in the New Settlement Study.	The proposal includes 317 ha of mixed use development with 5 neighbourhoods, a high street, and 2 community hubs with super market, multi-functional library, estate agent, pharmacy, shops, gym, hotel, professional services, and trades. 3 primary schools, secondary schools, playing fields, village greens within each neighbourhood and a burial ground. Jobs – high density retail in high street, low density rural hamlet, employment on east and med/high density office on northern edge and traditional business cluster close to M2 on north of the site. Due to the early stage, this scheme is less well developed than others, but it promises all the right things. There is very little detail provided, such as whether the CCG have been approached in relation to a new GP, and in relation to jobs it would be helpful to better understand the mix proposed – demand is for B1c space and will this fit in their vision and land budget? The important issue is that the whole package is deliverable (and viable) and will all be provided, how, and when and with what trade-offs. Further information is required to work up the proposal in more detail and to ensure there is sufficient viability to deliver. The viability assessment will be assessed in detail.	Satisfactory progress subject to further information and viability testing.

Question 1c: Outline the proposed trajectory			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Ideally delivers early.	Fails to demonstrate the site can start delivering in a meaningful (shortish) period.	The proposal says it will be delivered on phased basis – with the master builder building the key infrastructure. Little detailed information is provided, and no phasing plan is included, despite mention of one. It is also not clear whether this can deliver at pace and how this will be achieved. It will be important to understand how this site, together with NS4, could both be developed, what the road capacity is and what compound infrastructure needs emerge.	Further information required.
Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	Not yet provided, which means the timing implications for delivery and relationship with the current capacity of the Motorway junction is uncertain. Initial comments from Highways England consider it unlikely that signalisation of J6 would address the issues and consider that the cumulative impact may require a full grade-separated gyratory junction, but this may not be justified by the economic case due to the numbers. The long term implications for Faversham should be considered and modelling undertaken. Kent County Council considers that signalling can be managed so as to not interfere with other junctions, however, modelling is required to demonstrate the interrelation of the junctions.	Requires further work and response to the highway comments from KCC and HE.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New Settlement Study.	The proposal provides for a full range of facilities including; Homes, schools, range of retail and commercial, GP, village greens, open space and play areas, bus hub, burial ground. This proposal is at an early stage and while it promises much, there is little detail. Some of the benefits don't appear to be tailored to a smaller site and not scales appropriately for a garden community and we would expect new links to flow from the development	Requires further work to provide detail about the benefits particularly in relation to jobs.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
		especially when a new bus hub is proposed. There is very little information provided on the number of jobs. More work needed to ensure that the scheme does itself justice and to explain how realistic, deliverable and viable it is.	
Provides evidence to demonstrate that the benefits are achievable.	Little or no evidence provided.	Not provided at this stage. It will be necessary for further evidence to be provided which sets out how the benefits will be delivered.	Requires further evidence that benefits can be achieved.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic.	A viability appraisal has now been submitted and will be subject to detailed testing.	Satisfactory progress – requires testing.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits.	The proposal recognises the location which is surrounded by the AONB and provides buffer and open space in the south. However, the location adjacent to the AONB (and other landscape matters) is a significant issue which will need further work if it is to be addressed. The AONB planning Unit have provided initial provisional comments and indicate a potential objection to this scheme. These comments will need to be considered and addressed.	Further work required and to respond to the AONB comments.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough.	Benefits only relate to this proposal.	Not provided at this stage. It is surprising that a scheme of this scale is not providing more district wide benefit, and this should be considered further.	Further work required to identify whether any benefits can be provided.

Question 2: Abnormals			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	The proposal recognises that upgrades to services are required. Little information is provided about the constraints or abnormals, such as pylons across the site, or requirement for significant landscape mitigation and relationship with AONB. No costs or trade-offs have been set out, however the viability appraisal has been submitted and this will be tested in detail. Further information will be required to explain how the AONB issue will be addressed. This is particularly important given the initial provisional concerns expressed by the AONB Unit.	Further work required to explain how the pylons and AONB issue change the masterplan.
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. *We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.*	Or over optimistic assessment.	Further detailed viability work has been requested and received and a detailed assessment and testing will be undertaken.	Satisfactory progress - Further testing.

Question 3: Joint working			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promoter would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	The proposal envisages a partnership approach. Lord Matthew Taylor retained in advisory capacity to shape proposals and be a sounding board to ensure Garden Community principles not lost. Would be an independent member of design team and speak to members. This is a new approach for the developer, who recognises the need for joint working. However, little detail is provided, but the additional information provided in January 2019 includes an organogram which sets out their approach for a strong partnership. They would be willing to explore working with Homes England and other organisations and welcome the support of MHCLG, to provide dedicated funding for officer support. They also want to join the Garden Villages and Towns Forum to learn from and share good practice.	Satisfactory progress and will require further information and detail about how the joint working will be delivered.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc).	No acknowledgement of need for resources.	The additional information provided in January 2019 states that they would support the Council in the Local Plan process and commits to providing all the evidence required to justify its allocation, including attending the EIP. Agreement would be needed about what evidence is required and how this is to be provided. Some commitment to enter into a PPA process is helpful.	Satisfactory progress, subject to further information about how this will be delivered.
Outline when intervention or action is needed and what form they would like this to take (timetable, consideration of policies needed in Swale or wider).	No timetable or detailed plan given.	Further information provided in January 2019 commits to entering into a PPA which would produce a masterplan, set a framework for joint working, strategic allocation in the Local Plan Review, and submission and determination of a planning application. This is welcomed and more detail will be required in due course.	Satisfactory progress, subject to further information about how this will be delivered.

Question 3: Joint working			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Demonstrates this action plan aligns with the next plan. And outlines what polices may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail was initially provided, although further information in January 2019 shows they appear committed to the plan process and to provide evidence, defend the allocation, attend the EIP hearings and take an active role in the plan review.	Satisfactory progress, subject to further information.
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	The additional information provided in January 2019 welcomes assistance and joint working both with the Council, Homes England MHCLG and others to deliver homes quickly. Further detail will be required.	Satisfactory progress subject, to further information about how the joint working will be delivered.

Question 4: Delivery vehicle			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Discusses various delivery models, weights up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	The initial proposal envisaged 4 landowners who will work in partnership with Gladman and consultancy support. It proposes a master builder approach who will deliver crucial infrastructure, in accordance with a Design code and control parcel release in accordance with phasing plan. Little detail was initially provided, but further information was received in January 2019, which explains that they do not see the need to establish a formal LDV and are continuing to use a model of 4 private landowners who will work collaboratively. They are relying on an 'effective partnership' between key stakeholders to formal governance board, delivery team and Governance committee. This is set out within the organogram, but further detail will be required to be assured of its operational objectives and governance arrangements.	Satisfactory progress with further detail required about how this vehicle will work in practice.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	Little information was initially provided about the model and engagement, however, it is understood that there have been meetings with the Parish Council and also public meetings in November and January, with others scheduled. The latest information says that they will take a proactive approach to pre-application consultation, and that they are committed to continuing this consultation post consultation. They will make resources available for effective delivery of stakeholder and public engagement. A specialist PR and communications company MPC have been engaged and a draft strategy has been provided. There appears to be a good commitment to engagement and further partnership working on this and an engagement strategy will be required. However, further detail is required about the model and community control.	Further work required on the nature of the delivery vehicle and an engagement strategy produced.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	Not provided. Gladman are known to have submitted the scheme for consideration under the Government's Garden Community Prospectus and as such will be aware of emerging policy. It is will also be important here to consider such matters as the Government's consultation in respect of net biodiversity gain.	Further information required about details of the mechanism going forward.
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples,	This is a new approach for Gladman, who are keen to embrace garden communities and who have bought Mathew Taylor on board. They are experienced land promoters, however no examples are provided. This model may therefore be untested, which could pose some risk that will need to be considered and if necessary mitigated.	Further information required to provide detail on how it will be delivered.

Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	The proposal recognises this issue and believes that this should be managed through a long term community controlled stewardship structure using a community management company funded through an annual management charge with resident and stakeholder participation. Community assets and open space would be transferred to a trust, parish, company to assume responsibility and retain in perpetuity. No consideration appeared to have been given to the range of potential creative options and it would seem that management and transfer issues are considered separately. Whilst further information is provided in January 2019 that shows progression of thought, it does not really provide more clarification, other than recognising that there are numerous mechanisms and that a Governance committee should be put in place at the outset and then for a new parish to take over responsibility. A dowry is suggested and then that it will be self-financing. It is not clear that this will adequately manage and maintain the considerable community assets and while the capital cost and ongoing maintenance has been included within the calculations, this will need to be examined and the viability appraisal tested in detail.	Further detail and testing required.

Question 5: Advice	**What specific advice do you require and what technical research will you undertake should the bid be successful?**		
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of Travel**
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	Little information is provided in the initial submission, however, further detail is given in the January 2019 response. This welcomes any form of assistance to accelerate delivery whether that be direct funding of infrastructure, access to public funding of loans on preferential terms. Further discussion and agreement about the approach will be required.	Satisfactory progress Further detail required to progress scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response e.g. we need a Borough wide Water Cycle Study to help develop our scheme).	No acknowledgement of the need for further work,	Little information is provided, although further details are included in the January 2019 response which recognises the need for pre-application advice with key stakeholders, sign up to a PPA and work collectively. However, there is a general lack of information about what additional work is required or will be provided. This will need to be considered in more detail ad provided as the scheme progresses,	Further information required on how and when they will work with the Council.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.).	Highlights problems or data issues with no positive way forward.	Not provided at this early stage. It appears that little consideration has been given to exactly what technical evidence and solutions based approaches will be used. This is particularly an issue in relation to the AONB and the initial comments of the Unit, which raise objections to the approach. Further consideration and response to these comments is required,	Further information required to address AONB issues.

Question 6: Environmental Opportunities			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Clearly identifies the net gains or improvements under the five broad areas.	Fails to move beyond prospectus and New Settlement Study.	• The scheme proposes an extensive country park to the south of the site linking to the AONB. • It seeks to retain and enhance existing feature within landscape framework and Provide SUDS. • Opportunity to provide mitigation package for SPA and SACs. It is unclear as to whether this is a landscape led scheme or whether net biodiversity gain will be achieved. There are also landscape issues to potentially address (see LUC comments and initial provisional views from the AONB Unit). There is also little detail about the relationship with North Street and the other hamlets and how these are enveloped and dealt with within the masterplan and from an environmental view.	Further information required including a response to LUC and AONB Unit comments.
Provides evidence to demonstrate that these are achievable.	Little or no evidence provided.	Not provided It will be necessary for this to be explored in more detail if the scheme is progressed.	Further information required if the scheme progresses.
Provides evidence that they have been realistically assessed.	Concern that they may be too optimistic.	Not provided. A response to the LUC comments is required.	Further information required to provide a response to LUC comments.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible).	Lack of recognition of any negative impact.	Considers that the open space and Country Park to the south provides benefits. However, this will need to be clarified and tested further in relation to the LUC findings. There may be an opportunity to optimise the landscaping provision and to further consider landscape mitigation through dealing with the red lines which can be considered through a masterplanning review process.	Further information required to respond to LUC comments and recommend masterplan review.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough.	Improvements only relate to this proposal.	The proposal provides open space and a country park to the south to respond to the AONB surrounding this part of the site. However, given the initial comments of both the AONB Unit and LUC, this will need to be considered in more detail and a response provided to their conclusions.	Further information required to provide a response to AONB Unit and LUC comments.

Question 7: Environmental Constraints			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	• The proposal is adjacent to the AONB and within AHLV. • Topography identified, hydrology considered – not in flood risk area. • Use of SUDs proposed and proposal for how deal with western source protection zone. • Network of mature woodlands and hedges. • Existing properties at centre of site, but not in ownership, relationships. • listed buildings within site and on edge and potential archaeology along western edge. • Recognise noise source of M2. States that there are no significant views of the site from any roads or PROW more than 1.5km away. While the issues are identified, they are not always clearly provided with a solution and addressed. For example:	Further information to specifically address LUC and AONB Unit comments.

Question 7: Environmental Constraints			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
		• How does the masterplan relate to the hydrology constraints? • Electricity transmissions pylons cross site west to east –but not accounted for in masterplan. • Does there need to be more of a gap to the north? – in order that it becomes its own settlement rather than an extension to Faversham. • Views are considered but it is not then specified whether there are any views which are more important than others? For example what about views into and out of AONB? While the proposal recognises the adjacent AONB it does not appear to view it as a major issue. However, the initial provisional comments from the AONB Unit demonstrate that this is a key issue and indicate a likely objection to development in this location. It will be necessary for these initial comments to be considered and responded to. There are also clearly other landscape issues identified by LUC which will also need to be further considered.	
Provides reasonable confidence that the ‘long list’ (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	See above. Requires further consideration and a response to both the AONB Unit and LUC initial comments.	Further information required to provide a response to the AONB Unit and LUC comments.
Where constraints are identified provides a ‘action plan’ outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc. No mitigation strategy – or over optimistic.	No mitigation strategy – or over optimistic.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Considers off site (close proximity) constraints and provides a realistic view to managing these,	No consideration or inadequate approach to management,	The proposal recognises the adjacent constraints of AONB, nature reserve in West, ancient woodland in SW corner and conservation area to South. Whilst there is recognition of the constraints, it is not clear what the masterplan is doing about them and how they are being addressed. Further consideration is required to address these issues and those relating to the AONB and landscape generally.	Further information required to provide a response to the AONB Unit and LUC comments.

Question 8: Delivering the design principles			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	The proposal recognises the Governments ‘Locally led’ paper, but does not provide any detail. Their position is clarified in the further information provided in January 2019 which believes the council has the opportunity to set out design principles and requirements in the local plan. They caveat this by saying that these should not be too prescriptive to limit alternative innovate design. There is an issue here about how this will be achieved in practice. For this scheme they envisage the development of a detailed Design Code/ development brief and a team to work collaboratively on this and with the master planner, and for this code to be secured by way of condition and secured through the land sale contract.	Further detail required, specifically about their wish not to be too prescriptive.
Recognises the TCPA principles and met these in a meaningful way.	References them but with no detail or reasons for departure.	The proposal seeks to align scheme with the TCPA principles, but there is little detail or expansion upon these. See above.	Further detail required to demonstrate how these have informed the masterplan.

Question 8: Delivering the design principles			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	The proposal mentions exemplary design with emphasis on spacious and efficient layouts, embracing technological solutions, but no detail or examples are included.	Further information required to show how the principles will be applied locally.
Shows that the proposal responds to landscape context (accepting limited detail may be available).	Lack of recognition of landscape within and surrounding the site.	The scheme proposes a landscape buffer from north M2 and south AONB and country park along south and west. A north south landscape corridor. However, this is a less well-developed landscape led proposal and little detail is translated into the masterplan. LUC have considered the evidence submitted and provided comments which express concern about the AONB which will need to be addressed (alongside those from the AONB Unit) and further information provided.	Further information required to respond to the LUC and AONB Unit comments.
Provides a ‘action plan’ outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	Not provided at this early stage. Whilst this is not surprising, it will need to be considered further and provided.	Further information required.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	Little information was initially provided about engagement; however, it is understood that there have been meetings with the Parish Council and also public meetings in November and January, with others scheduled. The latest information says that they will take a proactive approach to pre-application consultation, and that they are committed to continuing this consultation post consultation. They will make resources available for effective delivery of stakeholder and public engagement. A specialist PR and communications company MPC have been engaged and a draft strategy has been provided to the Council. There appears to be a good commitment to engagement and further partnership working on this and an engagement strategy will be required.	Satisfactory progress. An engagement strategy is required in due course.
Agree with community land ownership and stewardship – ideally with details and examples.	Fails to commit to community land ownership and stewardship (Pass/Fail?).	This issue is not addressed in any detail, and whilst further information is provided in January 2019, which shows progression of thought, it does not really provide more clarification, other than recognising that there are numerous mechanisms and that a Governance committee should be put in place at the outset and then for a new parish to take over responsibility. A dowry is suggested and then that it will be self-financing. It is not clear that this will adequately manage and maintain the considerable community assets and while the capital cost and ongoing maintenance has been included within the calculations, this will need to be examined and the viability appraisal tested in detail.	Further information is required about how land ownership and stewardship is addressed.

Question 9: Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what infrastructure is proposed and why.	No consideration of what is required or failure to commit.	The proposal will be self sufficient and seeks to provide a neighbourhood centre, three primary school, a secondary school, playing fields, a variety of jobs, green infrastructure a well-connected network of footpaths and cycle paths. There is a good recognition of what is required including fibre optics to premises. Services are available to the site without new provision, that this will require localised upgrades. It recognises there are water issues and that they will need to work with Southern water to model demands and phase delivery and investment. Further consideration will need to be given to the Pylons crossing the site and also the Gas mains. A response from South Eastern Water is still awaited. Further detail will be required to address these issues.	Satisfactory progress with further information required specifically relating to water and how the pylons will be addressed.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of the proposal subject to detailed discussion with the Education Authority specifically in relation to the Secondary School.	Further information required in relation to education.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required. It is recommended that a Utility working group is established to consider cumulative issues and timing.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed. (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits. Only addresses the min. need for the new community.	Only addresses the min. need for the new community.	This issue is not addressed. It is unclear as to the likely wider benefits that might be available, which has potentially under-played those that might be available to existing residents in terms of new community facilities. There is also little by way of references to existing Faversham residents and how this proposal relates to the town.	Further information required particularly on the AONB issue.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	The proposal considered that the current M2 J6 operates satisfactorily and that there are no constraints. It suggests that signalising of J6 could deliver significant additional capacity and recognises that further improvements would need detailed technical appraisals. The A251 runs north south and the proposal considered that it offers the opportunity for alternative high quality spine road, to deflect traffic and downgrade existing road and link in with roundabout at north. It identifies bus routes and mentions a transport hub with quick bus link. it is necessary to understand the capacity of the motorway junction and the extent to which signalling is appropriate. It is understood that there may be an issue with the junction further north up the A251 and the existing situation whereby traffic queues back from the A2 / A251 junction almost as far back as the M2 junction 6 where additional queueing could increase tailbacks towards the M2 Junction 6 coastbound off-slip. It is understood that a meeting with Kent County Council is to be held on 31 January 2019 and that a meeting is also to be arranged with Highways England. Initial comments from Highways England are concerned about the impact on Junctions 5 and especially 7 and these require further work to what level of development could be accommodated before additional mitigation is required. They also consider it unlikely that signalisation of J6 would address the issues and consider that the cumulative impact may require a full grade-separated gyratory junction, but this may not be justified by the economic case due to the scale of development proposed. The long term implications for Faversham should also be considered and modelling undertaken. Initial comments from Kent County Council state that while signalling can be managed so as to not interfere with other junctions, modelling is required to demonstrate the interrelation of the junctions. They also require consideration of the impact on the B2041 junction with the A2. Duty to cooperate discussions are also recommended to consider the wider impact south on M20 J9 and Trinity Road Ashford. Finally, and subject to modelling results, they consider that the rural lanes (A251) will not have the requisite capacity for anticipated flows.	Further information required to address highways comments from KCC and HE.
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	The site encloses the A251 which runs north south and adjacent to J6 of M2. Improvements to this junction are proposed, but this will need further discussion with Highways England and confirmation that this could work. The proposal states that the station is 6 minutes' drive, but it is doubtful as to whether this would be from whole site or, indeed, likely given traffic queues at the A251/A2 junction. It is also unclear where the data for the graphic on trips (page 17) comes from and how the potential to capture trips externally will be achieved. It is also difficult to understand how the proposed quick bus link would operate any more efficiently than the current Ashford-Faversham service. Finally, more detail is required about this and also in relation to the proposed new footpaths and whether there are also cycle routes and how these would link to Faversham.	Further information required to clarify highways issues.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	The proposal recognises that the design and implementation of a revised layout and junction would need to be provided early, however, no detail is provided. It is also necessary to understand the extent to which J6 is a current constraint on capacity. Initial comments from Highways England are discussed in detail above and the key issue is the concern about the junctions, however, it makes no specific comments on timescales. Comments from Kent CC are discussed above and the key issue is that initial modelling on cumulative impact concludes that the local network around Faversham would be unlikely to cope without significant mitigation. The issues raised will need to be considered in more detail and in particular the understanding of timing and delivery issues.	Further information required and response to HE and KCC comments.
Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities. (e.g. HA re J5a or	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	The proposal recognises the importance of meeting with Kent County Council and Highways England and this is happening with meetings scheduled for 31st January 2019 and onwards. The outputs have not been provided however, informal comments from both HE and KCC have been received. Highways England are concerned about the impact on Junctions 5 and especially 7 and they require further work to what level of development could be accommodated before additional mitigation is required. They also consider it unlikely that signalisation of J6 would address the issues and consider that the cumulative impact may require a full grade-separated gyratory junction, but this	Further information required to clarify highways issues and respond to HE and KCC comments.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Faversham junctions).		may not be justified by the economic case due to the scale of development proposed. The long term implications for Faversham should also be considered and modelling undertaken. Initial comments from Kent County Council state that while signalling can be managed so as to not interfere with other junctions, modelling is required to demonstrate the interrelation of the junctions. They also require consideration of the impact on the B2041 junction with the A2. Duty to cooperate discussions are also recommended to consider the wider impact south on M20 J9 and Trinity Road Ashford. Finally, and subject to modelling results, they consider that the rural lanes (A251) will not have the requisite capacity for anticipated flows.	
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits. Only addresses the min. need for the new community.	Only addresses the minimum need for the new community.	Not provided at this stage. It is surprising that a scheme of this scale is not providing more district wide benefit, and this should be considered further.	Further work required to consider how highways issues could benefit wider Faversham area.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Outlines what green infrastructure is proposed and why.	No consideration of what is required or failure to commit.	The proposal includes a Country park, green space, allotments, community orchards, comprehensive network of linked spaces, and for cycling and walking it will create new north south PROW links. While this is not a landscape led proposal, a reasonable amount of open space is provided. However, this is largely located in the south and incorporates a country park along the southern and western edges of the site, and woodland planting to tie in with the recreational space and links with the AONB. However, LUC take issue with some of the conclusions put forward, especially in relation to the visual containment and use of the buffer planting and how to fit this into the open landscape. In addition there is a need to recognise the rural lanes and how these will be integrated into the development. There is some scope to offer further green infrastructure enhancements, for example, it is understood that other land made be available to the south. It is suggested that further consideration is given to the open space and landscaping through the use of a masterplanning review process.	Satisfactory progress but further review of the masterplan recommended.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	The approach appears to be a pragmatic one to address the relationship with AONB; however, the AONB Unit have expressed concern in their initial provisional comments, whilst LUC have also provided views. Therefore landscape issues in general are significant issues and they need to be considered further and addressed.	Further information required to address AONB Unit and LUC comments.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
of risks (Question 1b).			
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposal suggests that the screening and Country Park will help promote better engagement with communities about the benefits of the AONB. There may also be opportunities to extend the park further to the south. However, it is unclear whether this will be of wider benefit, whilst it will also be necessary to respond to the landscape issues raised by LUC and the AONB Unit.	Further information required to respond directly to LUC and AONB Unit comments.

Question 12: Sustainability			
A good answer would be:	**A weak answer would be:**	**PBA Comment**	**Direction of travel**
Ideas set out but also evidenced with a reasonable prospect of delivery and ideally examples.	Commits to sustainable design and delivery but no details provided.	The proposal mentions water conservation, food production and new technology and that this could include using zero carbon and energy positive technology to ensure climate resilience. This includes reference to SUDs, corridors, rainwater harvesting and consideration of renewable technologies PV and Solar panels, and ground source heat pumps. However, no detail is provided, and this will need to be subject to more detailed information. It is also not clear what has been costed and this will need to be tested as part of the assessment of the viability appraisal.	Satisfactory progress but further information required to show how these will be delivered.
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed.	Fails to move beyond simply acknowledging they are within the prospectus.	The specific standards are not referenced or included. There is no detail on high standards of design including Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards. It will be important that these are agreed early in the process to ensure that costs are fully factored in. It is not clear whether these have been costed and included within the viability appraisal.	Needs further development Viability work will be subject to detailed testing.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Highsted Park (South-east Sittingbourne)

Elevated views north-west over Sittingbourne from crest of Rodmersham dry valley

Orchards along valley at Highsted

Dry valley with remnant parkland west of Kent Science Park

Sunken wooded lanes east of the Kent Science Park

1.1 This short report provides an overview of the landscape context and sensitivities of the land wrapping around the south-east of Sittingbourne, which is being promoted by Quinn Estates as a new Garden Village for Swale in response to the New Garden Communities Prospectus.

1.2 The proposals comprise a new strategic southern relief road linking the A2 with the M2 (including new junctions onto both). The road forms the catalyst for development in four main clusters along its length, delivering c. 11,500 residential dwellings, associated community facilities (education, medical, sport and leisure) and c. 120,000 sq m of commercial floorspace as an extension to the Kent Science Park. It is suggested that the construction would be completed in 4 separate phases, over a 15-20 year period, with estimated delivery of 700 units per annum across the site.

1.3 Greenspace would comprise public open space, the retained framework of hedgerows, tree belts and woodland, and more formal sports pitches, play areas and amenity space. Open space / landscape buffers / corridors would provide multi-functional GI, a SuDS network and visual separation between each built-up area.

1.4 The relief road is established along the western edge of the proposed development largely within the Tunstall Farmlands character area (42), cutting through the minor dry valley west of the Kent Science Park extending to the east of Sittingbourne urban edge before cutting across the main valley of Rodmersham and Milstead Dry Valley (40) and onto the lower dip slope of Rodmersham Mixed Farmlands (29) where it joins the A2. The road forms the catalyst for residential and commercial development in four large clusters along its length in close proximity to the edge of Sittingbourne. There is very narrow rural separation from the existing settlement edge, mostly only 1 field depth of undeveloped land.

1.5 This is a preliminary assessment based on a site visit and understanding of the landscape character context. Further detailed landscape and visual appraisal will be required as the proposal moves forward within the planning process.

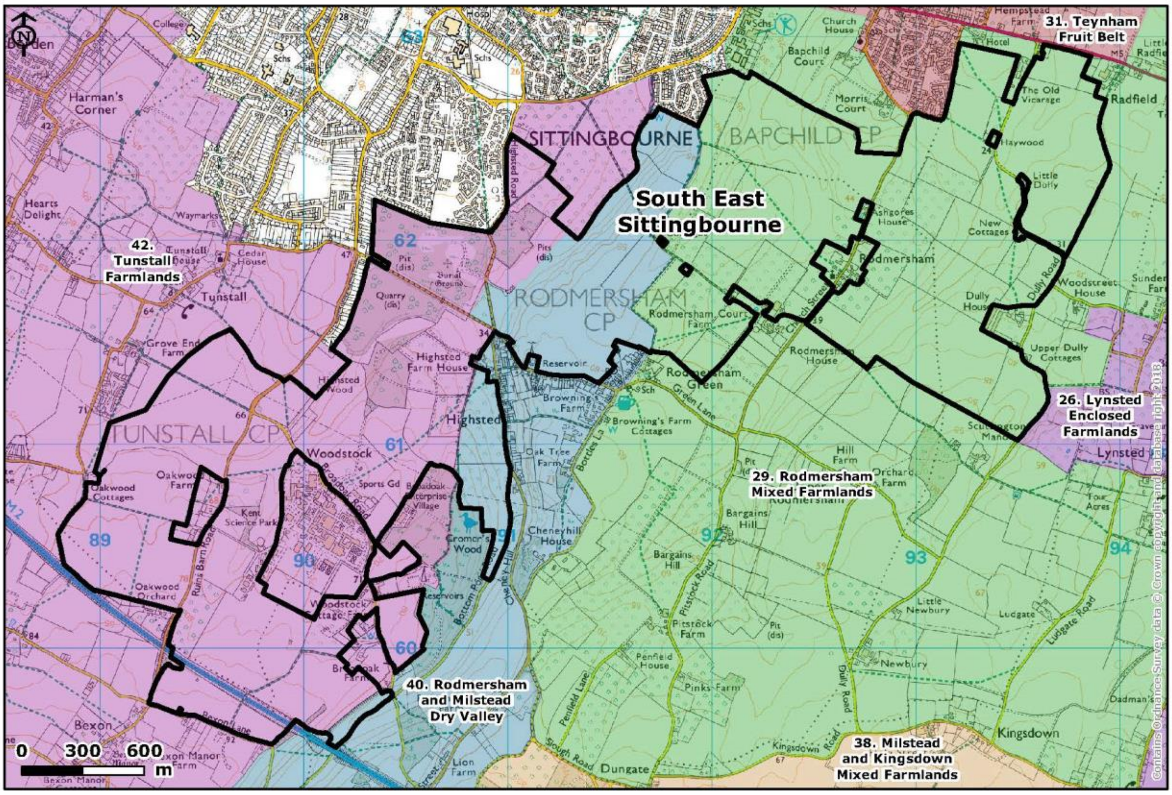
1.6 The report covers:

- Landscape and visual context/baseline
- Evaluation - Key landscape and visual sensitivities
- Commentary on initial landscape evidence provided by the developer
- Outline landscape and visual guidance
- Conclusion

Landscape and Visual Context / Baseline

1.7 The site lies to the south-east of Sittingbourne, extending from the M2 and north of the A2, including the Kent Science Park and adjacent to settlements at Bapchild, Tunstall Highsted, Rodmersham Green and Rodmersham. The southernmost part of the site which extends south of the M2 is within the Kent Downs AONB. Much of the area forms part of a dry valley system extending from the AONB and is largely designated as an Area of High Landscape Value – Kent Level (AHLV). The proposed development areas to the west of Ruins Barn Road and east towards Rodmersham and Bapchild encompass the flatter valley sides/dip slope and are not part of the AHLV.

1.8 The area extends across three main landscape character areas: Tunstall Farmlands (No.42); Rodmersham and Milstead Dry Valley (No.40); and Rodmersham Mixed Farmlands (No.29). A small part of the development also extends north of the A2 into the different Teynham Fruit Belt landscape (No 31).



Key Characteristics

1.9 The proposed garden settlement and southern relief road covers an extensive area of varied and contrasting character south-east of Sittingbourne, including open arable farmlands on the dip slope to the east and south-west and the intervening more enclosed dry valley landform, with its associated woodland, and more intricate land cover pattern. This is reflected in the three main constituent landscape character areas, as described below.

29: Rodmersham Mixed Farmlands

- Open, gently rolling fields in predominantly arable use, with small areas of pasture.
- Established and recently planted commercial orchards and associated shelterbelts around farmsteads and settlements (e.g. Rodmersham).
- Significant hedgerow removal, which has increased the openness and apparent scale of the landscape.
- Winding rural roads link small settlements and farms.
- Long views from elevated areas north and south, including to the Swale and St Nicholas Church, Rodmersham.
- Relative tranquillity and no evidence of pylons or visually intrusive buildings.
- Rodmersham Green – attractive settlement set around green and extending in linear form along rural roads.
- The historic buildings and Conservation Area at Tonge Mill (LCA 31)

40: Rodmersham and Milstead Dry Valley

- Steeply sloping dry chalk valley with rounded ridgelines contiguous with the AONB.
- Narrow rural lanes run through the valley, connecting farms and linear settlements e.g. Highsted.
- Large arable fields with some areas of orchard enclosed by small to medium woodlands.
- Enclosed landscape contrasts with isolated long unrestricted views from high points to Sittingbourne, Sheppey and the Isle of Grain/ Essex Coast.
- Relative sense of remoteness, despite close proximity to well-defined urban boundary of Sittingbourne and visually prominent M2 crossing the valley to the south.
- Ancient woodlands including Kent Wildlife Site at Cromer’s Wood.

42: Tunstall Farmlands

- Includes part of minor dry valley system contiguous with the Kent Downs AONB.
- Woodland including ancient and semi-natural woodland e.g. the edge of Cromer’s Wood.
- Large arable fields, with some remnant orchards e.g. at Sittingbourne settlement edge.
- Parkland landscape and features around Kent Science Park.
- Kent Science Park campus development within an otherwise rural landscape.
- Narrow winding lanes.
- Generally enclosed character within minor valley landform.
- Strong sense of rurality and relatively strong sense of remoteness in parts, although M2 and pylons detract from rural tranquillity.

Visual receptors

1.10 Visual receptors comprise views from:

- People enjoying countryside recreation/ users of the numerous public rights of way both within and outside of the site boundary, and potential views for recreational users within the Kent Downs AONB, and recreational visitors to the nature reserves/woodland;

- Passing views of motorists on the road network and minor lanes including designated Rural Lanes.
- Employees and visitors to the Kent Science Park would have views of the proposed development as well as people on public buildings on the edge of Sittingbourne. There are no specific tourist attractions, promoted viewpoints or national trails within the area.
- Residents in existing settlements – Sittingbourne, Tunstall, Bapchild, Rodmersham Green and Rodmersham.

Landscape value

1.11 The southern part of the site, between Bexon Lane and the M2, falls within the Kent Downs AONB. The land north of the M2 to the edge of Sittingbourne is designated as an Area of High Landscape Value – Kent Level. This area has visual continuity and integrity with the Kent Downs AONB and the dry chalk valleys are identified as one of its special qualities. It has high scenic value and the whole area forms part of the setting of the AONB. The land east of footpath ZU39 and extending north to Highsted Quarries and the urban edge of Sittingbourne is also designated as an Area of High Landscape Value – Kent Level.

1.12 The area around Highsted quarries, between Bapchild and Rodmersham Green (west of Church Street) and the land between the north of Cromer's Wood and Sittingbourne settlement edge are all designated as Important Countryside Gaps. Local Green Spaces are present in the northern half of the Highsted Quarries, and immediately adjacent to the proposed development at the playing field and field south of Sittingbourne Community College.

1.13 Highsted Quarries and Cromer's Wood are both designated as Local Wildlife Sites. Cromer's Wood and undesignated Highsted Wood are both ancient woodland. These areas have local value for biodiversity and are part of the rural landscape setting to Sittingbourne, Rodmersham Green and Highsted.

1.14 The Rodmersham Green Conservation Area is adjacent to the eastern site boundary, and contains a number of listed buildings. There are also listed buildings in Highsted on the site boundary. Bottom Pond Road, Church Street, Dully Road, Highsted Road and Ruins Barn Road are all locally designated as rural lanes.

1.15 Local recreational value is provided by public rights of way crossing the landscape and its proximity to Bapchild, Rodmersham, Rodmersham Green, Sittingbourne, Tunstall and the Kent Science Park. The landscape has local value as part of the rural landscape setting to these settlements, and in providing a rural gap between the settlements.

Evaluation

Key Landscape and Visual Sensitivities

- The distinctive steeply sloping dry valley landform is of greater sensitivity, and the open valley crests are visually prominent. It would be difficult to integrate linear infrastructure and large blocks of residential development in relation to the articulated topography of the dry valleys.
- The visual, physical and character continuity and integrity with the Kent Downs AONB. The dry valleys represent one of the AONB's special qualities and the area has an important role as the setting to the AONB.
- Open and elevated areas have high visibility within the surrounding landscape and local settlements including long views north out to the Swale and beyond, and south towards the Kent Downs AONB. St Nicholas church tower, Rodmersham, is a prominent feature in local views
- Generally, relatively high levels of tranquillity and strong rural character across much of the area despite proximity to Sittingbourne. Role of the area in providing rural separation between Sittingbourne and outlying villages.
- Well defined settlement edges of existing development e.g. at Sittingbourne and Bapchild and well contained character of existing villages e.g. Rodmersham Green with area forming rural setting to the villages.

- The locally designated rural lanes are features of higher sensitivity in terms of the contribution they make to landscape pattern, complexity, visual character and time depth.
- Cromer's Wood/Highsted Wood and Bex Wood are ancient woodland and a feature of higher sensitivity, as are the small areas of traditional orchard and pasture through the valley, and historic parkland at Kent Science Park. The woodland would also be sensitive to adjacent residential development on its immediate borders.
- Highsted Quarries, part of the LWS, provides a rural separation between Sittingbourne and Highsted, as well as a green edge to the settlement edge of Sittingbourne and local wildlife resource.
- The land south of the Kent Science Park in particular provides an important rural and visual separation between the Kent Downs AONB south of the M2 and the existing low rise development at the Science Park.

Summary of impacts and sensitivities by character area

29: Rodmersham Mixed Farmlands

1.16 The relief road would join the A2 to the east of Bapchild with a large area of residential development extending to the east of Bapchild and continuing east of the relief road. A relatively narrow area of undeveloped land/open space is retained south of Bapchild to Rodmersham. Two large blocks of residential development climb the lower dipslope south of Bapchild to the east and west of Rodmersham. Development will also extend north of the A2 and Lomas Road/ the railway within the adjacent fruit belt landscape. An undeveloped rural enclave is shown around Rodmersham.

1.17 In this area the elevation, openness and long views are highly sensitive. The area to the south and north of the A2 would essentially appear fully developed extending the urban edge of Sittingbourne in a linear form to encompass Bapchild almost as far east as Teynham. Along the A2, this would give the impression of an enlarged area of Sittingbourne rather than a new garden settlement. The small remaining parcels of open land south of the existing A2 and the new relief road/housing are likely to be unsustainable as farmland and therefore vulnerable to future development. The narrow rural gap east of Sittingbourne (Murston – Snipehill) would also be vulnerable. The small rural settlement of Rodmersham Green would form part of a much more extended urban area and there is currently limited information in how this would be integrated in practice. The two blocks of development on the dipslope south of Bapchild would be visually prominent and due to the elevation and openness of the landscape here are unlikely to offer options for effective screening

40: Rodmersham and Milstead Dry Valley

1.18 In the masterplan for the proposed garden settlement the valley floor is to an extent kept free of development and forms an area of open space and woodland with development on the visually and topographically sensitive valley sides. The relief road cuts into and across the valley in the north and includes a large roundabout/junction within the valley to access residential development to either side, including a block of development on the steep valley side adjacent to the existing edge of Sittingbourne and further blocks on the sides towards Rodmersham. Here, the road would descend/ascend the steep valley side with areas of residential development shown across the contours. A further block of residential development spills onto the valley side/crest to the west of Highsted and adjoining the boundaries of ancient woodland. Development on these steep slopes would be highly prominent.

1.19 The key sensitivities are the dry valley landform and rural character, high scenic value and continuity/physical integrity with the AONB including dry chalk valley qualities and ancient woodland. It is recognised that the proposed development respects some of these elements by leaving a part of the valley floor open. Key sensitivities are the relief road crossing of the valley to the north including the road junction, roundabouts and slip roads on the valley floor and climbing the valley sides and the associated visually prominent blocks of residential development on the steep valley sides and development adjoining the immediate edge of the ancient woodland.

42: Tunstall Farmlands

1.20 This masterplan for the proposed scheme shows the route of the relief road, with a large junction on the M2 impinging into the AONB to the south and the road continuing to the north through the minor dry valley west of the Kent Science Park, continuing along the upper edge of the valley skirting east of Highsted Quarries before dropping down to cross the valley and continuing to Bapchild in the north. The road runs extremely close to and is likely to impinge on the the quarry and Highsted Wood Ancient Woodland and having crossed the valley bottom at Stockers Hill it then climbs the visually prominent steep valley side.

1.21 A roundabout to the west of the Kent Science Park provides access to two large blocks of development, west on the more open dipslope towards Tunstall and east within the minor dry valley north of the Science Park. A large area of extended commercial development is indicated to the south of the existing Kent Science Park abutting the M2 and boundary of the AONB. At this stage it is not known what this commercial development would entail. Further areas of residential development are envisaged north of the relief road, including within part of the Highsted Quarries LWS.

1.22 The key sensitivities are the subsidiary valley landform north and west of the Kent Science Park and its area of parkland and the open and visually exposed character of the dip slope towards Tunstall. The proposal brings an area of substantial residential and commercial development onto the dip slope immediately adjoining the AONB effectively extending the urban edge of Sittingbourne substantially southwards in a linear form leaving only small isolated areas of agricultural land separating it from the existing urban edge and from Tunstall and Bapchild. A further key sensitivity is the physical loss and direct impact of the motorway junction on the AONB, impacts of large scale commercial development on the immediate edge/setting of the AONB. It is likely that increased traffic flows on rural lanes to access the junction will adversely affect a significant area of the AONB. The proposals will involve a loss of woodland, including ancient woodland at Highsted Wood to accommodate the relief road. There will be some loss of woodland/Local Green Space/LWS at Highsted Quarries, particularly to the northern quarry where residential development is proposed. Residential development extends around much of Cromer’s Wood, and mitigation will be needed to ensure no damage is caused to the site.

Commentary on landscape evidence provided by the developer

1.23 This section provides initial comments on the landscape information and evidence provided by the developer in their submission to Swale BC. This is contained within the Highsted Park document by Quinn Estates and the accompanying Landscape Technical Note (July 2018) by David Williams Landscape Consultancy. It contains general comments and specific comments on the developer’s approach to landscape sensitivity, the Link Road and the AONB.

1.24 In the main this is an accurate document, listing the landscape sensitivities and potential opportunities, including an extended section on green infrastructure. There are minor inaccuracies and some inconsistencies which include:

- The document notes that the Kent Science Park currently influences the setting of the Kent Downs AONB. Our opinion is that the small scale, low height and contained nature of this development does not influence the AONB at its present extent.
- The document notes that the vast majority of the area is not constrained by landscape designations when in fact a large part is AHLV.

1.25 **Approach to Landscape Sensitivity:** The document refers to the Swale Landscape Character and Biodiversity Appraisal report (2011). The Technical Note describes the different sensitivities within the site and uses this to give a merged overall sensitivity for the whole site of ‘moderate’. Current guidance states that sensitivity is produced for a specific piece of land, in relation to a specific type of development. Amalgamating the sensitivities of each landscape character area is not appropriate in this case. It should also be noted that the LCA is a strategic borough wide document and identifies broad overall generic sensitivities. More detailed specific work is necessary to build on the LCA and indicate sensitivities to the proposals outlined in this document.

1.26 Given the high sensitivities associated with this area (AONB/AHLV) the developer should provide more evidence to show precisely how the scheme is landscape-led and how '*the natural attributes of the location, including landform, landscape character, wooded areas…have been embraced and have led to a scheme which seeks to respect and conserve key features of the landscape*'.

1.27 **Kent Downs AONB:** There is limited discussion of the relationship between the development and the Kent Downs AONB, beyond mention of improved connectivity. A small section of the southern part of the site is within the Kent Downs AONB and much of the land has an influence on the setting of the AONB. The current buildings in the Kent Science Park are relatively well screened from the AONB by the relatively low height and bulk plus position in a slight dip in the landform. Additional impacts will include the impact of greater traffic on the rural lanes of the AONB to join the new M2 junction which are not identified in this document**.** It is not clear what mitigation measures will be taken to ensure that the new development does not cause harm to the AONB or impact on its special qualities. The point made at paragraph 3.1 of the Landscape Technical Note that the development would only impact on 0.003% of the AONB is a spurious argument. The applicant should provide a greater in-depth understanding of impacts on the special qualities and setting of the AONB as set out in the Kent Downs AONB Management Plan and Kent Downs AONB Setting Position Statement. The Landscape Technical Note does refer to these documents, and in section 3 acknowledges there will be some adverse landscape and visual effects on the setting of the AONB and the dry valleys that extend from the AONB. In our opinion more work is required and the developer should be asked to provide an indication of how para. 172 of the NPPF is addressed, how the development conserves and enhances landscape and scenic beauty and how the proposal meets the tests for development within/in the setting of an AONB.

1.28 **Rural lanes:** There is no mention within the submission document or the Landscape Technical Note about how the locally designated rural lanes will be integrated into the development, or how these will be enhanced. It is noted that the masterplan currently shows connections between the new road and the existing rural road network and this is likely to substantial increase traffic on local roads both within the AONB and other minor rural lanes with associated impacts on rural character and qualities.

1.29 **Boundaries and interface with Sittingbourne urban edge:** There is currently a well-defined settlement edge at Sittingbourne. The masterplan shows some retention of this through open space buffers however in some locations only a small amount of woodland/trees is shown separating the current settlements and the new development. Given the close physical proximity of the new residential development to existing settlements it is difficult to understand how new settlements will interact with existing settlements, or with each other. The small areas of landscape remaining that separate new settlements from Sittingbourne and Bapchild are likely to be unsustainable for farming and therefore vulnerable to degradation and future infill and therefore negating the design aims of this scheme as a 'necklace' of individual small villages. If the scheme were to be progressed further consideration would need to be given to mechanisms to conserve the openness and sense of separation between new development and existing settlements of Sittingbourne, Bapchild and Tunstall. This may require a greater area of land purchase and long term management covenants if the scheme were to be progressed.

Guidance

1.30 If this site proposal was to be progressed through the planning process a detailed landscape masterplan would need to be developed, accompanied by an LVIA. From our understanding of the landscape and visual sensitivities the following guidance is recommended.

1.31 This proposal is led by the construction of the new link road between the A2/M2. The landscape impacts could be reduced if the road was considered on its own and separate to the wider development proposals. The guidance is therefore set out for each element of the scheme.

The Relief Road

- Road design being the minimum necessary as a single carriageway will be less harmful than a dual carriageway.

- Junction design to minimise encroachment into the AONB and substantial landscape enhancement along Bexon Lane.
- Considering all options for the route of the link road aiming to retain the road location as far as possible on the dip slope rather than within the dry valley and away from the exposed valley crest and minimising intrusion into the valley as far as possible, accepting that a crossing of the valley is required to link the A2 with the M2 via the Kent Science Park.
- Design to limit access onto surrounding local road/rural lane network from the relief road (could be more easily achieved if residential development not associated).
- Further consideration of A2 junction location including options west of Bapchild.
- Careful design of the road where it cuts across the valley west of Rodmersham. In the absence of residential development the need for the intrusive junction and slip roads could be avoided as there are no requirements to create access to new development areas.
- Design of the road as a parkway/habitat corridor including reinstatement of chalk grassland along faces and cuttings. Planting to integrate the road along the valley crests.
- Landscape management strategy and management agreement to conserve and enhance character and avoid incremental development and infilling of left over land between Sittingbourne and the road and to maintain a rural landscape setting to the road.

Residential and employment development

1.32 The proposals for residential development are bolted onto to the link road, and appear to relate to landownerships and achieving a quantum of development to support the road. As such they currently do not appear as a fully integrated garden village development. The following guidance is noted:

- Careful design of development as an integrated scheme including integration with existing areas of settlement at Tunstall, Bapchild, Rodmersham, Rodmersham Green and avoiding creation of small isolated areas of residential development, and unsustainable green 'cordons' and slivers of land.
- Keeping residential development away from the locally designated landscape (AHLV) represented by the steeply articulated topography of the dry valley south of Sittingbourne where it would have very high visual and character impacts.
- Reducing extent of commercial development in association with the Kent Science Park within the larger extended area up to existing M2, and clearer specification of low rise campus style development in relation to the existing buildings.
- Development masterplan to avoid small gaps and slivers of undeveloped land adjoining existing development edges which would likely to become unsustainable for farming and vulnerable to infill. These areas of land should be brought into the masterplan and the boundaries of the area extended, with a land management plan prepared setting out mechanisms for their retention as high quality landscape edges and buffers.
- Avoid creation of extensive linear development eastwards creating a continuous urban area between Sittingbourne – Bapchild – Teynham.
- Avoid loss of woodlands and particularly areas of ancient woodland and seek to connect and link areas of woodland. Ensure that all woodland is appropriately buffered from development on its immediate edges.
- Avoid loss of LWS at Highsted Quarry.
- Create a comprehensive green corridor network along the dry valley.
- Create a comprehensive plan for woodland creation, landscape screening and buffering to integrate development and avoid hard urban edges and intrusion onto skylines in views from the valley and along the A2.

Conclusion

1.33 This is a very challenging site for development of a road and residential development of the scale proposed. In landscape terms much of the area is highly sensitive including part of the Kent Downs AONB and its immediate setting and representing special qualities (dry valley) extending out from the AONB boundary. The landscape quality is recognised by the local landscape designation. Within Swale there is no precedent for urban development climbing the dip slope transition between the coastal plain, fruit belt and chalk downs of the AONB or extending within the dry valleys. It is very difficult to achieve a scheme which is landscape-led in this context and there are limited opportunities to fully mitigate impacts in this location of high landscape sensitivity.

1.34 If a development of the size and scale proposed in this location were to be progressed, significant adverse landscape impacts would need to be accepted. At a minimum any scheme in this location would require:

- Exploration of all possible route options for the desired link road to minimise its extent and impact and maximise opportunities for integration;
- Extended site boundaries to permanently secure areas of landscape buffer/green gaps and/or mitigation for visual/landscape impacts;
- Reduced residential development areas to avoid the most sensitive locations (as set out above);
- Clear identification of measures to minimise impact on the AONB including reduced extent of commercial development;
- A single carriageway with reduced access onto the local rural road network.

Land at Bobbing

View south-west over arable fields towards Keycol Hill

View north from site boundary with Bobbing (Sheppey Way)

1.1 This short report provides an overview of the landscape context and sensitivities of the land at Bobbing for a new Garden Village for Swale in response to the New Garden Communities Prospectus.

1.2 The whole site (as extended to the south-east beyond Rook Lane in October 2018) comprises circa 226 ha in total. The figures below relate to the original extent of the site (c. 201ha) as of August 2018 for which fuller details have been provided. This assessment may need to be amended if further information comes forward for the extended site area.

1.3 The proposals involve 87 hectares of residential development (c. 2,500 dwellings) and an associated 6 ha of community facilities and 3 ha of flexible employment space. The majority of this development would be sited to the north of the railway line in proximity to Bobbing Village. Further to the south-west, to the south of the railway line, a smaller area of residential development is proposed together with a substantial area of "parkland" public open space, which is intended to act as a permanent open space buffer to the village of Newington, to the west.

1.4 Greenspace would comprise circa 100 hectares (or 50% of the site), concentrated in the proposed parkland in the south-western edge of the site. Additional open space is proposed in the form of a new Bobbing Village Green, new linear parks / ecology corridors, allotments and a SuDS network, and the retained Rook Wood as a "reserve".

1.5 This is a preliminary assessment based on a site visit and understanding of the landscape character context. Further detailed landscape and visual appraisal will be required should the proposal move forward within the planning process.

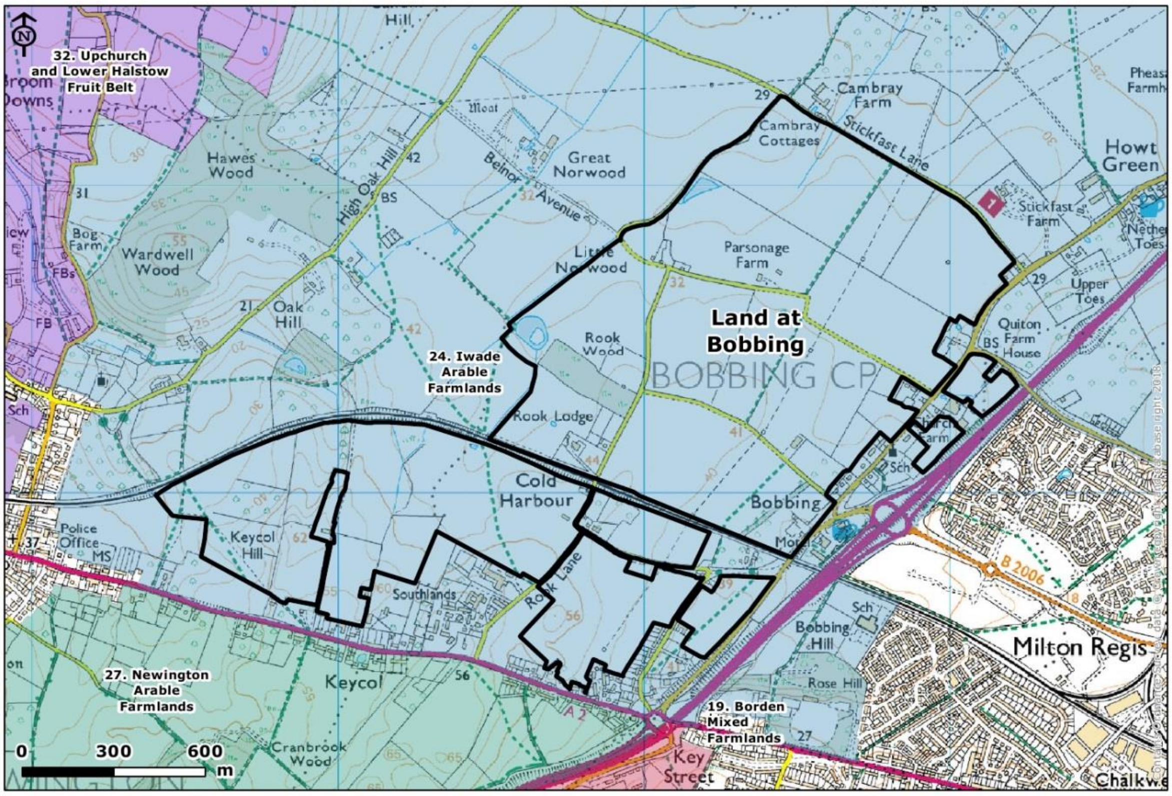
1.6 The report covers:

- Landscape and visual context/baseline
- Evaluation - Key landscape and visual sensitivities
- Commentary on initial landscape evidence provided by the developer
- Outline landscape and visual guidance
- Conclusion

Landscape and Visual Context / Baseline

1.1 The site (as extended to the south-east in October 2018) comprises circa 226 hectares of predominantly arable farmland in close proximity to Bobbing Village, to the west of the A249 and north of the A2. The land is dissected by the London to Dover/Ramsgate railway line. It does not contain any landscape designations.

1.2 The site falls within a single landscape character area: Iwade Arable Farmlands (No.24).



Key Characteristics

- An open agricultural landscape dominated by large and medium scale undulating arable fields including hops, with a very open and exposed character.
- Limited enclosure is provided by the treed boundary with Bobbing village and Sheppey Way to the south and east, by the mature planted corridor of the London – Dover railway line which bisects the site in cutting from east to west, and by a fragmented and limited hedgerow network (including remnant orchard apple trees) and occasionally lined by ditches and ponds.
- Rook Wood is a block of designated ancient woodland forming an important landscape and ecological feature within the central part of the site.
- The tower of St Bartholomew’s church (Grade I listed), Bobbing, is a landmark skyline feature in some views to the east.
- The site boundary with Bobbing village comprises linear development of intermittent, low density dwellings and their well-vegetated curtilages along Sheppey Way, with views focussed around the church as a landmark feature.
- A more pronounced undulating and gently rolling landform in the south-western part of the site, with field trees, small copses and hedgerows in the vicinity of Keycol Hill (high point of site at c.62m AOD) breaking up the expanse of arable fields and providing a more varied, scenic character. Views to the west/north-west from this elevated area incorporate the tower of St Mary’s church (Grade I listed), Newington.
- The local ridgeline of Callum Hill, including Hawes and Wardwell Woods to the west (Area of High Landscape Value – Swale Level) provides visual containment and a scenic rural backdrop in views from the site.

- Expansive long range views are possible to Iwade, across the Swale and the Isle of Sheppey to the north-east, and the wooded dip slope of the Kent Downs AONB to the south.
- Parsonage Lane is (in part) a scenic, winding rural lane with an important mature hedgerow forming the north-western boundary of the site, which links with Coldharbour Lane and Rook Lane running north-south through the site. All of these are locally designated rural lanes along part or all of their length.
- The site contains several farmsteads and modern agricultural storage sheds, but few other buildings. Electricity pylons and transmission lines are dominant and intrusive features, particularly within the northern part of the site.
- Variation in the south-eastern corner of the site formed of open arable fields partly enclosed by housing along the A2 and Bobbing Hill, with minor areas of horse paddocks/pasture, which slope down quite steeply from the high point around Rook Lane to Sheppey Way.

Visual receptors

- Visual receptors comprise passing views from the network of six public footpaths traversing the site, together with minor lanes, including Rook Lane / Cold Harbour Lane and Parsonage Lane, which provide north-south access through the centre of the site to the A2. Many individual private views are possible from the houses which adjoin / neighbour the site. There are no tourist attractions, promoted viewpoints, national trails or notable recreational areas (e.g. country parks or local public green space) within or adjacent to the site.

Landscape value

1.3 The site does not contain any national or local landscape designations, and is situated a minimum distance of 2.5km away from the Kent Downs AONB to the south. However, the site does hold certain local landscape values, including its value for recreation via the PRoWs crossing it in combination with its proximity to the settlements of Bobbing, Keycol and Newington.

1.4 The site also has local value as part of the rural landscape setting to the settlements, contributing positively to the wider, strongly rural backdrop which incorporates the more elevated Area of High Landscape Value (Swale level) further to the north-west. Parsonage Lane, Cold Harbour Lane and Rook Lane are all locally designated rural lanes.

Evaluation

Key Landscape / Visual Sensitivities

- The more pronounced and rolling landform in the south west part of the site is of greater sensitivity than the flat to gently undulating landform that characterises the main part of the site.
- Open, partly elevated area with large scale arable fields are less sensitive in terms of land cover and scale but also have high visibility within the surrounding landscape and local settlements at Bobbing and Keycol.
- The area of ancient woodland at Rook Wood, occasional infield clumps of trees and hedgerows including mature oak and ash plus orchard trees are features of higher sensitivity. The simple landscape pattern of regular arable field is less sensitive.
- Small pockets of greater tranquillity and more rural character notably along sections of Parsonage and Cold Harbour Lanes and in the SW part of the site are of higher sensitivity. The majority of the site is affected by road and rail noise, to varying degrees, resulting in low levels of tranquillity.
- The locally designated rural lanes (Parsonage Lane and Coldharbour Lane – in part; and Rook Lane – in full) are features of higher sensitivity in terms of the contribution they make to landscape pattern and complexity, visual character and time depth.
- The area to the west of the site south of the railway line provides rural separation and setting for the smaller settlement at Newington and at Keycol.
- Presence of pylons and overhead powerlines are dominant features on the site, and views out of the site to development and infrastructure means that there is no sense of remoteness associated with this area.
- Important views include the long views out of the site to the west to the scenic rural backdrop of the Callum Hill / Wardwell Hill ridgeline and woodland (Area of High Landscape Value – Swale Level) and the views across the site to the church tower at Bobbing.
- Role in providing rural separation between Bobbing, Newington and Sittingbourne.

Summary

1.5 The main sensitivities of this site relate to its function as rural landscape and context for the existing settlements and relationship with the wider rural area including the Wardwell Hill backdrop and role as separation/rural gap. The key sensitive attributes are its visual exposure, some areas of more elevated topography, hedgerows and mature trees, the large block of ancient woodland at Rook Wood and isolated areas of more rural and tranquil character within the western and south-western parts of the site. The area on the western part of the site, south of the railway is important in providing separation and rural setting for Newington and Keycol.

Commentary on landscape information provided by the developer

1.6 This section provides an assessment of the principal submission document, entitled 'Land at Bobbing - Second Stage Submission to Swale Borough Council, August 2018'. This submission includes a general overview of site characteristics and local landscape context (page 6), and specific commentary on landscape character and visual impact (pages 18-20).

1.7 The landscape evidence focusses on the largest land parcel within the site, to the north of the railway line, with comparatively little commentary on the land parcels to the south of the railway line, which are in part proposed as 'parkland'. The 'high-level' / strategic landscape features of the site, e.g. the hedgerow and woodland network, and its general condition / status, landform and PRoWs have been accurately identified and described.

1.8 The designated rural lanes within the site are proposed to be retained, although it is unclear at this stage how the increased volumes of traffic generated by the proposal would be controlled along the lanes and their rural character conserved.

1.9 The ‘evolving masterplan’ (page 12) provides an indicative network of different types of open space throughout the site, in addition to internal and boundary landscape ‘buffers’ (providing visual screening in addition to biodiversity/amenity value).

1.10 Consideration of how the proposed extensive parkland area will connect with the new areas of housing, in terms of both pedestrian/cycle accessibility and habitat connectivity, is lacking from the current submission. This area is currently separated from the larger part of the site to the north by the London to Dover/Ramsgate railway line, which results in significant severance between the areas either side of the line, with only limited minor level crossings providing access across. Page 23 of the submission states ‘existing level crossings will be improved in consultation with Network Rail’. At a more strategic level, consideration also needs to be given to how a development of this scale would support and connect to the Swale Green Grid Strategy, to facilitate and encourage car-free travel, local points of interest and potential areas of habitat creation and enhancement. Stickfast Lane and High Oak Hill, adjacent to/close to the site, are part of the Strategic Green Grid Route.

1.11 Page 25 of the submission, under the subject of local landscape context, states ‘the Council’s Urban Extension Landscape Capacity Study concluded that this area had ‘high’ capacity to accommodate change’. This is incorrect. The significant majority of the site was excluded from this study, with only a small part of it, between Bobbing Hill and Sheppey Way, forming part of Study Area 13 where the capacity to accommodate change was considered to be ‘moderate’.

1.12 A short very high level summary of landscape and visual impacts is included which makes some very broad conclusions on levels of impacts. These would need to be supported by a more detailed LVIA to feed into design and mitigation.

1.13 More information is required on what is meant by a ‘Landscape – led approach’ in practice and what the ‘strengthened landscape resource’ would comprise.

Guidance

1.14 If this proposal was to be progressed through the planning process a detailed landscape masterplan would need to be developed, accompanied by an LVIA. From our understanding of the landscape and visual sensitivities the following opportunities are noted:

- Design and locate the SuDS features, particularly swales as key elements of the green infrastructure network, to utilise the natural rise and fall of the land. At present, the evolving masterplan (excluding the parkland block) indicates a relatively limited open space and SuDS network, with no information as to whether the SuDS network would extend into each block of residential development. These areas would be expected to each be served by and designed around naturalistic swales, attenuation and retention ponds.
- There are significant opportunities to incorporate new, traditionally-managed (low intensity) orchards using varieties of local provenance, as key multi-functional community resources and features of the site’s green infrastructure network. This would reference the traditional dominance of fruit farming over the majority of the site up until the 1950s and 1960s, and contribute to reinforcing / conserving the time-depth within the landscape.
- There are opportunities to increase woodland cover, where appropriate, to limit visual impact and enhance habitat connectivity. The ancient woodland within the proposed Rook Wood reserve is irreplaceable (NPPF para 175) and should be connected to new native woodland and hedgerow planting, with a potentially greater buffer of open space to new surrounding built form and infrastructure. Current Natural England and Forestry Commission standing advice states mitigation measures could include leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland or tree (depending on the size of the development, a minimum buffer should be at least 15 metres).
- There are opportunities to restore and extend the hedgerow network, including planning for the next generation of hedgerow trees.
- Integrate designated Rural Lanes into the new settlements, ensuring their special rural qualities are conserved and enhanced. Utilise the character and qualities of existing rural lanes in

designing new roads within the site, to contribute to maintaining local distinctiveness and a sense of rurality.

- Consider how the existing areas with relatively higher scenic value and sense of rurality and tranquillity (generally the western and south-western parts of the site) can be preserved and sensitively integrated within the wider site masterplan. This could take the form of more significant open space / vegetated buffers to new built form, to provide a more gentle transition between built-up areas and neighbouring undeveloped farmland, and a focus on car-free routes.
- Aim to maintain existing relatively dark night skies by carefully considering the site-wide lighting strategy (both adopted and non-adopted roads and footways), utilising the latest technology to minimise light spill and glare. This is particularly important at the rural edges towards Wardwell Hill and Callum Hill.
- Preserve the predominantly undeveloped skyline character by avoiding locating new development on upper slopes, ridgelines and other high points within the site, where it would be more visible on the skyline and in longer views from adjacent settlements and the wider area. Such locations would include the areas around Keycol Hill and Rook Lane.
- Consider incorporating important and locally distinctive skyline features and views within the general layout and design of key vistas, e.g. maintain and focus views to St. Bartholomew's church, Bobbing, from the proposed 'Bobbing Village Green'; maintain the open views to the Callum Hill ridgeline and woodland from western parts of the site.

1.15 It is considered that there also needs to be further justification for converting the existing south-western land parcel from agricultural use to parkland, in terms of impacts on landscape and visual character, including further detail on what this parkland would comprise. Retaining the existing landscape baseline by removing this land parcel entirely from the proposed development could better serve the same function of preserving the existing undeveloped landscape character, openness and settlement gap to Newington, providing this was aligned with proposals to restrict future infill development. This would suggest a need for integration of amenity and rural spaces within or better related to the proposed development to the north east of the rail line. This may require extension of the existing red line boundary to the north of the existing site with a proviso that a sense of separation is maintained in relation to existing development at Iwade.

Conclusion

1.16 This site does not contain any national or local landscape designations and overall is considered to be moderately sensitive. It is considered that the site could accommodate a degree of development providing the above guidance is implemented to respect the key sensitivities and minimise landscape and visual impacts, including the site's relationship with neighbouring settlements, and its function and value as a rural setting and buffer. Further work is required to develop the masterplan for the site in line with the above guidance and a comprehensive landscape and visual impact assessment is required to guide the master planning process, including opportunities for mitigation and enhancement. There may be some significant landscape and visual impacts, although these are likely to relate to local landscape features and views.

Land South of Faversham

Open arable fields with shelterbelts, looking towards wooded ridgeline of the Blean

Blackcurrant production with spire of St Mary of Charity, Faversham and Isle of Sheppey in background

1.1 This short report provides an overview of the landscape context and sensitivities of the land south of Faversham which is being promoted by the Duchy of Cornwall as a new Garden Village for Swale in response to the New Garden Communities Prospectus.

1.2 The proposals comprise a mixed-use development, combining residential development (c. 2,500 dwellings) and 15-20,000 sq m of commercial/business/retail space, employing c. 2,500 people. Community facilities would be sited in the centre of the development, and existing uses of the site including Faversham Town FC and Faversham Cricket Club would be integrated into the site.

1.3 Greenspace would be provided through a series of linked landscaped spaces, green corridors, squares and pocket parks within the development and foot and cycle connections to Faversham and the surrounding countryside would be improved. Salters Lane and Selling Road would be retained and enhanced as rural roads. A linear park is proposed at the south of the site as a buffer to the M2, and will also provide public open space and areas for food growing.

1.4 This is a preliminary assessment based on a site visit and understanding of the landscape character context. Further detailed landscape and visual appraisal will be required as the proposal moves forward within the planning process.

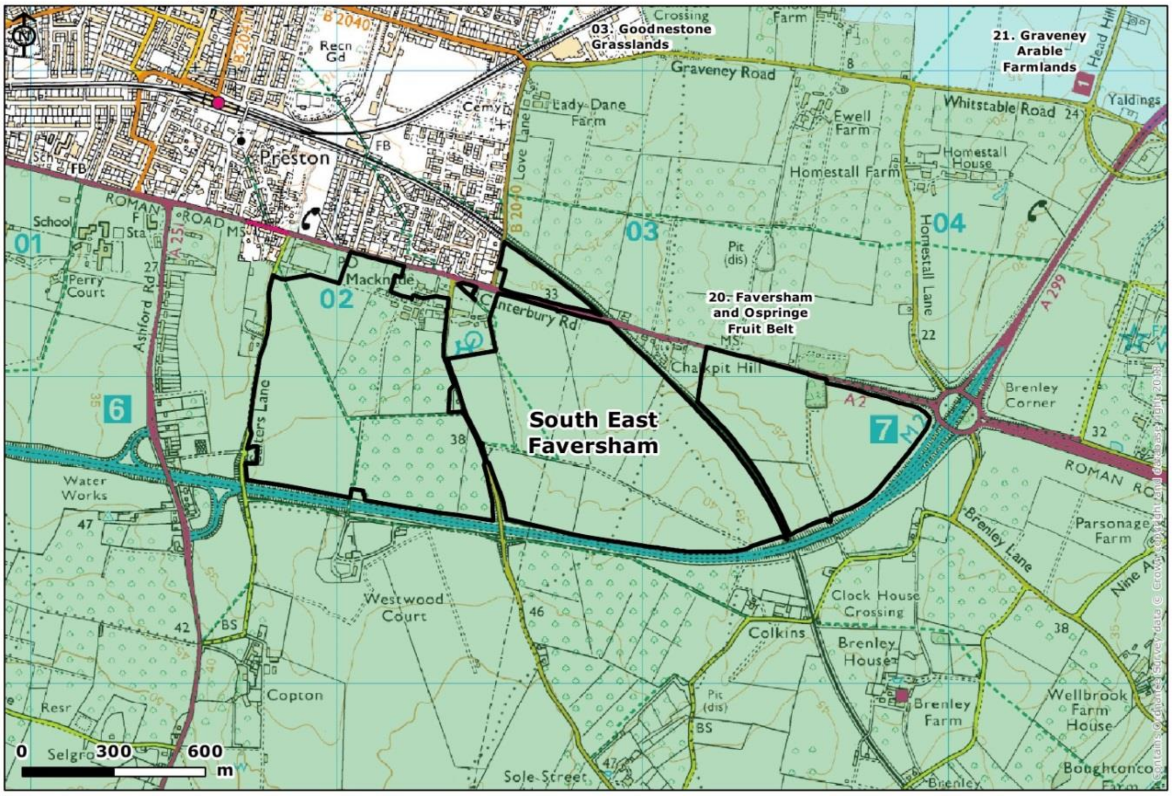
1.5 The report covers:

- Landscape and visual context/baseline
- Evaluation - Key landscape and visual sensitivities
- Commentary on initial landscape evidence provided by the developer
- Outline landscape and visual guidance
- Conclusion

Landscape and Visual Context / Baseline

1.6 The site comprises approximately 131ha of predominantly arable farmland to the south-east of Faversham, extending between the A2 and the M2, with a small area north of the A2. The site is crossed north-south by Selling Road and the London-Dover railway line, with Salter's Lane forming the site's western boundary. It does not contain any landscape or ecological designations. The south-east of the site is 250m from the Kent Downs AONB, while the north of the site is 1.5km from the Swale SPA, SSSI and Ramsar site.

1.7 The site falls within a single landscape character area: Faversham and Ospringe Fruit Belt (No.20).



Key Characteristics

- An agricultural landscape dominated by medium-scale undulating arable fields, blackcurrant production and some areas of orchard, with an open character.
- Limited localised enclosure provided by straight poplar and alder shelterbelts within the fields and a fragmented and limited hedgerow network along Salters Lane and Selling Road.
- The church tower of St Mary of Charity, Faversham (Grade I listed) is a landmark skyline feature in some views to the north.
- The wooded ridgeline of the Blean (Area of High Landscape Value – Kent Level) to the east provides a scenic rural backdrop in views from the site. There are views to the Isle of Sheppey to the north from the site, with wind turbines prominent.
- The eastern part of the site, including the land north of the A2 is more undulating than the western areas. There is a localised higher point (40m) adjacent to the M2.
- The site is enclosed by major transport corridors of the M2, A2 and London-Dover railway, which impinge on tranquillity within the site. There is no public access in the east of the site with an absence of PRoWs.
- The site contains the Macknade farm complex and Faversham Cricket club. The site is adjacent to residential properties at Chalkpit Hill, the Macknade Fine Foods complex, Faversham Town FC and the Waste Recycling Centre on the western side of Salters Lane.
- An electricity transmission line runs north-east to south-west through the site, to the east of Selling Road.

Visual receptors

- Visual receptors comprise passing views from the three public footpaths which traverse the site, together with users of rural lanes Salters Lane and Selling Road. Motorists on the A2 will also have passing views, although much of the site is screened by roadside vegetation. Passing views are also possible from the railway. Views would also be possible for employees and visitors to the Macknade Fine Foods facility, as well as users of the Faversham Town FC and Faversham Cricket Club facilities, the latter of which is a designated Local Green Space. There are individual private views from the houses which neighbour the site plus visual receptors on the Preston edge and interface with the site. There are no tourist attractions, promoted viewpoints or national trails within the site.

Landscape Value

- The site does not contain any national or local landscape designations; however it is adjacent to an Area of High Landscape Value – Kent Level (south of the M2). The Kent Downs AONB is also located 250m from the south-east corner of the site.
- Recreational value includes three PRoWs which cross the site (ZF21, ZF25 and ZF26) and the designation of Faversham Cricket Club as a Local Green Space. The site also has local landscape value as part of the rural landscape setting to the settlements of Faversham and Preston-next-Faversham. Salters Lane and Selling Road are locally designated Rural Lanes.
- Heritage assets include two listed buildings at Macknade – one within and one adjacent to the site boundary. One of these is an oast, which is a locally distinctive feature of this landscape. The site is also located adjacent to the Preston-next-Faversham Conservation Area to the west and 200m from the Faversham Conservation Area, to the north.

Evaluation

Key Landscape/Visual Sensitivities

- The flat to gently undulating landform that generally characterises the site is less sensitive, although local undulations and high points are more sensitive in terms of visual prominence and views that they offer.
- The blackcurrant production, apple orchards, linear shelterbelts and hedgerows along Selling Road are features of higher sensitivity. The open and partly exposed area with a simple pattern of medium-scale arable fields is less sensitive in terms of land cover and scale.
- Distinctive line of poplar/alder shelterbelts which break up the landscape.
- Small pockets of greater tranquillity and a more rural character notably along Selling Road and the footpaths are of higher sensitivity. The majority of the site is affected by road and rail noise to varying degrees, resulting in low levels of tranquillity.
- The role of the site in providing rural separation between Faversham/Preston-next-Faversham and the M2 and providing the rural/agricultural setting of Faversham.
- Important views include the long views out of the site to the scenic wooded ridgeline of the Blean to the east (Area of High Landscape Value – Kent Level) and to the elevated ground of the Isle of Sheppey in the north, and views across the site to the church tower of St Mary of Charity at Faversham.
- The well vegetated London-Dover railway provides a green corridor through the intensively farmed landscape.

Summary

1.8 The main sensitivities of this site relate to its function as a rural landscape and setting to Faversham and specifically the Conservation Area of Preston-next-Faversham, and its relationship with the wider rural area including the Blean ridgeline backdrop and Area of High Landscape Value – Kent Level south of the M2. The key sensitive attributes of the site are the remaining hedgerows along Selling Road and linear poplar and alder shelterbelts, the variety in agricultural land cover provided by blackcurrant growing and the apple orchards, and the limited isolated areas of more rural and tranquil character between the transport corridors. The area forms part of the traditional productive agricultural setting to the market town of Faversham.

Commentary on landscape evidence provided by the scheme promotor

1.8 This section provides an assessment of the initial landscape information and evidence provided by the developer in their submission to Swale BC (Land South of Faversham: New Garden Communities Prospectus Submission to Swale Borough Council).

1.9 Appendix 6 'A Preliminary Landscape and Visual Appraisal' prepared by LDA Design is a relatively detailed study for this stage, and provides a good and accurate level of landscape background and commentary on landscape character and visual impact.

Landscape

1.10 The preliminary appraisal correctly identifies the site's relationship to the Kent Downs AONB and Area of High Landscape Value – Kent Level south of the M2, and the presence of designated Rural Lanes and Local Green Space. The study places the site within the Faversham and Ospringe Fruit Belt (LCA 20) and correctly records its condition as 'Good' and sensitivity as 'Moderate'.

1.11 The framework plans (page 23 and 24 of the principal submission document) include a network of roads and green corridors, linking the site to Faversham along existing pedestrian and cycle routes and into the countryside to the south. One green corridor is centred along the existing route of footpath ZF21. It is unclear what would happen to footpaths ZF25 and ZF26 which are currently within the site. Improved access will be needed for the pedestrian and cycle access south of the M2 into the Kent Downs AONB and Area of High Landscape Value – Kent Level.

1.12 Further green infrastructure is shown in the framework plan, which indicates that greens, squares, pocket parks, allotments and orchards will be integrated throughout the development. A linear park is proposed immediately adjacent to the M2, which will act as a buffer visually, aurally and for air quality. Salters Lane and Selling Road Rural Lanes will be retained and enhanced. It is unclear at this stage how the increased volumes of traffic generated by the proposal would be controlled along the lanes and how their rural character would be retained.

1.13 There is a positive section on the relationship between the new development and Faversham. This includes improving pedestrian and cycling connectivity between Faversham and the surrounding countryside, through the new development. It is envisaged that Faversham and the new development will be 'mutually supportive'. The submission document does not provide detail on the envisaged relationship between the site and the Kent Downs AONB, apart from improved access (presumably pedestrian/cycling rather than vehicular). The cited aims on page 32 to reduce noise from the M2 may also benefit the AONB. The LDA Design report makes reference to the Kent Downs AONB Management Plan and Kent Downs AONB Setting Position Statement. These documents should be further referred to in more detailed master planning.

1.14 It is noted that there have been discussions with the developers of the proposed development at Preston Fields, and it is important that the landscape proposals are compatible, as well as proposed infrastructure, particularly in the treatment of designated Rural Lane Salters Lane. Consideration should be given to the cumulative impact of this development in relation to consented developments at Perry Court and Orchard Cottage, and the proposed North Street garden community south of the M2.

1.15 'Interventions to tame' the A2 are referenced throughout the proposal, but little detail is given on what these would be in practice. It is acknowledged that the proposals are still in development however more information is required on what this would comprise. The area north of the A2 is proposed to be a main square or street which will create the primary entrance to the development. This would work well to slow traffic along the A2, however further details are required as to the relationship between this main square/street and the existing housing to the west on the A2. Improvements to the A2 are also sited on page 32 as part of the work to improve air quality. Page 31 of the main submission proposal states that a 'key objective of the master planning process will be to avoid exacerbating air quality issues', especially in relation to the Ospringe AQMA, which is 1.4km west of the site. The impact of this development on the whole of the A2 around Faversham should be considered, not just the length which adjoins the site.

1.16 The railway line results in significant severance between the eastern and central parts of the site. Consideration of how this area will be integrated into the whole site is lacking at this stage. One issue is whether the site can practically be developed east of the rail line which would potentially be an isolated area of land next to the motorway junction and could be more successfully used to create the sense of a rural approach to the town along the A2.

1.17 The appraisal concludes that there are no significant landscape constraints to prevent development of the site. It also concludes that the landscape proposals could mitigate adverse landscape effects and enhance local landscape character.

Visual

1.18 Viewpoints both within the site and outside the site are considered within the appraisal, which emphasises the importance of topography and shelterbelts in providing screening and filtering of views to the site.

1.19 The London-Dover railway is currently well screened via cutting and vegetated embankments, and the development should aim to continue this.

1.20 The appraisal concludes that there is no significant visual constraint to prevent development of the site, and that the landscape proposals could mitigate adverse visual effects.

Guidance

1.21 If this site proposal was to be progressed through the planning process a detailed landscape masterplan would need to be developed, accompanied by an LVIA. The LDA Preliminary Landscape and Visual Appraisal is a good foundation. From our understanding of the landscape and visual sensitivities the following opportunities are noted:

- SuDS should form one of the underpinning elements guiding the development of the site-wide green infrastructure network, with each individual block of development served by and designed around naturalistic swales, attenuation and retention ponds. Comments are made regarding the provision of sustainable drainage infrastructure throughout the framework plan, although this is not particularly apparent at the scale of the existing framework plan.
- Careful consideration should be given to the treatment of the current landform, to ensure the subtle undulations are not lost within the development. Landform can be used to focus views either being left open where views can be appreciated or marked by appropriate landmarks.
- Maintain, restore and extend the hedgerow and shelterbelt network, including planning for the next generation of hedgerow trees, and the poplar and alder shelterbelts.
- Integrate designated Rural Lanes into the new settlements, ensuring their special rural qualities are conserved and enhanced. Utilise the character and qualities of existing rural lanes in designing new roads within the site, to contribute to maintaining their local distinctiveness and a sense of rurality.
- The provision of edible streets, community orchards and allotments as part of the GI network is to be welcomed, particularly in light of the existing and historical prevalence of fruit-growing within this landscape. The emerging masterplan should consider opportunities to retain or partially retain and integrate the existing apple orchard in the west of the site.
- The layout of green space provided throughout the development should also be designed for net biodiversity gain. The well vegetated railway corridor should be maintained and enhanced.
- Aim to maintain existing relatively dark night skies by carefully considering the site-wide lighting strategy (both adopted and non-adopted roads and footways), utilising the latest technology to minimise light spill and glare, including on the Rural Lanes. This is particularly important in relation to the proposed development at Preston Fields.
- Consider incorporating important and locally distinctive skyline features and views within the general layout and design of key vistas e.g. maintain the open views to the Blean wooded ridgeline to the east, and to the Isle of Sheppey to the north; maintain and focus views to St Mary of Charity, Faversham.

- Consider opportunities for the area east of the rail line and options for maintaining the rural approach to Faversham along the A2.

Conclusion

1.22 It is considered that overall landscape sensitivity of this area is moderate/low–moderate. It does not contain any national or local landscape designations, although is in proximity to the AONB to the south of the M2. Should the above opportunities be implemented, it could potentially be possible to mitigate many of the landscape and visual impacts of a development in this location, although there may remain some significant impacts on the local landscape features and views. Nevertheless, a development of this size would significantly alter the relationship of Faversham with its rural setting and potentially impinge on the setting of the AONB. The site would function more as an urban extension than a discrete garden settlement (albeit that it is capable of being planned on 'garden' principles). The impact on the character of the historic market town of Faversham has not been considered as part of this study. The cumulative impact of this new settlement with other developments on the south and east edges of the town would be a key issue to be considered in developing the proposal.

Land at Ashford Road, North Street, Sheldwich

View south-east across site from Plumford Road

View north-west towards North Street/A251

1.1 This short report provides an overview of the landscape context and sensitivities of the land at Ashford Road, North Street, Sheldwich which is being promoted by Gladman Developments as a new Garden Village for Swale in response to the New Garden Communities Prospectus.

1.2 The proposals for the site comprise c. 5,000 residential dwellings, business/commercial land and community facilities (education and leisure). New 'spine roads' on either side of the existing A251 are proposed, with a new roundabout junction onto the M2 west of J6. Greenspace provision would comprise public open space, linked green spaces, allotments and a community orchard. A new country park would connect the south of the site to the Kent Downs AONB providing a rural edge along Newhouse Lane. The construction would be phased. The boundaries of the site are constrained by the M2 and AONB to the north and south, and by orchards / National Fruit Collection to the east and west.

1.3 This is a preliminary assessment based on a site visit and understanding of the landscape character context. Further detailed landscape and visual appraisal will be required should the proposal move forward within the planning process.

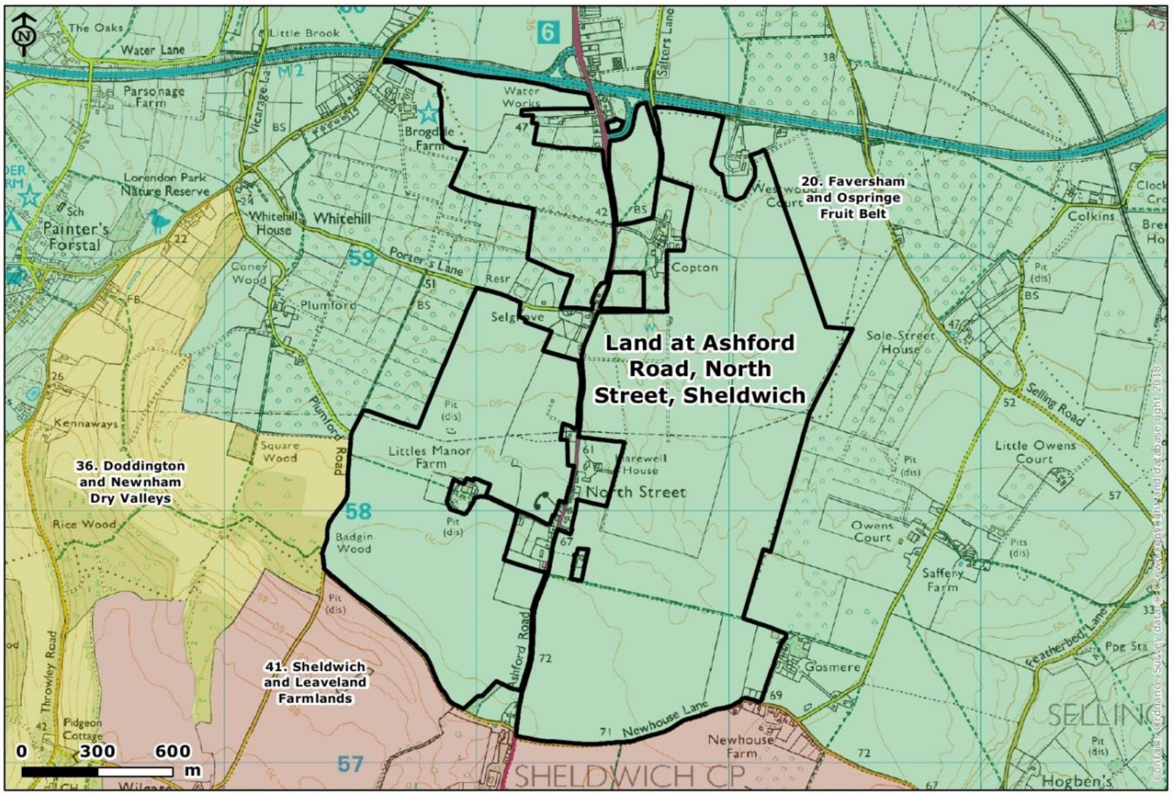
1.4 The report covers:

- Landscape and visual context/baseline
- Evaluation - Key landscape and visual sensitivities
- Commentary on initial landscape evidence provided by the developer
- Outline landscape and visual guidance
- Conclusion

Landscape and Visual Context/ Baseline

1.5 The site comprises 317 ha of predominately open arable farmland, extending south from the M2 to Newhouse Lane, surrounding the small settlements of Copton and North Street. The A251 runs through the centre of the site. The site is within an Area of High Landscape Value – Kent Level and is enclosed to the west, south and east by the Kent Downs AONB and its characteristic landform of rolling downland and woodland, cut by dry valleys.

1.6 The site falls within a single landscape character area: Faversham and Ospringe Fruit Belt (No.20).



Key Characteristics

- Gently undulating landscape, comprising the lower dip slope of the Kent Downs, with a steady incline from around 35m AOD in the north rising to 72m AOD in the south of the site. The southern part of the site is generally flatter than the north, with less pronounced undulation.
- Large open fields, some of which have never been enclosed, in predominantly arable use with some areas of commercial fruit growing/orchards, plus occasional remnant poplar shelterbelts and gappy hedgerows.
- Mature hedgerows and trees line the A251.
- Long views south to Sheldwich church and its wooded backdrop (within the AONB). Views of parkland at Copton immediately south of the M2.
- Open and rural character, although transport corridors including the M2 and A251 reduce the sense of remoteness and tranquillity.
- The openness allows long and expansive views from parts of the site to the Thames Estuary/Isle of Sheppey to the north and the wooded ridgeline of the Kent Downs AONB (notably Perrywood) to the south-east.
- Local areas of small scale residential development including the linear development of North Street and sporadic housing along the rural lanes. A general absence of woodland, apart from occasional tree groups around larger houses.
- Some edges of the site, notably along Plumford Road, have a strong visual relationship with the surrounding Kent Downs AONB.

Visual receptors

- Visual receptors comprise passing views from the three public footpaths traversing the site, together with vehicular traffic along the A251 and minor lanes, including Salter's Lane, Porter's

Lane, Newhouse Lane and Plumford Road. Many individual private views are possible from the residential properties within and adjacent to the site. There are no promoted viewpoints, national trails or notable recreational areas (e.g. country parks or local public green space) within the site. Brogdale, home of the National Fruit Collection, is located on the western boundary of the proposed development. It is the focus for a number of festivals and events including visitor tours through the surrounding orchards.

Landscape value

- The site lies almost wholly within the locally designated Area of High Landscape Value – Kent Level, and is adjacent to the Kent Downs AONB, which comprises the land to the south and west of Newhouse Lane and Plumford Road. The site represents some special characteristics and qualities of the surrounding AONB through its long-range views from the dip slope. It is important as part of the setting of the AONB providing rural separation/buffer from the M2 and Faversham to the north.
- The site is adjacent to the Belmont Local Wildlife Site and Badgin Wood, ancient woodland and also a Local Wildlife Site. The Plumford Road Roadside Nature Reserve is present on the southern boundary of the site. Salter’s Lane and Porter’s Lane, which run partially within the site, are both designated locally as Rural Lanes.
- Heritage value is represented by the adjacent Sheldwich Conservation Area and groups of listed buildings within North Street, Copton, Gosmere Farm and Newhouse Farm, including the Grade I listed Copton Manor. 330m south of the site is Lees Court Registered Park and Garden, listed at Grade II.
- The site has some recreational value, via the limited network of three PRoWs which cross the site (ZF20, ZR393 and ZR394). The site forms a rural setting to the settlements of North Street, Copton, Gosmere and Sheldwich.

Evaluation

Key Landscape/Visual Sensitivities

- The rural landscape as a whole is sensitive in providing separation and a rural setting between Faversham and the nationally designated AONB, which is of high scenic quality. It forms part of the dip slope setting of the AONB, including representation of some AONB special qualities.
- In landform terms alone the more pronounced and undulating landform in northern parts of the site (with characteristics of dry chalk valleys) is of greater inherent sensitivity than the flat to gently undulating landform that characterises the southern part of the site; however, the southern area has a stronger relationship to the surrounding AONB, forming its immediate setting.
- The predominantly open and exposed areas of large scale arable fields are less sensitive in terms of land cover and scale but also have high visibility within the surrounding landscape and local settlements at North Street and Sheldwich and the AONB
- The locally designated rural lanes within and adjacent to the site are features of higher sensitivity in terms of the contribution they make to landscape pattern and complexity, visual character and time depth.
- The ancient woodland at Badgin Wood, which is situated adjacent to the site boundary on the western side of Plumford Road, and occasional infield clumps of trees and hedgerows including mature oak and ash plus remnant orchard trees are features of higher sensitivity.
- The traditionally grazed parkland (unregistered) around Copton Manor house (Grade I listed) in the north of the site has scenic quality and significant time depth, and is consequently of higher sensitivity. The predominantly undeveloped skylines within and surrounding the site, occasionally punctuated by locally distinctive landmarks such as isolated oasthouses (e.g. Littles Manor Farm) and church towers (e.g. Church of St James, Sheldwich) are more sensitive to development because new buildings/structures may detract from these skylines as features in the landscape.

- The undeveloped rural character of the site provides a scenic backdrop and setting to the settlements of North Street and Sheldwich (also a designated Conservation Area), which increases the sensitivity of the landscape.
- A number of important views are present, including the long views north to the Isle of Sheppey and Thames Estuary, east and south-east to the wooded ridgeline of the Blean and Perrywood from the more elevated south of the site; and shorter range views to the adjacent AONB from Plumford Road.
- Areas of relative tranquillity exist within the site, predominantly away from the road noise of the M2 and A251 (e.g. along Plumford Road and Porter’s Lane), which are of higher sensitivity.

Summary

1.7 The main landscape and visual sensitivities relate to its function as a rural landscape (locally designated as an Area of High Landscape Value – Kent Level), part of the chalk dip slope and proximity to/as the setting for the Kent Downs AONB, which surrounds the site to the west, south and east. The key sensitive attributes are its openness and visual exposure which allow for some long views into and from the site, including to and from the AONB; isolated areas of more pronounced undulating topography and more complex landscape pattern, hedgerows and mature trees; some areas of tranquillity; proximity to ancient woodland at Badgin Wood and a number of designated heritage assets, including the Sheldwich Conservation Area. There is no precedent in Swale for development on the dip slope of the chalk downs of such a size and scale and there are few opportunities for integration of development in this relatively open and visually exposed landscape.

Commentary on landscape information provided by the developer

1.8 This section provides an assessment of the initial landscape information and evidence provided by the developer in their submissions to Swale BC (A Garden Village for Swale Vision Document).

Landscape

1.9 The relevant designations applicable to the site and its surroundings have been identified within the submission, together with a broad description of its landscape features within the Opportunities and Constraints section of the submission document. However, there are few explicit references to landscape character, and no reference to the landscape character area within which the site lies; or to the adopted Landscape Character and Biodiversity Appraisal SPD. Further information is required on how the emerging masterplan design responds to landscape character and provides opportunities to strengthen and enhance the existing landscape resource.

1.10 Given the proximity of the AONB, further detail is required on how the proposal would affect or conserve the setting of the AONB and identified special characteristics and qualities. These not only relate to views and visual impacts but also the proximity and potential greater pressures and recreational use and how these would be managed. The document does not provide any information on how impacts on the AONB and AHLV would be addressed or mitigated, other than some broad areas of buffer planting around the site. A new country park is proposed to connect the south of the site to the Kent Downs AONB providing a rural edge along Newhouse Lane – this could provide some level of landscape buffer but detail on this is very sparse in existing documentation. However, the potential for providing a better wooded buffer along the southern edge of the site in relation to existing woodland within the AONB is a positive attribute.

1.11 A further omission within the document relates to the locally designated rural lanes, and how their particular scenic character and other attributes would be conserved and integrated within the proposed development.

Visual

1.12 A short high-level summary of views is included which makes a very broad conclusion that the site is visually very well contained. There is no real acknowledgement at this stage of potential visual impacts on existing residential receptors within the surrounding settlements. This would need to be supported by a more detailed LVIA to feed into design and mitigation. In our opinion, this site is not well contained visually and its openness and exposure is one of its characteristics.

1.13 Overall, the gently undulating landform, including some extensive flat areas, coupled with the general openness of the landscape, offers limited opportunities to screen new development via existing topography and landcover. Conversely, it is fair to say that the majority of the site is not significantly overlooked by larger settlements or from areas of higher ground. Key locations that would need further in-depth assessment as part of an LVIA would include the settlements along North Street / A251 which the proposed development would enclose; Sheldwich village, Wilgate Green and neighbouring PRoWs within the AONB, and possibly Selling village as well as potential visual impacts in relation to receptors at Brogdale. The south-western corner of the site along Plumford Road is exposed and forms a prominent skyline in longer views from the edge of Wilgate Green, to the south-west.

1.14 Mitigation options are noted as new woodland screening planting and landscaped open space buffers around the site boundaries. This is shown to an extent on the indicative masterplan, although the new screening/buffering is limited along the eastern and western site boundaries. Further consideration is needed on how to 'fit' buffer planting into this more open landscape.

Guidance

1.15 If this site proposal was to be progressed through the planning process a detailed landscape masterplan would need to be developed, accompanied by an LVIA. From our understanding of the landscape and visual sensitivities the following opportunities are noted:

- The proposed primary SuDS corridor running north-south through the site, utilising the subtle natural fall in levels, represents a strong foundation from which to develop the site-wide green infrastructure network. Each individual block of development would also be expected to be served by and designed around naturalistic swales, attenuation and retention ponds.
- The landscape and open space buffering to the M2 and AONB proposed is logical. However, whilst the principle of a new country park has merit, it could be argued that an additional location further north within the site would better serve existing communities around Faversham with enhanced access to green space, in addition to the new communities to be created. In its current location the country park and proposed playing fields provide a very narrow buffer/transition to the AONB and the Sheldwich Conservation Area.
- At present, the indicative masterplan indicates a relatively hard built-up edge along some of the site boundaries, particularly in the east. This would represent a harsh contrast to the adjacent commercial orchards and farmland, and should be suitably buffered. This may require a reduced development area to allow effective landscape integration within the existing scheme boundaries and/or alternative land management/purchase surrounding the development site to allow for planting.
- The provision of community orchards and allotments as part of the GI network is to be welcomed, particularly in light of the historic fruit-growing within this landscape. However, the masterplan indicates only one discrete community orchard, relatively isolated from the main residential areas. There is an opportunity to integrate traditionally managed, low-intensity orchards much more widely within the site, connected with a new hedgerow and woodland network.
- There are opportunities to increase woodland cover, where appropriate, to limit visual impact and enhance habitat diversity and connectivity. The neighbouring ancient woodland within Badgin Wood is irreplaceable (NPPF para 175) and it is noted that a woodland and open space buffer to new development is shown on the indicative masterplan. Current Natural England and Forestry Commission standing advice states mitigation measures could include leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland or tree (depending on the size of the development, a minimum buffer should be at least 15 metres).
- There are opportunities to restore and extend the hedgerow network, including planning for the next generation of hedgerow trees.
- Integrate designated Rural Lanes into the new settlements, ensuring their special rural qualities are conserved and enhanced. Utilise the character and qualities of existing rural lanes in designing new roads within the site, to contribute to maintaining local distinctiveness and a sense of rurality.
- There is little commentary at this stage on how the masterplan and overall design principles would mitigate for the significant increase in vehicular traffic and associated noise that the development would likely generate, in terms of the loss of existing sense of tranquillity within this landscape. The existing road network within the site would be significantly extended by the proposal, including by new primary ‘spine’ roads.
- The aim should be to maintain existing relatively dark night skies by carefully considering the site-wide lighting strategy (both adopted and non-adopted roads and footways), utilising the latest technology to minimise light spill and glare. This is particularly important for the areas in closer proximity to the AONB.
- Preserve the predominantly undeveloped skyline character of the surrounding AONB by providing separation, buffering and stepped heights to new built-form in the southern part of the site (it is noted that this is proposed, to an extent). Other skyline sensitivities relate to the Church of St.James, Sheldwich and its associated Conservation Area; again, relating to the southern site boundary.
- Incorporate important and locally distinctive skyline features and views within the general layout and design of key vistas, e.g. maintain the long views north to the Thames Estuary and Isle of Sheppey, and east / south-east to the wooded high ground of the Blean and Perrywood.

Conclusion

1.16 This is a challenging site for a new garden village development being both in the setting of the AONB and within a local landscape designation. It is considered to be a landscape of moderate-high sensitivity, as well as being visually exposed. In Swale, there is no precedent of urban development climbing the dip slope transition between the coastal plain, fruit belt and chalk downs of the AONB. Currently urban development is limited to the North Kent Plain, relating to the Thames Estuary-Medway/Swale edge (Medway Towns, Sittingbourne and Faversham). A development of this size in this location would introduce urban features in an otherwise open, visually exposed rural landscape. Even if all the guidance outlined above was implemented, there would remain the substantive issue of the effective loss of the rural landscape separation and setting between Faversham and the AONB, and development within an area locally designated for its landscape value. It is likely that such a development would generate significant landscape impacts with relatively limited opportunities for mitigation.

Local Plan Panel Meeting	
Meeting Date	14 March 2019
Report Title	Local plan review process update and potential options
Cabinet Member	Cllr Gerry Lewin, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Gill Harris
Key Decision	No
Classification	**Open**
Recommendations	1. Note the content of this report which provides an update for Members on where we are in the local plan review preparation process including an update on the evidence; 2. Recommend to Cabinet that work on new garden communities continue in order that their position be considered as potential options for the Local Plan Review process; and 3. Further to Council Minute 151 of 26 July 2017 which aims to deliver M2 junction 5a, A2/M2 link road, completion of the Northern Relief Road and Southern Link, agree to investigate potential strategic options that will deliver this infrastructure and wider benefits, subject to evidence and Sustainability Appraisal.

1 Purpose of Report and Executive Summary

1.1 The purpose of this report is to provide Members with an overview of the local plan review process as we move towards the preparation of the formal Regulation 18 Issues and Options consultation document currently scheduled to take place this autumn. Whilst this Panel will meet to discuss whether they wish to give a steer on the content of the document in the summer, now is good opportunity to take stock of the evidence completed to date and to set out next steps.

1.2 The ‘headlines’ for each of the completed evidence reports is set out in the table in **Appendix I** along with information on other evidence that is underway or due to be carried out and reported at a later date. It is important to remember that as well as evidence, there are other factors that inform the plan-making process. These include the Council’s corporate objectives, the constraints and challenges facing the Borough and national planning policy. In advance of the formal Regulation 18 consultation (also referred to as ‘Issues and options’), Members will be presented with a number of potential options that will deliver an appropriate strategy for the Borough's development needs and will need to support a preferred option for the consultation in the autumn.

2 Background

2.1 In her final report, the Inspector of the Bearing Fruits Local Plan Examination found the plan to be sound. However, she recommended that a review be undertaken immediately to address potential issues surrounding transportation in the Borough, particularly in and around Sittingbourne. This was agreed through Council Minute 148 of July 2017. Since then, amendments to the Statutory Regulations for the local plan process have made five yearly reviews of local plan mandatory in any event.

2.2 Additionally, at Council Minute 151 of July 2017, Members resolved to support improvements to the road infrastructure in the Borough to improve traffic flow and air quality. The minute states "***With the Government proposing to allocate some of the £6 billion a year raised from Vehicle Excise into upgrading our A road system, this Council welcomes the MPs for Sittingbourne and Sheppey and Faversham and Mid Kent pressing Government and KCC to secure funding to the strategic highway network across Swale including the completion of the Northern Relief Road and Southern Link, Brenley corner, and A249 improvements to the M2 thus significantly improving air quality and traffic flows***".

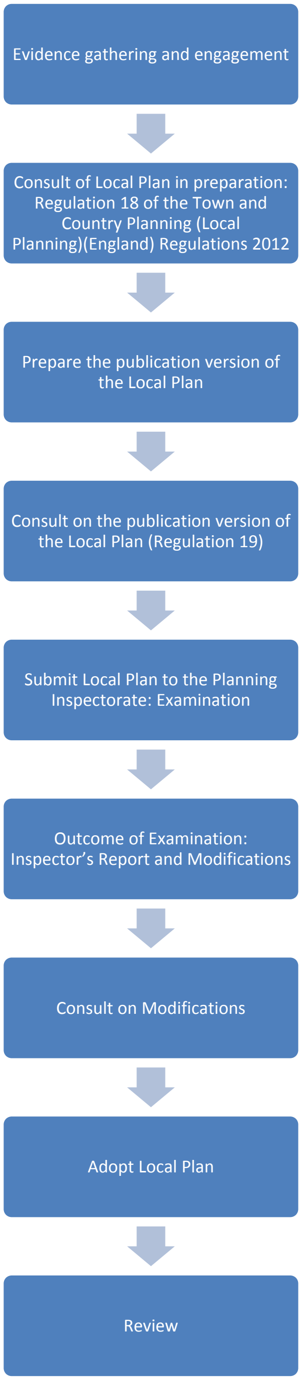
2.3 In February 2017, the government published its Housing White Paper: Building the Right Homes in the Right Places. It included a number of specific measures to provide the additional housing needed nationally. This included measures to speed up the planning process. A standardised methodology for assessing housing need at local authority level was also presented in the Housing White Paper and the principle was embedded in the National Planning Policy Framework (2018). A consultation on a proposed standardised methodology was carried out in December 2018. On 19 February, the Ministry of Housing, Communities and Local Government (MHCLG) published their response to the consultation and on 20 February amended the NPPF to reflect the requirement for housing need to be calculated using the standard methodology that is now embedded in the national planning policy guidance that complements the NPPF.

2.4 Working through the proposed methodology based on the 2016 ONS Household projections indicates that the annual housing need figure for the Borough is likely to increase by approximately 36% from 776 dwellings per annum to 1054 dwellings per annum (an additional 278 dwellings to be provided per year from 2022).

2.5 With these considerations in mind, the Council has already begun to explore the potential of new garden communities to deliver the housing numbers at a quantum that would also be able to provide the necessary supporting infrastructure and this has been dealt with through other reports included on the agenda for this meeting.

Local plan review preparation process

2.6 Local plan preparation follows a set process, as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The main stages are illustrated below, with the Council at the ‘evidence gathering’ stage. Work now needs to begin on considering strategic development options in order to stay on programme to produce a consultation document by autumn 2019 in accordance with the Local Development Scheme (September 2018).



Evidence gathering and engagement

2.7 The NPPF (2018) is very clear that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. The evidence should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals (paragraph 20).

2.8 A critical part of the evaluation of the evidence is the Sustainability Appraisal (SA) that is an iterative process used to develop and refine options and assess the effects against social, economic and environmental objectives.

2.9 In light of the infrastructure needed to support new development, the Council is also in regular contact with the stakeholders that provide the infrastructure including the education authority, the highways authorities, the clinical commissioning groups, utilities providers, and public transport providers to name a few.

2.10 All local authorities are also required to collaborate with neighbour and upper tier authorities as well as stakeholders on cross boundary issues, under the responsibility of ‘Duty to Cooperate’ that was introduced in the Localism Act 2011. This could extend to a local planning authority seeking to negotiate to meet some portion of its development needs within a neighbouring authority area (if they cannot realistically be met within its own area). Potentially a jointly prepared local plan could be considered. No such proposals or cross boundary development issues have been identified by Swale or any neighbouring authority at this stage of the process.

2.11 **Appendix I** to this report provides a table of the evidence needed to prepare a ‘sound’ local plan review for the Borough of Swale. The table sets out the key findings of the evidence already produced and information on the evidence that is underway or due to be carried out in the near future. The purpose of evidence is to provide the information that will enable the Council to help identify reasonable alternative strategies to meet development needs and justify resulting policy. From such reasonable alternatives, a deliverable strategy will be developed to form the backbone of a local plan review that meets the development needs for the Borough for the plan review period.

Development strategies for the local plan review

2.12 At the Local Development Framework Panel meeting of 8 February 2018, a report on the high level strategic options for housing growth and implications for Swale Local Plan Review was discussed. The report presented the findings of the consultants’ report on issues facing Swale to be addressed by the local plan review. Subsequently, the Council produced a ‘New Garden Communities prospectus that resulted in four submissions.

2.13 A number of potential high level spatial options will need to be considered including options for new garden communities to provide for the quantum of development required and supporting infrastructure.

2.14 The reasonable alternative options for delivering a development strategy need to be evaluated in consideration of all of the evidence presented in accordance with national planning policy and the public consultation exercise. Government policy is a key factor in preparing the local plan as policies and proposals must be positively prepared, justified, effective and consistent with national policy if the local plan is to be found 'sound' at Examination.

Regulation 18 'Issues and Options' Consultation Document

2.15 The local plan review preparation timetable is set out in the Local Development Scheme and was considered by the Panel meeting of 20 September 2018. Whilst we are currently at the evidence gathering stage, it is now necessary to start to prepare development strategy options in some detail for the formal consultation stage scheduled for the autumn of this year. This will be based on evidence and the other factors set out above.

2.16 Potential development strategies will be generated based on all of the facts before us. Within this context, it is likely that there will be a number of different development strategies that could be generated to deliver the local plan review objectives. Later this summer, it is anticipated that officers will be able to summarise the key areas of evidence and will be seeking a steer from Members on agreement of the alternative development strategies to be drafted into the consultation document; and whether one of those should be identified as a preferred option at this stage.

2.17 A preferred option development strategy cannot be identified or agreed until all of the necessary information and evidence is completed. At this stage the completed and emerging evidence summarised at **Appendix I** to this item is not yet ready to rule any potential strategy out as a result of 'showstopper' issues. However, for the process to remain on schedule, the necessary evidence to test all potential options, including those capable of delivering the improvements to the strategic and local highway network identified in the corporate objective referenced at para 2.2 above, needs to be put in hand. This work will be within the context of the entire evidence base and evaluation of alternatives through the Sustainability Appraisal. It is anticipated that the evidence base will be sufficiently advanced for officers to be able to seek a steer on reasonable alternative strategies and whether one of these is emerging as a preferred option by summer 2019. Members are therefore invited to agree the recommendations to endorse that approach to the work.

3 Proposals

3.1 In order to progress identification of reasonable alternative development strategies for further consideration, the recommendations of this report are therefore to:

1. Note the content of this report which provides an update for Members on where we are in the local plan review preparation process including an update on the evidence;
2. Recommend to Cabinet that work on new garden communities continue in order that their position be considered as potential options for the Local Plan Review process; and

3. Further to Council Minute151 of 26 July 2017 which aims to deliver M2 junction 5a, A2/M2 link road, completion of the Northern Relief Road and Southern Link, agree to investigate potential strategic development options that will deliver this infrastructure and wider benefits, subject to evidence and Sustainability Appraisal.

4 Alternative Options

4.1 Members could choose not to agree the recommendation to explore either new garden communities or strategies that deliver improvements to the strategic road network. On the basis of the evidence received to date, this would seriously limit the opportunities to address the level of development required over the local plan review period and to provide suitable supporting infrastructure. Delaying a decision on enabling work could lose valuable time on the local plan programme and leave the Council poorly prepared to deal with potential major development proposals as set out elsewhere in this agenda. These alternatives are not, therefore, recommended.

5 Consultation Undertaken or Proposed

5.1 This report takes stock of the process and identifies the evidence already completed and underway. Further public consultation on the local plan review Issues and Options stage is proposed for late 2019.

6 Implications

Issue	**Implications**
Corporate Plan	Supports the Council's corporate priorities for delivering regeneration and delivering improved quality of life.
Financial, Resource and Property	It is anticipated that the Local Plan can be progressed in accordance with the agreed budget although this is subject to the council agreeing Planning performance Agreements (PPAs) with key developers/landowners promoting sites within the Local Plan Review.
Legal, Statutory and Procurement	None anticipated at this time.
Crime and Disorder	None at this time.

Environment and Sustainability	The Local Plan process is subject to Sustainability Appraisal that considers the social, economic and environmental impacts.
Health and Wellbeing	The Local Plan process is subject to Sustainability Appraisal that considers the social, economic and environmental impacts.
Risk Management and Health and Safety	None at this time
Equality and Diversity	The Local Plan process will be subject to Community Impact Assessments at appropriate points.
Privacy and Data Protection	None at this time.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Evidence Update Table

8 Background Papers

None

Evidence	Purpose of Evidence	Status	Headline findings/ recommendations	Potential impacts for the local plan review
Employment Land Review (ELR)	To identify the amount of additional employment land needed during the local plan review period	Completed and published	41ha of additional B2/B8 15ha of additional B1	In order to be 'sound', the local plan review will need to contain a strategy which, as a minimum, seeks to meet this need.
GTAA	To identify the requirement for additional pitches for those who meet the definition of 'Traveller' in government policy. To identify the requirement for additional Travelling Show Person plots and houseboats.	Completed and published	51 additional pitches for Travellers and 1 additional Travelling Show Person plot.	Members agreed at November Panel that officers should investigate potential new sites through a 'call for sites' exercise currently underway and investigate possibilities for additional public site(s). 40 of the pitch need will be met at Brotherhood Woodyard bringing the total number of pitches needed to 11.
Landscape Sensitivity Study	To assess landscape sensitivity to future change from development.	Underway	To be reported at a later date	To be reported at a later date
Local Landscape Designation Review	To recommend Areas of High Landscape Value across the borough	Completed and reported to Local Plan Panel in November 2018	10 Areas of High Landscape Value recommended	Evidence to inform LP review
Strategic Housing Land Availability Assessment (SHLAA)	To identify land that is suitable, achievable and deliverable to meet the development needs of the Borough for the local plan review period.	Underway	To be reported at a later date	A catalogue of sites with potential for inclusion in the local plan review to meet the development needs of the Borough

Evidence	Purpose of Evidence	Status	Headline findings/ recommendations	Potential impacts for the local plan review
Strategic Housing Market Area Assessment (SHMA)	To identify the housing need for the Borough and to identify the affordable housing need within the overall figure	Ready to be commissioned and will be advances as soon as possible once the standardised methodology is formalised.	As yet unknown but based on the consultation standardised methodology it is likely to be between 1030 and 1086 dwellings per annum from 2022 to 2038.	In order for the plan to be 'sound' it must plan for the full objectively assessed housing need as a minimum.
Strategic Flood Risk Assessment (SFRA)	To provide the evidence base information on what land within the borough is vulnerable to flooding to support local plan allocations	At commissioning stage, due to be completed by June.	To be reported at a later date.	Will provide the information on land at risk of flooding to assist with site allocation selection.
Retail & Leisure Needs Assessment	To identify the future retail and leisure needs of the Borough in terms of floorspace and facilities. Also assessed the retail hierarchy and reviewed the vitality and viability of both the town and local centres in the Borough.	Completed and to be published in due course.	Sittingbourne: 1,900 sq. m. of convenience goods floorspace; between 12,300 and 22,600 sq. m. comparison goods floorspace. Faversham: 2,700 – 4,700 sq. m. comparison goods floorspace only. Sheerness: 1,200 sq. m convenience floorspace and between 4,500 and 7,900 sq. m. of comparison goods floorspace. Between 7 and 9 new gyms across the Borough.	The local plan review will need to allocated land to meet the retail needs within the town centres where possible.
Air Quality Assessment	To assess the potential impacts of new development on air quality and, if necessary, identify potential mitigation measures.	To be commissioned after the transport modelling is complete. Due to be completed by June.	To be reported at a later date.	To be reported at a later date.

APPENDIX I

Evidence	**Purpose of Evidence**	**Status**	**Headline findings/ recommendations**	**Potential impacts for the local plan review**
Sustainability Appraisal	The mechanism for considering and communicating the likely effects of a draft plan and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising positive. Its preparation is a statutory requirement	Underway. Scoping complete and reported to Local Plan Panel in September 2018.	Ongoing.	Iterative process to accompany the development of the emerging Local Plan Review.
Transport modelling	To assess the capacity of the road network and potential mitigation measures against different development scenarios.	As reported to this panel elsewhere on the agenda.	As reported to this panel elsewhere on the agenda.	As reported to this panel elsewhere on the agenda.
Settlement Hierarchy Study	To assess the existing settlement hierarchy in Bearing Fruits.	Underway	To be reported at a later date.	To be reported at a later date.
PBA report on New Settlements viability	To assess the viability of the NS submissions and assess their ability to deliver some of the Borough's development needs as part of the strategic options.	As reported to this panel elsewhere on the agenda.	As reported to this panel elsewhere on the agenda.	As reported to this panel elsewhere on the agenda.
Whole plan viability	To assess the policies and proposals within the plan to ensure they are viable.	To be undertaken at a later stage as part of the preparation of the draft plan.	To be reported at a later date.	To be reported at a later date.

APPENDIX I

Evidence	**Purpose of Evidence**	**Status**	**Headline findings/ recommendations**	**Potential impacts for the local plan review**
Open Space Assessment Study	To assess the quantum of open space in the Borough and to identify the OS needs for the local plan review plan period.	Almost complete and due to be reported in June to this Panel.	To be reported to the Panel in June.	To be reported to the Panel in June.
Green Infrastructure Strategy	To assess the quantum of green infrastructure in the Borough and identify opportunities to expand and develop both the quality and quantum of the GI network.	At tender stage, due to be completed by June.	To be reported at a later date.	To be reported at a later date.
Biodiversity baseline study	Assessment of the quantum of biodiversity areas in the Borough.	To be confirmed	To be confirmed	To be reported at a later date
Housing optional technical standards	Assessment of the potential for technical standards for new housing.	To be confirmed	To be confirmed	To be reported at a later date.
Strategic Transport Modelling	High level testing of development targets and alternative distributions of development on the strategic and local highway networks	Member Briefing on preliminary outputs 14 March 2019.	Preliminary outputs suggest alternative development strategies will not release sufficient capacity in the highways network to meet development targets post 2022 and deal with background growth in traffic. Further mitigation to the network is likely to be required alongside a package of measures for modal shift will need to be investigated.	Formal reporting to June 2019 Panel.