

APPENDIX A (for Cabinet Report, March, 2020)

Consultation Draft version of Swale Heritage Strategy – 2020 to 2032: Table of consultation responses

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s)	<p>1. Surprised that Avenue of Remembrance is not mentioned. It is unique, of at least local heritage importance and in 2023 will be 100 years since given its name.</p> <p>2. There should be more plaques on historic buildings in the Sittingbourne High Street and town – similar to London & Faversham.</p> <p>3. More info boards (like the ones at Central Ave. and Bobbing Hill) would be helpful to promote heritage. The new town square is a key opportunity in this respect. More generally, Swale’s heritage needs better publicity – little reference to it in declining local papers and nothing on Facebook. Not sure of any outreach to schools..</p> <p>4. There should be a Heritage Museum more central to the town and one of the new units in the Spirit of Sittingbourne Scheme might have been an option. Twice SBC has allowed proposals for a new heritage centre to be dismissed. This should now be a priority, as the existing separate facilities in Sittingbourne are too small to showcase their collections or allow much in the way of community involvement on the premises. The existing small heritage museum in East Street should be placed on the Heritage at Risk Register as it is loaned to the museum by the family that own the freehold and this arrangement can not be guaranteed indefinitely. The use of Phoenix House for research and to hold talks, etc. is also less than ideal, with that building under threat in recent years. If the cinema in the High Street were to become redundant, it could perhaps be a suitable venue for a central Sittingbourne Museum. It would be wonderful to have a smart new museum with a destination café overlooking our (Sittingbourne/Milton Regis) waterfront to showcase the heritage we have, but this would be expensive and probably just a pipe dream unless a developer could be persuaded to adopt this as part of their plans?</p> <p>5. The previous administration of SBC put commercial opportunity over community, and opportunities for community development were lost as a result. Please to see that the new administration recognizes the importance of Swale’s heritage. The Strategy is quite an achievement, but more will be needed than paper and lists. It will take a great commitment and coordination of human and financial resources, and its hoped that there’ll be action on the part of SBC, as well as words.</p> <p>6. Family members own much of the land covered by one of the Swale Conservation Areas, but we have no particular comment to make at present.</p> <p>7. Found strange that no mention of Oare. The village has Tudor era buildings, a church dating back to C13, a C18 pub whilst train to gunpowder work passed through the village. Must also be a long history of the creek – oyster fishing, barge-building, etc.</p>	<p>1. There is loose reference to the Avenue on page 25 of the Strategy, but agreed that a stronger, specific reference would be appropriate. The strategy document has been altered to reflect this.</p> <p>2. Consideration is being given to the creation of a plaque scheme, either separately or in combination with the development of a local list. However, SBC consider this would need to be Borough-wide.</p> <p>3. New signage highlighting heritage interest is currently being considered as part of the overall package of development for the Spirit of Sittingbourne Scheme, and SBC will be looking at further signage/info in this respect that goes beyond the scope of what can be provided via the Spirit of Sittingbourne development. The Strategy and the actions that will build from it will result in the Borough’s heritage</p> <p>4. SBC recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council’s intention to continue to provide grant support will remain key to supporting successful project outcomes. There is no specific funding available for, or plan in place for a central Sittingbourne Museum facility at present, but SBC will explore options for this and meanwhile and more generally, officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>5. Each administration has its own set of priorities, and whilst the greater consideration now given to heritage is considered appropriate and overdue, it is worth remembering that this Heritage Strategy is built on work abandoned by the previous administration. SBC under its new administration recognizes the very significant challenges in turning the words in the Strategy and supporting documents into meaningful actions. SBC appreciates the efforts already made by many local groups, and is reviewing its resources to ensure it has the capacity to follow through on the elements set out in the Strategy Action Plans, working with other parties wherever possible to optimise outcomes.</p> <p>6. Noted. No change necessary to Strategy documents in relation to this response.</p> <p>7. Oare is mentioned in relation to gunpowder manufacturing (page 31), although as a general principle, it is not feasible to commit to mentioning every settlement in Swale Borough. There needs to be good reason related to the thematic approach used to consider the Borough’s heritage. SBC will however add further reference to Oare in relation to section on Maritime and transport heritage if the evidence supports this.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>8. Various properties of historic interest are listed in the Hartlip and Dargate (Hernhill) area for future consideration along with a 'Famous Red Wood Tree at 'Dargate House'. Some of these should be considered for listing, e.g. the village school in Hartlip.</p> <p>9. Concerned about owners (large & small) failing to allow heritage properties to fall into disrepair. SBC should be proactive and consulting with owners to try and prevent this happening, and using its powers when necessary. Also concerned about heritage in general terms, and more specifically, the setting of historic buildings being impacted by modern development e.g. as per the example of Sheppey Court, Halfway.</p> <p>10. Enforcement procedures & penalties need to be expanded in the document for transparency, and any costs incurred through the council and courts reinvested in further ongoing listings. Planning decisions need to be taken that don't potentially put at risk more of Swale's heritage.</p> <p>11. Current owners of heritage assets should be advised of their responsibilities.</p> <p>12. Would like to see Promenade/Rose Street Cottage of Curiosities & Big Fish Arts and CSI Sittingbourne (Community Archaeology Project supported by professional archaeologists at Canterbury Archaeological Trust Ltd) mentioned amongst the other organisations on page 68.</p> <p>13. Without doubt, Swale has heritage that should be preserved and promoted. Funding for this is a problem and a majority of the proposals seemed to be based on persuading external bodies to assist in this respect, and it is understood why there is no particular mention of government funding. Pleasing to see that SBC is looking to the growth of the area by means other than the building of houses, and perhaps promotion of Swale's heritage would raise people's perception of the area. The current funding set aside (by SBC) is unfortunately a drop in the ocean in relation to the heritage that requires saving and improvement, but it is of course a step in the right direction. Doubt if SBC will have the teeth it needs against the commercial interests that will be up against it in some instances</p>	<p>8. Again, it's not feasible to commit to mentioning every settlement in Swale Borough, but there are existing (albeit limited/brief and dated) character appraisals for the conservation area at Hartlip and Hernhill (Dargate) where some of this information has already been picked up. Where that is not the case, the information provided will be used to fill in any gaps when the CAs in the separate parishes are reviewed. The information provided can also be used in relation to the potential heritage plaques scheme under consideration, and to determine buildings/structures to be put forward for statutory and/or local listing.</p> <p>9. SBC shares the concern on 1st point, but the resources have not been made available to adequately tackle this growing problem. The additional funding put in place to support this strategy will help to start tackling this problem more effectively, although resources will still be tight and so success cannot be guaranteed in every case. The setting of heritage assets is given much higher priority under current national and local planning guidance but it is accepted that this has not always been the case in the past. Government growth targets for Swale and the SE Region more generally mean that some compromises will inevitably be necessary going forward in balancing planned growth with other considerations including the natural and historic environment. It is also the case that what is referred to as 'enabling development' is sometimes needed (as is the case at Sheppey Court) to allow neglected historic buildings/sites to be repaired, re-purposed and brought back to life in a viable way.</p> <p>10. Chapter 4 in the Strategy on Positive Management will be expanded to make reference to the range of statutory powers available to SBC and how these might be employed to tackle issues of deterioration/neglect and breach of planning controls. No planning decisions are knowingly taken which would put further Swale heritage at risk - conversely decisions are made which aim to reduce this problem, whenever the opportunity arises.</p> <p>11. It would be a huge task to contact all the owners of heritage assets in the Borough given the sheers number involved (over 1430 listed building entries alone - representing approx. 2000 buildings – not to mention other designated and non-designated heritage asset types). SBC will contact individual owners of groups of owners for a particular area and/or heritage asset type in a way designed to have the maximum impact, e.g. all High Street property owners when looking to tackle condition issues in such an area.</p> <p>12. Agreed this would be an appropriate change given the unusual art-based approach to heritage celebration and understanding employed by the former and the exciting volunteer possibilities offered by the latter, so duly actioned.</p> <p>13. Noted and agreed. Funding to support the ongoing priorities remains a concern, and this has already been picked up and will be reflected in the wording of the strategy in relation to the response received from the Listed Property Owners Club (LPOC). Local Planning Authorities do have quite wide ranging powers that can be used to secure the long-term conservation of heritage assets, and improve/restore visual and residential amenity. Both staff and sometimes financial resources are needed to make the optimum use of these powers – resources that have typically in short supply both at SBC and many other councils. However, SBC under its new administration is determined to grasp the mettle and start tackling some of the property and landowners that have allowed locally and nationally important heritage to decay for too long, with additional staff and/or monetary resources provided where needed to support this drive.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>14. Welcome change in tone from previous consultations at both Borough and County level. Consider the educational benefit aspects of the strategy could be broadened to look at how ordinary folk have helped to shape the local areas and their history. This could introduce individuals and school groups to aspects of research for learning purposes. Could also look at heritage educational route by creating/supporting schemes allowing individuals to work in the building trade on the restoration side.</p> <p>15. Would like to see Sittingbourne High Street given real support, as we have such amazing buildings there, in spite of the poor condition of many. Found no reference to using local schools within the 3rd sector, as a teacher, would urge that this is considered. In the 1980's, the head at Murston Junior School was a visionary in terms of the importance of the local environment and its history to the pupils. Would also like to highlight the Funton Brickworks as a site worth preserving, while other brickfields disappear for good.</p> <p>16. Important that remnants of ancient woodland small shaws (small strips of ancient woodland between fields) are protected for ecological and flood protection purposes. Ancient woodlands, marshlands and nature reserves should be included in the Strategy to help ensure future protection. It's disappointing that Swale's rich natural heritage is not better described and integrated into the strategy. The fact that the Borough's historic, cultural and architectural heritage is rooted to a very great extent in that natural heritage is almost entirely ignored – or at least taken for granted. Swale's landscape is characterised, e.g., by the multiple sites where brick earth was removed to fuel the industrial scale brick making well outlined on page 30. Yet there is no reference to those sites or to the way in which they have been integrated into the rural and urban landscapes since the brick earth was removed. Light pollution in the rural areas is becoming an increasing problem and impacting in particular in negative terms on wildlife.</p> <p>17. SBC could lobby government for a return to some form of VAT relief on heritage repairs.</p> <p>18. SBC could run a grant scheme for particular types of repair, e.g., roof repairs.</p> <p>19. SBC should enable quicker easier access to advice to the Heritage Team for owners of heritage assets. Lack of capacity in this area needs addressing. Would support the creation of more officers for SBC.</p> <p>20. Shocked to be made aware of the high number of heritage assets at risk. A key issue with the strategy is the funding for it. 250k will go no way towards meeting the funding levels required, although a dedicated heritage-at-risk officer would be welcomed. I'm the owner of a grade II listed building and am acutely aware of the extra costs in maintaining, repairing and running a heritage asset – particularly if this is to be done in a sympathetic way.</p> <p>21. Strategy a bit long, which could put some off. Some of history could be shortened and/or put into appendix.</p>	<p>14. Agree it would be appropriate to include a section on education in the chapter 5 of the strategy under the headings at 5.2 with reference to how ordinary folk have played their part in shaping heritage. There is existing reference to workforce development/local trade, but this will be expanded to create or support schemes encouraging students and other groups to train or re-train for a role in the heritage construction sector, where there is currently a recognised skill shortage.</p> <p>15. Positive management of Sittingbourne High Street Conservation Area moving forward is prioritised in the draft Action Plan for the Strategy. SBC agrees with the 2nd point made and the text at 5.2 of the Strategy will be amended accordingly. The point regarding Funton Brickworks is noted, and SBC will consider this further in liaison with interested third parties.</p> <p>16. Reference will be made to the importance of ancient woodland and marshlands as one type of historic landscape in the Borough, but the Strategy is not considered the appropriate vehicle for the mapping and protection of these types of areas moving forward – this is planned to be actioned through a Blue & Green Infrastructure SPD or Strategy. The existing landscape assessment documents supporting the Local Plan fail to accurately consider the specific historic landscapes created around county houses and in relation to processes such as brickmaking and gunpowder manufacturing, so a new themed section will be produced for this, whilst cross references can be provided to other existing relevant and proposed policy/strategy documents. The issue of light pollution is well known. Again the Strategy is not the appropriate vehicle to tackle this issue head on, but management plans for rural Conservation Areas or other heritage areas will take this issue into account as far as possible (given that public street lighting is not an SBC function), as SBC does in dealing with individual planning proposals for new development, typically in liaison with Natural England and/or Kent Wildlife Trust.</p> <p>17. SBC will consider doing this through the Local Government Association and/or its local MP's. Existing national heritage bodies have sought to influence government policy on this matter for many years to no avail, although it is hoped that continuing pressure in this respect may eventually produce a positive result.</p> <p>18. SBC used to do this, but this is no longer realistic due to year-on year cuts to local government funding. This same scenario applies to many other local authorities.</p> <p>19. Noted. The 'Heritage Team' currently consists of 1.75 equivalent full time members of staff, but SBC is exploring different options for capacity building for this tiny team as part of the work in developing and implementing the Strategy.</p> <p>20. Noted and acknowledged. The agreed 250k funding is just for the first 3-year action plan, and it is acknowledged that additional funding will be needed beyond that, if the Strategy is to be effective and meaningful.</p> <p>21. Noted and acknowledged. SBC is considering the Strategy structure as part of review, but the focus is principally on ease of use and overall degree of accessibility/value rather than length.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>22. More could be made of Swale's agricultural history. Would be great to keep an oast for heritage reasons, subject to funding being available for this. In Tunstall Parish, protection of the cherry orchards, hedgerows and ancient woodland is needed. Keeping Kent as the Garden of England is paramount.</p> <p>23. Welcome a focus on high design quality for future developments, especially where there is an impact on heritage – this should apply within a wide radius of heritage assets. SBC needs to shift away from allowing pattern book developments.</p> <p>24. Conservation Area review work is long overdue and extra resources should be applied to this to expedite it. Shocked to see that this might be left to parish councils/volunteer groups. SBC are the designators/custodians of these areas and as such should provide the necessary staffing, expertise &/or funding to lead on this work. Delegating this work out suggests an abdication of responsibility and could result in inconsistencies of approach being taken.</p> <p>25. The heritage interest prevalent in villages and churches is given inadequate consideration in the Strategy. It would be good to include how churches can continue to be used to retain their heritage interest. SBC is already responsible for some closed churchyards, but they could also take on ownership for the community where graveyards are abandoned.</p> <p>26. When putting in parking restrictions, don't go overboard with them, as too high prices and too many restrictions can cause parking problems elsewhere.</p> <p>27. Improved access and clearer signage is needed for cycling & walking routes.</p> <p>28. All heritage like the Sittingbourne & Kemsley Light Railway (SKLR) and museums should have full support of SBC with officer and financial aid to help secure/encourage volunteers, and to improve access and to secure sites from intrusion (vandals, etc.) SKLR and the Minster Gatehouse Museum need particular support and the full potential of the former has not been reached.</p>	<p>22. Noted, although the intention was to give just a flavour of each of the main heritage themes in the Borough. SBC agrees with the point raised about oasts and will explore this in liaison with interested parties. SBC is committed to protecting its natural heritage as well as its historic environment (the two frequently overlap) and there will be other policy/guidance documents supporting the Swale Local Plan that will provide the necessary mechanisms to help protect important landscape types and features in the Borough.</p> <p>23. SBC is already doing this as much as possible through the mechanism of national and local plan policies and the input of in-house conservation and design specialists in relation to development proposals. The ability to achieve distinctive developments will be improved by the rollout of Conservation Area Appraisal & Management Plan/Strategy documents</p> <p>24. SBC will retain overall control of CA review work, but will make use of local groups that have relevant knowledge and skills to assist in the review process wherever possible. A partnership approach is preferred wherever possible and guidelines would be applied to ensure consistency.</p> <p>25. Some consultation responses indicate that some re-shaping of the overall structure of the Strategy may be needed. As part of this re-shaping, greater consideration will be given to villages, and this will be separated out from the existing section 3.8 on town centres, etc. Churches (and associated buildings) make up a significant heritage element of the Borough and are not always contained within towns or villages, so consideration will be given to providing a separate heritage theme section for them. If followed through, this would consider the issues highlighted here, which are becoming increasingly common. However SBC is unlikely to want, never mind be able to take on further heritage ownership responsibilities as many of the closed churchyards passed on to it by the Diocese of Canterbury came with existing significant historic fabric condition problems and SBC is struggling to find the sums needed to deal with all the problems identified in a recent condition survey of these areas.</p> <p>26. Parking provision issues are considered more appropriately in relation to the current work for the introduction of a Supplementary Planning Document on Parking Standards.</p> <p>27. Improved access for or around heritage sites is a matter that SBC generally pushes for, and heritage trails will be encouraged, and where feasible, supported by SBC.</p> <p>28. The Council recognises the significant role that heritage attractions like the SKLR provide for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are</p>

		prioritised, and resources allocated proportionately.
Consultation Response Type Private individual(s) continued	Summary of issues raised 29. The Open House weekend events in Faversham are beneficial in terms of heritage awareness and appreciation and consideration should be given to doing something similar in/around Sittingbourne. 30. Protection and listing of important local buildings is needed, i.e. New Century Cinema (Sittingbourne), Burtons store (Sittingbourne) Brenchley House (Sittingbourne). Many other councils already do this, and the involvement of local amenity societies in connection with this is positive, but this work should be given higher priority, and included in initial 3 year action plan 31. In reference to Tonge Conservation Area (page 38 of Strategy), there used to be an interpretative panel near the millpond explaining the history of the area. It no longer exists, so please could it be replaced. 32. Better control over shopfronts in Sittingbourne is needed and the poor condition of many buildings (e.g. New Century Cinema) needs addressing. Loss of community facilities like the listed adult education centre (likely to be turned into flats) is a further sucker punch to the town from both a heritage and social infrastructure perspective. The tired shops and public space at Roman Square would be better pulled down and the space re-used as a proper market square with decent stalls – not the rather tacky type typically seen on the High Street. A quality shopping experience, including an improved public realm is needed if people are going to want to use the town centre or visit Sittingbourne. There are other towns around the country where coordinated quality presentation and maintenance complements and enhances the heritage and character of the whole, making a pleasant place in which to spend time. Not so Sittingbourne. 33. Local heritage attractions such as the Sittingbourne & Kemsley Light Railway and Barge Museum could be made much more of and help to improve the perception of the town. Much more could be made of Milton Creek and the associated heritage of this area (e.g. possible barge trips to Ferry Inn, Sheppey). The surrounding villages could have more amenities, notably Tunstall and Borden. Rodmersham has it about right, but Iwade and Bapchild have become too big and are losing identity as a result	Summary of SBC Response 29. Consideration will be given to an Open House (or similar) scheme for the Sittingbourne Area, but managing this type of event is very time consuming and could not be supported under the existing staff resource. SBC will examine whether such an event could be managed by an amenity group for the Sittingbourne area with limited support from SBC officers, as happens elsewhere (e.g. Canterbury). 30. Brenchley House is already grade II listed and subject to a recent part residential conversion scheme which will help to ensure its long term conservation. Neither the cinema nor the Burtons Store are considered to be of statutory listing quality in terms of the current designation criteria, but this may change in the future. Meanwhile, SBC will look to ensure that their special architectural qualities are protected through the planning and associated conservation area controls. Additionally they may be given greater recognition when the High Street Conservation Area is reviewed and could be candidates for the planned List of Buildings/Structures/Sites of Local Interest, which it is agreed can and should be developed as a work stream in the initial 3-year action plan. It is now planned that a start will be made on this, in terms of producing a consultation paper setting out draft ideas for establishing stakeholders, agreeing a set of criteria and designation types and a draft methodology in 2020. However, the full development and adoption of a local list is anticipated to require a longer timeframe, so this is an element which will be spread across all 3 years of the initial action plan, which has been altered accordingly to reflect this. 31. The missing interpretative panel will be considered when the planned review of Tonge CA takes place (planned for 2020/21 as item for initial 3-year action plan). 32. SBC is aiming to build on the regeneration taking place to Sittingbourne town centre (through the Spirit of Sittingbourne development) by working with partners and individual property and business owners to improve the quality and feel of the High Street and immediately surrounding areas. There are actions referenced in the initial 3 year action plan reflecting this and officers are already doing some preliminary work on this and developing complementary actions through a planned supplementary planning document. The idea raised for Roman Square will be considered as part of this work. 33. The Council recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>34. Various observations about the rich archaeological interest in Swale and about relevant local history (set out in reference to the heritage themes used in the Strategy) and surviving physical features that still allude to this today, which could be usefully referenced in the Strategy to enhance its overall interest and value to the widest audience.</p> <p>35. The Strategy's Action Plan is commendable but there is concern that SBC will not carry out the majority of the actions set out in it, based on current actions to date.</p> <p>36. The reference to climate change is commendable, but what about the substantial amount of new housing being created (in particular on the Isle of Sheppey) and the pollution generated by this? Objective 3 [SIC – it's actually priority 2] refers to improving wellbeing, inter-alia. Wellbeing on Sheppey is at an all-time low with commuters on the island having to contend with traffic congestion on a daily basis. This situation will only be compounded by further housing growth. Villages (both on the island and mainland part of Swale) are developing so much and so fast, that they are losing their village character</p> <p>37. Agree that coastal assets should be supported, but what evidence is there that SBC is doing this? On Sheppey for example, nothing has been done about the camper vans parked along the beach on the Leas at Minster, all year. What is happening to the wastewater and sewerage generated by this unauthorised parking?</p> <p>38. How can farming be supported when houses are allowed to be built on agricultural land? If houses are to be built, then they should be limited to brownfield sites, particularly in relation to Sheppey.</p> <p>39. Why would tourists want to come to Sheppey with its congested roads and green spaces built on, and yet further housing growth on the way? The addition to the Little Oyster on the seafront at the Leas is an eyesore and should never have been approved. There's insufficient parking for it, and it's not in keeping with surroundings.</p>	<p>prioritised, and resources allocated proportionately.</p> <p>34. The information provided is very useful and will be incorporated into the Strategy and/or into the appropriate Conservation Area appraisals, when these are reviewed and updated. SBC is working with Kent County Council's Principal Archaeologist from its heritage team to ensure that the rich archaeology of Swale Borough is better expressed and brought to life for readers of the Swale Heritage Strategy. Also to ensure that the priorities in the Strategy and elements in the associated Action Plans (initial and beyond) take sufficient consideration of key archaeological and other hidden heritage concerns.</p> <p>35. SBC has set out an Action Plan for the first 3 years of the Strategy period, which it considers to be realistically achievable given expected resource levels. Some of these actions may result in longer-term projects and/or additional areas of work involving third parties that may extend beyond the initial 3-year action plan period, but should nevertheless be achievable within the 12-year lifespan of the Strategy.</p> <p>36. The housing targets for the Borough are determined by central government based principally on anticipated growth in the area and surrounding region. SBC accepts that there is a genuine need for new housing in the Borough but shares the concerns of many about the sheer extent planned and the capacity for the area to accommodate this in a sustainable manner. The Strategy, along with other documents supporting the Swale Local Plan will help to highlight the environmental and other constraints that apply to the Borough's area and whilst this may not lead to any reduction in the number of new homes in Swale required by the government, it will help to guide this future growth to areas which are not environmentally or otherwise sensitive and have existing physical and social infrastructure to support new/additional housing. It will also help to identify the need for new/improved infrastructure.</p> <p>37. The Council recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>38. There is simply not enough brownfield land available within the Borough to meet the required housing growth levels, but the need to protect high grade agricultural land is taken into account in both allocating sites for development and determining planning application for new development on areas of agricultural land.</p> <p>39. SBC recognises that there are significant problems with transport infrastructure both on Sheppey and in the Borough more widely. It is working with the Highways Agency, Kent County Council and other key agencies/bodies to address these issues as rapidly and effectively as possible. Improvements have and will continue to take place on the island and meanwhile, SBC will continue to support local communities and groups to develop and/or improve the visitor offer on the island, and other initiatives which would also help to support and develop the local</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>40. A review of the Tunstall and Hartlip Conservation Areas is long overdue. In Tunstall, the Coffin Pond there (now sadly neglected and a death trap for any animal unwittingly hopping the wall and falling in with no escape route) was once a cart wheel wash with natural drainage, and Kent County Council's initial works to it and then lack of any maintenance since has left it in a deplorable state. In Hartlip, trees are being felled for no apparent reason, inappropriate materials are being used and character features are being removed. Furthermore, the rural character of the area is being ruined by hard landscaping and urban fences and we are seeing excessive lighting installed harming character and wildlife. Social disharmony is developing where community and cohesion once were and are wanted. By 2023, the matter will be totally out of control. More attention should be paid to the Conservation Area policy (Policy DM33) in the current adopted Local Plan.</p> <p>41. In relation to the heritage significance of Queenborough's naval history and harbour, the Floating Jetty and ship, 'The Spirit of Sheppey' could do with some support.</p> <p>42. Generally agree with the high level vision and with the 5 priorities set out in the Strategy, but in relation to the 4th priority, would suggest that the significant military and defence history and associated surviving structures south of Keycol Hill, near Newington. Also, particularly given the significant congestion and air pollution issues facing Newington, the planned review of its Conservation Areas needs to be given a much higher priority.</p>	<p>economy. SBC is considering the issue of improvements to the amenities for Minster Leas.</p> <p>40. Unfortunately, a review of the majority of the Borough's Conservation Areas is long overdue. SBC cannot rectify this situation all at once so difficult decisions have had to be made about where to focus first. In terms of Conservation Areas, (CA's) this has meant focussing early review work on those CA's either on the at-risk register and/or facing significant development pressure. As such a review of the Tunstall and Hartlip CAs is not planned to feature in the initial 3-year action plan, but may well feature in the second one. Meanwhile, SBC will liaise with KCC to see if remedial works can be carried out to the Coffin Pond to render it safer and in so doing, perhaps improving its heritage value. The issues highlighted for Hartlip are sadly not unique to this village, but SBC is genuinely committed to managing development as sensitively as possible to retain special character and to assist in the important aim of community cohesion. Policy DM33 and other applicable Development Management (DM) policies are given due consideration when assessing development proposals, but it must be recognised that less than ideal developments cannot always be resisted with the suite of national and local planning policies that SBC and other Councils have to work with. Councils are not allowed to put in place local policies that conflict with largely pro-development national planning policy, and schemes which SBC consider to be inappropriate (including on heritage grounds) are sometimes allowed on appeal by the independent national body, the Planning Inspectorate. It is also the case that much development (notably domestic extensions and walling/fencing) that takes place does not require planning permission and is therefore outside the control of SBC and other Local Planning Authorities. The provision of public street lighting is a county council function, albeit that under a protocol arrangement put in place some years ago, Kent County Council is required to consult with the relevant district/borough Heritage Team before installing or changing public street lighting in conservation areas. Unfortunately strict adherence to the protocol has not always been observed in recent years, and this is something that SBC in liaison with the other Kent local authorities is seeking to properly re-establish.</p> <p>41. The Council recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>42. SBC notes and welcomes the generally positive feedback on its proposed high-level aim and derived priorities. It is not considered that the 4th priority should be altered, as the heritage highlighted is considered unlikely to be of international significance. The point is however duly noted and SBC will liaise with the County Council's Heritage Team to ensure that the heritage significance of this area is given due consideration when a review of the Newington Parish Conservation Areas take place. SBC notes the concern raised about the planned timing for the Newington Parish CA's review work. Consideration has been given to this and as a result, it has been brought forward to 2020/21.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>43. The Minster Gatehouse is staffed by volunteers who do their best to welcome visitors from all over the world, and the Sheppey History Page on Facebook helps this in terms of awareness. Whilst the page has resulted in items of historical significance being donated to the museum from overseas countries, keeping the entrance fee low to encourage visitors means that the volunteer group has little income. Help from local organisations is waning due to present economic conditions and as such, any help with building overheads would be a relief and very welcome.</p> <p>44. The current and future owners of the (former) Adult Education Centre, New Century Cinema and Burton Store (all in Sittingbourne) should be required to conserve their history and structure.</p> <p>45. Support the idea of SBC working with local groups, people and businesses in developing and implementing heritage projects and would suggest adding the History Group in Newington to the list of willing parties in this respect. The group has recently worked so hard promoting the Roman Villa find in the village, together with WWI events, promoting interest from the local school.</p> <p>46. Knowing that SBC struggle to find funding for the heritage related work that needs to be done, is it possible to route all of part of the Section 106 monies to this worthy cause? Also, is there anything in the Local Plan that requires developers to contribute (via S106 agreements) to the upkeep of local heritage?</p> <p>47. Compilation of a list of heritage sites is difficult as one person's historical building is another's decaying wreck, awaiting demolition. The matrix used to decide on heritage status should unfortunately have to include commercial viability. Whilst this is harsh, the assessment must examine expenditure versus long-term reward/benefit. Also needs to establish if/when a heritage site reaches the end of its relevance.</p>	<p>43. The Council recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>44. SBC will be considering the Sittingbourne High Street buildings (the cinema and Burton store) as part of its review of the High Street Conservation Area, and will be working with owners (where possible) to ensure key historic buildings (listed or otherwise) are conserved and kept in a positive use. SBC is currently exploring a residential conversion of the former adult education centre, and particularly given its grade II listed status, will be looking to achieve a high quality scheme that retains key architectural features and the essential character of the building, in the event that an alternative community use cannot be found for the building, which would likely be SBC's preference, in accordance with current Local Plan policy.</p> <p>45. Noted and acknowledged. SBC would be pleased to work with this group in carrying out the Newington Parish Conservation Area review work, and any associated/follow-on projects in the area.</p> <p>46. There are limited sums of money from major development recently completed or currently underway, and typically the monies collected on these schemes are ring-fenced to be used for specific requirements of a more fundamental nature, such as children's' school place provision. Heritage typically falls well down the pecking order for possible benefit from commuted sums paid in relation to a Section 106 agreement. However, SBC is able to, and does use planning conditions and Section 106 agreements to benefit heritage interests where such an interest is directly relevant to a proposed and subsequently approved development. In response to the second part of the question, the answer is no, and that this would not be possible.</p> <p>47. SBC assumes this refers to the proposed development of a list of buildings/sites of local heritage interest. It also acknowledges and accepts validity of the conundrum referenced up to a point. However, there would be very little heritage left in the UK if the designation of buildings and areas by Historic England and local authorities couldn't see beyond the dereliction/poor condition of some buildings/areas to the benefits brought about from their renewal and possible associated re-purposing. Furthermore, not every heritage building or site can realistically have commercial viability, but that should not automatically lead to its inevitable demise. The bigger pictures needs to be borne in mind in e.g. how buildings/structures/areas that may not be viable in their own right can contribute significantly to community cohesion and the visitor economy of the Borough. However, the local listing scheme proposed to be developed as part of the initial 3-year action plan will of course need to take into account some degree of practical considerations around the overall feasibility of long-term sustainable conservation.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
<p>Private individual(s) continued</p>	<p>48. When looking at conversion schemes, the requirement for retention of features should not be too stringent and should allow for modern lookalike materials to be used.</p> <p>49. To address the issue of SBC working with local groups, is it not possible to utilise the Borough Councillor Ward and Parish Councillors set up? Such councillors could form the local liaison and there may be an opportunity for the respective councillors to create a local heritage forum?</p> <p>50. It's important to bear in mind that people and communities are significantly integral parts of Swale's heritage – this is especially relevant around specific areas/industries e.g. dockyards, aviation, brewing, etc., but it's also particularly relevant in rural areas. Without generations of families living and working in these industries and locations, the true importance and benefits of their heritage is lost. Instigating oral history workshops would help to ensure that the memories from those who have worked in industries/trades/work areas no longer found in, or dying out in Swale would be great and would help to ensure that this human side of the Borough's heritage is not lost.</p> <p>51. It has to be recognised that new housing is required in the Borough, given national population increases, and this then raises the population of new families experiencing Swale's heritage. The downside of this could be seen as large housing developments encroaching upon specific heritage sites/areas or out-of-area people taking over the more rural areas/villages homes and potentially breaking the heritage family chain, as village children are unable to purchase properties as none become affordable and/or available. A solution could be to plan for a small number of new houses e.g. 10-15 in a number of villages/rural areas rather than large housing estates. This would allow for the continuation of local family heritage/roots, whilst allowing these rural areas to expand, thrive and become more sustainable.</p> <p>52. Difficult to be constructive as can't help but think of the huge number of historic buildings already destroyed, particularly around Milton Regis. Nothing to show in heritage terms for the loss of Sittingbourne's paper mill but also the former Milton workhouse, fire station and the church opposite. Its Victorian post box was taken to Rochester. Can only hope a better job can be done with what is left!</p>	<p>48. SBC's Heritage Team typically seeks to work with scheme applicant to agree which elements of a building are critical to its heritage significance and essential character, and the team does not ask for the retention of existing elements in a building which contribute little or nothing in this respect, which is why developing a good understanding of a building's form, evolution and evolved functions is so crucial to an appropriate design outcome. Modern materials are typically allowed to be used in conversion schemes to some degree, but not where this would unacceptably compromise a building's architectural and/or historical integrity.</p> <p>49. SBC does not wish to seek to set in stone how it would work with local groups, and vice versa. The nature of the work/project and make-up, capacity, knowledge and skills of local groups and individuals will likely suggest an appropriate form of liaison/partnership working method in each instance, and an early action of SBC would be to establish the position in this respect before any work commences in earnest. It is anticipated that SBC will soon be adopting an Area Committee System, and this would likely be a positive way for SBC ward and parish councillors to formally input into heritage projects/work planned for the area in question.</p> <p>50. SBC agrees with this point, and considers it appropriate that priority 5 of the Strategy is altered to better reflect this. This factor will also be drawn out wherever possible and appropriate in appraisal work which, inter-alia sets out relevant local history, and in physical enhancement works which might include interpretation/information boards about a particular building/site and/or area. Such information/interpretation could be designed to capture oral history via the use of digital technologies and smartphones, tablets, etc. The use of oral history workshops is an interesting idea and something that SBC would be interested in exploring further. To this end the provision of a consultation paper to explore how this might best be done will be considered for the second action plan, resource permitting.</p> <p>51. SBC acknowledges the points made here and the understanding shown to the difficult balancing it act it has to perform year-on-year in accommodating housing growth whilst seeking to protect key interests (including natural and built heritage) and ensuring that new development is sustainable as possible. SBC will be developing its new settlement strategy for accommodating housing growth as part of the review of the adopted 2017 Local Plan and ideas such as the one set out here will be investigated as part of a balanced approach to meeting the overall housing growth required to be accommodated. Affordable housing continues to be a problem and is typically difficult to achieve without a minimum number of new houses. It is currently possible for small schemes of affordable housing to be constructed in villages/rural areas where there is a demonstrated local need for housing (identified a Parish Council) and the houses can be delivered on what is known as an 'exception site', i.e. land outside of the designated settlement boundary for a village, or in/on the periphery of a small village/hamlet with no settlement boundary.</p> <p>52. SBC acknowledges that some of the Borough's heritage has been lost, and whilst to a degree, this was perhaps unavoidable for one reason or another, including the need to accommodate significant growth, it is acknowledged that certain elements of the heritage lost could perhaps have been prevented. SBC is not alone in this scenario however, and the combination of the national and local planning policies and ever greater need to be more sustainable in development terms means that now and in the years to come, heritage buildings/areas must be allowed to play a more prominent role in shaping future development, which would be more likely to see the repair/re-use and/or sensitive remodelling of historic buildings/sites/areas to help create distinctive new developments, instead of their loss, as was more common in years past.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>53. The provision of brown tourist destination signs would help in attracting more visitors into the Borough and in particular on to the island which has many heritage attractions that are little known about beyond the immediate local population.</p> <p>54. It's unfortunate that for many years, SBC has consistently failed to grasp the importance of the maritime history of Milton Creek, including maintaining the navigation as a fundamental asset to the town. Contrary to much advice, it allowed the building of a non-lifting bridge across the creek, thus effectively barring the town to a significant future potential as a destination for visitors and yachtsmen. The historical significance of the Raybel has been recognised, but may be the only vessel willing to make the trip. It's disappointing to see that the restoration of adequate navigation up to the town has not been considered in the plans.</p> <p>55. A lot of residents do not know the heritage of their area. Perhaps a heritage feature in Inside Swale would help? SBC could also highlight road names that relate to an area's heritage, whilst heritage trails in the town centres would be good too. Please continue to support, what in many cases are amazing proactive local groups that do so much to promote heritage in Swale.</p> <p>56. Agreed that tackling heritage and buildings/structures at risk is a high priority, but so is the preservation and possible extension of conservation areas.</p> <p>57. The reference to Swan Quay in the Strategy should be removed: The blue building called the Chandlery is already listed whilst the attached building behind would require listed building consent for any alterations. Two buildings are less than 25 years old. The open shed was built as a temporary structure (no foundations so unlikely that any viable use could be found for it). The most recent visit by Historic England found no grounds for any listings on the site beyond the already listed blue building. The site as a whole has considerable potential for sympathetic re-development and its location within the Faversham Conservation Area already ensures that any such redevelopment would be in keeping with its context.</p>	<p>53. The provision of brown tourist destination signs is outside the control of SBC – it is a county council function. However, SBC is willing to consider this matter further as part of the work to develop the Visitor Economy framework, and would liaise with Visit Kent, Historic Swale, individual heritage site providers and other relevant parties in examining the anticipated benefits of the provision of individual new brown signs or a coordinated package, and whether SBC could contribute to the cost of provision. It is considered that the anticipated SBC Area Committees could play a useful role in developing this work.</p> <p>54. SBC notes the point made, but the potential of Milton Creek is still there to be developed, in spite of the bridge referred. Notwithstanding the above, SBC remains committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>55. SBC cannot commit to a heritage feature being provided in every edition of Inside Swale due to the limited staff resources it has for this area of work, but is committed to raising the profile of the historic environment up the agenda in general terms, so as well as issuing relevant press releases in relation to heritage projects, it will also look to use its own web pages and the Inside Swale magazine to promote/raise awareness of work in this area. SBC is committed to its continued support of the local groups that promote heritage in Swale.</p> <p>56. Noted and acknowledged. The majority of the actions in the draft initial 3-year action plan are focussed on conservation area review work. This is aimed at ensuring each relevant Conservation Area (or group of small CA's) has the necessary character appraisal and associated management plan/strategy in place to help manage future development proposals more context sensitively and also to set out specific enhancements which could be carried out, resource permitting. The assessment work carried out might also identify the need for the introduction of Article 4 Directions in some cases, which would limit the scope for potentially harmful changes to be carried out, by bringing more forms of development under SBC's control (i.e. by reducing permitted development rights). The majority of the CA reviews planned in the initial action plan focus on those CA's on the Heritage at Risk Register, and existing CA boundaries will be carefully considered as part of the review process, and altered if there are sound heritage based reasons to do so. Note: boundary review can sometimes however result in the reduction of, as well as the enlargement of conservation areas.</p> <p>57. (as per response to response points 111 and 181) Noted and acknowledged. However, the reference in the Strategy will remain as this merely reflects suggestions made by interested parties in relation to the 2018 stakeholder survey. SBC will not pursue a listing review of the site, but as part of a review of the Faversham Conservation Area, will examine the potential of this site taking into account its heritage interest and the policies (general and site specific) set out in the Swale Local Plan, and the Faversham Creek Neighbourhood Plan.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
<p>Private individual(s) continued</p>	<p>58. In lieu of no firm proposal for a dedicated new museum facility in Sittingbourne, a practical and 'quick-win' way forward might be to harness all the history our volunteer groups already have to hand, package up a pictorial selection of it up as a travelling exhibition to visit all the village halls in turn, backed by the parish councils hiring their halls and promoting the day to their residents. Maybe a grant for portable exhibition stands and transport costs, etc., might be needed, but it would harness the strength of volunteers and the history focussed meetings that already take place in some villages. A similar version could visit schools, with volunteer history experts passing their knowledge onto the younger generations through short talks.</p> <p>59. As the Heritage Strategy is linked to both the Local Plan and Corporate Plan, it may get submerged with trying to deliver on too many fronts. Prioritising projects will get confused unless some sort of scoring system is applied taking into account the different roles a project might be performing, so that the overall support can be maintained. Keeping up the basic premise of caring about saving our heritage is important to many people in Swale, so appropriate PR will be important in this context.</p> <p>60. Suggest that the role of Parish Councils in supporting the objectives of the Strategy is put forward as a topic for Swale KALC (Kent Association of Local Councils). Parish Council's can play a vital role in local knowledge and mapping locations.</p> <p>61. As a graduate of UCL's Institute of Sustainable Heritage MSc programme, SBC's investment and confidence in the importance of heritage-led regeneration is vigorously applauded. It's considered that the Strategy's 5 priorities are right with one major omission: Moveable heritage or artefacts should be listed alongside the other heritage assets (buildings/nature/landscape). Moveable/portable heritage comprise some of the most tangible areas of heritage for the general public, e.g. a bronze age axe from Iwade. Consider there should be a work stream in the action plan to address projects dealing with local museum objects and/or archaeological archives derived from the very development projects that are part of regeneration and growth in Swale, which might include the provision of a new museum/gallery for Sittingbourne which can be used for rotating temporary displays – highlighting the works of different heritage and arts groups and heritage conservation ongoing, etc. This would ideally be in a central location, based on experience of meeting visitors to the CSI Sittingbourne Lab in The Forum over a 10-year period, including residents with little heritage knowledge to enthusiasts that travelled from outside Swale to see it. In the 2 years that the CSI project ran as designed, it attracted national media attention and an international conservation award.</p>	<p>58. This is an interesting idea that SBC would at least in theory, be interested in exploring further. However, it seems with the anticipated level of resources moving forward that SBC would be unable to provide much if anything in the way of officer support for such an initiative. This is particularly the case if SBC's relevant officers are to make the expected progress on the already challenging (but realistic) work programme set out in the Heritage Strategy Action Plan and in related work streams. If it is possible that such an initiative could be coordinated by a key local history group with limited SBC officer support, then this may be a possibility, and it is likely that modest grants could be made available from SBC (and possibly other parties) to support this. SBC will bear this point in mind as a potential future action plan item once the more initially critical area appraisal and intervention work is well under way.</p> <p>59. There are necessarily links between the Heritage Strategy and the Corporate and Local Plan, but the primary role of the Strategy is to support the Local Plan in setting out how the Council intends to conserve and enable the enjoyment of its local heritage in order to meet a key requirement of the National Planning Policy Framework of 2019. This focus combined with officers good knowledge of local areas and issues has served to suggest the particular projects/actions to feature in the initial Action Plan. Furthermore, the Heritage Strategy will have specific resources put in place or ring-fenced to deliver on the actions, so focus will be maintained. Appropriate PR will be important moving forward, but more important will be maintaining a sufficient level of resource to keep the positive momentum going beyond the funding provided to support the initial 3-year action plan.</p> <p>60. SBC agrees this is a good suggestion and will look to take this forward at the next Swale KALC meeting, if feasible. SBC is fully aware of the valuable role Parish Council's have in collecting and communicating local knowledge, and mapping the locations associated with this.</p> <p>61. SBC agrees this would be appropriate and priority 1 has been altered to reflect this. SBC recognises the role that different types of heritage play in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. There is no specific funding available for, or plan in place for a central Sittingbourne Museum facility at present, but SBC will explore options for this and meanwhile and more generally, officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Private individual(s) continued	<p>62. 'Growing up in Swale, as many of us have, I've rambled across many an orchard – but rarely do we see the old trees of generations past, whose gnarly grace turns space to place... Our heritage as "The Garden of England" is at threat. Research from the People's Trust for Endangered Species shows that Kent has lost 85% of its traditional orchards'. At East Hall's neglected old orchard, we have the opportunity to reverse this trend, by getting together as locals, friends and families, with the generous support of SBC, and have a ruddy good time doing it! Observing this initiative transform from student project to imminent event, with support from SBC, is an excellent example of partnership working! I take heart from this and the significant change of faces and attitude of SBC, that the success of partnership working such as the 2009 Anglo Saxon CSI Sittingbourne project, enabled and delivered by Sittingbourne Heritage Museum/AMTeC Heritage Science CIC/Canterbury Archaeological Trust/The Forum and KCC... might point to a new life for this or similar projects in Sittingbourne.</p>	<p>62. SBC agrees that the example referenced represents a great example of partnership working, and was pleased to help enable this, and in particular to hear how enjoyable this was. SBC remains committed to engaging with its local communities in developing and implementing projects. It recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes.</p>
Local heritage attractions and local amenity groups & societies	<p>Respondents in this category number 15 and consist of: Blue Town Heritage Centre (BTHG), Borden Heritage Group (BHG), Creek Creative CIC (CC), Eastchurch Aviation Museum (EAM), Faversham & Oare Heritage Harbour Group (The) (HHG), Faversham Society (The) (FS), Friends of Milton Regis Court Hall (FCH), Historic Research Group of Sittingbourne (HRGS), Minster Gatehouse Museum (MGM), Murston All Saints Trust (MAST) , Newington History Group NHG), Rotary Club of Sittingbourne Invicta (RCSI), Sittingbourne & Kemsley Light Railway Ltd (SKLR), Sittingbourne Society (The) (SS) and Swale Community Centres (SCS).</p> <p>Responses of the same type from more than one attraction/group are set out below whilst responses specific to a particular group follow on - set out with the specific attraction/group listed.</p> <p>63. (FCH & MGM): SBC relies on volunteer organisations to run its heritage attractions, but the financial position of many of these can be precarious. Grant funds are available for capital projects, but are not readily available to help with running costs. Entry fees (where applicable) need to remain low to encourage visits, voluntary donations are typically small and volunteer members cannot continue to take money from their own pockets in order to run facilities on behalf of SBC. Furthermore, only so much can be gained by local fundraising. SBC should therefore consider a scheme of grants to subsidise the difference between donations/entry fees and day-to-day running costs.</p> <p>64. (FCH, HRGS): SBC and heritage attractions often seem to be pulling in the opposite directions. For example, volunteers often work for more time than the maximum period in SBC's short stay car parks. Perhaps there could be a scheme whereby volunteers running facilities on behalf of SBC could park free of charge whilst on duty, similar to the arrangement for some SBC officers? Parking places are limited and expensive for those who wish to be in the town for more than 4 hours, thus discouraging both visitors and volunteers. SBC could consider following Hull Council's idea of rewarding volunteers with a cryptocurrency.</p> <p>65. (SS, FS): We find little in the Strategy about proposals for strengthening SBC's planning enforcement function, which does seem to be a weakness at present. We hope that the proposal to increase the numbers of planning staff will enable the</p>	<p>63 & 64. The Council recognises the role that heritage attractions play in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>65. SBC will be reviewing the function and resourcing of the Planning Enforcement Team at latest, by the autumn of this year, in relation to the latest independent audit of this function of the Planning Service, and in relation to this and the Strategy, it is anticipated that staffing will be increased.</p>

Consultation Response Type	enforcement function to be strengthened. Summary of issues raised	Summary of SBC Response
Local heritage attractions and local amenity groups & societies (continued)	<p>66. (SS/FS): Pleased that SBC recommend the development of a local list, but would urge that higher priority be given to this, and call for it to be included in the first 3-year action plan, especially as SBC acknowledges that it has the highest number of heritage assets of all Kent authorities on the national Heritage at Risk Register. A notable building for potential inclusion on such a list is Sittingbourne's New Century Cinema given its Art Deco frontage. In Faversham through the current Neighbourhood Plan work, the Post Office is emerging as a candidate for national listing as a heritage asset representing some of the best of 60s architecture, and a rarity in the town.</p> <p>67. (SCC, HRGS, BHG): SCC works closely with HRGS and the Sittingbourne Heritage Museum, both of which like SCC are in need of new premises. We are working to develop a proposal for the creation of a community, visitor, education and heritage centre in Sittingbourne. This could play a very important role in the study, conservation and presentation of the area's heritage, making it accessible to the centre's many users, building a sense of community. We'd encourage SBC to consider the provision of such a centre as an important element of the Strategy and Action Plan. Such a facility should be big enough to display all aspects of local history as well as having the facilities for a research room with internet access and access to relevant databases. An added attraction would be a café for refreshments and a local tourist information facility. Consideration might be given to the use of a historic building for this facility to consolidate historic environment enhancement in Sittingbourne town centre.</p> <p>68. (EAM, MGM, HRGS): The current brown signage within the Borough is woefully inadequate and out of date therefore rendering it unfit for purpose. As this is a basic requirement for the promotion of tourism, we suggest an urgent Borough-wide review and subsequent upgrade and rationalisation of this potentially critical asset ASAP. This is a particular issue for Sheppey. More widely, awareness improvement/training of Swale's heritage is fully endorsed, but signage and appropriate interpretation/information for where these are would be advantageous as a longer-term legacy. Utilising the strengths of local history groups to assist in the production of interpretation/information boards giving the background of an area should be simple and relatively inexpensive. Likewise this same strength could be used to provide new street and building names in keeping with the background and history of an area.</p> <p>69. (HHG, MAST): In relation to Strategy priority 5, we suggest that consideration of the historic environment be more explicitly widened to include natural heritage. Not only essentially 'wild' areas, but those also managed for agricultural or recreational purposes, such as re-wilded areas, coastal salt marshes, SSSI's, sanctuaries and reserves. It also needs to be recognised that the natural landscape provides the setting for other heritage assets – they go hand-in-hand.</p> <p>70. The Friends of Milton Regis Court Hall (FCH): Swale's Heritage should have high impact on the internet – this is currently not the case.</p>	<p>66. In response to this and related/similar responses, SBC will be bringing forward the development of its local list to feature as a work stream item in the initial 3-year action plan. This will be developed in conjunction with interested parties and stakeholders including the Faversham and Sittingbourne Societies.</p> <p>67. Whilst it has limited resources, it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. There is no specific funding available for, or plan in place for a central Sittingbourne Museum facility at present, but SBC will continue to explore options for this in liaison with local groups and meanwhile and more generally, officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>68. The provision of brown tourist destination signs is outside the control of SBC – it is a county council function. However, SBC is willing to consider this matter further as part of the work to develop the Visitor Economy framework, and would liaise with Visit Kent, Historic Swale, individual heritage site providers and other relevant parties in examining the anticipated benefits of the provision of individual new brown signs or a coordinated package, and whether SBC could contribute to the cost of provision. It is considered that the anticipated SBC Area Committees could play a useful role in developing this work.</p> <p>69. The topic of natural heritage is not appropriate for this Strategy, which is intended to focus on the historic environment. There are other Local Plan policy and guidance documents that already focus on this area, and/or are planned to, a key one being the Blue & Green Infrastructure Supplementary Planning Document or Strategy, planned to be developed later this year. However, as indicated elsewhere in relation to similar feedback, the Strategy will be expanded to consider the importance of historic landscapes forged by former industrial processes and by the development of large country homes that have created distinctive landscape contrasting with the surrounding more typical countryside landscapes, as these are not adequately considered by existing Local Plan evidence base documents.</p> <p>70. Noted and acknowledged. This is something that SBC will be working on as part of Strategy priority 5 that is based around raising the topic of the historic environment up the agenda through various means, which will include an improved on-line presence.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Local heritage attractions and local amenity groups & societies (continued)	<p>71. (FCH): Each attraction/group tries to attract people to visit it, but the limited impact of these small organisations makes it difficult to attract many people from outside the area. SBC should give itself to attract a priority to attract people to heritage sites by printed and on-line publicity, to augment the efforts of the individual attractions/groups.</p> <p>72. (FCH): Attractions rely on volunteers for manpower but recruiting them is a difficult and unpredictable task. There's scope for SBC to be a focal point for recruitment of volunteers. Many potentially willing people are probably unaware that individual attractions/groups are crying out for help. SBC could make a real impact here.</p> <p>73. (FCH): Volunteers are typically pulled in many directions by the various calls on their time. This can make consistent support including attendance at meetings difficult. More support from SBC might help with this.</p> <p>74. (SS): We were impressed by SBC's efforts to preserve features of the listed building east of the Dover Castle pub in Teynham. We hope that these efforts towards preserving worthwhile features of listed buildings will continue.</p> <p>75. (SS): Recent events have shown up the importance of rescue archaeology in an area rich in Romano-British and other remains, and we welcome the priority given to this area in the Strategy.</p> <p>76. (EAM): The early aviation heritage of Sheppey is of unique importance and deserves a higher priority than it has received in the past. Eastchurch Aviation Museum has the distinct opportunity to contribute not only to the local economic and cultural community, but also to play a part in the local prison's programmes for reducing re-offending. We would strongly urge inclusion of parts of Eastchurch village, as well as areas of Stamford Hill former airfield into the review programme for becoming Conservation Areas, and the Eastchurch Aviation project to be given higher status in the Strategy, more generally.</p> <p>77. (EAM): We believe the (grade II listed hangars at the museum site) to be significantly at-risk and were surprised they were not included in the Appendix II Local Heritage at Risk Register. We suggest their urgent inclusion.</p> <p>78. (EAM): EAM is contributing to 'local distinctiveness' through providing public access to the unique aviation heritage of Sheppey, within grounds that would otherwise be inaccessible, being within a prison site. This both creates a positive image and adds value to the local identity of the community.</p> <p>79. (EAM): The potential for an internationally significant aviation heritage site at Eastchurch would substantially increase the number of tourists coming to Swale and thereby have a positive effect on the visitor economy, including for visitor accommodation and associated businesses. It should therefore be seen as a strategic project, given that SBC has already offered financial support for the hangar project.</p> <p>80. (EAM): EAM strives to raise awareness and understanding of the historic environment through promoting visits by schools and other youth groups. We also promote and welcome visits by adult groups including those with mentally and</p>	<p>71 – 73. SBC recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>74. Noted and acknowledged. This is an area which SBC's Heritage Team working with their Development Management colleagues (and also where possible applicants) always seek to achieve as an important and established principle, and will continue to do so.</p> <p>75. Noted and acknowledged. SBC is committed to strengthening the development management policies around archaeology and the consideration of this through planned future work as part of the Strategy.</p> <p>76. Noted and acknowledged. The aviation heritage of the island is given priority and is specifically referred in in Strategy priority 4. Furthermore, it has been decided following a review of all the consultation responses, including the Aviation Museum's response, that it would be appropriate to include an action for SBC to work with the museum in developing a strategy for the development of the museum and in particular plans for the long term conservation of the listed aircraft hangars. SBC does not have the capacity to conduct a review of Eastchurch for possible Conservation Area designation in the initial 3-year Action Plan given the concentration of other high priority actions, but this is something that SBC can begin to explore in working with the museum on its strategy, with a view to taking this forward in the second Action Plan.</p> <p>77. This was simply an administrative error and one of the reasons why SBC included the baseline Local Heritage at Risk Register as part of the consultation package. It will be added to the version taken forward to adoption.</p> <p>78 - 82. Noted and acknowledged. Please see SBC's response to point 76, above.</p>

Consultation Response Type	physically challenging conditions, including Parkinson, Stroke and Dementia. In terms of physical health promotion, we are also popular with walking groups and cycle path users.	Summary of SBC Response
Local heritage attractions and local amenity groups & societies (continued)	<p style="text-align: center;">Summary of issues raised</p> <p>81. (EAM) EAM has an attraction for groups with specific interests (e.g. aviation enthusiasts, classic and military vehicles, etc.) from outside the Borough and even internationally. We readily and regularly cooperate with other Borough heritage sites and museums to encourage tourism and the understanding of Swale's heritage.</p> <p>82. (RCSI): We are keen to support actions that promote and strengthen our local community, particularly in Sittingbourne. As such, we very much welcome the initiative and the application of resources proposed in the Strategy and Action Plan to identify, conserve and utilise our heritage assets.</p> <p>83. (MGM) MGM is currently promoting and celebrating local history. Tours are a regular feature with interactive educational opportunities for our island schools and groups. The 12 volunteers are committed to ensuring that the museum provides a focal point for Minster the island more generally and to helping local schools develop their understanding of local history, and would like some help from SBC in their efforts to achieve this.</p> <p>84. (BTHC): BTHC considers it has not received the level of support from SBC that its historical position and ongoing efforts deserve. Much tourist publicity in the UK and in Europe is around their old towns which are seen as an important part of local heritage. BTHC would remind SBC that Blue Town is the old town of Sheerness – where the town was first established around the historic dockyard, before expanding across the Sheerness Defences to the newer area of Marine Town and Mile Town. The old town should be looked at as a major heritage site and needs investment to give it the heritage status it deserves. BTHC is pleased to see the dockyard church being restored, but considers, given the funding it receives, that SBC consider Sheerness to end at the church and not extend down the road to Blue Town, so would ask for serious reconsideration in this respect, and the support and funding required to enhance Blue Town's status.</p> <p>85. (BTHC): One of the most important activities provided by BTHC is the collection and recording of archives. Since establishment 10 years ago, we continue to receive all manner of archive materials dating back to the early days of the town, from local and worldwide former residents. As a charity with no mainstream funding, BTHC does what it can to ensure the items are carefully handled and recorded, but this is a monumental task, and as such, we'd ask that SBC provide funding for BTHC to engage the professional help this important activity needs. Archives are the major source of historical facts and the Island has a long and proud history which must be preserved and made available for future generations. BTHC welcomes the publication of the Strategy and trusts it will see a more supportive attitude towards the heritage of Sheppey, and Blue Town in particular.</p>	<p>83. SBC recognises the role that heritage attractions play in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>84 & 85. SBC recognises the role that heritage attractions play in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately. Furthermore, it is anticipated that a range of positive interventions will be implemented for the Blue Town area following the completion of a review of the Royal Naval Dockyard and Blue Town Conservation Area, as part of a series of Management Plan measures.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Local heritage attractions and local amenity groups & societies (continued)	<p>86. (SKLR): The Strategy, whilst it has moved on positively from the company initially hired to produce it, has still failed to acknowledge the importance of moveable heritage. Swale was historically rich in industrial railways, but the only one left operating in the area in the SKLR's two-mile remnant of the former Bowater's Railway. The SKLR also preserves several items of moveable heritage which are equally synonymous to the local paper making industry, with 8 engines that worked within the paper mills all of their working lives.</p> <p>87. (SKLR): The section on papermaking and railways in the Strategy contains several errors of historical importance and suggested corrections are set out for SBC's attention/action.</p> <p>88. (SKLR): SKLR notes the heritage elements listed in priority 4 (maritime and aviation) fails to include the Light Railway, even though this was the last narrow gauge steam-hauled industrial railway to operate in the UK. Its been acknowledged by Fedecrail (The European Federation of Museum and Tourist Railways), the UK Heritage Railway Association and others as being of specific importance. The Milton Regis Viaduct has been recorded by the Institute of Civil Engineers as being a significant Historic Engineering Work. Since opening as a tourist railway in 1970, the SKLR has had nearly 900,000 journeys, promoting tourism and the heritage of Swale not only locally, but nationally and internationally. We'd therefore ask that other forms of industrial heritage (such as the SKLR) are included in this priority, and that as an organisation of great historical importance to Swale, that the Strategy gives due recognition to SKLR and its assets, both structural and moveable.</p> <p>89. (SKLR): In section 1.7 of the Strategy (Big Issues), SBC has omitted one big issue facing many heritage assets throughout the Borough, namely vandalism. SKLR has suffered problems of this nature for many years, and it has even extended to arson.</p> <p>90. (HRGS): HRGS commends SBC's acknowledgement of the area's heritage, and hopes it can liaise with the relevant counterparts at Kent County Council (KCC) to encourage KCC to also cherish Swale's heritage. HRGS agrees with the high level vision contained in the Strategy and SBC's valuing of volunteer commitment is appreciated.</p> <p>91. (HRGS): HRGS considers that the monitoring framework and review process planned is vital to the process. Will the findings of this review be shared with the community?</p> <p>92. (HRGS): The consultation period (especially being over Christmas/New Year) was too short, and reduced the opportunity to read, discuss and reply. A longer period (90 days) would have allowed time for wider reflection and for our members to seek feedback from the local community before responding.</p>	<p>86. Noted and acknowledged. Strategy priority 1 has been altered to reflect the importance of moveable/portable heritage in relation to this and similar feedback from other respondents.</p> <p>87. Noted and acknowledged. SBC appreciates the time and trouble taken to point out these errors/omissions and the relevant sections of the Strategy have been altered accordingly.</p> <p>88. SBC recognises the role that heritage attractions play in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately. Consideration will be given to the designation of the viaduct at the national or local level.</p> <p>89. SBC acknowledges that this is an issue for many heritage sites, and Section 1.7 of the Strategy has been expanded to reflect this.</p> <p>90. SBC is working closely with KCC's Heritage Team in developing the Strategy, particularly in relation to the archaeological aspects of the document. Improved liaison is however considered to be required with the county's Highways & Transportation Team. This is not limited to Swale however, and so action to improve matters in this area is being pushed forward by the Kent Conservation Officers Group – in particular the benefits of re-establishing the Kent County Highways/Kent District Heritage Teams consultation protocol established many years ago.</p> <p>91. Yes, as stated, the monitoring reports will be made available to view as a link on the Council's Heritage Strategy web page. The word 'publically' has been added to reinforce this.</p> <p>92. The period of time allowed for consultation responses was 6 weeks, thereby according with the guidance set out in SBC's adopted Statement of Community Involvement. It is acknowledged that the timing of the consultation (spanning over the Christmas break period) was not ideal, but SBC was and remains keen to deliver on this overdue important piece of work and in particular to try and move to adoption by the end of the current financial year. Fixed internal reporting deadlines for taking the Strategy through the necessary processes to adoption therefore played a part in the less than ideal timing. However to mitigate against this, reminder letters were sent out to all consultees and SBC has been happy to accept and consider late responses.</p>

Consultation Response Type	Summary of issues raised	Summary of SBC Response
Local heritage attractions and local amenity groups & societies (continued)	<p>93. (HRGS): Whilst SBC values volunteer commitment, the opportunities for a coordinated and sustainable central body would further add value, if a funded position was in place to emulate the role of the Museum Development Officer (funded by the Arts Council), whose only focus would be to promote Swale's heritage. This would enable that individual to advise, share news and help with the development of heritage sites.</p> <p>94. (HRGS): In relation to heritage sites/attractions, Sittingbourne does not have a tourist information point. The town's library offers only folders, which are not managed or replenished. What is provided is hidden away, uninteresting and poorly presented.</p> <p>95. (HRGS): It is hoped that the additional funds will enable the preservation of heritage assets and reduce the at-risk situation. The Strategy talks about listed buildings and working in conjunction with private owners, but it all seems rather powerless to take preventive action currently. Examples quoted supporting this message, include Borden Grammar School, the aircraft hangars on Ministry of Justice land, and the historic dockyard building at Sheerness owned by Peel Ports Group.</p> <p>96. (HRGS): Regarding the identification of sites/areas at-risk, Milton High Street Conservation Area is one such important area (the architecture is outstanding), and we also consider that the Periwinkle Mill site should be included in the first 3-year survey proposal.</p> <p>97. (HRGS): Can the at-risk register please include the listing of important local buildings for Sittingbourne and Milton Regis, including Brenchley House, Burtons store, New Century Cinema and Sittingbourne Railway Station.</p> <p>98. (HRGS): The Avenue of Remembrance is seen as a valued heritage asset and attraction. During the 100th anniversary (in 2023), it would be a fitting tribute to have the trees and memorials to the fallen marked as 'conserved' and missing trees and plaques replaced and trees maintained. This commemorative thoroughfare is believed to unique in the UK.</p>	<p>93 & 94. The Council recognises the role that local amenity and history groups play in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officer will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>95. SBC acknowledges that neglect of important heritage assets has been allowed to develop and continue in past years, leading to further deterioration of historic fabric in some instances. Whilst the resourcing needed to tackle these types of issue is still considered relatively weak, SBC under its new administration is more determined to make the best of its resources and where possible, capacity build its key teams to be able to tackle these issues more effectively, if necessary tackling significant business interests using the range of statutory powers available to it, where such businesses are not willing to work with SBC and partnership organisation towards positive conservation outcomes.</p> <p>96. Milton High Street Conservation Area is already included on the national and local Heritage at Risk Register. As such, it has been prioritised for early review/appraisal (in 2020/21) in the initial 3-year Action Plan, as has a plan to secure the enhancement and long-term conservation of the retained water mill wheel and associated structures at the Periwinkle Mill site in Milton. Work is already underway on this project.</p> <p>97. There appears to be some confusion here between the local Heritage at Risk Register and the proposal to develop a list of buildings/structures/sites of local architectural or historic interest. SBC will work through the list provided and ascertain if any of the buildings/structures are genuinely at risk. Should this be the case, they will be added to the baseline local heritage at risk register prior to adoption of the Strategy. Whilst SBC can legitimately determine whether a building/structure/site should be treated as a non-designated heritage asset (and it frequently does have to make such determinations – typically in relation to development proposals), entry onto a local list should not be an ad-hoc process. It requires a set of qualifying criteria to be agreed in advance with all invested parties, and a methodology and timeframe(s) for carrying out the necessary survey work. The buildings/structures referenced may well be suitable candidates for a Swale Local List, but they would need to be put forward once the appropriate framework for the list is in place.</p> <p>98. A Councillor-led working group is being set up to examine the best way of securing the long-term and sustainable conservation of this important local heritage/community feature. Local heritage groups will be involved in this, and the group's comments have been duly noted by SBC and will be passed on to the working group chair and relevant officers for information/action.</p>

Consultation Response Type		Summary of SBC Response
Local heritage attractions and local amenity groups & societies (continued)	<p style="text-align: center;">Summary of issues raised</p> <p>99. (HRGS): We'd welcome the establishment of a Sittingbourne Town Centre Team or Town Council to promote and champion Sittingbourne. Faversham and Sheerness already have such bodies. The Economy and Community Services (Culture & Places) Team are very supportive but could not take on the extra commitment without extra resources, which HRGS believe are necessary if SBC is serious about heritage tourism in Sittingbourne.</p> <p>100. (HRGS): To successfully combine all of the Strategy's key points, then a bold approach is needed. SBC could consider adopting leading examples from elsewhere, including ways of living and volunteering in the community. For example, has SBC looked at the potential of having a distinctive programme of encouraging the voluntary sector to move into the area? The Department for Culture, Media & Sport has previously given funding to 5 projects to make volunteering more age-friendly and inclusive, as they recognise the benefits of this (insert web link from rep 64). Vienna tops the worlds most liveable surveys as its citizens enjoy affordable public transport, abundant greenery and rents UK citizens could only dream of. Purpose built or converted heritage properties with modern amenities would attract residents who are more likely to be available for volunteering (insert web link from rep 64). When SBC considers building a new heritage centre for Sittingbourne, please consider a combined package including associated residential property, both public and private to attract the right mix of residents, who could also provide your volunteer base.</p> <p>101. (HHG): In relation to Strategy priorities 1 and 2, from our perspective, heritage means so much more than historic buildings, art and artefacts. It also includes skills, training and jobs, particularly those in relevant traditional sectors, as well as initiatives, resources and infrastructure capable of generating the opportunities to develop these for the 21st Century. In particular, 'heritage at risk' must consider these factors as being equally important to physical infrastructure. With the considerations as above, we entirely support Strategy priority 3.</p> <p>102. (HHG): We support the principle of Strategy priority 4, but would suggest that SBC should involve the Faversham Creek Trust and HHG in the development of projects relating to this priority. Whilst we note the importance to Swale of the maritime and aviation heritage on Sheppey, we suggest that more emphasis on, and the involvement of other maritime linked areas and locations would greatly add to the richness, diversity and attractiveness of the Borough as a whole. Our primary interest is in Faversham and Oare, but to varying degrees, Conyer, Sittingbourne/Milton Regis. Lower Halstow and Otterham also have historic and future maritime heritage potential, the importance of only some of which appears to have been recognised in the consultation documents.</p> <p>103. (HHG) We support the intention of the Strategy to identify heritage at risk and untapped potential opportunities, and consider these of key importance, provided that a broad view of heritage is taken, such as we have suggested. The highest priority for HHG would be the identifying of key infrastructure elements, such as the restoration of the Faversham Creek Bridge as an opening structure – as required by the rights of navigation for Faversham Creek. Achieving this would potentially unlock the restoration</p>	<p>99 - 101. The Council recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes.</p> <p>Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>102. SBC would be happy to involve HHG in SBC led or supported projects relating to Strategy priority 4. The particular focus on the aviation and maritime heritage on Sheppey is however considered entirely appropriate and is not planned to be changed. This in part is due to the high degree of significance this heritage is considered to have (as evidence by Historic England, inter-alia), but also because Sheppey as a whole is the most deprived area of the Borough, and as such, SBC considers it appropriate to focus the bulk of its community/physical regeneration efforts/initiatives there, including heritage related projects focussed on the repair and re-use of nationally and internationally important heritage assets, which it is anticipated will bring about a wide range of benefits, not only for the assets themselves but for local people and businesses, and for the wider local economy and community. The specific focus is also one which is supported by Historic England.</p> <p>103. The Council recognises the role that both the natural and built heritage plays in supporting the development of our individual destinations and providing valuable experiences for both residents and visitors. It is also mindful of the huge voluntary workforce in sector providing services and facilities and will work to ensure that volunteers have access to resources (including business advice and training) to enable them to do their jobs as effectively and efficiently as possible. The Council is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to</p>

<p>Consultation Response Type</p> <p>Local heritage attractions and local amenity groups & societies (continued)</p>	<p>of the Faversham Basin and other publicly beneficial infrastructure work.</p> <p style="text-align: center;">Summary of issues raised</p> <p>104. (NHG): We agree with the Strategy’s high level vision in broad terms but are concerned by its particular focus on Faversham. This market town is the undoubted jewel in Swale’s crown, but it already has a strong and effective society ensuring some protection and promotion of its historic attractions. The Strategy in its current form risks a further imbalance between heritage protection and promotion east of Sittingbourne and that found to the west. We’d therefore like to see a more detailed strategy for the villages and surrounding areas that appear to be grouped together as ‘rural communities’.</p> <p>105. (NHG): In relation to Strategy priority 1, we recommend that the Strategy takes into account the value of oral heritage and how this might be preserved. Is it as risk as some people move away and older residents pass away? The Strategy should also consider the importance of objects/artefacts and archives. Objects include those already known and those yet to be discovered. This is an area of heritage related work where smaller community groups can be most engaged and valuable because of the more achievable workloads and cost.</p> <p>106. (NHG): In relation to Strategy priority 2, we consider the wording conflates two disparate ideas. We therefore suggest adding ‘...by tackling Swale’s significant issues of heritage at risk’ to priority 1.</p> <p>107. (NHG) We fully support Strategy priority 3, but in relation to 4 consider it inappropriate that a single area of the Borough is given priority. We believe that all areas of Swale’s heritage should form an integral part of local strategies and therefore, this point should finish at the words ‘visitor economy’.</p> <p>108. (NHG) In relation to Strategy priority 5, we’d like to see a more detailed commitment to promoting heritage through education. There is only loose reference to this at present, and we’d like to see SBC with the assistance of heritage and educational experts, develop an education pack on Swale’s heritage, made available to schools, libraries and voluntary groups. NHG has proven successful experience in this area and would welcome the opportunity to be involved.</p> <p>109. (NHG): Our biggest concern is the apparent lack of a strategy to respond to the excavation of newly-identified archaeological remains. In Newington, we have already lost the original temple pictured in the draft Strategy document, although NHG acted with SWAT archaeology to remove the foundation flints so that they can be ‘restored’ on the Persimmon site. Whilst we understand the reasons for this, we’d like to see a clear strategy, even in stage 1 for responding to new excavations</p> <p>110. (NHG): There needs to be a strategy to consider the issue of heritage objects and</p>	<p>thrive. Moving forward the Council’s intention to continue to provide grant support will remain a key focus.</p> <p style="text-align: center;">Summary of SBC Response</p> <p>104. SBC in the development of this Strategy has sought to be as fair and proportionate as possible in considering the issues and challenges applicable to the different parts of the Borough bearing in mind the limited resources it has to apply to this work. Faversham and its surrounds is only referenced more than other areas because of the sheer extent of heritage it contains – not for any other reason. However, SBC is very aware that valued heritage can be found in all parts of the Borough, and a glance of the draft initial Action Plan will show that this in part has been focussed on other parts of the Borough including Newington, areas in and around Sittingbourne, and on Sheppey.</p> <p>105. SBC has altered the wording of Strategy priority 1 to reference the importance of moveable/portable heritage. Consideration will be given to extending this to also reference oral histories and archive information, but the principal focus of the Strategy was always and is intended to be on physical heritage, so whilst SBC acknowledges and appreciates the reasoning behind this suggestion, it may be a step too far for this Strategy given the need to make the limited resources available work effectively over an already wide work area.</p> <p>106. SBC has considered this point carefully. The reference in question relates well to the wider objectives of both priority 1 and 2. However, as the majority of respondents that have commented on the priorities have indicated that they are broadly content with them, SBC has decided to leave the key wording of Strategy priority 2 broadly as it stands.</p> <p>107. The logic here is that providing a stronger and more focussed input on the aviation and maritime heritage of Sheppey will result in wider benefits for the Borough as a whole, because of the nationally and internationally significant importance and associated appeal it is considered it can bring, in terms of raising the profile of the Borough and providing an uplift to the local economy. As per the response made in relation to point 104, this does not mean that the heritage of other areas will be ignored/neglected.</p> <p>108. SBC is committed to engaging with its local communities in developing and implementing projects. Whilst it has limited resources it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council’s intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately.</p> <p>109. A detailed theme/topic paper (as one of a series of such papers planned to be produce over the 12 year duration of the Strategy) looking at the issues raised here and in relation to archaeology concerns from other respondents will be prepared by Kent County Council (in liaison with SBC) as an early item for the initial Action Plan. It is planned that this paper can be used to help shape the heritage related policies in the next iteration of the Local Plan, specifically in relation to archaeological considerations.</p> <p>110. SBC cannot commit to a specific strategy on this matter at this time, although some of the issues around this are likely to be picked up in the paper referred to in point 109 above. A heritage theme paper may also be produced on this during the duration of the Strategy.</p>
---	---	---

<p>Consultation Response Type</p> <p>Local heritage attractions and local amenity groups & societies (continued)</p>	<p>finds, etc, including re. their storage and conservation.</p> <p style="text-align: center;">Summary of issues raised</p> <p>111. (CC): The reference in the Strategy to the possible listing of buildings at Swan Quay needs to be deleted (similar comment to that set out in response point 57, above). In addition though, Creek Creative is a not for profit Arts Centre operating for over 10 years in close proximity to the site, and as such, we'd welcome appropriate and sensitive redevelopment of the area which would contribute to the viability of Creek Creative.</p> <p>112. (FS): In Faversham Article 4 controls have been ignored in places. There needs to be a proper enforcement and a campaign in this respect to raise awareness. We welcome the intent to introduce Areas of Special Advertisement Control – these would be very useful in conserving the heritage of Faversham.</p> <p>113. (FS): Grade II listed Radfield House is a prominent and embarrassing eyesore on the Watling Street and its condition clearly suggests a lack of concern for heritage in Swale. SBC should use the powers available to it to address this issue, as is the case for grade II listed Pett Dane at Eastling.</p> <p>114. (FS): Common Heritage: Swale has a remarkable richness of heritage, and whilst this is a benefit, it makes presenting/communicating that heritage more difficult. SBC might therefore consider an annual tourism focus/theme to produce an experience of depth/quality e.g. The Defence of the UK. Watling Street provides a link to Canterbury and London, and in our view, SBC needs to do a great more to connect its heritage nationally, and to link with national and regional heritage centres.</p> <p>115. (FS): Natural Heritage: It would be desirable to see more linkage in the Strategy between the built heritage and the natural heritage, as is evidenced at the Oare Gunpowder site, now also a country park.</p> <p>116. (FS): Youth & Education: Appreciation of our built and cultural heritage has to be an active and engaged process. We'd therefore urge SBC to include the creation and implementation of an educational outreach programme in its Strategy.</p> <p>117. (FS): Community Celebration: After 50 years of pioneering Open House programmes, we are evolving it into two linked festival weekends in July each year, 2020 themes being the railway/Victorian Faversham and gunpowder. FS is also working with HRGS through Historic Swale to make and celebrate Becket and Dunkirk.</p> <p>118. (FS): Research: There's still more to be done on researching Faversham's history.</p>	<p style="text-align: center;">Summary of SBC Response</p> <p>111. (as per response to response points 57 and 181) Noted and acknowledged. However, the reference in the Strategy will remain as this merely reflects suggestions made by interested parties in relation to the 2018 stakeholder survey. SBC will not pursue a listing review of the site, but as part of a review of the Faversham Conservation Area, will examine the potential of this site taking into account its heritage interest and the policies (general and site specific) set out in the Swale Local Plan, and the Faversham Creek Neighbourhood Plan</p> <p>112. As indicated elsewhere, the Planning Enforcement Team is planned to be strengthened. The Article 4 Direction for Faversham will be reviewed along with the conservation areas for Faversham and Faversham-next-Preston, and publicity to make householders more aware of it can be considered as one of a range of management measures to be implemented.</p> <p>113. Noted and acknowledged. SBC is in dialogue with the owners, whose professional advisers have confirmed they are beginning to work up a conservation focussed scheme for this Radfield House. In respect of Pett Dane, there is a longstanding current planning and listed building consent application in for the extension and alteration of this listed building, the assessment of which was stalled for a number of reasons. Priority will be given to picking this up again and determining the application which in turn will inform whether any subsequent action by SBC will be needed. Meanwhile, it will be added to the baseline Swale Heritage at Risk Register.</p> <p>114. SBC believes this to be a good idea and will give this further consideration, although the already challenging nature of the work programme coupled with the still limited resources may mean that this is ultimately something that SBC cannot take forward, at least within the initial 3-year Action Plan period. What SBC is committed to is the production of a heritage theme/topic paper each year to build up knowledge/understanding of the depth and types of different heritage assets, their condition, vulnerabilities and opportunities, etc., starting with archaeology.</p> <p>115. As indicated elsewhere, the topic of natural heritage is already covered by existing or planned separate Local Plan evidence base documents. However, the matter of historic landscapes (purpose-designed formal and informal landscapes and landscapes shaped by former industrial processes) will be included in an additional historic landscapes theme section to be introduced into the Strategy.</p> <p>116. The importance of this is acknowledged and already referenced to some degree in the Strategy. Whilst acknowledgement of this factor will be given greater reference in the Strategy documents and SBC will support and enable third party projects which seek to provide such educational outreach, SBC itself is unlikely to have the capacity to launch such a programme itself and could therefore not commit to this at present.</p> <p>117. Noted and acknowledged. As indicated elsewhere, SBC would be interested in supporting other local groups/societies to run the Open House programmes in their areas, but could not commit to managing such an event itself due to limited resources.</p> <p>118. Noted and acknowledged.</p>
---	---	---

<p>Consultation Response Type</p> <p>Local heritage attractions and local amenity groups & societies (continued)</p>	<p>The relocation of the Doddington Library into the Reading Room at Town Hall has created a space for research in this area including the archives not only of the Faversham Society, but also the other 14 or so heritage assets in Faversham, organised through Faversham Museums Together.</p> <p style="text-align: center;">Summary of issues raised</p> <p>119. (FS): Creek Basin & Upper Creek: The buildings around Swan Quay (including TS Hazard and the Faversham Creek Hotel form a cluster of considerable heritage interest, and about which, there is considerable public concern in Faversham. These buildings, along with the upper basin provide an excellent opportunity for a combined heritage and economic initiative.</p> <p>120. (FS): TS Hazard: This grade II* listed building is a signature one both for Swale and Faversham. Its current usage is ill-suited and FS wishes to see the building restored and used for a more appropriate purpose combining conservation, regeneration and tourism. If a maritime museum were to be developed there, it would provide an entry point to the Cinque Ports and enable Swale and Faversham to develop a link with Chatham and the Historic Dockyard and the National Maritime Museum.</p> <p>121. (FS): Conservation Areas: FS supports the general thrust of the Strategy in this respect but is concerned in terms of the reference to the Faversham CA, that (a) it is starting too late, and (b) the timeframe suggested is too short. This is largely in relation to the Neighbourhood Plan work for Faversham now underway.</p> <p>122. (FS): Areas of High Townscape Value: Early thinking around the Faversham Neighbourhood Plan suggests that there are some areas we would like to suggest for this designation. It's understood that this is not an immediate priority for SBC, but we'd like to be able to use this designation in the near future.</p> <p>123. (FS): Old Gate, Old Gate Road, Faversham: This is a listed heritage asset of uncertain ownership, which some local residents are concerned by be in a dangerous condition.</p> <p>124. (FS): Suggested additions to the Strategy text (principally around content of heritage theme areas) and proofing comments put forward for SBC's consideration/attention.</p> <p>125. (MAST): MAST considers that the following elements re missing from and/or need to be given great emphasis in the SBC's plans:</p> <ul style="list-style-type: none"> • The risks to heritage through new housing development/poor urban development and the need for contextually sensitive development to eliminate or reduce the risks. • The need not to treat heritage assets in isolation, but to enhance them by considering their wider settings and looking at signed trails/paths between them. • The need for sustainable urban planning and transport policies, reducing dependency on cars and encouraging walking/cycling and better public transport. This will benefit the environment, health and the access to and appreciation of 	<p style="text-align: center;">Summary of SBC Response</p> <p>119. Noted and acknowledged. This question can be explored in due course with the planned review of the Faversham Conservation Area (see 121 below).</p> <p>120. Noted and acknowledged. SBC is waiting for the stage 2 (intrusive) survey report on the building it commissioned last year. On receipt of that report, the information provided (on recommended repairs and possible interventions/alterations) can be used to help frame the terms of the planned feasibility study for potential re-use of the building and land around it. The Cinque Ports Museum idea is certainly one which SBC would like to be given due consideration as part of the feasibility study. The planned repair and re-use of this building is included as an item in the draft initial 3-year Action Plan</p> <p>121. Careful consideration has been given in relation to this matter, and it considered that it would be appropriate to bring the review work forward, and also allow a longer period for the review work to take place within. It is planned to bring forward the review work to commence in 2020, and allow for this, if necessary to run through into 2022.</p> <p>122. SBC confirms it would have no objection to this in principle, although the current requirements and considerations related to Policy DM36 will be reviewed along with all the other Development Management (DM) policies later this year which could result in re-working of the policy or its requirements being consumed within one or more separate DM policies.</p> <p>123. SBC is aware of this issue and will arrange for a site meeting with the owner of the directly adjoining homeowner as well as seeking advice from its legal team on the ownership question, as a priority.</p> <p>124. Noted and acknowledged. SBC appreciates the time and trouble taken to put forward these suggestions and pick up the typos, etc., picked up in the proofing comments. The suggestions additions have been actioned along with the identified errors in the draft version of the Strategy.</p> <p>125. SBC is already aware of the first four points raised, and these are already embedded in existing policies (including the adopted Swale Local Plan) and development management practice. The Heritage Trail is a matter which SBC will look into in liaison with the County Council.</p>
---	---	---

<p>Consultation Response Type</p>	<p>heritage assets.</p> <ul style="list-style-type: none"> • Prioritisation to the avoidance of harm to the Borough's Kent Downs AONB landscape. • The reinstatement of the Swale Heritage Trail, which was established in the mid 1990s following extensive research, but has since been neglected and fallen into disuse. <p style="text-align: center;">Summary of issues raised</p>	<p style="text-align: center;">Summary of SBC Response</p>
<p>Local heritage attractions and local amenity groups & societies (continued)</p>	<p>126. (BHG): Inadequate consideration has been given to the preservation of Sittingbourne High Street which has many historic buildings that give a continuous history of the town.</p> <p>127. (BHG): Inadequate consideration given to local streetscapes in general. The character of many Swale villages is intrinsically linked tied into how communities have developed. Whilst we understand the need to accommodate growth, there's too little recognition of the importance of Swale's road network in not only providing access, but also contributing character. New roads should be carefully planned for new development, without wholesale upgrading of historic roads and lanes.</p> <p>128. (BHG): We have a particularly affinity for the history of the Adult Education Centre in Sittingbourne. It was originally Borden Grammar School and is therefore an important link to Borden's history. It's hoped that SBC will use its powers to encourage a sympathetic re-use of the building that would still allow some public access to the more interesting parts of the building.</p> <p>Respondents in this category number 9 and consist of: Bobbing PC, Borden PC, Bredgar PC, Dunkirk PC, Eastchurch PC, Iwade PC, Milstead PC, Newington PC and Rodmersham PC.</p> <p>It should be noted that the Borough's 3 town councils were consulted, but none of them responded. Responses of the same type from more than one parish council are set out below whilst responses specific to a particular group follow on - set out with the specific attraction/group listed.</p> <p>129. Bobbing PC: We agree with SBC's high levels vision and the derived 5 priorities set out in the Strategy. We also agreed that in terms of SBC's stated desire for working with local groups that this is the right way forward, as these interested parties will have a fundamental and greater knowledge of their local areas and area's interests. In terms of whether SBC has the right priorities in the first Action Plan, we consider that you have to start somewhere and focussing in on these first 17 objectives will show the people of Swale how dedicated the council is in taking our heritage and its conservation seriously.</p> <p>130. Borden PC: The objectives of the Strategy are laudable; however they need to recognise that the primary highway network needs to be sufficient to cope with the extra traffic and therefore any management plan for the Conservation Areas should involve traffic reduction through diversion to main highways.</p> <p>131. Bredgar PC: The 2015 Heritage Asset Review references the importance of setting. This is tremendously important, but the built heritage of Swale is embedded in the landscape heritage of Swale, which is equally important. The exigencies of modern</p>	<p>126. SBC is concerned about the condition of this High Street and as such, the tackling of the issues facing this area are planned to be addressed as far as possible via the related work stream item included in the initial 3-year Action Plan, and scheduled to commence later this year.</p> <p>127. SBC does give significant consideration to the character and quality of streetscapes in relation to its development management function. The ability to enable a stronger/more detailed consideration in this respect will be enhanced by the rollout of the conservation areas review programme starting very shortly. Management plans for recently reviewed conservation areas should be able to influence the design of new roads and paths and interventions to existing roads/paths to provide and/or retain as much contextual sensitivity as possible.</p> <p>128. Noted and acknowledged. SBC is currently exploring a residential conversion of the former adult education centre, and particularly given its grade II listed status, will be looking to achieve a high quality scheme that retains key architectural features and the essential character of the building, in the event that an alternative community use cannot be found for the building, which would likely be SBC's preference, in accordance with current Local Plan policy. The question of allowing some public access to parts of the building will be duly considered.</p>
<p>Parish and Town Councils</p>		<p>129. Noted and acknowledged.</p> <p>130. Noted and acknowledged. Measures to explore traffic calming/reduction (where appropriate) will be explored with the High Authority (Kent County Council - KCC) in developing and agreeing management plans for conservation areas. However, it is anticipated that SBC would be reliant on KCC to fund and implement any agreed measures.</p> <p>131. Noted and acknowledged. Whilst SBC can work with Parish Councils and other local groups to help conserve protected hedgerows and trees, some of the concerns raised here are realistically beyond the scope of SBC to aerially influence given the significant permitted development rights put in place by central government for agricultural operations. However, SBC is committed to working with landowners and farmers to protect the character of the Swale rural landscape as far as possible (for visual amenity and ecological reasons) without impinging on the operational effectiveness of farming operations.</p>

<p>Consultation Response Type</p> <p>Parish and Town Councils (continued)</p>	<p>agricultural practice have degraded the landscape considerably and whilst it is difficult to halt the march of agricultural efficiency, it does seem that there is a gross mismatch between how well buildings have been protected, in terms of their heritage, and how badly hedgerows and traditional field structures have been neglected. Iconic Swale sights, like sheep grazing under cherry trees, have almost vanished, and whole orchards are – even in the AONB – swathed in polytunnel plastic. The balance needs to be better addressed, with greater powers given to prevent the spoliation of the landscape and the setting of our built heritage.</p> <p style="text-align: center;">Summary of issues raised</p>	<p style="text-align: center;">Summary of SBC Response</p>
	<p>132. Bredgar PC: It would be good if there were more clarity about the administrative structure within SBC for dealing with heritage matters. There's mention of a 'heritage team' but how would it work? The term 'conservation officer' is not mentioned in the document, but surely this role needs to be given more prominence, and perhaps power. We feel, rightly or wrongly, that there may have been an increasing reluctance for conservation officer(s) to get out and about in the Borough, which is in marked contrast to a decade or so ago, when the conservation officer was a familiar figure in the village. The present conservation staff are no doubt extremely busy, but it would be good to make the role a more outgoing one again.</p> <p>133. Bredgar PC: The Strategy references the Swale Heritage at Risk Register being freely available to view from 2020. This kind of transparency is very important. It should be emphasized and propagated throughout the process, and go hand-in-hand with increased accessibility to the concerned public of all areas of the heritage conservation process.</p> <p>134. Dunkirk PC: We welcome the draft Strategy and strongly support the stated aims and 5 priorities. However, the text contains omissions, inconsistencies and missed opportunities for heritage, notably in respect of archaeology in the landscape and natural heritage. Dunkirk has relatively little built heritage compared especially with Boughton-under-Blean. The radar tower is acknowledged, however the Strategy fails to register the significance of the landscape heritage preserved beneath the Blean Woods West, or their distinctive character and history. Yet this is the largest ancient broadleaved woodland in southern Britain and it has national and European designations. An ancient woodland has, by definition, remained undisturbed since at least 1600AD. It follows that the land on which these woodlands grow will hold archaeology from medieval and earlier periods, and artefacts preserved in-situ and in context. These woodlands have archaeological potential, and form a direct connection with the Borough's history, long since erased elsewhere by ploughing and development.</p> <p>135. Dunkirk PC: Above ground, the character of Blean Woods is also recognised as an area of High Landscape Value, yet the Strategy only mentions the richness of the Borough's historic landscapes and natural heritage in passing. This approach is unbalanced and inconsistent with Swale's Local Plan Strategic Policy ST1. If read only in the narrow sense of designated Historic Parks and Gardens, it ignores the historic importance of relict landscapes preserved under ancient woodland. These contain earthworks, medieval wood-banks and archaeology, largely undisturbed by human activity (reference is made to the Iron Age univallate hillfort, Bigbury Camp to reinforce this point).</p>	<p>132. The 'Heritage Team' is low profile because it currently only consists of 1 full-time office and 1 agency based consultant who works 4 days a week and there is only funding for until January/February 2021. SBC intends to recruit a further officer to help implement the Heritage Strategy actions, and other possibilities for capacity building the small team are currently being explored too. The small size of the team combined with the high workload levels means that staff are not able to get out and about as much as their equivalents in years gone by. However, they are no less dedicated to their role (than previous incumbents) and welcome the opportunity to get out and about and to interact with local people and local groups when the opportunity arises. The Planning Service based conservation officers are not a team in their own right, but are incorporated into the Spatial Planning (aka the Local Plan or Planning Policy) Team). As and where appropriate, they work with officers in the Economy and Community Services Team on work streams which involve supporting community/local group driven heritage projects.</p> <p>133. Noted and acknowledged. SBC would confirm that this is the general intention moving forward.</p> <p>134. Noted and acknowledged. Information concerning the heritage and other values of ancient woodland is noted and the contribution that ancient woodland makes to the various types of historic landscapes and areas of archaeological interest will be referenced in changes to the Strategy. Fuller consideration of the value of ancient woodlands and hedgerows and other types of natural assets will be taken into account in SBC's planned Local Plan evidence based work around trees, woodland, orchards and hedgerows and 'Blue & Green Infrastructure' more generally.</p> <p>135. The Strategy will be redrafted to provide a completely new theme section on historic landscapes (as part of the heritage themes chapter) and a strengthened related section on archaeology and hidden heritage. The information provided will be carefully taken into account in this redrafting work (plus see the response set out at point 134, above)</p> <p>136. The reference referred to is made in relation to the landscape character of part of the Borough, and consideration of the area in question as an NNR is not the primary concern in the context of the themed section (on agriculture, horticulture and rural heritage). The natural heritage of the Borough is of course very important, but it is not within the scope of this Strategy to do more than make passing reference to it, and provide cross reference to the Local Plan</p>

<p>Consultation Response Type</p> <p>Parish and Town Councils (continued)</p>	<p>136. Dunkirk PC: The Strategy references Elmley Nature Reserve (NNR) and also mentions The Blean, but there's no mention of The Blean NNR. Such fleeting recognition of the economic and social value of natural heritage is inconsistent with the reference to the Borough's outstanding natural environment in the Swale Local Plan. This undermines Local Plan Core Objective 1, and fails to take an integrated approach to the conservation of both heritage and wildlife.</p> <p style="text-align: center;">Summary of issues raised</p> <p>137. Dunkirk PC: The Strategy does not consider the structural and harm to fabric caused by heavy traffic to heritage assets in conservation areas, and air pollution (the canyon effect) in places like Boughton-under-Blean. Nor the need to protect the network of sunken rural lanes as distinctive ancient features of the areas of high landscape value. Neither does the Strategy address climate change, or its consequence for heritage.</p> <p>138. Dunkirk PC has 3 specific recommendations in relation to the Strategy:</p> <ol style="list-style-type: none"> 1. Recognise the importance of ancient woodlands across the Borough... Integrate references to human activity and the working history of ancient woodlands with local social and economic history... Value them as heritage assets in their own right, as well as irreplaceable conservation assets for biodiversity and social assets for wellbeing. Seek to protect them from insensitive management and loss of heritage features... 2. In accordance with Strategy Priority 5, recognise Local Wildlife Sites across the Borough for their environmental value and range of social and economic benefits... Provide formal protection for local wildlife sites within the planning system, which might take the form of a supplementary planning document... 3. In lieu of initiating a Borough-wide local listing process, which we nevertheless consider should be given higher priority, the Strategy should, in accordance with Priority 1, initiate an immediate spot listing for local listing (based on the precedent of the Historic England methodology applied to spot list buildings of national importance)... <p>139. Eastchurch PC: We take pride in our history and the heritage associated with it., and contribute positively initiatives and work to manage/enhance the parish and help attract visitors. It's understood that the grade II listed Aviators Monument (erected in 1955) is owned by SBC, so as part of its Strategy we'd ask that serious consideration is given by SBC to restoring this valuable monument to its original splendid condition before it's too late (weathering has detracted from much of the lettering).</p> <p>140. Iwade PC: It's disappointing that neither Iwade nor Bobbing are included as conservation areas. The only reference in the Strategy to Iwade is in relation to the Heavy Anti-Aircraft gun site. Furthermore, the Strategy speaks about future discoveries</p>	<p>and other documents that focus on this area, including SBC Biodiversity Action Plan.</p> <p style="text-align: center;">Summary of SBC Response</p> <p>137. SBC acknowledge this is a notable omission from the Strategy, and both the issues highlighted are planned to be included in the section referencing the Borough's Big Issues, as far as heritage conservation is concerned. SBC is unlikely to be able to exert significant influence in the area around traffic levels and typically related air quality issues but will do what it can to mitigate harm in this respect, possibly including through the mechanism of conservation area management plans as referenced elsewhere. There is an existing policy in the adopted Local Plan that seeks to protect the character of rural lanes. This will be referenced in the Strategy (it isn't currently) and the policy will be reviewed as part of the Local Plan Review process to assess its effectiveness.</p> <p>138. In relation to point 1, please refer to the response to point 135, above. In relation to point 2, please refer to the response to point 136, above. In relation to point 3, and as a result of this and other calls to prioritise this work, SBC will commit to commence work necessary to develop a local list from this year, although given the significant amount of work needed to develop an effective and widely supported local list, this is a project that is anticipated to be developed across the full timeframe of the initial 3-year Action Plan.</p> <p>139. The Aviators Monument is owned by SBC and it will arrange for a condition survey to be carried out in the near future and a specification drawn up for any repairs/restoration needed. SBC's very limited budget for repairs/maintenance means that any work identified as necessary may not take place as soon as it, or the Parish Council would ideally like, but it will be scheduled in as soon as possible, taking into account the backlog of work it has for its owned or directly managed heritage buildings/structures and areas, including the numerous close churchyards which the Diocese of Canterbury has passed onto SBC to manage, many of which require significant and costly intervention.</p> <p>140. There are many other villages in the Borough that do not have conservation areas such as Dunkirk, Lower Halstow and Minster. This does not mean they are not valued in heritage terms. With the possible exception of Eastchurch (specifically in relation to priority 4 of the Strategy) SBC cannot commit to exploring the possible designation of additional conservation areas within the initial 3 year Action Plan period, but this is something it is willing to consider within the longer overall (12-year) period of the Strategy. Meanwhile it is intended to create further heritage theme sections relating on villages and on historic landscapes, and a strengthened theme section on archaeology/hidden heritage, and the information provided will be considered for inclusion in these sections of the Strategy as applicable.</p>
--	---	--

Consultation Response Type	of sites of archaeological interest, but there's no mention of the Iwade Henge site recently identified (see: https://www.kentonline.co.uk/sittingbourne/news/iwade-neolithic-henge-uneearthed-22497/). There does not appear to be any mention of All Saints Church (grade I listed building) or Coleshall Farm (grade II listed) whilst we also consider that the local creeks (including the interesting history of Deadmans Island, Chetney Hill and Stangate Creek) and associated heritage walk routes should get greater emphasis.	Summary of SBC Response
Parish and Town Councils (continued)	<p style="text-align: center;">Summary of issues raised</p> <p>141. Milstead PC: We feel that the Strategy is very useful and that its value will grow with a process of continual local involvement. In this regard, its considered that SBC should contact all parishes individually in order to resource local knowledge and to identify possible places of heritage interest – some of which are known to older residents, but not necessarily newcomers to the area. A particular concern is whether any consideration is given to supporting the amenities in small villages, such as pubs, shops and village halls.</p> <p>142. Newington PC: The 5 priorities set out in the Strategy are considered appropriate, but we believe that the area to the south of Keycol Hill should also be included, given its significant WWI heritage, which is really unique.</p> <p>143. Newington PC: We consider that the principle behind the Action Plan items is appropriate, but are concerned that leaving the planned review of the Newington Parish Conservation Areas until 2022/23 may be too late with development proposals affecting transport and air quality damage to the area – so more urgent consideration is needed.</p> <p>144. Newington PC: We consider that SBC's stated desire to work with local groups, etc., in implementing heritage projects is entirely appropriate and would like to be actively involved with SBC with this type of work in Newington Parish. Newington History Group should also be involved.</p> <p>145. Rodmersham PC: We're concerned that Rodmersham Conservation Area has not been reviewed in a very long time, and would like this to now come forward as an action in the initial 3-year Strategy Action Plan.</p> <p>146. Rodmersham PC: We'd like to see the current conservation area boundary expanded to include other buildings/features, including St. Nicholas Church, Highsted Valley, Bargains Hill and Bottles Lane.</p> <p>147. Rodmersham PC: We're concerned that the ancient waterways in the parish are preserved, as they're of significant importance to the character of the area. We'd like to see the strategy encapsulate these natural but important historical watercourses, including the network of springs and ponds. The importance of chalk pits and woods (incl. Highsted Woods and the chalk pits at Cromers Road and Highsted Road – rich in Saxon history – should also be recognised.</p>	<p>141. SBC is committed to contacting all the parishes separately, and this will be done inter-alia, to help establish the work programme for the second Strategy Action Plan. In the meantime, it will be establishing contact with the parishes and associated local groups/societies it will be working with in carrying out the work streams identified in the initial 3-year Action Plan. Consideration is given to the issue of supporting rural amenities and whilst it has limited resources, it will be possible through a number of its work streams - Visitor Economy and Community Services – to continue to enable and facilitate to ensure that businesses and communities continue to thrive. Moving forward the Council's intention to continue to provide grant support will remain key to supporting successful project outcomes. Officers will work to include individual stakeholder comments in emerging action plans and there will be a much closer working relationship between Cabinet Members and officers across teams to ensure that actions are prioritised, and resources allocated proportionately</p> <p>142 & 143. SBC does not consider that the WWI heritage referred to is likely to be as significant as the heritage referenced in priority 4 of the Strategy. However, SBC accepts the arguments put forward for the early review of the Newington Parish Conservation Areas and so will bring the commencement of this review work forward to 2020/21. As part of this review work, the area south of Keycol Hill will be considered in terms of the measures needed to highlight, protect and manage the surviving WWI defence structures.</p> <p>144. Noted and acknowledged. SBC would be pleased to work with Newington Parish Council and the Newington History Group in taking the above-mentioned work forward, and in relation to any other future heritage related projects in the Newington area.</p> <p>145. SBC shares the Parish Council's concern in this respect, but unfortunately, there are many other conservation areas (CA's) in other parishes in the same position. SBC has needed to prioritise the review of those CA's on the at-risk register or facing harm to their heritage significance through substantial development pressure. It is considered that Rodmersham does not at present fall into either of those categories, but the concerns are noted, and it will be considered for the second Action Plan.</p> <p>146. This request will be given due consideration when the conservation area review takes place.</p> <p>147 & 148. SBC notes and acknowledges the points made. These will be referenced, as applicable, in the planned new themed section on historic landscapes and villages, and the strengthened section on archaeology/hidden heritage</p>

Consultation Response Type		Summary of SBC Response
<p>Government and other national advisory/regulatory bodies</p>	<p>148. The countryside all around Rodmersham is typical Kentish chalk downs, with a dry valley (a rare landscape feature), with ancient hedgerows and ancient coppiced woodlands, fruit orchards and open agricultural and rolling fields and valleys, which are an intrinsic part of the area's heritage and vital to the distinctiveness of the village, this history of which dates back to 700-800AD.</p> <p style="text-align: center;">Summary of issues raised</p> <p>Respondents in this category number 4 and consist of: The Forestry Commission, Historic England, Natural England and the Listed Property Owners Club.</p> <p>149. Forestry Commission: Confirm that it is not in a position to input into the consultation process for Local Plans. However sets out information (a summary of Government policy on ancient woodland) to assist SBC in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving SBC's renewable energy obligations.</p> <p>150. Historic England: Our overarching view is that the draft Strategy is a relatively good document of its type and compares well with other Kentish examples currently existing or in production. In our view, there are 3 headline issues the Strategy needs to address:</p> <ol style="list-style-type: none"> 1. A large number of conservation areas lacking fit for purpose character appraisals and management plans, 8 of which are on the current national at-risk register. 2. A concentration of heritage assets at Sheerness dockyard that are functionally redundant, highly significant (some internationally so) and some in increasingly poor condition such that they are on the current national at-risk register. 3. Development proposals for new housing which manifests itself in the shape of new settlements and/or as expansion of existing urban areas into previously Greenfield land. Such proposals raise issues for the setting of existing heritage assets but are probably most problematic for undesignated (and at present unrecognised) archaeological remains. The Strategy might have a role to support SBC's approach to handling such developments, with defined principles on assessing heritage impacts, guidance on appropriate scale/form of development. <p>151. Historic England: It is to SBC's members' credit that they are prioritising and ring fencing through the Strategy, increased expenditure on the historic environment, and we welcome this. However, Historic England would wish SBC to identify and prioritise the implementation of solutions for the nationally and internationally significant high grade and at risk heritage assets at Sheerness Dockyard. Whilst we recognise that SBC understand and reference the need for this, it is not in our view given sufficient weight and therefore an appropriate level of priority. Historic England would focus its contribution to achieving the aims and objectives of the Strategy in these areas, as an extension of our statutory and corporate functions. As such it is suggested that Priority 4 of the Strategy be amended to specifically reference the Sheerness Dockyard, and SBC needs to be willing to discuss with the dockyard owners (Peel Ports Group) the possibility of its statutory powers being used to secure the necessary conservation interventions. Historic England would support this approach, particularly if discussion</p>	<p>149. The information concerning the heritage and other values of ancient woodland are noted and the contribution that ancient woodland makes to the various types of historic landscapes and areas of archaeological interest will be referenced in changes to the Strategy. Fuller consideration of the value of ancient woodlands and hedgerows and other types of natural assets will be taken into account in SBC's planned Local Plan evidence based work around trees, woodland, orchards and hedgerows and 'Blue & Green Infrastructure' more generally.</p> <p>150. SBC notes and acknowledges the points made, and fully accepts that the headline issues highlighted are both key and challenging. The overall focus of the Strategy and associated Action Plan work programme has been specifically drawn up in the manner shown to try and address all three of these issues to some degree, although the clear focus is on the first and second issues. SBC is acutely aware of the vulnerability of non-designated (and at present unrecognised) heritage and is working closely with Kent County Council's Heritage Team to consider how such heritage might be more effectively safeguarded, including through increased awareness. Closely allied to this work stream is the commitment of SBC to develop a local list. This was previously planned to be developed as part of the second 3-year Action Plan, but SBC recognises the importance and urgency in bringing this work forward and developing it over a longer period in partnership with the parish and town councils, local amenity societies and Kent County Council, et al. SBC's considers the point made about setting out the approach to developments, etc., may be best handled as part of the impending review of the Local Plan and suite of development management policies, but further consideration on this matter will be undertaken, and if appropriate/practical, a new section in the Strategy may be included to this end.</p> <p>151. Noted and acknowledged. SBC's intention moving forward is to make specific reference to the Sheerness Dockyard buildings/structures re maritime heritage and also to the buildings/structures at Eastchurch in relation to aviation heritage, both in respect of Strategy priority 4. The related initial Action Plan item for the dockyard is sketchy at this point as Historic England will appreciate the limitations on detail that can go into that document, but action has already been taking to set in motion the initial dialogue with Peel Ports and other key parties to work towards a plan to secure the long term conservation of the highly significant historic buildings and structures at the dockyard, including the boat store and associated wet and dry dock structures. Peel Ports will be made aware of SBC's willingness to use the statutory powers available to it in the forthcoming meetings to which Historic England will also be invited to attend.</p> <p>152. SBC is aware of the weaknesses of the Strategy in this respect and is working closely with Kent County Council's Principal Archaeologist in addressing this, both within the body of text in the Strategy itself, but also as a related, subsequent topic paper which will be used to inform the policy or policies on archaeological matters in the Local Plan Review work already under way.</p>

Consultation Response Type	continues not to produce the required outcomes.	Summary of SBC Response
Government and other national advisory/regulatory bodies (continued)	<p>152. Historic England: The Strategy needs to articulate better how archaeological remains will be a part of it, and hence planning decisions, making the Strategy specific to Swale, and providing more guidance than the NPPF itself does. Where known and particularly if under threat, some archaeological assets should be considered for designation in order to provide clarity about national importance and hence future management, but these will always remain a minority. Responsibility for understanding, demonstrating and mitigating the harm to archaeological significance that major development cannot avoid, must rest with applicants, but the Strategy must reinforce how SBC expect such issues to be taken into account, and to provide it with the opportunity to act where harm is too great and/or unjustified.</p> <p style="text-align: center;">Summary of issues raised</p> <p>153. Historic England: We suggest a priority of the Strategy could be to more clearly reference reducing Heritage at Risk. Many of the actions in the Action Plan derive from at-risk related issues, but it is not explicit in the Strategy's priorities. In this same regard, we very much welcome the provision of SBC's local Heritage at Risk Register. This may need to encompass designated assets not currently included within the national Heritage at Risk Register (including grade II listed buildings) in order to provide a comprehensive picture of the condition of the heritage locally.</p> <p>154. Historic England: We welcome a review of the planning enforcement strategy and would strongly encourage SBC to update this to include enforcement related to the neglect (deliberate or otherwise) of heritage assets. An additional action for the Action Plan could be to raise awareness of the benefit of enforcement powers, provision of officer and member training (if required) and increased use of such powers to address heritage at risk issues (suggest ongoing from 2020).</p> <p>Note: A full copy of the detailed response from this key consultee is provided for reference in combination with this summary table of consultation responses.</p> <p>155. Natural England: No comment</p>	<p>153. Noted and acknowledged. Priority 2 in the Strategy will be redrafted to reflect this important point.</p>
Utilities and other infrastructure providers	<p>156. Listed Property Owners Club (LPOC): The Club applauds SBC for its proactive approach to heritage conservation through this strategy, very much understanding the difficulties facing Councils in doing so. The Swale Heritage Strategy is a good mechanism for tackling specific problems facing the area including Sheerness Dockyard and urban conservation areas including historic high streets. Offers up the opportunity for SBC to demonstrate proactive management of its heritage. LPOC is pleased that the strategy recognises the Club's contribution to heritage conservation and supports the high level vision and 5 priorities stemming from this. It would encourage SBC to properly resource the priorities in coming years so it has the greatest effect.</p>	<p>154. Noted and acknowledged. SBC is committed to carrying out this review by autumn 2020, and furthermore, it is anticipated that the Planning Enforcement Team will be appropriately strengthened (again, later this year) by an additional member of staff. The training needs of the team are members are reviewed annually as is the training for other SBC staff and members. A new section regarding the benefits of enforcement powers (in relation to heritage conservation) is planned to be inserted into the Strategy Chapter (4) on Positive Management and it is hoped to provide some positive examples of actual (or threats of) interventions in this respect as a recurring element in the triennial Action Plan monitoring reports, which will be available to view on the Swale Heritage Strategy website. SBC remains committed to continuing to explore the idea of utilising a capacity building grant from Historic England to fund a dedicated Heritage at Risk Officer for Swale.</p>
Kent County Council and other local advisory and regulatory bodies, including adjoining local authorities	<p>Respondents in this category number 2 and consist of: The National Grid and Southern Water, both of which simply confirm that they have no comment.</p> <p>Respondents in this category number 4 and consist of: Ashford Borough Council, Kent County Council, Kent Downs AONB Unit and the Medway & Swale Estuary Partnership.</p>	<p>155. No change necessary to strategy documents.</p> <p>156. Noted and acknowledged, in particular the reference to the proper resourcing of the strategy in coming years. Changes will be made to the text in the relevant section of the strategy to reflect this important message. Changes will also be made to acknowledge the role of the club as the secretariat to the All Party Parliamentary Group on Listed Properties.</p>
		<p>157. No change necessary to strategy documents.</p>
		<p>158. Noted and acknowledged, and in particular, SBC will be working to draw out the wider meaning/value of heritage to communities beyond national designations, in the re-drafting of the Strategy document.</p>

Consultation Response Type	Summary of SBC Response	
Kent County Council and other local advisory and regulatory bodies, including adjoining local authorities (continued)	<p>157. Ashford Borough Council: No comment.</p> <p>158. Kent County Council, Environment, Planning & Enforcement Team (KCC): The author of the response from this KCC Team has experience of working on other heritage strategies across the county, and confirms that in his experience, there is no prescribed formula for them. That they do however need to be based on a sound evidence base that describes in summary what is characteristic and distinctive in the area's heritage and how significant it, and its assets are. The use of the thematic approach in the asset review is welcome in that respect. However, it is important to understand that significance could be expressed in terms of what it means to communities as well as its place in terms of designation and regional and national interests.</p> <p style="text-align: center;">Summary of issues raised</p> <p>159. Kent County Council: The Strategy should consider the condition and the vulnerability of the heritage and what management is needed to care for it for the future. It should also very clearly set out the many benefits and real value of the historic environment to challenge the perception that heritage is all about constraint on change. The strategy should identify issues, strengths and weaknesses identify the main stakeholders who will help deliver it, whilst a vision, aims, priorities and an action plan should all form part of the strategy.</p> <p>160. Kent County Council: SBC's Strategy does include each of these elements, though in places, the structure is difficult to follow the trail or thread through. However, the evidence base (set out in the separate Asset Review) focuses on the designated heritage and we consider that more should be made of the undesignated heritage, which is an important, and the major part of the Borough's heritage. Also, whilst there is a natural weighting towards the built heritage of the Borough, further consideration is needed of its archaeology and landscape, which we would be pleased to assist you with in drawing out.</p> <p>161. Kent County Council: A detailed set of comments on the different sections of the Strategy is provided (note: this it too lengthy to set out in this consultation response table)</p> <p>Note: A full copy of the detailed response from this key consultee is provided for reference in combination with this summary table of consultation responses.</p> <p>162. Kent Downs AONB Unit: The Meads Henge was a very significant archaeological find (2nd confirmed wood henge in Kent) made by Canterbury Archaeological Trust, giving further insight into the ancient history of the Borough. We're also involved with the commissioning of archaeological investigations at Perry Wood in Selling (owned by SBC) where the hilltop earthwork has been confirmed as a significant iron-age encampment, looking out over the Swale. This also offers rich and significant insights into the ancient history of the area.</p> <p>163. Kent Downs AONB Unit: Regarding the history of the landscape, the Downland part of the Borough is particularly characterised by management of ancient woodland as well as grassland and for horticulture. Noted that fruit growing was referred to but not specifically orchards. Whilst the scarp slope of the Downs is often thought to be typified by a network of dry valleys, the natural springs and water resources were a clear part of</p>	<p>159. Noted and acknowledged. There is simply so much heritage in Swale Borough that it would not be practical to set out this type of information in the strategy in any level of details for all of the current designated heritage assets, let along the non-designated ones. However, consideration will be given to setting out information in more generic terms about vulnerabilities and opportunities for each of the heritage theme areas akin to the approach used in the Dover Heritage Strategy. This combined with the (to be) annually updated local Heritage at Risk Register will help to provide both the bigger and the more detailed picture, especially as the development of the local list starts to take shape, and this can also be factored in.</p> <p>160. Noted and acknowledged. SBC welcomes and very much appreciates the offer of assistance in redrafting the section of the Strategy on archaeology and linking it appropriately to a new theme section on historic landscapes. The point made re striking a better balance in the Strategy between designated and non-designated heritage is well-made and following earlier informal discussions on this and the Strategy more generally the structure of the document will be re-drafted in places to better reflect this more appropriate balance.</p> <p>161. SBC acknowledges and thanks KCC for the significant time and trouble taken to provide this detailed commentary, which it will carefully take into account and action as appropriate in the necessary redrafting of the Strategy and supporting documents.</p> <p>162. Noted and acknowledged. The useful information provided will be incorporated into the re-drafted archaeological/hidden heritage and/or proposed historic landscape theme sections of the Strategy. Both structures will be carefully considered for scheduling or local listing in liaison with Kent County Council and Historic England, and put forward as appropriate.</p> <p>163. Noted and acknowledged. The useful information provided will be incorporated into the proposed historic landscape theme sections of the Strategy.</p> <p>164. Corrections noted and actioned. The question over the Beowulf reference to a Tonge location will be examined further and altered if appropriate.</p>

Consultation Response Type	the history of areas such as Painters Forstal. Water extraction has made a bid difference to this part of the landscape e.g. there was once a grand boating lake at Lorenden Park.	Summary of SBC Response
<p data-bbox="166 338 507 495">Local businesses/landowners, or companies with local business/property interests</p>	<p data-bbox="507 306 1605 432">164. Medway & Swale Estuary Partnership: Minor corrections pointed out for 2 different sections of the Strategy. Mention is also made to the reference in the Strategy concerning the question of whether Tonge can be considered a notable location in relation to the epic Old English Poem, Beowulf.</p> <p data-bbox="884 621 1228 653" style="text-align: center;">Summary of issues raised</p> <p data-bbox="507 747 1605 873">Respondents in this category number 10 and consist of: D.S. Smith Paper Division (Kemsley), Duchy of Cornwall, Fenrose Ltd, Frogna Farmhouse, G.H. Dean & Co. Ltd, Green Cube CIC, Niaux Ltd, Peel Ports Group, Shepherd Neame Ltd and Swan Quay LLP.</p> <p data-bbox="507 905 1605 1125">165. D.S. Smith: Some inaccuracies highlighted concerning the history of Kemsley Mill and its founders. The paper mill is starting to work in its centenary and we are continuing to gather in as much evidence about the mill and village as possible, which can be scanned at high resolution. We now have the two WWII plaques removed from what is now the Appleyard mounted next to our Visitors Centre. Kemsley village should be included in reference to important C20 buildings. We have much information on the village and the social welfare approach used by Frank Lloyd.</p> <p data-bbox="507 1157 1605 1472">166. Duchy of Cornwall: The Duchy owns land southeast of Faversham and is engaging with SBC through a Planning Performance Agreement to develop proposals for part of the land in question between the M2 and A2 for a mixed use sustainable urban extension, for which an Enquiry by Design and a conceptual masterplan has been provided. The Enquiry process identified Faversham's history as a key feature of the town's identity, greatly valued by local people. The emerging design proposal therefore aims to positively manage the effects of growth on the town's identity and function, as referenced in the Strategy and through the Enquiry. Specifically, heritage assets within and near to the proposed development area (including the Faversham-next-Preston Conservation Area) have informed the conceptual masterplan.</p> <p data-bbox="507 1503 1605 1692">167. Duchy of Cornwall: The draft Strategy's principles are consistent with the Duchy's approach to building new communities, most notably the role of heritage in enhancing local distinctiveness and place making, and there are considered to be significant opportunities in this respect. The SE Faversham Draft Housing Manual produced by the Duchy following the Enquiry provides a baseline for ensuring that the proposal displays an appropriate level of contextual sensitivity.</p> <p data-bbox="507 1724 1605 1902">168. Duchy of Cornwall: The Faversham-next-Preston CA is relatively close to the proposed SE Faversham mixed use development area, and it is noted that the Strategy references the review of this conservation area in the initial Action Plan. The Duchy requests that this conservation area should not be extended further east along the A2. Such a larger area was not considered to be warranted when it was designated, and nothing appears to have changed materially. Any possible extension of the existing CA</p>	<p data-bbox="1605 464 2775 527">165. Corrections to relevant Strategy section actioned. Other points noted for future reference in relation to planned/anticipated action plan items.</p> <p data-bbox="1605 716 1991 747">166. Noted and acknowledged.</p> <p data-bbox="1605 1062 1991 1094">167. Noted and acknowledged.</p> <p data-bbox="1605 1283 2775 1503">168. Noted and acknowledged. As acknowledged in relation to the Faversham Society response, the review of the Faversham Conservation Areas will be brought forward to help inform the neighbourhood plan work for the town already under way. SBC will necessarily review the boundaries of both conservation areas as a key part of this work. Based on current knowledge of the Faversham-next-Preston Conservation Area, it is not anticipated that the boundary will be materially changed, but notwithstanding the point made, this cannot of course be ruled out.</p> <p data-bbox="1605 1598 2775 1850">169. Noted and acknowledged. SBC appreciates the point made concerning the monitoring process, but considers that a more wide-ranging triennial Action Plan report combined with an annual update to the (publicly available) Local Heritage at Risk Register is sufficient, particularly bearing in mind the limited staff resources it has to carry out the wide range of ongoing and planned heritage related work. Annual updating of the at-risk register will serve to inform if any additional resources need to be obtained, and SBC is also committed to exploring the use of existing software packages to help relevant staff more easily monitor and record changes to, and the condition of all the Borough's statutory listed buildings and structures.</p>

Consultation Response Type	Summary of SBC Response	
Local businesses/landowners, or companies with local business/property interests (continued)	<p>boundary further east than Salters Lane would tend to constrain the improvement of the environment which is inherent in the Duchy's intentions for the SE Faversham mixed use development.</p> <p>169. Fenrose: Fenrose has an interest in land at Hempstead Lane, Bapchild, which adjoins the Tonge Conservation Area. In principle, we support the publication of the draft Strategy which inter-alia seeks to address heritage at risk, with the local register at appendix 2 being useful for this purpose. Fenrose believes the proposed 3-year review period to monitor the outcomes is too long and that an annual update should be undertaken to monitor progress – especially in relation to buildings which are in a particular state of repair – such an approach would be consistent with SBC's annual budget setting processes and enable resources to be allocated if necessary.</p> <p style="text-align: center;">Summary of issues raised</p> <p>170. Fenrose. Fenrose notes the intention for an early review of the Tonge Conservation Area and the reasons for this, but whilst we are generally supportive of this, we would question whether the possibility of extending the country park (and by implication the conservation area) is relevant to such a review. Fenrose considers that the extension of the conservation area to include what is at present arable land either side of the stream (over which there is no public access) would devalue the concept of conservation. Had this land been of value to the setting and appreciation of Tonge Mill and the associated cluster of historic buildings, it would no doubt have been included when the conservation area was designated in 1987.</p> <p>171. Frogna Farmhouse: We think the 5 Strategy priorities are good, but would suggest a 6th, namely Enable, and have set out some examples for proposed actions in this respect e.g. raising awareness of the Kent location database for Film & TV production companies with encouragement to sign up. Also, the executive summary, when read alone, does not do justice to the work undertaken to create the Strategy. We suggest adding additional text under the following headings: Scope & Scale (of challenge); Benefits (what are the key benefits?); Risks (what are the risks if we don't follow the Strategy?). Consideration could be given to simplifying this information and consolidating it as a one page summary e.g. in the form of a table. It is also suggested that the Strategy acknowledges key individuals who prepared/reviewed material and the principal sponsor. Suggested corrections are also put forward in relation to the reference in the Strategy to Frogna Farmhouse.</p> <p>172. G.H.Dean: We are the owner of Radfield House, referenced in Appendix 2 of the Strategy, i.e. the Local Heritage at Risk Register. G.H. Dean takes no issue with the inclusion of Radfield House, but does raise concern with the annotation used in relation to the photograph of the building on page 52. It is considered that the phrasing used is not objective, particularly in comparison to the annotation used in relation to other photographs of heritage at risk in the main Strategy document. G.H. Dean suggests the following annotation be used instead: 'Radfield House – Teynham – at risk grade II listed building'.</p> <p>173. G.H. Dean: We do not object to the classification for the condition/trajectory of the</p>	<p>170. Noted and acknowledged. SBC is not setting out with the purpose to extend the Tonge CA. Merely to review it and put in place a management strategy/plan to help managed and safeguard the heritage value of the conservation area for the foreseeable future. It is however a standard requirement of any conservation area review to consider whether existing boundaries are appropriate, so SBC will of course be looking at this element. To help celebrate the Thomas Becket anniversary in 2020/21, SBC plans to have in place a better understanding of the history and surviving heritage (built and natural) for this area and a management plan that will allow SBC to improve and better manage the special qualities of the area. This might include the provision of some new/replacement interpretation measures and the creation of a heritage trail. Consultation would take place with interested parties, including Fenrose and the Parish Council in developing and agreeing the final form of the Conservation Area Character Appraisal & Management Plan.</p> <p>171. SBC note and acknowledge the points put forward. We think there is significant merit in all of the suggestions put forward (notably the 6th, enabling priority idea) and we are looking at how the Strategy documents might best be re-draft to take these on board. The suggested corrections concerning the reference to Frogna Farmhouse have been actioned.</p> <p>172. SBC note and acknowledge the point raised and consider on reflection that the wording used in relation to the image was not sufficiently objective. The alternative wording suggested will therefore be used in relation to this image, although the text in the body of the Strategy not related to any specific property may be altered to reinforce SBC's aim to tackle heritage at risk issues regardless of ownership, as there is a perception in some quarters that SBC is not willing to take on large business interests that are not willing to work with it in addressing identified heritage at risk concerns. This is a perception that SBC need, and are determined to change if the overall vision and derived priorities of the Strategy are to be taken seriously and supported by a wider audience.</p> <p>173. Noted and acknowledged, and SBC confirm that it would welcome dialogue in this respect to work towards a sustainable conservation solution for Radfield House. SBC will contact Hume Planning to this end, to arrange a meeting, and thanks G.H. Dean for noting and highlighting the referenced minor errors in the Strategy, which have been duly corrected.</p> <p>174. SBC consulted both the Swale area MP's on its draft Heritage Strategy. Whilst neither responded, it is nevertheless hoped that both will support the Strategy in general terms. SBC has long worked with community groups (big and small) to support a wide range of community initiatives (heritage-related) and otherwise, and is committed to doing so in spite of the ongoing cuts to local government funding which make this enabling work increasingly difficult.</p>

<p>Consultation Response Type</p> <p>Local businesses/landowners, or companies with local business/property interests (continued)</p>	<p>building as set out in the draft local register, but would like it to be noted that we have instructed Hume Planning to assess the different options for the site and the listed building. We would welcome dialogue with SBC and suggest that it would be appropriate to use the term 'Discussions ongoing' in the note section for the heritage at risk entry for Radfield House. Minor errors to page 9 and 52 of the main Strategy document are also pointed out.</p> <p>174. Green Cube: Please lobby central government and hopefully our local MP's will support this initiative by SBC. Valuable historic assets are being lost through too much bureaucracy, which wastes time that many old building do not have. In particular, please lobby on behalf of smaller community groups – for Heritage Lottery and Historic England, etc., to consider more alternative uses for buildings when funding bids are submitted – not just give money to the larger portfolio holders or big glossy projects.</p> <p style="text-align: center;">Summary of issues raised</p> <p>175. Green Cube: Please also enforce the Strategy aims. Landlords, Parish Councils, community groups and local and county councils need to be held responsible both financially and morally for the upkeep of buildings and land. Currently, many organisations flout their obligations in this respect or do not know enough about their assets or legal/community obligations.</p> <p>176. Green Cube: The Strategy is very welcome as so much of Swale's heritage has been lost, and continues to be, seemingly through neglect. Particularly in relation to high street heritage buildings, there appears to be no incentive for owners to repair/restore these buildings to encourage new tenants, so many become/stay empty. Ultimately this could lead to the loss of such buildings. This is probably a central government issue, but if listed buildings could be brought in line with non-listed buildings with just a 3-month business rate free period, perhaps it would encourage the owners to at least carry out sufficient repairs and maintenance to make it attractive to tenants. This would also generate more revenue for SBC and perhaps bring more business back to the high street.</p> <p>177. Niaxo: We are currently engaged with organisations incl. Historic England and UNESCO around exploring the building of applications (apps) for collecting and exploiting heritage data for better use in various areas, notably law enforcement, education and volunteer engagement. There are aspects of the Strategy which are interesting in terms of where Niaxo's interests lie, especially in some of the data collection and exploitation parts of the proposed Action Plan. Niaxo would like to engage with SBC to see if there is any way it might contribute to helping achieve Strategy aims. One thing Niaxo is looking to do is to make available more widely the geospatial representations of cultural heritage to more people, and it would be really exciting to implement this work locally.</p> <p>178. Peel Ports: Peel maintains a positive commitment to continue to collaboratively work with SBC and other key stakeholders with regards to heritage in Swale. As an ISPS (international shipping port-facility security) zoned operational Port, there is difficulty in the reconciling of heritage assets with this working dock and maintaining safe working practices in accordance with Health & Safety, but we are open to further</p>	<p style="text-align: center;">Summary of SBC Response</p> <p>175. SBC under its new administration is determined to do so, and planned changes to the resourcing of, and range of focuses for its Planning Enforcement Team will better enable it to do so. The publication of the Strategy, and further planned changes to it prior to adoption combined with an improved level and clarity of information of SBC's website should make land/property owners more aware of their obligations from a heritage conservation and related amenity perspective. SBC will also be seeking to set a good example in the stewardship of the heritage assets in its ownership or management responsibility as far as its limited budget allows, taking into account all the other services it provides for residents and local businesses, etc.</p> <p>176. Such a change would require a change in legislation nationally, which SBC is not aware has been considered/discussed at the national level. SBC essentially agrees with the sentiment here in that empty rate charges would potentially make landlords of listed buildings more pro-active, where they could be put into commercial use. However, SBC consider it likely that such a move could well have significant, potentially unintended consequences on a range of listed buildings where there is more limited prospect of that happening. As such, where there is deterioration in a property's condition, addressing this would principally be down to SBC's Planning Service through the use of planning enforcement powers.</p> <p>177. Agreed that it would be useful to establish contact and see if there is scope for any partnership working between SBC and Niaxo on any heritage related projects. As a key principle of the Strategy, SBC is keen to work in partnership with stakeholders, including companies with local connections, so it will therefore establish contact to see what opportunities might exist in this respect. No change necessary to strategy documents in relation to this response.</p> <p>178. SBC notes and acknowledges the commitment by Peel Ports expressed here, to continue dialogue. However the poor and deteriorating condition of the listed Sheerness dockyard buildings combined with their high level of heritage significance and potential for shared and wider benefits through a heritage-led regeneration of the area in question from SBC's perspective means that this longstanding issue/concern cannot be allowed to drift any longer. It is therefore hoped that Peel Ports Group will be willing to engage urgently and effectively with SBC, Historic England and other key stakeholders in finding a sustainable solution for the Dockyard buildings (some of which are of international heritage significance), and viewing this important work as an opportunity for the port, the town of Sheerness and indeed the wider Borough.</p> <p style="text-align: center;">Summary of SBC Response</p>
--	---	---

<p>Consultation Response Type</p> <p>Local businesses/landowners, or companies with local business/property interests (continued)</p>	<p>discussions with SBC to develop a strategy regarding the Port Zone. As SBC may recall, the Sheerness Port Masterplan does have aspirations for a Heritage areas, which we are happy to discuss.</p> <p style="text-align: center;">Summary of issues raised</p> <p>179. Shepherd Neame: The company has read the comments in the Strategy made in respect of the Faversham Brewery site, and it welcome the positive dialogue that has been established over the past few years regarding its refurbishment plans for brewery buildings/site curtilages along North Lane. However, Shepherd Neame nevertheless remains concerned about the over-use of conservation areas/Article 4 Directions and local listings within Faversham and the Borough in general. It considers that these can have a negative impact on its ability to remain responsive to the constantly changing commercial needs of running a successful pub, restaurant and hotel operation. In particular the company would strongly advocate an urgent review of the Faversham area conservation areas, and whether the areas covered by these designations can still be justified. In parallel, the extent and coverage of any Article 4 Directions should be reviewed to check whether the removal of Permitted Development rights can still be justified. A full review of the economic consequences of applying Article 4 Directions would be a useful adjunct to any review process.</p> <p>180. Shepherd Neame: As a rule, the company would resist the preparation of any local list of buildings (non-designated heritage assets) on the grounds that such designations add a further layering of the planning process which cannot often be justified in architectural, aesthetic or historical terms. Once again, this can have a negative effect on the efficient operation of its asset base. Instead, the NPPF 2019, paragraph 197 provides sufficient policy protection in its own right regarding the protection of non-designated heritage assets. In view of the company being a major business operation within the Borough with many property and landholdings which would be affected by the Strategy, Shepherd Neame would be happy to continue to engage with the Council to ensure that the right balance is struck over the protection of the historic environment.</p> <p>181. Swan Quay: The Quay is referred to on page 57 of the Strategy where reference is made to SBC working with Historic England and Kent County Council to add buildings of high heritage value to the national list. The quay has already been inspected by</p>	<p>179. SBC notes the concerns raised, but would state that as a guiding principle, heritage designations are provided and used to ensure that change is managed sensitively – not to prevent development taking place. SBC is fully aware that development can be positive and in some cases result in change which better reveals heritage significance. It remains committed to working with Shepherd Neame so that the company can thrive, but in such a way that the wider interests of the town, including visual and residential amenity and heritage value/interest are not unacceptably compromised in the process. The planned review of the Faversham Conservations will be brought forward and the areas covered by the designation and the boundaries will be re-appraised as part of this process (as will the parallel Article 4 Direction), but this is primarily to enable the this review work to help in form the Faversham Neighbourhood Plan work which is already underway. It is not anticipated that the review will result in any shrinking of the conservation areas in question nor the associated Article 4 controls. The Article 4 Directions both in Faversham and elsewhere in the Borough are however principally focussed on residential properties as these are the types of buildings that even within conservation areas, have a wide range of permitted development rights, and the scope to carry out changes which can have a negative effect on individual buildings and the wider scene is therefore significant. Impacts on limiting individual freedoms to develop properties are balanced against wider amenity (including conservation/heritage) considerations, but it must be recognised that the additional costs that Article 4 controls can give rise to for individual property owners must be viewed in the context of evidence that shows typically higher property values in well-managed conserved historic areas, as well as the wider benefits to the town and local economy from a visitor economy and outside investment perspective.</p> <p>180. Shepherd Neame is the only respondent to have expressed this view. Local lists are now quite well established across a growing number of local authorities, and indeed there was a ministerial announcement on this very matter at the end of 2019 effectively pushing those authorities that don't already have one, to get on with developing one. SBC is therefore committed to developing such a list, and in view of the other feedback to the Strategy (reinforcing the value of non-statutory designated heritage at the local level), is planning to bring this forward as a work stream item in the initial 3-year Action Plan. It should be noted though that any properties proposed for such a list would be subject to consultation, including with the relevant property owner(s) and those with a relevant interest (e.g leaseholders).</p> <p>181. (as per response to response points 57 and 111) Noted and acknowledged. However, the reference in the Strategy will remain as this merely reflects suggestions made by interested parties in relation to the 2018 stakeholder survey. SBC will not pursue a listing review of the site, but as part of a review of the Faversham Conservation Area, will examine the potential of this site taking into account its heritage interest and the policies (general and site specific) set out in the Swale Local Plan, and the Faversham Creek Neighbourhood Plan</p>
--	---	--

	<p>Historic England, with one building at Swan Quay already grade II listed as a result. Reasons are put forward to illustrate why any further listing would likely be inappropriate and unrealistic, and in view of this, it is requested that the specific reference to Swan Quay be removed from the Strategy on the grounds that a greater level of protection afforded by national listing is unwarranted and unnecessary.</p>	
--	---	--