

Sustainability Appraisal (SA) of the Swale Local Plan Review

Interim SA Report
Non-technical Summary

January 2021

Quality information

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Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Local Plan Review (LPR). Once in place, the LPR will establish a spatial strategy for growth over the period 2022 to 2038, building on the adopted Local Plan (2017), which covers the period 2014 to 2031. The LPR will allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.

Central to the SA process is preparation of an SA Report for publication alongside the Draft Plan; however, at the current time an *Interim* SA Report presents targeted information to inform decision-making on the part of Swale Borough's elected councillors. This report is the Non-technical Summary (NTS) of the Interim SA Report.

This Interim SA Report / NTS

This Interim SA Report presents an appraisal of alternative growth scenarios for Swale Borough, i.e. alternative spatial approaches to providing for new homes through the LPR.

This Interim SA Report is structured so as to answer three questions in turn:

1) What has plan-making / SA involved **up to this point**?

- Establishing growth scenarios

2) What are the SA findings **at this stage**?

- Appraising growth scenarios

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives, as well as an underpinning understanding of key issues, as established through evidence-gathering including consultation on a Scoping Report in 2018.¹

Taken together, this understanding of key topics, objectives and issues indicates the parameters of SA, and provides a methodological 'framework' for appraisal. A list of the topics and underpinning objectives is presented in Table 3.1 of the main report. In summary, the following topics form the back-bone to the framework:

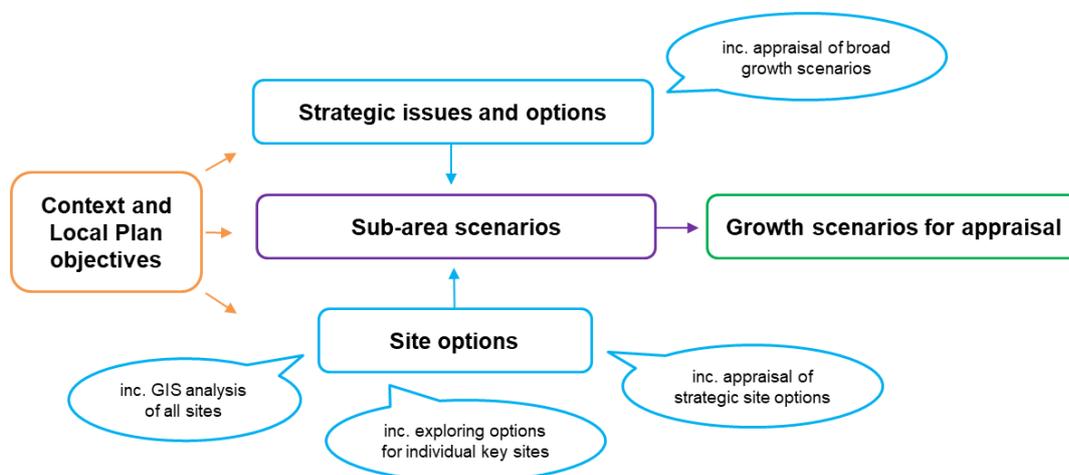
- Air quality
- Biodiversity
- Climate change mitigation
- Communities
- Economy and employment
- Flood risk
- Heritage
- Housing
- Land
- Landscape
- Transport
- Water

¹ The Scoping Report is available at: swale.gov.uk/planning-and-regeneration/local-plans/local-plan-review/local-plan-review

Plan-making / SA up to this point

The aim here is to explain a process that led to establishment of the growth scenarios that are a focus of appraisal at the current time. Figure A presents a summary of the process.

Figure A: Establishing growth scenarios – process overview



Context and Local Plan objectives

A large amount of work has been completed by the Council since commencing the LPR process in 2017. This includes: a consultation entitled Looking Ahead; publication of a Garden Communities Prospectus and subsequent detailed work to explore the four garden community options submitted by developers for consideration; an ongoing process of engagement with key stakeholder organisations; and completion of a wide range of evidence studies.

The evidence generated has fed into work to establish growth scenarios, both directly and indirectly, in the sense that evidence has informed the establishment of LPR objectives which, in turn, are an important starting point for the establishment of growth scenarios. Any growth scenario that would self-evidently not align with the LPR objectives can be deemed 'unreasonable', and not considered further.

Strategic issues and options

Discussion in this section of the report (Section 5) is split under two headings:

- **Quanta (how much?)** – there is strong evidence that the LPR must provide for Local Housing Need (LHN), as understood from the Government's Standard Methodology (as set out in the Planning Practice Guidance, as updated in December 2020), which is 1038 dwellings per annum. However, there is also a need to consider the risk (albeit small) of the LPR needing to provide for higher growth in order to meet unmet housing needs arising from West Kent, where there are constraints to growth (in particular Green Belt and AONB), pressures in respect of unmet needs arising from London and emerging Local Plans facing challenges.
- **Broad distribution (where?)** – firstly, there is a need to note that a wide range of evidence-base studies have been prepared of relevance to the matter of how new development (both housing and employment), should be distributed across Swale Borough, and important evidence was also gathered through the Looking Ahead consultation (2018). Appendix II of the main report presents a review.

Secondly, an important consideration is the spatial strategy reflected in the adopted Local Plan, as broadly rolling this forward is an option for the LPR. The question of whether to depart from the adopted Local Plan spatial strategy, and if so to what extent, was explored through consideration of *broad* growth scenarios in July 2020, and an appraisal of the broad growth scenarios is presented in Appendix III of the main report.

Ultimately, the conclusion reached is that there are strong arguments for focusing LPR growth at the Faversham area, as a counter-balance to the strategy in the adopted Local Plan (this is known as Broad Growth Scenario C, and elected members provided a 'steer' in support of this approach in mid-2020) and, as part of this, there is support for strategic growth at Faversham. However, in the view of Council officers (in discussion with AECOM) there is also a need to remain open to the option of a more balanced distribution of LPR growth, and the possibility of two strategic growth locations, specifically one at Faversham and another at Sittingbourne.

Site options

A large number of site options have been submitted to the Council by land-owners and developers, and a process of Strategic Housing Land Availability Assessment (SHLAA) has been completed by the Council in order to identify a shortlist of sites that are available, deliverable and potentially suitable for allocation. The SHLAA provides an important input to the process of establishing growth scenarios (i.e. alternative packages of sites).

Within Swale Borough, as within other local authority areas, there is an important distinction to be made between strategic and non-strategic sites. Strategic sites are those with a housing capacity above circa 1,000 homes and which will be associated with economies of scale that can enable delivery of a good mix of uses (e.g. retail and employment as well as a good mix of homes) and enable delivery of new or upgraded infrastructure (e.g. new road infrastructure, community infrastructure, green infrastructure).

Section 6 of the main report considers strategic and non-strategic site options in turn. In summary:

- **Strategic site options** – four strategic site (or ‘garden community’) options were submitted to the Council following publication of the Prospectus in 2018. These have been examined in detail since that time,² and Appendix IV of the main report presents a comparative appraisal. In light of the appraisal, Council officers (in discussion with AECOM) concluded that: one of the options is quite clearly not suitable for allocation through the LPR, namely North Street, which would involve a new settlement to the south of Faversham; another option can be ruled-out on balance, albeit recognising that the scheme could deliver transformation benefits in terms of employment land and transport infrastructure, namely Southeast Sittingbourne; and the other two options should be taken forward for detailed consideration through the appraisal of growth scenarios, namely East / southeast of Faversham and Bobbing. Further discussion is presented in Section 6.2 of the main report.

N.B. there is also the question of site-specific options (i.e. options for specific sites), for example alternative site ‘red line boundaries’ and alternative conceptual masterplans. See Section 6.2 of the main report.

- **Non-strategic site options** – the SHLAA is the main vehicle for considering the merits of non-strategic sites in isolation; however, a supplementary piece of analysis has been completed, with the findings presented within Appendix V of the main report. Specifically, Appendix V presents the findings of a quantitative GIS-based exercise, which has involved examining the spatial relationship (i.e. proximity to / percentage intersect) between all SHLAA sites and a range of constraint (e.g. flood zones, designated heritage assets) and opportunity (e.g. GP surgeries) features for which data is available in digitally mapped form across the Borough as a whole. The analysis does not aim to rule sites in/out, but simply aims to provide information to supplement the SHLAA, and inform consideration of site options within each of the Borough’s sub-areas in turn (see below).

Sub-area scenarios

Having gone through a process of building ‘top down’ (quanta and broad distribution) and ‘bottom-up’ (strategic and non-strategic site options) understanding, the next step was to draw understanding together to establish growth scenarios for each of the Borough’s sub-areas in turn. This is the focus of Section 7 within the main report.

There is no set way of dividing the Borough into sub-areas; however, for the purposes of the task at hand, it was considered appropriate to explore growth scenarios for: Sittingbourne; Faversham; West Sheppey; Teynham; Newington; Eastchurch; Leysdown; Boughton; Iwade; and Tier 5 settlements and the rural area.

For each sub-area the aim is to arrive at a conclusion on the sub-area growth scenarios that should be taken forward to Section 8 of the main report, where the final step in the overall process (as summarised in Figure A) sees the sub-area growth scenarios combined into a single set of borough-wide growth scenarios.

As a further point on methodology, it is important to note that this work was undertaken subsequent to a decision on an emerging preferred growth scenario by the Swale Borough Cabinet on 28th October 2020 (as informed by the Local Plan Panel steer of 8th October). As such, the emerging preferred growth scenario for each sub-area was taken as a starting-point.

In summary, the decision was to take forward the emerging preferred scenario plus:

- one or more **higher growth** scenarios for Sittingbourne, Newington, Eastchurch and Leysdown; and
- one or more **lower growth** scenarios for Faversham, West Sheppey and Teynham.

Table A presents a summary.

² See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

Table A: Summary of sub-area scenarios (number of homes; emerging preferred scenario highlighted)

Sub-area	Sub-area scenarios taken forward to Section 8		
Sittingbourne	850	1,350	3,350
Faversham	1,000	3,400	-
West Sheppey	0	650	850
Teynham	0	350	1,100
Newington	0	200	-
Eastchurch	0	65	-
Leysdown	0	100	-
Boughton	20	-	-
Iwade	0	-	-
Tier 5 settlements	90	-	-

Growth scenarios for appraisal

The final task was to draw together the understanding generated in order to arrive at a single set of reasonable borough-wide growth scenarios for the LPR. In practice, this meant exploring ways of combining the **sub-area scenarios**, also mindful of housing supply from **commitments** (i.e. sites with planning permission and/or an allocation in the adopted Local Plan that are expected to deliver in the LPR plan period, i.e. post April 2022) and **windfall** sites (i.e. sites that are neither an existing commitment nor an LPR allocation).

There are many potential combinations of the sub-area scenarios; however, it is possible to immediately rule out those combinations that would deliver too few or too many homes. When seeking to understand the number of homes that must be delivered through the sub-area scenarios in combination, there is a need to take into account not only the total number of homes needed in the plan period, but also supply from commitments (11,000 homes), supply from windfall sites (1,530 homes) and the need for a supply buffer of at least 10%. On this basis, there is a need for combinations of sub-area scenarios to deliver **at least 5,740 homes**.³

Section 8 of the main report goes through a process of considering ways to combine the sub-area scenarios in order to deliver *at least* 5,740 homes, concluding that there are five reasonable growth scenarios – see Table B, Table C and the subsequent maps.

Table B: Summary of the reasonable scenarios

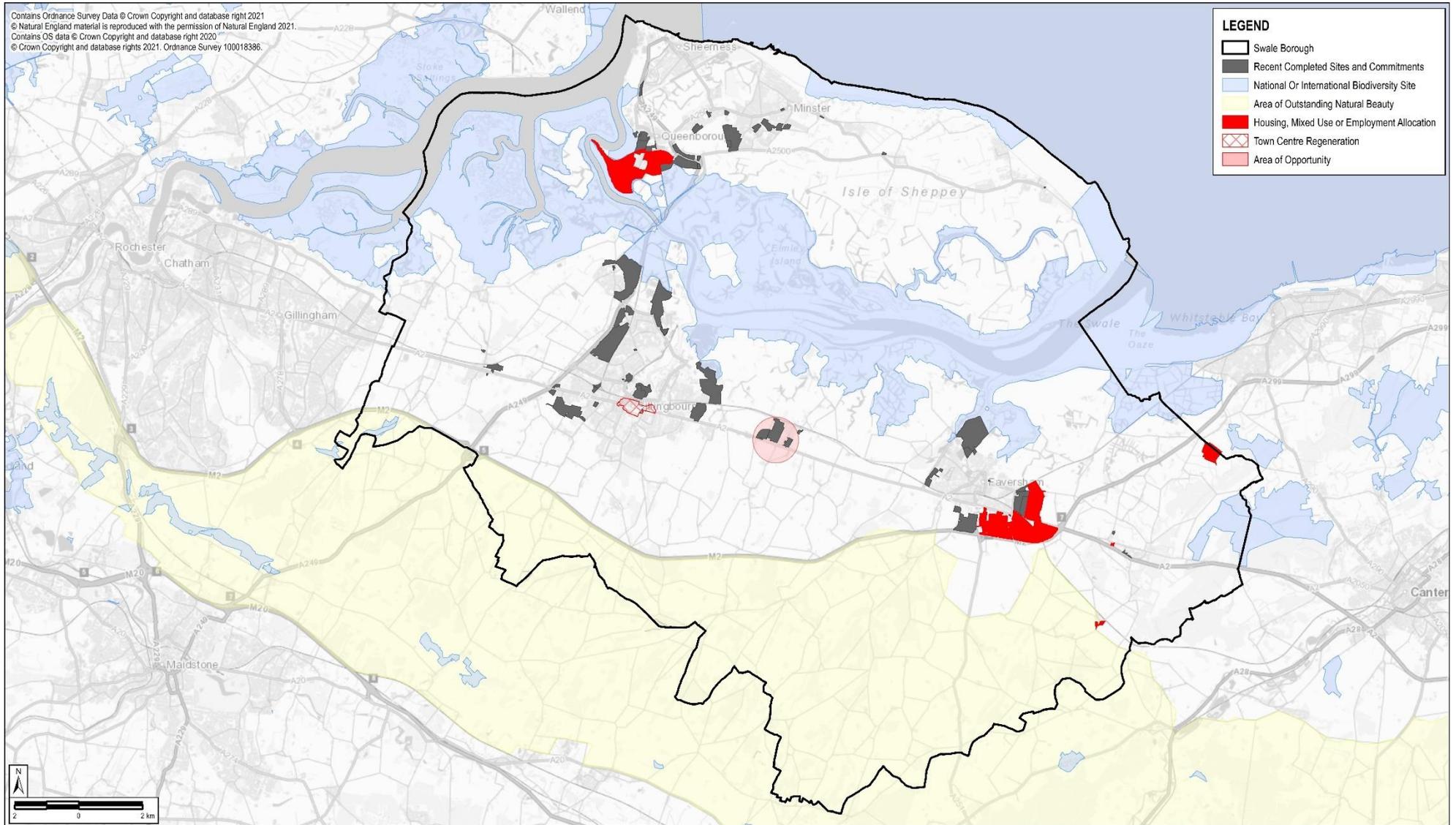
Scenario	Description	Total homes
1	The emerging preferred growth scenario	18,840
2	Scenario 1 but with higher growth at Sittingbourne (Bobbing) / lower at Faversham	18,940
3	Scenario 1 but with lower risk urban extensions (UEs) in place of higher risk	18,755
4	Both strategic growth locations; lower growth scenarios elsewhere	19,390
5	Scenario 1 plus lower risk urban extensions (UEs)	20,355

³ Calculated as: LHN (1,038 dpa x 16 years = c.16,600) + 10% buffer (1,660) – completions (11,000) – windfall (1,530)

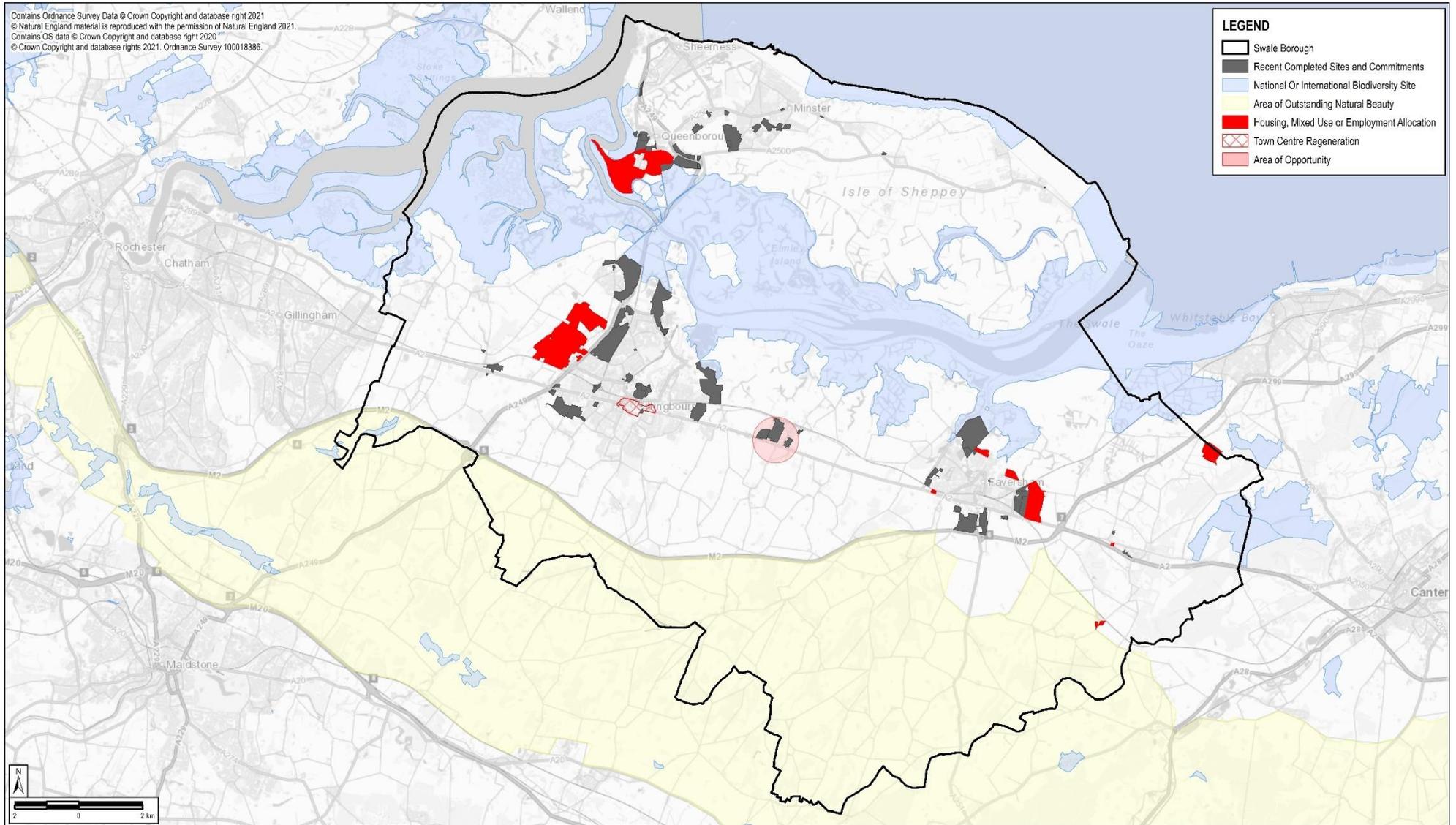
Table C: The reasonable growth scenarios (with constant elements of supply greyed-out)

Growth scenario		1	2	3	4	5	
Source of housing supply		Preferred scenario	Bobbing Faversham UEs	E/SE Faversham Low risk UEs	E/SE Faversham Bobbing	Preferred scenario Low risk UEs	
Commitments		11,000	11,000	11,000	11,000	11,000	
Windfall		1,530	1,530	1,530	1,530	1,530	
Allocations	Sittingbourne	Town centre	850	850	850	850	
		Urban extensions	-	-	500	-	500
		Garden comm (Bobbing)	-	2,500	-	2,500	-
	Faversham	Urban extensions	-	1,000	-	-	-
		Garden comm (E/SE)	3,400	-	3,400	3,400	3,400
	West Sheppey	Sheerness	-	-	-	-	-
		Minster / Halfway	-	-	650	-	650
		Q'borough / Rushenden	850	850	-	-	850
	Tier 4 settlements	Teynham	1,100	1,100	350	-	1,100
		Newington	-	-	200	-	200
		Eastchurch	-	-	65	-	65
		Leysdown	-	-	100	-	100
		Boughton	20	20	20	20	20
		Iwade	-	-	-	-	-
	Tier 5 settlements	Neames Forstal	90	90	90	90	90
Elsewhere		-	-	-	-	-	
Total homes in the plan period (2022-2038)		18,840	18,940	18,755	19,390	20,355	
Total homes per annum		1178	1184	1172	1212	1272	
% supply buffer above LHN (1038 per annum)		13%	14%	13%	17%	23%	
					Provide for LHN	Provide for higher growth (unmet needs)	
					Possibly provide for higher growth	Provide for higher growth (unmet needs)	

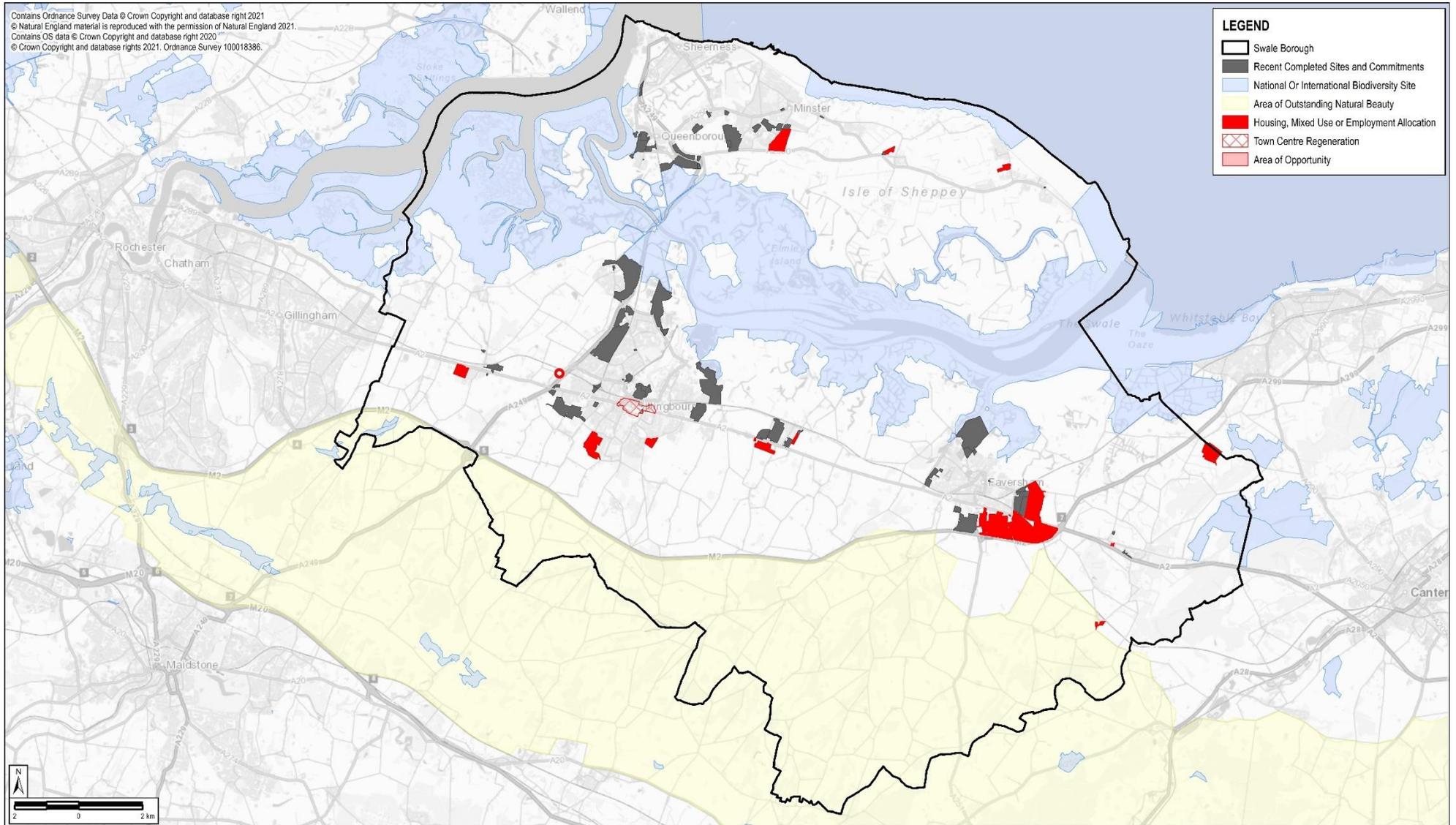
Scenario 1: The emerging preferred scenario



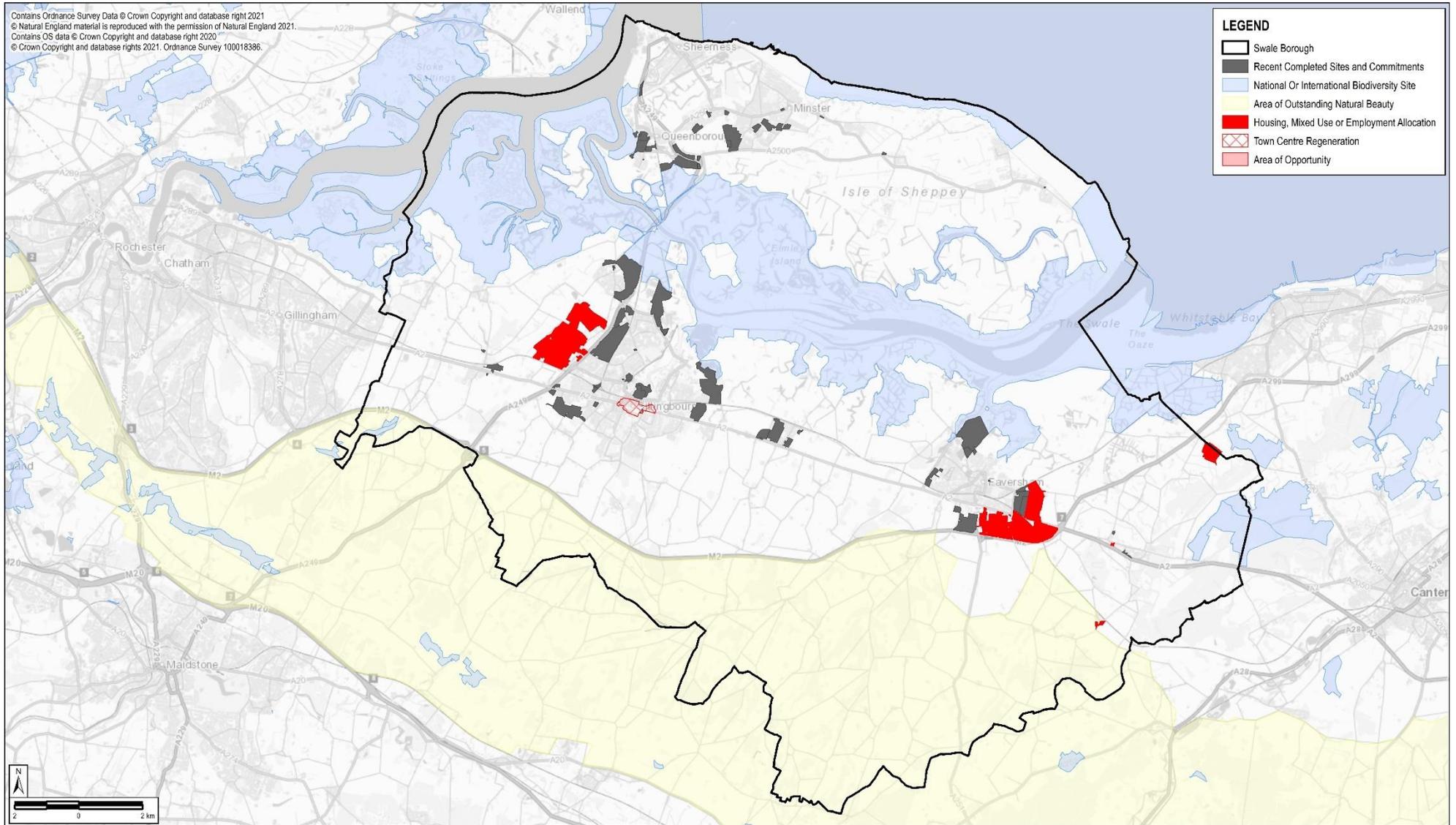
Scenario 2: Scenario 1 but with higher growth at Sittingbourne (Bobbing) / lower at Faversham



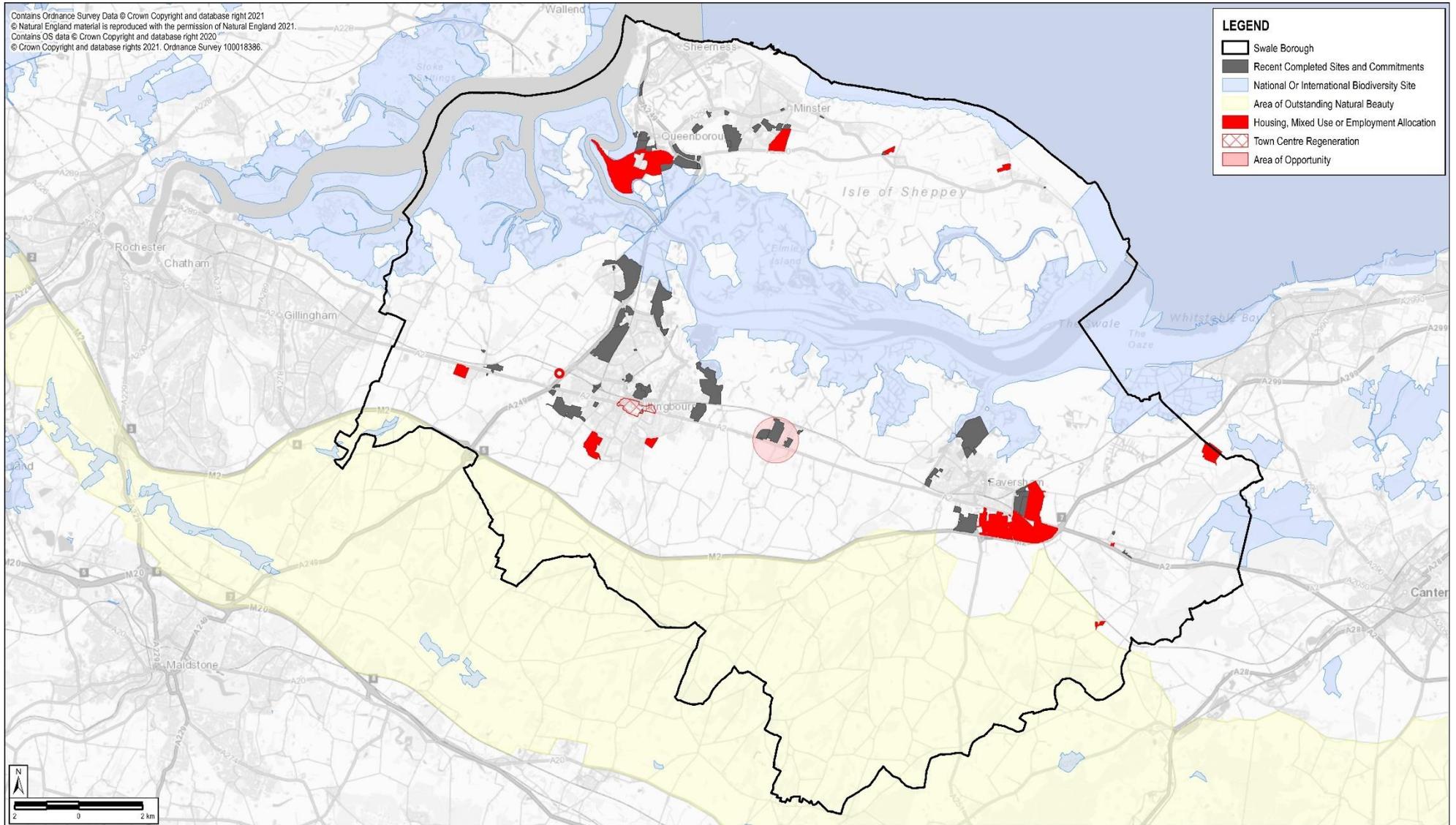
Scenario 3: Scenario 1 but with lower risk urban extensions (UEs) in place of higher risk



Scenario 4: Both strategic growth locations; lower growth scenarios elsewhere



Scenario 5: Scenario 1 plus lower risk UEs



SA findings at this stage

Part 2 of the Interim SA Report presents an appraisal of the five reasonable growth scenarios in respect of the established SA framework. It also presents a statement prepared by officers, in response to the appraisal.

Appraisal of the reasonable growth scenarios

Summary appraisal findings are presented in Table D. Within each row of the table, the performance of each of the growth scenarios is categorised in terms of significant effects (using red / amber / light green / green)⁴ and the scenarios are also ranked in order of preference (where 1 is judged best).

Table D: Summary appraisal of the reasonable growth scenarios

Scenario	Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario 5 Preferred scenario Low risk UEs
SA topic	Rank of preference and categorisation of effects				
Air quality	1	3	2	2	4
Biodiversity	2	3	1	1	2
Climate change mitigation	1	2	2	1	2
Communities	1	3	3	3	2
Economy & employment	1	3	4	4	2
Flood risk	2	2	1	1	2
Heritage	2	3	3	1	3
Housing	4	3	2	3	1
Land	1	1	1	2	3
Landscape	2	3	3	1	4
Transport	1	2	2	2	3
Water	1	1	2	1	3

⁴ Red indicates a significant negative effect; amber a negative effect that is of note but with limited or uncertain significance; light green a positive that is of note but with limited or uncertain significance; and green a significant positive effect.

Overall appraisal conclusions

It is immediately apparent that Scenarios 1 (the emerging preferred scenario) and 4 (two strategic growth locations) perform well in a number of respects, as indicated by the number of stars and green scores assigned (particularly Scenario 1) and the relatively low number of red scores assigned (particularly Scenario 4).

However, it does not necessarily follow that it is a straightforward choice between Scenarios 1 and 4, when deciding which is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to housing objectives, which could mean favouring Scenario 5.

Having made these opening remarks, the following bullet points summarise the performance of the broad growth scenarios in respect of each element of the SA framework in turn:

- **Air quality** – higher growth is not supported given air quality constraints affecting Swale (and neighbouring authorities), particularly along the A2 corridor and along the B2006 in Sittingbourne. Scenario 1 performs well because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns. With regards to significant effects, it is appropriate to flag a notable degree of risk under all scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period; however, air quality is currently a priority issue for the Council.
- **Biodiversity** - Scenarios 3 and 4 are judged to perform best, as allocation of site SLA18/113 at Rushenden would be avoided (albeit it is recognised that detailed work is underway to understand the potential to avoid and mitigate biodiversity concerns associated with the site, and HRA work has concluded no likelihood of significant adverse effects to the SPA). Scenario 2 performs poorly, on the basis that strategic growth to the east and southeast of Faversham is judged to be preferable to strategic growth at Bobbing. With regards to significant effects, it is appropriate to flag a notable degree of risk in respect of the three worst performing scenarios. It is recognised that the best performing scenarios (Scenarios 3 and 4) could lead to significant positive effects, particularly given the potential for strategic growth locations to support achievement of biodiversity net gain; however, there is no certainty at the current time, given the available evidence.
- **Climate change mitigation** – whilst it is challenging to differentiate the scenarios, on balance Scenarios 1 (the emerging preferred scenario) and 4 (two strategic growth locations) are judged to be best performing. Scenario 1 may be preferable from a transport emissions perspective, whilst Scenario 4 may be preferable from a built environment emissions perspective. With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect on the baseline, with the fact that there is a highly ambitious local net zero target in place. On balance, it is considered appropriate to flag a concern with all scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor influencing spatial strategy, site selection and development of site-specific proposals.
- **Communities** - Scenario 1 is judged to perform most strongly, as strategic growth at Faversham would deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including an up-to-date masterplan. Scenarios 2 to 4 perform poorly, as there would either be problematic piecemeal expansion at Faversham (Scenario 2) or a missed opportunity at Queenborough/Rushenden (Scenarios 3 and 4). There is also a concern regarding growth locations in combination impacting on existing community infrastructure capacity under Scenario 5. With regards to the significance of effects, it is appropriate to highlight Scenario 1 as performing significantly better than the other scenarios. Scenario 1 is clearly designed to ensure that housing growth brings with it community benefits. The only stand-out concern is in respect of the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. The other scenarios would all lead to mixed effects.
- **Economy and employment** - Scenario 1 performs most strongly given the assumed employment land supply at the proposed mixed use allocations, albeit there is some uncertainty. Relative to Scenario 1: Scenarios 2 and 4 perform less well, as there would be a loss of 10 ha of employment land at either Faversham or Rushenden, with the resulting shortfall only partly addressed by strategic growth at Bobbing; and Scenario 3 performs least well, because there would be a loss of 10ha of supply at Rushenden (also potentially some missed opportunity at Teynham). With regards to significant effects, it is appropriate to flag a degree of risk under all scenarios, and predict that the worst performing scenario would lead to significant negative effects. These conclusions are reached in light of the headline targets set out in the Employment

Land Review (ELR, 2018), albeit certain ELR targets are a range and require careful interpretation. It is also important to consider that the national and regional situation may have moved-on somewhat since the ELR.

- **Flood risk** - the key consideration is in respect of site SLA18/113 at Rushenden. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/Rushenden; however, at the current time it is appropriate to 'flag' a significant risk.
- **Heritage** - Scenario 4 performs best as it would involve a focus at two strategic growth locations with limited historic environment sensitivity. Scenario 1 also performs well on a similar basis, i.e. there would be a focus of growth at strategic sites; however, there is a concern around constraints at Teynham being a barrier to strategic growth. Scenarios 2, 3 and 5 perform poorly as there would be a need to allocate a number of urban and village extensions with historic environment sensitivities. With regard to significant effects, it is appropriate to take a precautionary approach, and flag a notable degree of risk under Scenario 1, and the strong possibility of significant negative effects under Scenarios 2, 3 and 5.
- **Housing** - it is appropriate to highlight Scenario 5 as best performing, as it is a higher growth scenario comprising a good mix of sites. Scenario 3 also performs well, as there would be a good mix of sites, including sites assumed to be associated with relatively low delivery risk, and certain sites thought likely to be able to deliver early in the plan period. Scenarios 2 and 4 are joint third best performing. Focusing on Scenario 4, whilst there would be a major reliance on strategic sites (with associated delivery risk), there would be a 17% supply buffer (also, both strategic sites are proposing to deliver 40% affordable housing). Finally, Scenario 1 performs least well, as the scenario associated with both a lower supply buffer and a focus on sites with delivery risks. With regards to significant effects, it is certainly fair to highlight Scenario 5 as representing a highly proactive approach to responding to delivery challenges and risks. Housing needs could be met under the other scenarios, although there is a degree of uncertainty in respect of Scenario 1.
- **Landscape** - Scenario 4 is judged to perform best. Scenario 1 performs second best, although there are concerns associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Scenarios 2 and 3 are judged to perform on a par, with certain of the urban/village extensions in question giving rise to a degree of concern. Scenario 5 gives rise to a concern, as a higher growth option, although the effect could be to prevent a situation whereby there is a need to accept windfall development in sensitive locations and/or the effect could be to reduce pressure for growth in sensitive locations in neighbouring authorities. With regards to significant effects, it is appropriate to flag a risk under all but the best performing scenario, including on the basis of the need to allocate at least one site within a locally designated landscape.
- **Transport** - Scenario 1 is judged to perform best, followed by those scenarios involving strategic growth at Bobbing and then Scenario 3, which would involve more dispersed growth. Scenario 5 (higher growth) is judged to perform least well, although there could be some potential for growth locations along shared transport corridors (e.g. the Lower Road on the Isle of Sheppey) to pool funding to deliver strategic transport upgrades, for example junction upgrades, cycle routes and improved bus services. With regards to significant effects, emerging transport modelling work is serving to suggest that Scenario 1 will not lead to severe impacts on the strategic road network, but it is appropriate to flag a degree of risk for the other scenarios, and flag a particular risk under Scenario 5, given known constraints in the west of the Borough.
- **Water** - there would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events (breaches of discharge permits); however, it is not possible to highlight concerns with any particular sites, or parts of the Borough, on the basis of the available evidence. It is therefore appropriate to flag a concern with Scenario 5, as a higher growth scenario, and also Scenario 3 which involves a degree of dispersal to locations distant from a WwTW. It is not possible to predict significant negative effects, because there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth; however, given the uncertainties at the current time, it is appropriate to flag a degree of risk under all growth scenarios. It will be for the Environment Agency to comment further.

Officers response to the appraisal

As discussed, it is not the role of the appraisal to arrive at a conclusion on which of reasonable growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. The following statement explains officers' reasons for supporting Growth Scenario 1, in-light of the appraisal:

Scenario 1 is judged to perform well overall in that it aligns well with a range of priority objectives, and whilst there are clear tensions and challenges, it is not possible to envisage an alternative strategy that would perform better overall. The appraisal serves to highlight Scenario 4 as potentially having a degree of overall merit, however the view of officers is that a strategy involving two garden communities would involve a high degree of delivery risk, and it is important to note that when the elected councillors of the Local Plan Panel considered broad growth scenarios on 30th July 2020 there was no support for a strategy involving two garden communities.

The appraisal highlights several stand-out risks; however, it is important to note that the appraisal is undertaken largely blind to the policy framework within the LPR that will guide delivery. In this light, officers do not judge any of the highlighted risks and drawbacks to be unacceptable ('showstoppers'). Taking key matters in turn:

- Biodiversity – the proposed policy is seeking to accord with best practice nationally, and biodiversity net gain is being prioritised as one of the key 'policy asks' of developers;
- Flood risk - latest understanding is that there is good potential to reduce risk to an acceptable level through masterplanning and design measures, and there is a need to support growth at Queenborough and Rushenden if long standing regeneration objectives are to be realised;
- Heritage – the Council's heritage specialists have been closely engaged as part of the spatial strategy, site selection and policy writing process, and there is scope for further strengthening of policy if necessary;
- Housing – the evidence suggests the proposed supply can meet needs, and whilst there are inevitably risks, these need to be balanced against a desire not to over-allocate, with resulting issues and impacts.
- Landscape – a key concern relates to growth at Rushenden; however, there is confidence in the potential to address concerns through masterplanning and design.

Next Steps

Publication of the Proposed Submission LPR and SA Report

The aim of this Interim SA Report is to inform a decision on whether to publish the LPR for consultation, under Regulation 19 of the Local Planning Regulations. Should a decision be made to publish the LPR, then there will be a need to prepare the SA Report for publication alongside the LPR. Table E explains the information that will be presented in the SA Report, in comparison to the information presented in this Interim SA Report.

Table E: Structure and information presented within this Interim SA Report versus the forthcoming SA Report

Part	Question	This Interim SA Report	The SA Report
1	What has plan-making / SA involved up to this point?	Establish growth scenarios	Establish and appraise growth scenarios
2	What are the SA findings at this stage?	Appraise growth scenarios	Appraise the LPR
3	Next steps?	Finalise and publish the LPR	Submission and examination

Submission, examination and adoption

Once the period for representations on the Proposed Submission LPR / SA Report has finished, the main issues raised will be identified and summarised, and a decision made regarding whether the plan is considered 'sound'. Assuming that the LPR is considered to be sound, it will then be submitted to Government, alongside the summary of issues raised through consultation and other supporting documentation, including the SA Report.

An examination in public will then be held, overseen by one or more appointed Planning Inspectors. The Inspector(s) will consider whether the plan is legally compliant and sound, in light of the available evidence, including representations received at the Regulations 19 stage, the SA Report and (in all likelihood) further evidence gathered through hearings. The Inspector(s) will then either report back on the Plan's soundness or identify the need for modifications. If there is a need for modifications these will be prepared and then subjected to consultation, alongside SA if necessary.

Once found to be 'sound' the LPR will be adopted by the Council. At the time of adoption a 'Statement' must be published that explains the 'story' of plan-making / SA and sets out 'the measures decided concerning monitoring'.

Monitoring

The SA Report must present 'measures envisaged concerning monitoring', albeit mindful that decisions on monitoring must be taken by Swale Borough Council (the last Authority Monitoring Report was published in 2017).

At the current time it is too early to make any firm recommendations in respect of areas for monitoring / potential monitoring indicators; however, it is fair to highlight that monitoring efforts could potentially focus on:

- Emerging proposals at all LPR growth locations, ahead of planning applications, with a view to ensuring that proposals reflect strategic priorities, including in respect of:
 - the declared climate emergency and the urgent need to decarbonise ahead of the 2030 net zero target;
 - the declared local ecological emergency and the aims of the Environment Bill, including in respect of taking a strategic approach to nature recovery and environmental net gain.
- Air quality at key locations likely to see increased traffic due to LPR growth – again, monitoring in the short term could serve to inform forthcoming planning applications at LPR growth locations;
- Employment land requirements – given that the Employment Land Review is now over two years old, and the regional and national economic context and baseline situation will have evolved since that time;
- Flood risk – the Council might report annually on the number of homes in flood risk zones;
- Housing – there is a need to closely monitor affordable housing delivery, including tenure split;
- Water – ongoing consideration should be given to any risk of capacity breaches.