



AGENDA

LOCAL PLAN PANEL MEETING

Date: Monday, 29 October 2018

Time: 7.00pm

Venue: Council Chamber, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Membership:

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

Quorum = 3

Pages

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(a) in the event of the alarm sounding, everybody must leave the building via the nearest safe available exit and gather at the Assembly points at the far side of the Car Park. Nobody must leave the assembly point until everybody can be accounted for and nobody must return to the building until the Chairman has informed them that it is safe to do so; and

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2. Apologies for Absence and Confirmation of Substitutes

3. Minutes

To approve the [Minutes](#) of the Meeting held on 20 September 2018 (Minute Nos. 221 - 227) as a correct record.

4. Declarations of Interest

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

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

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

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

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

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

Part A Reports for Recommendation to Cabinet

- | | | |
|----|---|-----------|
| 5. | Responses to 'Looking Ahead' consultation | 1 - 224 |
| 6. | Revised National Planning Policy Framework and implications for the Swale adopted Local Plan and the emerging Local Plan review | 225 - 270 |

Issued on Friday, 19 October 2018

The reports included in Part I of this agenda can be made available in **alternative formats**. For further information about this service, or to arrange for special facilities to be provided at the meeting, **please contact DEMOCRATIC SERVICES on 01795 417330**. To find out more about the work of the Local Plan Panel, please visit www.swale.gov.uk

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

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Local Plan Panel Meeting	
Meeting Date	29 October 2018
Report Title	Responses to 'Looking Ahead' consultation
Cabinet Member	Cllr Gerry Lewin, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Gill Harris
Key Decision	No
Classification	Open
Recommendations	That the Panel note the report, provide the steers to officers as appropriate and listed at paragraph 3.1 and recommend to Cabinet that these are agreed.

1 Purpose of Report and Executive Summary

- 1.1 The document '*Looking Ahead*' was published to provide a consultation opportunity to help scope the content for the next Local Plan. The consultation was responded to by 283 parties, making a total of 3,308 responses. An accompanying quick questionnaire was responded to by 481 respondents including 30 responses from schools. In addition to the set options responses to the 11 QQ questions, a further 1,781 free text comments were submitted.
- 1.2 The purpose of this report is to:
- 1) Report back the responses made to both the consultation itself and the quick questionnaires, together with the outcomes of a series of workshops held.
 - 2) Highlight the main issues raised via the consultation and how they will be taken forward to the next stage of the Local Plan process.
 - 3) Seek a steer from Members on a number of key questions posed by the consultation.

2 Background

- 2.1 The document '*Looking Ahead*' (LA) was agreed by Panel on 28 March and subsequently published for a 6-week consultation that ran from 27 April to 11 June 2018. It was also supported by quick questionnaires (QQ). Their purpose was to provide a consultation opportunity to help scope the content for the next Local Plan and to also help establish community priorities across a range of planning matters.
- 2.2 Letters were sent to some 2,000 individuals and organisations on the Council's planning policy data base. The consultation material was made available online (the website and consultation portal), via a limited number of hard copies and through Council offices and local libraries. Press coverage and social media assisted the consultation. It was necessary for the Council to amend the consultation format to ensure that the consultation was framed in a way to be

compliant with the requirements of the General Data Protection Regulations (GDPR) which looked at what information was necessary for the completion of the consultation, how questions could be framed and how data was to be collected and stored, including obtaining appropriate consents for the publication of personal data and permissions to retain their details for future consultation exercises.

- 2.3 LA sought views on 46 questions ranging from the national and local challenges facing the economy, housing, infrastructure, climate change, transport and the environment. It also began to explore some of the issues around the possible settlement strategy for the next Local Plan. It posed questions about a new Local Plan vision, what the alternative approaches to distributing development should be and, specifically, whether the Council should be considering new settlements.
- 2.4 As a wide-ranging document, LA was intended for audiences including local communities, planning professionals, developers and statutory consultees. Recognising that not all would have the time or inclination to address all the matters being canvassed, a quick priority setting questionnaire (QQ), aimed principally at residents, was also made available. Overall the QQs were intended to allow more instant reactions to issues and contained 11 questions, with opportunities to input free text. It also asked some GDPR compliant general questions about the respondent, but was anonymous. Officers also targeted the QQ at local schools via the Council's Youth Forum.
- 2.5 To support the consultation, five invitee only technical workshop/discussions were held, attended by representatives from a range of organisations. Notes of these workshops are included in Appendix IIIa-d.
- Developer/landowners: 27 April 2018. This coincided with the launch of the Council's *New Garden Communities Prospectus*, but the event was also used to consider the approach to meeting future development needs in the Borough and how such issues as improving delivery of housing and infrastructure could be tackled.
 - Infrastructure and utilities: 12 June 2018 and attended by 11 services and organisations, including most of the principal infrastructure providers. This considered the big infrastructure issues affecting future growth, but also took the opportunity to look at the initial expressions of interest made to the Council's *New Garden Communities Prospectus*.
 - Natural Environment: 22 June 2018 and attended by 15 organisations, including most of the principal environmental organisations. This considered the main natural environmental challenges ahead for the Local Plan, but again, also took the opportunity to look at the initial expressions of interest made to the Council's *New Garden Communities Prospectus*.
 - Heritage and Culture: 28 June 2018 and attended by 11 organisations, including Historic England. This considered the main challenges to the historic environment, but also its links with tourism and culture, as well as culture and tourism issues generally.
 - Rural Communities: 4 July 2018 and attended by 9 organisations, including CPRE, and Action with Communities in Rural Kent as well as English Rural Housing Association. This considered the main issues affecting the future of rural communities and also considered their role in meeting future development needs.
- 2.6 The consultation itself conformed to the Council's Statement of Community Involvement. Whilst some Members had expressed concern at the proposed anonymity of the QQ a similar approach was used in the early stages of the last Local Plan and they are effective at this stage where a lack of personal information is not particularly essential. The requirement under GDPR that only information necessary for the performance of the task is collected resulted in a decision being made to only collect post code details. Whilst some Members and consultees

were unhappy with this change, this type of consultation is fairly typical, and can be preferred by respondents.

- 2.7 For the *LA* consultation itself, it was more possible, with some considerable pre-publication work, to embed the GDPR requirements. However, in reporting back the representations within the schedules attached to this report and in the Members Room, it has been necessary to withhold personal details, in the case of private individuals, even in cases where they may have consented to have them displayed. This is because the online 'Objective' system currently only has the ability to turn on or off the details in totality rather than for each individual respondent. Therefore, individuals are simply known by their ID number, although the names of organisations can and have been displayed. 'Objective' is working to change this in future to allow those who opt in or out to be displayed as appropriate.
- 2.8 At the heart of the concern about the anonymity of the *QQ* was its possible manipulation, particularly from developers. However, this has been checked and no evidence of misuse of the system in this way has been found and the content of the results would bear this out.
- 2.9 The *QQ*, with its use of ranked choices within each question enables 'Objective' (if that is wished) to 'smooth' out the effects of co-ordinated responses. This is because whilst people may all choose the same first choice, they rarely all pick the same 2nd, 3rd, 4th and so on. 'Objective' applies scoring to the numbers of persons selecting each choice made, so as well as looking at the top answer to a given question (Top Preference at Appendix II), the Panel is able to also look at the 'Overall Preference Scoring' at the end of each question. This can sometimes give a more rounded picture that considers every preference and the number of people who selected each. In most cases, this makes little difference to the outcome shown under 'Top Preference', but for some questions 'Overall Preference Scoring' can bring out nuances that can be considered.

Discussion of the representations

- 2.10 Full copies of all the representations to both *LA* and the *QQs* are available in the Members Room. Three Appendices are included within this report:
- 1) A summary of the responses received to each of the questions in *LA*, together with a summary of the further actions needing to be carried forward (Appendix I).
 - 2) 'Pie Chart' reports of the responses to the *QQs*, together with a compiled summary of the main issues raised in free text boxes (Appendix II).
 - 3) Attendance and meeting notes of the four workshops held to support the consultation (Appendix IIIa-d).
- 2.11 The main covering report is structured as follows:
1. Discussion on the overall nature/character of the comments made.
 2. Commentary on the characteristics of the responders themselves (i.e. type, location, age, etc.).
 3. 'Headline' comments highlights.
 4. Consideration of the *LA* questions themselves, with reference to the *QQs* and workshop responses as appropriate. Overall themes are picked out in the answers to the question, together with key points that the Council will need to take forward. For some questions, the Panel are asked to give a specific direction to officers on the way forward. However, in many cases it will be premature to do so, given that evidence gathering is still at a relatively early stage.

The overall nature and character of the comments

- 2.12 The *LA* consultation was responded to by 283 parties, making a total of 3308 responses. 460 QQ were returned, plus 30 questionnaires which were tailored to local schools. There will of course have been parties who responded to both consultation opportunities.
- 2.13 Many have engaged with the questions as they were intended, although frustration has emerged in the responses particularly with the national housing targets and the impotency of the Council to change them; issues arising from the Bearing Fruits Plan; and poor overall levels of trust in the Council, consultants and developers.

Who responded?

- 2.14 For *LA*, some 64 respondents out of the total of 283 filled out the Equalities section of the questions, but not all of the questions were answered. Consequently, only a fairly basic range of information has been extracted. Some 50% of those responding were in the 61-74 years age group, with 30% aged 45-60; and a further 16% aged 25-44. There was a fairly equal split between men and women. 90% of respondents were married and all were English. 80% were abled bodied. Of the people responding to these issues 75% were from the ME9 postcode area; and 20% from ME10, so a considerable focus on Sittingbourne end of the Borough. Less than 1% of people answering this section were from the Faversham postcode area.
- 2.15 In the case of the QQ, responses are split roughly 50:50 between those below and those above 60, but with those from the 60-74 age group forming the largest and those below 30 and over 75 the smallest. The stereo typical responder appears, on the face of it, likely to be a person who is employed or retired and a home owner. They are also likely to be White, British and living in the wider Sittingbourne area. Some 90% of the question responses were from residents, with the remainder made up of (in descending order) businesses, developers, groups, visitors and 'other'.
- 2.16 In terms of the overall levels of response for both *LA* and the QQs, clearly there is a significant majority of the population of Swale whose opinions are entirely absent. This is partly due to the nature of this stage in plan preparation where parties do not tend to get involved until there is something more definite and possibly site(s) specific which the Council itself is seeking views on. There is also the historic problem of the general inability nationally for the local planning process to engage wider communities beyond the so-called usual suspects. This is not to say that the silent majority do not share the views of those who have made comments; it's just simply the case that planning consultations frequently do not reach them to enable this to be determined one way or the other. On a positive note, response levels are greater for the *LA* campaign than at the equivalent stage for *Bearing Fruits*.
- 2.17 In the case of the QQ for schools, the low level of response was not helped by the timing of the consultation (at the end of the school year) and thus its outcomes need to bear this in mind. However, this questionnaire does bring out nuances from the different age profile of those responding to the main QQ and these are highlighted in the report as appropriate.
- 2.18 Given the relatively moderate level of overall responses, is there a criticism that can be levelled at the consultation arrangements themselves or the consultation documents? – there are a small number of responses who highlight this. Concerns relate to the online portal not working or the *LA* questions being too complicated and/or too time consuming. Some parties repeat difficulties that they have heard from someone else, but overall, the level of responses suggest little to support the view that people just gave up due to difficulties.
- 2.19 It was never the case that all 46 *LA* questions were compulsory for all to answer and the QQ gave the opportunity for those who did not have the time to engage in a different way. It is

always possible to word questions more simply, but a certain amount of technical language is inevitable. Whilst some may have not understood some questions, the overall level of responses clearly shows that there were many more that did engage. Equally, the vast majority of people used 'Objective' without difficulty. As always with Local Plan consultations, emailed responses and ordinary letters received within the consultation period were perfectly acceptable as well.

- 2.20 There were though some sporadic technical issues with 'Objective', but these were quickly resolved by admin staff, whilst some related to the usual problems of forgotten passwords. The most serious issue was a temporary glitch that caused 'Objective' to lose saved draft responses. In this case, a modest extension in time was given to the consultation and for those who were having more serious difficulties, they were allowed to email in their comments where they could be added manually by SBC after the consultation closed.

The 'big' themes

- 2.21 The following is a digest of the 'big' themes from all the consultation responses. It comes as no real surprise that the biggest issue is housing – how much and where it should go. In the case of LA, residents, amenity groups and Parish Council's, form the clear majority, with a strong Sittingbourne based emphasis. These parties believe that growth has gone too far and that the social and environmental implications, particularly for infrastructure/services (esp. health and roads) and, notably, food production and wildlife, are unacceptable. Specific proposals (not part of the consultation) come in for particular criticism. If development is to be contemplated, then other parts of the Borough are generally suggested from the location of the commentator, but with a strong belief that only brownfield land with higher density should be used. Many have found it difficult to move beyond their fundamental concerns about housing numbers to engage meaningfully with the other questions posed by LA. Although similar concerns may be widespread, a more nuanced view is present in some representations. Such individuals are more likely to pose the question that if growth is to come, what will it offer and look like?
- 2.22 Developers are more likely to engage with wider questions, but, again, it is no surprise that they take the view that the Government's housing numbers represent the minimum. It can also be seen that the individual developer's response reflects their own particular site portfolio and, as a result, most advocate a variety of strategy responses to ensure that all the bases are covered. There is however, recognition that better development quality is needed; albeit more than tinged with a need for reality, flexibility and concerns about viability. Residents, amenity groups and Parish Council's want developers to be more tightly controlled and not allowed to 'get away with it', with more rigorous use of best practice standards by the Council.
- 2.23 On the constraints to the delivery of housing numbers, infrastructure providers and statutory consultees appear to keep their powders dry, but at the same time, no potential show-stoppers are flagged up by them at this time.
- 2.24 Residents, amenity groups and Parish Council's highlight future uncertainties and how these may require caution. Brexit is often cited, not only in terms of the belief that it will mean that less housing will be required, but also that more agricultural land will be needed to feed ourselves. There is a mix of views about the effects of technological changes, particularly their ability to deal with transport related problems.
- 2.25 Environmentally, there are strong themes from residents, amenity groups, Parish Council's and statutory bodies, both around the need to protect designated areas, but also the need for better environmental standards for wildlife, built design, for green building initiatives and green energy to tackle climate change. Renewable energy potential is viewed as a significant asset for the Borough.

- 2.26 Economically, there is much agreement about the need for jobs and what the future could include, but less around what areas should form the focus. There is however an emphasis on the need for a better educated future workforce and more training.
- 2.27 The poor quality of the Borough's town centres is cited, particularly Sittingbourne, which comes under fierce criticism for the quality of its shops, parking, pedestrian environment and the type of shopper it attracts.

The 'Looking Ahead' questions

- 2.28 This section of the report considers the *LA* question responses, having regard to Appendix I and Appendix II, and, as appropriate, pulls in the responses to relevant *QQs* and the outcomes of the workshops held. Having done this, the report flags up the evidence being taken forward and seeks steers from Members on a practical way forward to deal with some of the issues arising. In most cases, decisions are not required because it is too early in the process to do so and further evidence will be needed upon which to base them.
- 2.29 Q1 and Q2 of *LA* related to GDPR and Equal Opportunities, which are dealt with earlier in the report.

Q3 Scope of the next local plan: Are there any specific matters that you consider the next local plan should be covering or amending from the adopted version?

- 2.30 This was an open ended question and rather than making specific reference to the adopted Local Plan, comments from residents, Parish/Town Councils and amenity groups raised general concerns about the potential scale and location of growth and its impact upon a wide range of infrastructure and the environment. Responses from developers and planning agents were of the view that the Council would need to meet the objectively assessed housing need set by the new standard methodology, but acknowledged the large challenges this presents. It was suggested that the adopted Local Plan's strategies and policies would need completely re-thinking.
- 2.31 Various pieces of evidence base are either planned or currently being prepared which will help inform future issues and options to deal with the concerns raised and at this point, no new matters have been identified. Eventual determination of the settlement strategy will be fundamental to how these issues move forward.

Q4 Evidence for the new local plan: Are there any specific topic areas that you think need further research?

- 2.32 Q4 was answered in much the same way as Q3 and again shows that the key concerns for residents, Parish/Town Councils and amenity groups are housing and its impacts upon infrastructure and the built and natural environment. As touched upon above, many pieces of evidence base are imminent or underway to inform these matters including transport modelling, air quality modelling a Heritage Strategy and a Landscape Designation Review to name a few.
- 2.33 Developers and planning agents considered that a range of deliverable sites would be required to meet the challenging growth requirements before us and these issues will again be informed by a number of pieces of evidence currently planned, underway or completed, including a SHLAA, SHMA and Employment Land Review. At this point, no additional evidence requirements have been identified.

Q5 The big future questions: We have provided just a small digest of some of the big challenges that may face us. This is your chance to tell us your own thoughts about what the future may mean for us. What do you think?

- 2.34 Responses to this question repeated many of the main issues raised and discussed in Q3 and Q4, however there was more of a steer towards things such as the impact of Brexit upon the population statistics and the resulting need for housing and agricultural land. The production of an evidence base for these issues is outside the remit of the local planning authority, as housing land targets will now be determined through the standard methodology introduced by the revised NPPF (2018). That has ONS population projections at its heart and consequently should reflect demographic trends. That said, Government has already committed through the Housing White Paper and policy statements to boosting housing delivery nationally to 300,00 dwellings per annum. Local Plan process and any future Government guidance on such impacts would be implemented as necessary.
- 2.35 Another issue more keenly raised in this question were the potential future changes in working environments and patterns, such as home working and automation. The recently completed Employment Land Review does touch upon these issues. A policy response will need to be an integral part of the overall local plan development strategy. Overall, responses to this question were again largely in line with the summaries outlined in the big themes above and no additional research requirements have been identified at this time.

Q6 Swale's Strengths, weaknesses, opportunities and threats: Do you agree with this analysis of Swale's strengths, weaknesses, opportunities and threats? If not, what should be added or taken away?

- 2.36 Responses to this question tended to agree with the analysis noted in LA, but considered that the scale of potential growth would put many of the strengths at risk and possibly even push them into the weaknesses category. For example, a new settlement around Kent Science Park could destroy the outstanding natural environment currently listed as a strength. There was also some disagreement around the strength of having cheap land, and of the employment opportunities at large distribution centres and business parks. There was some disagreement over whether migration should be seen as a threat and developer/planning agent responses considered future growth to be an opportunity, where planned properly.
- 2.37 Many responders also used the question as another opportunity to raise their general concerns which have already been outlined and discussed above and others considered whether the Council had the will to actually deal with the matters raised. At this time, it is not considered that responses to this question raised matters which require any currently unidentified pieces of research or evidence.

Q7 The next generation of employment sites: Where should we be locating the next generation of employment sites?

- 2.38 This issue attracted substantial comment from residents, groups and Parish Councils. Most respondents felt that Swale's new employment sites should be located either in Sittingbourne, Faversham and Sheppey, either at existing employment locations or near good transport networks. There were conflicting views as to the suitability of the Kent Science Park to expand for further employment. Various other general points were made about where to locate employment development, these included:
- Adjacent to the motorway/main roads, rail links and local ports.
 - On brownfield land.
 - Located close to existing housing.
 - Sites with the least ecological and landscape impacts should be used for employment use
 - Good public transport corridors are required between housing areas and employment nodes.

- Employment in town centres to sustain retail and leisure.
- No green belt or agricultural land should be used for employment.
- Release land in smaller settlements and in deprived communities.
- Need to be in locations sought by employers.

2.39 The revised NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt and employment has been included in the list of specified uses for which strategic planning policies are expected to make adequate provision. The Council must ensure that it allocates an appropriate range of employment sites across the borough, with good transport links, which meet the floorspace requirements as set out in the Employment Land Review, 2018.

2.40 Question 10 of the QQ asked where new employment land should be focused. Whilst the top preferences were for the focus to be at Sittingbourne (27%), Faversham (22%) and Sheerness/Queenborough/Minster (16%), 8% supported a focus in a new settlement within the Borough. Other ideas included focusing new employment land on sites near to public transport, sites directly accessible to the M2 and on sites within or adjacent to existing employment areas. However, by far the most popular suggestion was to focus new employment development on brownfield sites.

Q8 The Swale economy: Do you agree with our assessment of what we need to provide to ensure that the economy is sustained? How can Swale ensure that its current positive economic forecasts come to fruition and are sustained?

2.41 An interesting array of answers with no clear consensus. The key themes appear to be around ensuring Swale has a diversified economic base with a choice of good quality, accessible employment sites, whilst supporting existing businesses and local entrepreneurs. There were a number of respondents who said that the Local Plan needs to recognise the role of leisure, tourism, farm diversification and environmental heritage in building and sustaining the local economy. Another key theme was the need to improve the skills and ambitions of the local population, across the age spectrum, to help people compete for the new jobs.

2.42 Responses to QQ Q1 highlighted that people consider the contribution of improved roads, quality of the built and natural environment, image and improved public transport to creating a positive economy for Swale. Making full use of brownfield land and; adequate lorry parking; taking traffic out of towns and villages; and ensuring that there is sufficient supporting health and social infrastructure were some of the ways suggested to do this

2.43 The revised NPPF has dropped the requirement to avoid policies providing for long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Elsewhere, it introduces specific support for logistics operations, with planning policies and decisions recognising and addressing the specific requirements of storage and distribution operations at a variety of scales and in suitably accessible locations. The Council will therefore need to consider a policy, or part of a policy, to specifically support the storage and distribution sectors, ensuring that it allocates an appropriate range of employment sites across the borough, with good transport links, which meet the floorspace requirements as set out in the Employment Land Review, 2018. Supporting transport and infrastructure, plus good design and environmental quality is also recognised and, in line with the revised NPPF will be a key issue to ensure quality of new development. Overall, the Council will need to balance all of the evidence with what its aspirations are for the local economy as part of the decision in arriving at a reasonable and deliverable development strategy for the local plan review.

Q9 Making our communities more resilient: What will Swale need to do to make its most deprived communities more resilient in the face of future economic change?

- 2.44 Again, a wide range of answers were received with the most common response being around the issue of skills and opportunities for training. This includes the skills of both young people seeking to enter the workforce and adults, more support for apprenticeships and better public transport to education/skills providers. There was an interesting suggestion that there should be positive discrimination in planning and investment towards deprived communities, but how that would work in practical terms is unknown. There were suggestions that infrastructure needed improving, both to attract investment and to support existing residents. This included road infrastructure, health and social care provision and more affordable housing. This would require a multi-agency approach between the NHS, Social Services, schools, Police, businesses, KCC, etc.
- 2.45 There were a number of comments around enhanced investment into Sittingbourne & Sheerness town centres and the regeneration of existing housing estates with more sport, leisure and cultural facilities.
- 2.46 Responses to QQ Q3 on making stronger communities again highlighted supporting infrastructure for new development as the overwhelming requirement, with improved education facilities and development enabling people to live healthier lives highlighted.
- 2.47 A number of the responses were actions which are for central Government, rather than the Local Plan. These included a radical change to business rates to encourage businesses into Swale and the creation of small enterprise funds to encourage SME set ups. The Local Plan review will be supported by an Infrastructure Delivery Plan.

Q10 Our town centres: What do you think the future planning policy should be toward our town centres, in particular, how can we ensure that the areas beyond the core retail areas remain vibrant and how can we ensure the vitality and viability of our centres as a whole?

- 2.48 This issue attracted substantial comment from residents, groups and Parish Councils. There was a consensus that future policies need to be flexible for areas both beyond the core retail area and within it. Many responses felt that the future High Street would be about leisure/amenities/restaurants/culture, as well as retail units. There was also support for residential (especially affordable units) uses within both the core and the periphery and support for vacant shops being used for offices/hot desking opportunities, etc.
- 2.49 It was proposed that the LP policy needed to be a reactive policy as to what a town needed at any given time. This is supported by the NPPF which recommends flexible planning policies for town centres to allow them to react to changing trends and which allow the diversification of town centres. One group wanted Sheerness, Sittingbourne and Faversham to have their own specific regeneration/town plans.
- 2.50 A number of practical suggestions were made including assistance with improving the look of the current High Streets, especially some of the extremely architecturally attractive buildings in need of restoration, and free parking was also a popular choice.
- 2.51 QQ responses to Q2 on making our town centres more successful, highlighted image and appearance as the most important issue, with heritage and easier car parking as other key themes. This also reflected the view that allowing non shopping uses and housing in the town centres would assist with vitality. There were however conflicting views on whether encouraging more larger and multinational retailers and additional restaurants and coffee shops was a good or bad idea.
- 2.52 The existing town centre policies will need to be re-drafted to be more in line with the NPPF's move towards more flexible policies to allow town centres to accommodate changes in shopping

habits. A retail and leisure study has already been commissioned to inform this and whether there are likely to be any new sites required to meet needs across the local plan review period.

Q11 Existing strategic employment locations: How can the economic and other opportunities of our existing strategic employment locations be more fully realised?

- 2.53 There were a few key themes raised in response to this question. The need for continued investment on Swale's existing strategic employment sites was a popular response, as was the need for these areas to be pro-actively managed and subject to continued investment to raise productivity. Another key theme was the need for investment in infrastructure improvements across Swale to support the needs of the strategic employment sites. The main infrastructure requirements suggested were the M2 J5 improvements and the completion of the NRR down to the A2.
- 2.54 One respondent suggested that all existing employment sites should be allocated/safeguarded for employment uses in the LP review. This is something that officers are investigating as it was also raised by the ELR consultants.

Q12 The approach to housing numbers: What would the implications be for Swale if it were to adopt either the Government's 'starting point' for housing targets or a higher level of provision?

- 2.55 Responses to this question echo the broad themes highlighted in paras 2.28-2.34 above. There is no appetite within the responses from residents, Parish Councils and amenity groups that any imposed or higher housing target would be acceptable from the environmental and infrastructure perspectives. There is also a view that the problems caused by new housing is generated by non-locally generated needs, usually perceived as being from London. Developer responses also echo their general themes outlined in para 2.29 but stress the benefits of growth – better economy, more housing delivery, with more affordable homes and improved infrastructure.
- 2.56 Responses to Q4 of the QQ also considered this question. In the 'Preference Scoring', there is a clear view that other authorities should meet some or all of Swale's provision (36.8%), although 26% felt that Government targets should be adhered to. Some 22.7% made 'other' comments which largely related to the same reasons expressed above as to why a target should be reduced or even ignored.
- 2.57 A key question for Members to consider in due course is whether the exceptional circumstances required by the NPPF exist for Swale to pursue a lower housing target from that which will be set by the Government's standard housing methodology. The latest Government population projections indicate a housing target in the vicinity of 1,050 dwellings per annum as proposed in LA. This is against a downward trend for many other local authorities who have seen reductions as a result of lower than previously forecast in-migration figures. Whilst there is to be further consultation on the standard methodology, to enable MHCLG consideration of how the latest trends and distribution sits with the Government's stated objective of delivering 300,000 dwellings per annum nationwide, the Swale figure is not expected to reduce, not least as Swale's in migration trends remain significant (whereas other areas are showing a decline).
- 2.58 Residents who responded to the consultation believe there are strong reasons to seek a lower housing number (see above), whilst developers believe the opposite. The argument for lower numbers is the same one that ran through the adopted Local Plan process.
- 2.59 The question now is 'what has changed' and if things have, do they amount to exceptional circumstances? Obviously, the housing numbers have and it would clearly be wrong to deny that these will not increase pressures on infrastructure and environmental resources. However, for the revised NPPF (2018), the direction to Councils remains clear in that they:

“... should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 2.60 In the case of i., the policies being referred to are those relating to international and national wildlife sites; land designated as Local Green Space, an Area of Outstanding Natural Beauty, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding or coastal change. For ii., these policies must not only apply in such a way as to impact upon the overall number that can be accommodated, but that the harm has to be significant and demonstrable enough to outweigh the benefits.
- 2.61 The Council will need to undertake an assessment of the Borough’s physical and environmental capacities by such means as its Sustainability Appraisal, Strategic Housing Land Availability Assessment and transport modelling. As a result, it is therefore premature to make firm judgements on whether the housing figure should be higher or lower than the standardised figure. However, it remains the case, as with the adopted Local Plan, that there are significant parts of the Borough not affected by the environmental assets listed by the NPPF, whilst in the case of infrastructure, future growth will only be required to address its own additional stresses, as opposed to it dealing with existing capacity problems. Likewise, it is also clear that any perceived inability of the market to deliver the housing numbers expected will not be grounds to lower a housing target, despite widespread scepticism from the public, politicians and professionals alike.
- 2.62 Whilst it is still premature to rule anything in or out, Members are advised that it will be more than likely that for most local authorities, the Government’s standardised housing figures will represent the starting point figure for their housing targets. If this is the case for Swale, it goes without saying that the Council is likely to have a difficult journey ahead with challenging choices to make.

Q13 Co-operating with other councils to meet development needs: Do you believe that Swale should consider asking its council neighbours to provide for its unmet development needs? If so, what reasons would the Council give, who would it ask and why would they be well placed to help? Likewise, if asked by a neighbouring council to consider meeting their unmet development needs, what should be our response and why?

- 2.63 There is some overlap in the responses with the previous question, however, from resident’s perspective, the belief that Swale cannot cope with the additional development leads to the view that other areas should be receiving some or all of its growth. The QQ (Q4) also reflects this view with some 37% of the responses believing (Preference Scoring) that other areas should take the growth. In the schools QQ, although a wish to divert development to other areas remains the first choice at 32%, within the ‘Preference Scoring’, it is a much closer affair with 31% revealed as wishing to see the Government targets met – perhaps a reflection of how the young can see the housing crisis differently.
- 2.64 Developers and landowners believe that there is no question of Swale’s growth being diverted elsewhere as there is no case to do so. However, a number are quick to highlight the possibility of Swale needing to consider taking unmet need from elsewhere.
- 2.65 There is little appetite from residents for Swale to take a greater share from elsewhere or to unilaterally increase the numbers, although developers cite that affordable housing, economic, housing and infrastructure delivery may Page 11 reasons to do so.

- 2.66 Some parties extend the view of cross-border co-operation into other issues, such as infrastructure and education. The reliance for Swale residents on general hospital services outside of Swale is given particular attention.
- 2.67 It is very early in the process, but Swale has not, to date, been asked to consider taking unmet need from any other area, although there is interest in its economic ambitions from Maidstone. This probably has as much to do with the stages reached by local plans in other areas, but may also be, in part, explained by the likely lower than expected (although not for Swale), demographic forecasts that will form the next round of standard methodology housing targets for these Councils. Any future changes to the standard methodology may also have a bearing.
- 2.68 However, London remains the big uncertainty and this could still yet lead to further demands being made on Swale (although no direct approach from the Mayor has been made to date). Regardless of any formal need to take London growth, demographic trends tell us of influences on Swale's housing need from London migration that will need to be addressed.
- 2.69 Despite the Duty to Co-operate, there remains a lack of co-ordination in the SE on the 'big' and strategic cross boarder issues. The Government is relying on Statements of Common Ground between Councils to address questions of unmet need and infrastructure; however, as yet, there is little evidence anywhere that Councils are showing an appetite for this form of co-operation and it seems likely that this vacuum will leave Councils vulnerable to multiple suggestions from developers of a need to take other areas unmet housing needs.
- 2.70 As with the previous question, the Council's response will be linked to ongoing work around development capacity and it will be continuing its dialogue with its neighbours, which will be including over time, scoping potential Statements of Common Ground.

Q14 Departing from the standardised housing number methodology: What compelling circumstances could there be for the Council to take a different approach to the standardised method of arriving at overall housing numbers?

- 2.71 The responses here from Q12/13 re-surface here, but some residents develop the comments to refer to reforms they believe are needed to the wider planning system.
- 2.72 A specific view from residents and some Parishes is that the Council should only be planning to meet local need and this is linked by some (both there and elsewhere) to the position post Brexit on the presumed assumption that as immigration falls we would not need to build so much housing.
- 2.73 Some developers, as before, develop their arguments as to why the number should be increased, although this is not a universal view held by all of them as some appear content with the standardised numbers.
- 2.74 Q14 was aimed at whether there was any technical demographic reason why the Government's standard methodology should not be used. The views from residents would represent clear departures from the standardised housing number methodology. In the case of planning only for local need, this would be contrary to Government policy, whilst the other 'Brexit' issues highlighted, if correct, would be reflected in the future demographic forecasts that inform the standardised methodology and it would not therefore be for an individual Council to unilaterally take them on board.
- 2.75 Whilst this question will need to be covered by the Councils Strategic Housing Market Assessment, Swale has historically not had any demographic peculiarities that have brought into question the reliability of demographic forecast which might suggest a future departure from the standardised approach.

Q15 Increasing housing delivery: How can the Council speed up the delivery of new homes in Swale?

- 2.76 There are a range of practical responses here ranging from the strategic to process issues. Strategically, the Council could direct housing to most viable areas, use brownfield land only, invest in infrastructure first (inc. schools) or use prudential borrowing to build homes. It could also allocate a range of different sites, including smaller sites as well as splitting up allocations. Use of modular forms of construction could also help speed up delivery. Ideas to improve the process of applications are also suggested, including more joint working with developers, Member training, more delegation and a speeding up of the SBC 'pre-app' and S106 processes.
- 2.77 Some of the suggestions are now confirmed in the revised NPPF - time bounded consents, ensuring a proportion of allocated sites are small sites and considering a range of development options, such as the sub-division of sites and new communities.
- 2.78 Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations.
- 2.79 Related to the speeding up of housing delivery, is the question of the industry's ability to deliver. The Government's focus until recently has been on local authority failure, whether it be a failure to prepare up to date Local Plans, or the insufficient allocation of land. National planning policy has therefore focused as a result on imposition, the most recent being the Housing Delivery Test. However, national action is now looking at financial incentives, both through initiatives such as the Housing and Infrastructure Fund, but also the recent launch of the £1 billion housing delivery fund to provide loan finance to help support small and medium sized developers. This is an attempt to open up the housing market, which currently sees almost two-thirds of new homes built by just ten companies. Despite scepticism over market delivery, it will be some time before the effects of such measures can be assessed. However, as already indicated, perceived market failures will be no reason for Councils not to meet their housing numbers through allocation of the necessary land.
- 2.80 However, there may be one option to insulate Councils from the penalties associated of non-delivery in the early phases of a Local Plan period and that is consideration of stepped housing targets. If supported by the likely trajectory of delivery, housing performance can be based on an initial lower target number on the assumption of delivery higher numbers later on. For Swale, this option can only be considered once it has selected its development strategy and determined the likely delivery timescales associated with it.

Q16 Affordable housing: How can the Council increase the amount of affordable housing that is currently built?

- 2.81 There is a strong community view that affordable homes should be built by the public sector/RSLs and kept affordable in perpetuity. There is scepticism about the new definitions of affordability advocated by the Government and a strong view that developers are using viability arguments as the means not to provide sufficient numbers of affordable homes. There is by some a wish to see more community led affordable homes initiatives, such as Community Land Trusts.
- 2.82 Developers and landowners, whilst keen to encourage the authority to assess their needs, via a Strategic Housing Market Assessment (SHMA), promote the full range of products as promoted by the Government's new definition. At the same time, some are keen to promote higher numbers in the right (i.e. viable) locations as the means to increase the amount of affordable housing, whilst suggesting that brownfield sites are less capable of affordable housing delivery. Others are keen to stress the need for flexibility, particularly when dealing with viability questions.

- 2.83 Q5 of the QQ also considered this issue, although the results were fairly evenly split between more housing for shared ownership, affordable rent and private ownership (circa 25% each). Housing for private rent was the least popular in the responses. For the QQ for schools, the emphasis was slightly different, although private rent was also the least popular.
- 2.84 Members have been understandably concerned about the ability of developments on Sheppey and at Sittingbourne to deliver meaningful numbers of affordable homes. However, the Council will need to undertake both a SHMA and viability evidence to inform the policy commitments on this topic.
- 2.85 The question of the role of Community Land Trusts is an undercurrent in a number of the responses. Community Land Trusts are a form of community-led housing, set up and run by ordinary people to develop and manage homes as well as other assets. They act as long-term stewards of housing, ensuring that it remains genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier. As a grass roots form of housing, it is the Council's role to facilitate them. In this respect, support can be expressed through the general housing policies of the plan, but perhaps also via specific 'reservations' for such initiatives within allocations or as bespoke allocations.

Q17 Meeting the future needs for Gypsies and Travellers: What approach should we be considering to making further site provision for Gypsies and Travellers?

- 2.86 Responses here are overwhelmingly from residents in the so-called 'settled community'. A small number include comments judged as inappropriate and these have been redacted as appropriate. The majority of views from residents and Parish Councils advocate minimal or no provision, with more rigorous use of enforcement powers by the Council. Some parties indicate that provision should be made in remote locations, or that large housing developments should include provision. The National Federation of Gypsy Liaison Groups supports the preparation of a needs assessment that should be fair and engage with Travelling Community, including those who fall outside of definition. Sites should then be allocated and supported by a fair criteria based policy.
- 2.87 Some Members may recall that during preparation of the adopted Local Plan, the question of whether provision for Gypsies and Travellers could be made on large housing schemes. The Council went as far as consulting upon a policy and collecting viability evidence that would have required sites of 50 dwellings or more to make provision. The approach found no support in the development industry or within groups acting for the Gypsy and Traveller community. Residents also objected to the housing allocations that included the provision. Despite the provision being potentially viable for developers, the Council agreed to remove the policy approach late in the plan making process.
- 2.88 The Panel will be aware that the Council has been preparing its new Gypsy and Traveller Accommodation Assessment (GTAA) and it is the intention to bring this before Members at their November Panel meeting. Subject to the overall need figures that this evidence will generate, the process may require the Council to allocate sites in the Local Plan review and as such a 'call for sites' may be required for consideration as part of the Strategic Housing Land Availability Assessment. Once the overall need figures have been identified, the Panel will be asked to agree the means by which any necessary additional sites are sought.

Q18 Mix of dwellings: What mix of new houses should we be trying to build in the future and how can we ensure that the housing market provides for all housing needs?

- 2.89 There is no really clear view being expressed here – in short, all types, both for and against. There is a slight prominence of views that, like affordable housing, the Council should be bringing forward its own stock for local people, but that there should also be use of creative solutions, such as Community Land Trusts. Some residents use the question to explain the

types of development that they would wish to see – e.g. small developments that are likely to be more acceptable to communities, or on brownfield sites. Developers, on the other hand, whilst pointing to the need for a SHMA, advocate a more market led approach, some suggesting that care should be taken when promoting a need for flats.

- 2.90 Q6 of the QQ also asked what sort of housing should be provided. The ‘Preference Scoring’, perhaps reflecting the prevailing demographics of the respondents, indicated 22.3% for specialist housing, e.g. for an ageing population, 20.4% for family housing and 17.9% for supported housing for those in care. The QQ for schools, reflecting the younger age profile, saw family housing and housing for couples as clear priorities.
- 2.91 The Council will need to prepare a SHMA to determine the type of housing that will be required. Some respondees are correct that there are developers who have a clear leaning toward the provision of larger 4/5 bed homes in their mix as a means to help maximise profit and/or viability. This has often been at odds with local need. This has been a difficult negotiating point at the planning application stage as the evidence for the adopted local plan expresses the housing mix need at a Borough-level and this has provided developers with the means to argue a different mix at the neighbourhood level. It will be necessary for officers to explore whether the next SHMA is able to provide the housing need at a much more local level.

Q19 Self and custom build: How best should the local plan make provision that will enable people to build their own homes?

- 2.92 Although there is some disagreement, across the comments is a large measure of support for encouraging this sector. The differences emerge when considering how it should be done. The majority view is that areas should be set aside on large developments, reserved for self-build, although at least one developer is concerned about the use of quotas. Others indicate that plots should be found at rural communities, although here there are parties who believe that the Parish Councils should be the final arbiter of where they would be located. Some residents believe that only those people with a commitment to the community in question should be considered. A further theme is the view that any such houses permitted should be of a very high environmental standard.
- 2.93 The Council has been maintaining a register of those wishing to have self-build plots made available; however, it will be the preparation of a SHMA that will take this expression of demand into account to determine the actual need and how it might be met. This is certainly an area that many mainstream house builders and developers are willing to consider by way of a reservation for serviced plots on a larger scheme and particularly in new settlements. The self-build register tends to include people who seek to build on large plots in rural areas which would otherwise be subject to general policies of restraint. In these cases, there is likely to be disconnect between their wishes and where they can be met.

Q20 Optional housing technical standards: What evidence is there that Swale should set additional housing technical standards in the next local plan?

- 2.94 Respondees cast their nets wide on this question to include a wide range of environmental and design standards beyond those indicated in national policy. In contrast, developers were far more guarded and considered that any standards should only be applied where evidence and viability showed them to be justifiable.
- 2.95 The majority of the comments relate more to general design best practice standards, such as that which might be covered by Council adopting documents such as Building for Life 12. The scope of the optional technical standards are however prescribed by national planning policy/guidance and are more specific than the general good practice standards that tend to be included in design manuals.

- 2.96 Use of the optional technical standards is intended to allow exceedance of the minimum required by Building Regulations. As well as for water usage, they also relate to improved accessibility and wheelchair housing, as well as internal space standards for all house types/sizes. In the case of space standards, planning guidance allows the use of a nationally described space standard. Guidance requires the Council to gather evidence to determine whether there is a need/justification for additional standards in their area.
- 2.97 Swale already has one such standard in the adopted Local Plan relating to water usage. This is perhaps the easiest of the standards to justify given that this is an area of water stress.
- 2.98 Other authorities in gathering the evidence for the use of nationally prescribed space standards have generally simply undertaken a comparison of schemes permitted against the standards to demonstrate that a certain percentage do not meet the standards, meaning that use of the national standard is justified. However, this appears insufficient to satisfy a Local Plan Inspector and it might therefore be necessary to examine factors present within the demographics of the local population, e.g. age, social deprivation and physical and mental health, which might be impacted upon by the standard of accommodation. Questionnaires to residents of new schemes known to be below the national standards might be helpful to establish this.
- 2.99 Even if the evidence of need is present, the Council would still need to test them for their impacts on viability. This is potentially a fairly significant piece of evidence base that is currently not programmed or resourced and Members views on whether it should be progressed would be helpful.

Recommendation: The Panel is requested to provide a steer to officers as to whether evidence should, in the first instance, be researched in respect of the optional technical standards for water, space and accessibility.

Q21 Making effective use of land: How can more effective use of brownfield land be achieved?

- 2.100 The use of brownfield land as a principle is a clear and strong theme across many of the responses to LA questions, particularly from residents, groups and Parish Councils. There is a belief that there are resources of such land available to meet all development needs, or if not, then growth should be capped to the level that is available so that no greenfield sites are used for development. Some consider that all brownfield sites, regardless of their location or sustainability, should be used, whilst statutory organisations point out that not all sites will be suitable because they may not relate to a particular community or may be of biodiversity interest. There is a suggestion in a minority of comments that the Council's brownfield register is inadequate, even that it has been deliberately kept short as a means to justify the use of greenfield sites. Some residents believe that greater sticks should be used to force developers to use brownfield land.
- 2.101 In contrast, developers are quick to point out the potential shortcomings of an over-reliance on brownfield land, e.g. slower delivery and poorer viability.
- 2.102 There has been some strengthening of the emphasis on the use of brownfield land in the revised NPPF. Councils are urged to make as much use of it as possible, whilst giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Authorities are encouraged to be more pro-active and there is helpful ancillary commentary in the NPPF on the use of under-utilised land and buildings, for example converting space above shops and building on or above service yards, car parks, lock-ups and railway infrastructure, alongside using airspace above existing residential and commercial premises.
- 2.103 However, what is not present in the revised NPPF is any suggestion of a brownfield only or even a 'use brownfield first' policy. Outside of metropolitan areas, it is therefore highly likely

that will continue to be a significant reliance upon greenfield sites to meet overall development needs. A new Strategic Housing Land Availability Assessment will be undertaken to determine what brownfield land can be brought forward for allocation and this will draw upon the brownfield land register (which will be updated). However, it can be predicted with some confidence that there will be insufficient levels of brownfield land that will be judged as available, suitable and deliverable to meet the assessed development need.

- 2.104 Swale has also produced its Brownfield Register in line with national regulation, which revealed very few larger brownfield sites which are not already being brought forward and these tend to be challenging to deliver. The majority of other identified brown field sites identified are less than the site size threshold for entry on the Register and are already subject to planning permission.
- 2.105 A key question for the Council is whether it can be any more pro-active to increase the amount of brownfield development currently achieved. For Swale in 2017/18, of all the extant planning permissions, some 34% are on brownfield land. There are some positives, for example, two of the largest local plan allocations are brownfield and these are now moving forward to deliver housing, whilst large windfall brownfield sites are also delivering. However, for most brownfields, it has been a long road from first identification, beset with site issues and viability challenges.
- 2.106 In terms of potentially being more pro-active, it would be relatively easy to simply identify swathes of existing town centres and say that within them X number of dwellings could come forward on vacant plots and in spaces above commercial premises (although this risks criticism of double counting where a windfall allowance was also counted in the housing land supply). This was the approach used by the Urban Capacity Studies prepared by Councils in the early 2,000s, but the reality is that more needs to be done to show the actual certainty of delivery, with viability and market preference the key barriers. Councils would not only need to identify the opportunities, but be prepared to support the process in direct ways, e.g. identification of Business Improvement Districts, the sale or use of car parks, use of Compulsory Purchase Orders, Local Development Orders and Permissions in Principle.

Recommendation: The Panel is requested to provide a steer on whether other measures to increase the deliverability of brownfield sites should be considered.

Q22 Density: Should the next local plan set minimum density standards? If so, what standards should we be considering?

- 2.107 Respondents again interpreted this question quite widely, including other suggestions for standards which should be adopted. Although there was probably a slight majority in favour of setting minimum densities, including those who felt it would prevent developers from prioritising high value housing, there were concerns from many over the poor standards that would result and the inflexibility to determine a density that responded to the context of a site or area. Developers were also cautious, although one felt they might be appropriate in central areas or at transport hubs. Some residents, groups and Parishes also felt that if standards were to be applied, then they should be variable between different locations.
- 2.108 The NPPF does allow Councils to consider the use of density standards, provided the evidence is provided and that the impacts upon viability are tested. At present, the Council does use density standards, but only outside of the Local Plan and development management processes via its Strategic Housing Land Availability Assessment work and as a guide to determine the yield of a site. This has the effect of influencing the housing numbers for Local Plan allocations, before detailed analysis of the context of the site and its surrounding is undertaken. In policy the numbers are expressed as a minimum and in many cases, as applications come forward on allocated sites, densities rise. For all other proposals, the

adopted Local Plan sets no density standard; instead requiring a context led approach to be taken.

- 2.109 There should not necessarily be any link between higher density development and poor quality design; although it would be reasonable to say that the best examples are often from areas with higher value for developers.
- 2.110 It would be possible for evidence to be gathered to examine developments permitted across a series of site typologies, using typical densities as a benchmark to determine whether such schemes are too high or low. However, it would be necessary to also consider the relationship between density and its effects on massing and building height, which tends to be a very site specific matter. The issue could be addressed by urban design analysis at the site allocation level, although this would not assist with windfall development. The latter could be addressed through considering review and strengthening if possible, of general design policies in the local plan.
- 2.111 The need to consider density as a means to potentially reduce the take of greenfield land for development is entirely understood. The research to support it would currently be an unplanned resource. In addition, there are some reservations that the use of standard minimum densities, albeit ones that could be variable depending on location could, unless somehow applied with great flexibility, cut across other objectives which are more about the context of the site and the local area. Even if work to establish density standards are progressed, these would still need to be subject to viability testing. A middle way would be to limit density analysis to urban design work associated with the proposed housing allocations.

Recommendation: The Panel is requested to consider whether officers should give further consideration to the use of minimum density standards.

Q23 Social and physical infrastructure: What do you consider the broad social and physical infrastructure priorities should be for Swale in the coming years?

- 2.112 This issue attracted substantial comment from residents, groups and Parish Councils. In totality, the full range of social and physical infrastructure is highlighted as priorities. However, health (hospital, GP and dentists, but also other facilities with health related benefits – i.e. sport and open space, reducing pollution), education, transport and sport/open space are notable in the level of responses.
- 2.113 A large number of site specific infrastructure priority needs are highlighted that include:
- Sittingbourne station parking.
 - Sittingbourne Northern Relief Road.
 - J5/A249 improvements.
 - Extra motorway junction south of Sittingbourne.
 - M2 widening.
 - A2 from Western Link to Brenley Corner to become a street.
 - A Swale general hospital/new hospital at Brenley Corner.
 - Leisure facilities.
 - A Swale incinerator.
- 2.114 Some used the question to say what infrastructure they did not want to see, notably a link road between the A2 and M2.

- 2.115 The QQ also gives supplementary help in the answer to infrastructure priorities. Q3 asked what more could be done to make communities in Swale stronger. The Preference Score showed that over 41% of the answers cited both the need for new development to deliver the infrastructure needed to support it and improvements both to the access to and facilities for education and training. Not surprisingly, the QQ for schools reversed this. Q7 also asked what the infrastructure priorities should be, with the Preference Score placing health care at 15.1%, roads at 13.6%, education at 12.4% and green infrastructure at 12.1%. The QQ for schools placed health care and education at the top of the list.
- 2.116 The question of the timing of infrastructure relative to development was prominent in comments to LA, with the prevailing view that developers were getting away with it, with the current system flawed. Other means to fund infrastructure were considered to be required and that no further development should be approved until infrastructure issues were addressed.
- 2.117 A thread of commentary amongst residents, but also in those of the statutory and other consultees, was the question of multi-functional green infrastructure. Kent Downs AONB considered that the linking green infrastructure with wider infrastructure needs was causing its neglect in priorities for funding and that the AONB itself was being impacted upon by increased footfall and increased use of rural infrastructure in the same way as other infrastructure provision. The KCC GIF has identified a large funding gap for GI across Kent and this needed to be addressed. To support the approach to green infrastructure in the local plan, officers are in the process of commissioning work on a new green infrastructure strategy.
- 2.118 The top infrastructure priorities continue to reflect those identified for the adopted Local Plan, notably health and roads. The question of means other than developers to fund infrastructure is pertinent, but although the Council will continue to explore all opportunities to leverage in external funding, the reality will be that the vast majority of future infrastructure provision will be developer led. The degree to which this will be a continuance of an infrastructure bolt-on approach or a more settlement wide approach will be a matter dependent upon the next Local Plan settlement strategy.
- 2.119 The Local Plan will be supported by an Implementation and Delivery Schedule and as the Council moves toward considering its development allocations, discussions with infrastructure providers will become more detailed and specific. Likewise, transport modelling will determine the extent of improvements required. However, at the present time, early discussions with those agencies, including those present at the Infrastructure Workshop on 12 June, were not indicating showstopper issues with the local plan review moving ahead. Many may find this likely position difficult to accept, particularly in the areas of health, roads and water, but it will be the major infrastructure providers that will have to signal the 'red' light if there is to be any adjustment either to overall levels of growth or its distribution and site allocation.

Q24 Capturing land values for social and physical infrastructure: What more can be done by the Council to ensure that the infrastructure needs generated by new development are matched by a developer's financial contributions? Should more radical approaches toward 'land value capture' be considered?

- 2.120 A number of parties were not able to move beyond the view that no development should be permitted without the infrastructure to support it. Developers were viewed negatively in terms of being the party failing to provide infrastructure at the expense of land banking and high CEO bonuses.
- 2.121 A number looked to the Government to provide the necessary funding, or see the need for developer contributions to be higher for greenfield sites. Others cited examples from other countries, or, like some Parish Councils, see CIL as the means to collect the sums required. Some felt that community solutions needed to be considered, although with no specific

suggestions. There is a view by some that whatever the route used, non-political members of the public should decide how money for infrastructure is spent for the good of the community.

- 2.122 There was some appetite for more radical approaches to be considered and a belief that for large schemes, requiring significant infrastructure, the responsibility for delivery should not lie in the hands of the private sector, but in a process that was fully accountable to local people. There was also a view that the Council does not have the expertise in this area.
- 2.123 Developers were cautious. One believed that land value capture was entirely a matter for Government to address, whilst another saw the best way to secure land value capture by directing development to the highest value areas. One felt that the master developer or Development Corporation models would be worthy of consideration, but that because of concerns about the speed of delivery on large sites, smaller sites should be allocated that follow more 'usual rules'.
- 2.124 Two useful developer comments are made. The first, who, whilst promoting a form of master developer approach, is of the view that land value capture (LVC) will only work on developments of a certain scale. There are concerns though that it would deter investment as developers prefer more traditional approaches. A site specific policy approach on infrastructure is advocated, ensuring that the cost of the infrastructure is factored into the overall land value. Early engagement would be essential to minimise risks, as would the early identification of infrastructure needs.
- 2.125 The second contribution notes that even where LVC is used, the value of the land in the first place will be part of it (and therefore varies as some areas will generate more than others). In any event, they felt that because local communities were not presented with the full information, they were undervaluing the contributions being made by developers. LVC was not considered to be without its problems – highlighting the North Essex Garden Communities. Unless landowners are given an incentive to sell, they may wait and in such cases, CPO is likely to be the only option.
- 2.126 It is certainly the case that the approaches here will strongly depend upon the settlement strategy agreed by the Council. It seems likely that a range of measures will be required with smaller schemes likely to follow the 'traditional' approach, but where larger schemes are being contemplated, there is the opportunity to dampen down the expectations of landowners provided that the infrastructure 'ask' is identified early enough. In the case of new communities, the potential for LVC is perhaps at its greatest, but it carries significant implications and, as one contributor notes, this is not an area where the Council currently has all the expertise it needs. Ultimately, it would only be where the public sector or a Development Corporation is in full control that LVC can be fully exploited to achieve all objectives; however, developers may be reluctant to engage with such models. For example, in the work undertaken for the *New Garden Communities Prospectus*, developers see a Development Corporation as unnecessary either due to their scale of landownership or interference. However, there are other models, such as via master developers, which can still capture well land values.
- 2.127 This is an area of work which will continue to be developed in accordance with the revised NPPF and Practice Guidance.

Q25 A Swale Community Infrastructure Levy? Should Swale introduce a Community Infrastructure Levy on the development of greenfield sites to housing across Swale?

- 2.128 Views are split on this subject. Some see CIL as a means to prevent abuse of S106 or as the means for local people to have a say over how money is spent. Others believe that it might be politically hijacked for non-essential projects, whilst others that it might be regarded as a blunt tool for some sites where the scale is able to deliver the infrastructure needed via S106.

2.129 The decision as to whether the Council should pursue a CIL charge is on hold pending viability work for the Local Plan Review. It will, to some extent, be dependent upon the settlement strategy that is pursued.

Q26 Mitigating impacts of climate change: How can planning policies positively influence climate change outcomes or mitigate their impacts?

- 2.130 There was an overall acknowledgement of the issue of climate change and its impacts on health, habitats and species. Most responses encouraged innovative solutions for example: learning from best practice abroad; a general support for renewable energy in new housing development (solar, ground source heat, wind); build quality and insulation; water efficiency measures including grey water recycling; a better standard of green infrastructure including more tree and hedgerow planting (which is currently seen as poor in Swale); an emphasis away from building new roads and concentrating on keeping communities 'local' with good public rail and bus transport, walking and cycling facilities/routes and use of smart technology; encouragement of waste reduction and recycling.
- 2.131 The case was also made for ambitious environmental standards to be set and enforced and tax cuts for eco building. Air quality, urban heat gain and flooding were identified as issues and the case for infrastructure (e.g. electric vehicle charging points, tree planting, improved drainage including sustainable drainage systems) was made. It was argued that design was important in adaptation and repeated calls for avoiding development on countryside/agricultural sites and in areas of water stress. Historic England emphasised the inherent sustainability of conserving historic buildings and Natural England stressed that the effects of climate change (e.g. coastal squeeze) must be fully integrated into Local Plan policies and site allocations and that Swale should work with neighbours on ecological networks and with aim of achieving urban cooling. Developers argued that Swale's resources include its green energy and grid infrastructure and it has a duty to ensure the best is made of this potential.
- 2.132 Q8 of the QQ sought views on how the Local Plan can protect the environment and mitigate the effects of climate change. The top preference was to do this by protecting and enhancing the countryside, particularly land designated for biodiversity and landscape (34%) and second, to protect high quality agricultural land (30%). Within the context of any other comments, there is substantial support for developing brownfield sites only and to reject housing numbers. To a lesser extent but still of significance, is support for the use of renewable energy (7%).
- 2.133 In terms of the local plan review, the policies in the adopted local plan will need to be reviewed and updated in light of the revised NPPF. One policy area highlighted in paragraph 149 of the revised NPPF is the need for plans to take into account the risk of overheating from rising temperatures, an issue of particular relevance in Swale. This could be accommodated in updated policies on green infrastructure, sustainable design and construction, woodland, trees and hedges, general development criteria or a new design policy. However, an evidence base to support any requirements, which is neither programmed nor budgeted for, would need to be completed.

Recommendation: The Panel is requested to consider whether officers should give further consideration to an evidence base on how the local plan can mitigate or adapt to overheating from rising temperatures as a result of climate change.

Q27 Green energy: What opportunities do you see in green energy for Swale and how should our planning policies seek to encourage or manage them?

- 2.134 There were a variety of answers to this question but the overall theme was that Swale has great renewable energy opportunities and green energy should be promoted. A solar farm developer argued that Swale's resources include its green energy and grid infrastructure and it

has a duty to ensure the best is made of this potential. Wider suggestions for green energy included: waste to energy schemes; solar panels; ground source heat pumps; generating glass; car parks with solar panels and wood fuel (latter AONB unit). Some respondents put the case for nuclear, wind, shale gas and hydropower as well as battery storage. Others argued against fracking or felt the costs of green energy were expensive and should not be passed to residents.

- 2.135 There was some support for solar farms in appropriate locations but equal recognitions of landscape/biodiversity etc. harm they can bring. Wind farms at eastern Sheppey, offshore and in rural communities were suggested with appeal that local communities should benefit.
- 2.136 There was frequent support that green energy in new development should be compulsory and new development should aim to be energy self-sufficient. Some suggested that renewables should be incentivised with grants and tax breaks and existing development should be retrofitted with renewables before new schemes progress.
- 2.137 Whilst there was encouragement for what Swale is doing already, there was recognition that a strategic approach is needed (e.g. identifying suitable sites for renewables and referencing KCC's Energy Opportunities Map). It was felt that SBC should lead by example, but there was an appreciation that central government also has a role to play.
- 2.138 Natural England supports renewables where no unacceptable environmental impacts. The AONB unit stated that renewable energy development of significant size in AONB would only be acceptable in exceptional circumstances and in public interest.
- 2.139 In terms of the local plan review, the policies in the adopted local plan will be reviewed and updated in light of the revised NPPF and consultation views to ensure they provide a positive strategy for renewable energy. Reference to KCC's Renewable Energy Opportunities Study will be made along with reference to the 2011 Swale Renewable Energy and Sustainable Development Study. Due to timescale and budget limits there are at present no plans to redo the Swale Renewable Energy study, however, if this was done it could assist identify suitable areas for renewable and low carbon energy and identify opportunities for decentralised systems and co-location of customers and suppliers as set out in the NPPF.

Q28 Improving the capacity and environment of the A2 corridor: What solutions should we be considering for improving the A2 corridor?

- 2.140 Responses to Q28 echoed some of the responses made on physical infrastructure requirements in Q23. Respondents tended to use this question for comments on transport issues in general and in particular highways issues. A significant number of residents considered that stopping all development in the area was the only way to halt worsening congestion in the A2 corridor.
- 2.141 Road improvements were also seen as a major issue in responses to the QQ. Q1 (How can the Local Plan create a positive economy for Swale?) and Q7 (What infrastructure should the Local Plan seek to deliver?) saw road infrastructure delivery as the top priority preference (43% and 32% respectively). Public transport improvement was also featured as a significant priority in both of these question responses.
- 2.142 There was broad agreement that the improvements to M2 Junction 5 and the A249 junctions at Key Street and Grovehurst are needed, in the short term to deal with development already planned for. Additionally, there was support for widening the M2 to three lanes to relieve pressure on the A2 and improving Junction 7.
- 2.143 There was some support for completing the Sittingbourne Northern Relief Road as soon as possible to see what that could achieve, especially in respect of taking commercial traffic and

HGVs out of Sittingbourne centre. There was opposition from residents and Parishes to a new A2/ M2 link road, with many considering that the development needed to justify and build a Southern Relief Road and new M2 junction was inappropriate; unlikely to be provided in a timely way and would worsen congestion overall; as well as having an unacceptable environmental impact. There was nevertheless some support for this proposal from some residents as well as developers.

- 2.144 Better traffic management (especially through Sittingbourne) through use of roundabouts rather than signals to improve traffic flows was supported by Parish Councils and residents. Some felt 20mph zones were the answer, whilst others felt this would slow traffic too much and make pollution worse. Managing school and HGV traffic at busy times were also suggested, as was making Sittingbourne electric vehicle access only. There were also suggestions for the use of bypasses for Ospringe, Teynham, Newington and Bapchild to avoid pinch points on the A2 corridor. Others considered that there is little which can reasonably be done to the A2 itself, without unacceptable impact to properties and the environment.
- 2.145 At the eastern end of the Borough there were suggestions to turn the A2 at Faversham into a more pedestrian / cycle friendly 'street' serving and linking new development with the town centre; and suggestions to bridge link Oare with Harty Ferry to open up the eastern end of Sheppey without further impacting the western end of the A2 corridor.
- 2.146 Non highway improvement focused suggestions to relieve the A2 corridor included improving rail and bus travel, introducing trams or light railway and consideration of public subsidy. The need to site and design development so as to reduce the need to travel and facilitate walking and cycling to local services and to public transport hubs was also noted by developers as part of a wider package of measures to support new development in all parts of the Borough.
- 2.147 In terms of messages for the local plan review to take forward, the concerns about existing congestion and the impact of additional development are very clear. However, there is a general reluctance to move past resistance to the imperative for further development and associated assumptions that car based travel will continue to be the main means of supporting this. Transport modelling is already in hand to support the local plan review and test future development scenarios and transport mitigations and inform a range of reasonable alternative development strategies. The work will need to be refined in more detail once a preferred option is chosen for the submission version of the plan; to inform strategic transport policies; development management transport policies; specific land allocation policies; and a supporting Local Transport Strategy (prepared with Kent County Council Highways).

Q29 Improving access from the eastern end of the Isle of Sheppey (the A2500/B2231): What further measures could be considered to improve accessibility to and from the eastern end of the Isle of Sheppey?

- 2.148 Several suggestions were made for a bridge at the eastern end of Sheppey to link with the mainland at Conyer or Faversham and then link back to the M2, although there is acknowledgement by residents and some developers that this would probably be too costly to implement. Improvement of road links on the island, including a dual carriageway from the A249 all the way to Leysdown was also suggested, to be paid for by developer contributions. The (already planned) improvements to the A2500 and the junction with Barton Hill Drive were also highlighted as necessary. Developers promoting land east of Scocles Road (Minster) suggested that a roundabout with the Lower Road could be provided as part of such development.
- 2.149 Non highways improvements suggestions included extending train services to the island and improving bus services such as the click and ride system at Sittingbourne. Trams or monorail to the east of the island were also suggested. Improving cycling and walking trails to coincide with nature trails was also highlighted. **Page 23**

- 2.150 Some commentators also considered that the costs involved in facilitating further development on the island were so substantial that it was pointless and that Sheppey should be allowed to stay rural.
- 2.151 There are undoubtedly viability challenges with development on Sheppey and therefore sustaining further major improvement in transport links, which has been realistically reflected in the consultation responses. It will be for the local plan review development strategy to determine what is viable and achievable here and what measures could be achieved through the local transport strategy which will support the local plan.

Q30 Sustainable transport projects: What are the next big sustainable transport projects that should be being considered?

- 2.152 Overall, there was some divergence between respondents who continued to support key road transport schemes as a 'sustainable' response to transport issues who consider that there is little real or economically viable alternative in a semi rural Borough. Nevertheless, there was also some acknowledgement that non car travel needs to be higher on the agenda than car travel if more sustainable means of travel are to be embraced. Technological advance and catering for electric cars and treating them preferentially for car parking are seen as a move towards sustainability. High density development and simply reducing provision for cars was also noted as a possible solution.
- 2.153 Better and cheaper public transport was noted as a key requirement to get cars off the road and should be subsidised. Covering key routes such as Sittingbourne to Maidstone with better services was also highlighted to reduce car traffic. Additional tram, train or trolley bus routes were also suggested to extend links with the existing public transport network.
- 2.154 Improved train services, especially to London to support commuting, was noted by many, although there was wide divergence of opinion as to what this should involve. Some respondents considered that fast trains should be truly fast and make fewer stops, whilst others felt that all train stations in the Borough should be improved and made best use of. Accessibility to all stations was also noted as an issue and an important consideration for the location of new development.
- 2.155 Expansion of and improvement in the reliability of bus services especially for short local trips and to neighbouring boroughs was highlighted, with expanding the click and ride Aviva system seen as having potential.
- 2.156 The importance of designing new development for cycling and walking to link with existing development, networks and especially local services such as schools was also highlighted. Pedestrianising town centres further and traffic taming (particularly in the context of the A2 at Faversham) were suggested.
- 2.157 The responses to Q30 of the LA consultation reflect the mixed approach which will be likely to be needed for the local transport strategy needed to support the local plan review. It is unlikely that public transport can be extensively subsidised or viably extended to all areas. Technology will undoubtedly have a role to play in making all transport 'greener' and more sustainable. However, national policy (NPPF 2018) is also clear on the need for local plans to focus development at locations which are or can be made sustainable through minimising the need to travel and offer a choice of modes of transport. The local plan review itself will need to respond to all of these issues through its development strategy; policies to facilitate transport infrastructure provision; the design, layout an access elements of land allocation policies; and development management policies relating to transport mitigations and parking.

Q31 Planning, congestion and air quality: How much should we be relying on future technological fixes to address air quality and congestion problems? What can be practically achieved by the planning system to mitigate or remove the adverse impacts upon air quality?

- 2.158 Air quality issue recognised as very important and requiring investigation through the Local Plan process, looking at both NOX and particulate matter from traffic, road surfaces, industrial pollution and agricultural pollution. Technology is seen as playing a major part in reducing pollution (e.g. retrofit particulate filters, car design, electric vehicles and charging points in new homes/town centres, public transport based on clean energy, smart working practices (e.g. home working/shifting hours) and more monitoring) but not an immediate impact so current concerns remain. It was also suggested that there is a need for high level political support and funding to be combined with strategic network improvements (e.g. relief roads and traffic improvements on existing roads) alongside an encouragement of walking and cycling infrastructure, sustainably located new development and improvements to public transport which must use clean technologies; and more freight should be moved by rail.
- 2.159 Some respondents suggested that mitigation is inadequate and there should be bans on HGVs and any new development in AQMAs, including the deallocation of allocated sites. Some suggested that the amount of new development should be restricted, that both developers should be required to pay long term mitigation costs and residents to pay for the pollution they cause and there should be a maximum of 2 cars per family.
- 2.160 Some suggested that traffic flow should be prioritised e.g. by removing speed bumps, signals, and 20mph zones as they restrict traffic flow and increase congestion and increasing roundabouts which are good for flow. However, others argued for more pedestrianisation especially in town centres and 10mph limits. It was suggested that the A2 in Faversham should be planned as a local street, rather than a road. Several argued for more planting and trees in existing and new development including town centres. The school run was a cause for concern and arguments were made for making parking at schools more difficult and that children should only attend local schools.
- 2.161 Maidstone Borough Council welcomed early engagement to assess the implications of proposed future development patterns in Swale and the potential traffic congestion and air quality impacts upon Maidstone.
- 2.162 In terms of the local plan review, the policies in the adopted local plan will need to be reviewed and updated in light of the revised NPPF and alongside the results of the transport model, air quality modelling and the green infrastructure strategy which will need to prioritise walking and cycling infrastructure. The local plan review will also need to be prepared to actively manage patterns of growth to support sustainable transport objectives as outlined in the NPPF. Development management policy could also cover the need for adequate provision of plug in charging points. Opportunities to improve air quality set out in the forthcoming Swale Air Quality Action Plan will also need to be promoted through the local plan review. It is also recommended that the Local Plan review pursue a specific Air Quality policy which could provide the opportunity to promote technical guidance for developers on air quality to be produced in parallel with any future revisions to the Swale Air Quality Action Plan.

Recommendation: The Panel is requested to give a steer on the inclusion of a specific Air Quality policy in the Local Plan Review with the opportunity to promote technical guidance on air quality and planning.

Q32 Securing net gains in biodiversity: What steps should we be taking to ensure that all projects, as far as possible, bring with them the necessary measures to secure real enhancements for biodiversity?

- 2.163 There was widespread support for the adoption of formal best practice standards for biodiversity, such as Building with Nature, as well as the idea that habitat and biodiversity protection, enhancement and maintenance, with a strong integration blue/green infrastructure within all development proposals, must be considered essential for new, and existing development.

- 2.164 The revised NPPF now requires that LP's and developments must "minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures." The LP policy will need to be reworded for the LP review to enshrine this principle within it.
- 2.165 The environment stakeholder workshop (Appendix III) highlighted the need for a Green Infrastructure Strategy and a Water Cycle Strategy. A Green Infrastructure Strategy is about to be commissioned but a Water Cycle Study is also needed which will be part of the evidence base.

Q33 Locally designated land: What should the approach be to the existing 'local designations' in the next local plan?

- 2.166 Residents and parish councils widely supported local designations (both landscape designations and countryside gaps) and argued they should be retained and extended and protected from development – to prevent settlement coalescence, protect town centre vitality, preserve village identity, to protect settings to villages and towns and comply with the Government's 25 year Environment Plan.
- 2.167 It was recognised that the Countryside has value beyond landscape itself: to prevent settlements merging, as mitigation for air pollution, for biodiversity, public amenity, flood prevention, sustainable drainage and to prevent soil erosion. The countryside also contributes to Swale's identity and brings a 'feel-good' factor. Brownfield land should be developed before countryside and farmland should be protected.
- 2.168 There was a perception that Faversham's countryside is better protected than Sittingbourne's. Many parish councils south of Sittingbourne argued for a designated buffer to the AONB to preserve its setting.
- 2.169 Some argued that small scale development can be integrated into designated land, but not garden village proposals. Local designations are a material consideration but their weight could be reduced in certain situations e.g. by custom build.
- 2.170 Historic England argued to keep local designations to preserve landscape and settlement character. The AONB Unit expressed support for review of local landscape designations to inform the Borough's development strategy.
- 2.171 Developers argued for a more flexible approach to development of locally designated sites (or that they should be removed completely) and allow villages and towns to grow organically/sustainably whilst retaining green space for community benefit and mitigating landscape harm.
- 2.172 There was recognition that designations can prevent new development being located in the most sustainable areas and can put extra pressure on undesignated land. It was considered that some development in the AONB could be less damaging than outside an AONB. Reference to updated NPPF and hierarchy of designations was made.
- 2.173 In terms of the local plan review, the policies DM24 (Conserving and enhancing valued landscapes) and DM25 (The separation of settlements – Important Local Countryside Gaps) in the adopted local plan will be reviewed and updated in light of the revised NPPF. The review of local landscape designations will be used as part of the evidence base to inform the local plan review. Important local countryside gap boundaries will also need to be examined during the course of the local plan review.

Q34 Achieving good design: How can the local plan help bridge the gap between ordinary and extraordinary design?

- 2.174 This question was primarily answered by residents, Parish Councils and amenity groups. Responses to this question were very much in support of requiring design to respect local character and distinctiveness, particularly with regards to heritage related matters and a general view was that good design should be sought everywhere, rather than extraordinary design achieved in some places.
- 2.175 The relevant adopted Local Plan policies already strive for development which respects local character and it is unlikely that this concept will change. However, the comments also criticised developers who are considered to be getting away with using 'off the shelf' standard designs and cheap materials. Examples were given in Iwade, The Meads and Great Easthall.
- 2.176 The NPPF states that design expectations should be made clear at an early stage and that these should follow and enhance local character. The use of assessment frameworks such as Building for Life is promoted and this is something currently being trialled by officers and could be considered for formal adoption as part of this review.
- 2.177 Depending upon the choice of settlement strategy and site allocations, there may be a greater role for the use of masterplans and design codes that can be used to specify and enforce, either by planning condition or legal agreement, design principles and standards. In the case of schemes where a master developer is involved, these can be further imbedded into the sale of land process to developers and the signing off of subsequent development phases.

Q35 The built environment: What initiatives should we be pursuing through the local plan to improve the built environment, including for historic buildings, structures and areas?

- 2.178 Responses to this question were answered in a similar manner to Q34, but with more of a heritage focus. Residents, Parish Councils and amenity groups shared a view that the Borough's heritage should be promoted through the use of museums and community events, for example, and that heritage assets should receive better protection.
- 2.179 There was some criticism of the Council's enforcement of heritage matters, including for example the use of Article 4 directions. Suggestions to help promote the improvement of historic buildings included the re-instatement of VAT relief on listed buildings, but these are outside the remit of the Local Plan.
- 2.180 A Heritage Strategy is currently under preparation and will provide recommendations and subsequently help inform policy formation moving forwards.

Q36 Agricultural land: How can Swale keep the loss of agricultural land to development to a minimum, especially the highest quality land? Where high quality land is being considered for development, how can we balance the need for new development with the value and quality of agricultural land, particularly best and most versatile?

- 2.181 Responses here reflect one of the big themes of the consultation; namely that Swale's agricultural land resource is considered to be a 'red line' constraint to development and that its value will increase in an uncertain world. Many residents believe that it should not be developed under any circumstances, whilst all efforts should be made to minimise its loss, notably by maximising the use of previously developed land, or, in some cases, use of lower quality land. There is a belief in some quarters that Swale is surrounded by lower quality land.
- 2.182 Developers are split on the issue. One developer, whose land interests' lie on Sheppey, where there is lower quality land, believes that the future settlement strategy should be directed at minimising the loss of high quality land. Others, with interests elsewhere, believe this would lead to an inappropriate strategy.
- 2.183 There is sympathy for those views expressed by many about the importance of the agricultural land resource for Swale. However, until there is a change in Government policy on this issue, it remains the case that national planning policy does not list agricultural land as one of the 'red

line' development constraints for plan making. It is certainly the case that all Councils should be minimising its loss, especially the high quality grades, but it is not a matter that impacts upon the quantum of development that a Borough needs to deliver; rather its potential distribution. Even then, because any distribution of development must be shown to be deliverable and to have regard to other constraints, the use of lower quality land has to be balanced with these other considerations.

Q37 Green spaces: How can we better integrate green space needs so that we provide multi-functional spaces to both maximise health and well-being and biodiversity? Should we be increasing open space provision above that currently sought and should we be considering the adoption of existing best practice for providing green infrastructure, such as those offered by 'Building with Nature'?

- 2.184 There was lots of support for the provision of accessible, multifunctional greenspace which is within easy walking distance of developments as respondents felt that it would help to deliver health and wellbeing benefits for people, along with habitat and corridors for wildlife, whilst helping to mitigate the effects of climate change. The need to ensure adequate funding to maintain the provision in perpetuity was strongly highlighted. The need to maintain and create wild life corridors was also strongly supported.
- 2.185 There was strong resistance from residents and communities for the loss of any existing green space or countryside.
- 2.186 In relation to garden communities, a respondent stated that they must have significant recreational spaces but also easy access to the surrounding countryside e.g. new public footpaths. There was also support for measures to retrofit greenspaces to existing residential areas within Swale wherever possible.
- 2.187 Not many responses commented on whether open space standards should be increased but Natural England felt that Swale should increase open space provision and exceed minimum requirements for green spaces.
- 2.188 The Local Plan Review will be supported by evidence from the Green Infrastructure and Open Space Assessment. New Garden Communities can have specific and high standard of green space incorporated into their master planning. Scope for exceeding current standards of provision elsewhere will need to be evidence based, and consideration could be given as to whether there are sufficient grounds to seek a net overall gain. Design codes can also be used to drive these standards.

Q38 The Swale challenges: Do you agree that the challenges for Swale in Statement 2 opposite represent the big challenges for Swale? If not, what would you include or remove?

- 2.189 Most of those agreeing with the challenges as set out were businesses, Parish Council's, statutory bodies.
- 2.190 There were lots of suggestions about extra challenges to include in the list, including:
- More skills training and apprenticeships needed;
 - Meeting the increased demand for energy and the challenge of transitioning to a low-carbon economy;
 - Improved sustainable transport links, leisure provision, green spaces, restaurants and shops;
 - More local employment;
 - Ensuring developers provide community facilities and necessary infrastructure;
 - Protection of the AONB, woodland and agricultural land;

- Addressing poor quality new builds and poor design;
- Policies and plans for managing water, sewage and waste; and
- Broadband fit for the 21st century.

2.191 There were also lots of general comments that were not strictly relevant to this question, such as that the level of growth proposed is untenable, better consultation with residents are required and the need for the right mix of houses in the right place, which reflects answers given to the earlier questions on housing numbers and type.

2.192 There was a broad level of agreement with the challenges outlined in LA. The additional topics suggested reflect matters which are covered under responses to other questions in LA, and perhaps again reflect the frustration of some respondents to the uplift in development requirements and the perception that environmental and infrastructure issues are not getting the appropriate level of priority. Adopted Local Plan policy also already exists for many of these issues, which will be updated as necessary to comply with the revised NPPF and the evidence base.

Q39 The current approach to meeting development needs in Swale: What would be the possible consequences of continuing with the current approach to meeting development needs in the Borough as set out by the existing adopted local plan vision and settlement strategy?

2.193 There was no clear response to this question, with views sharply divided between residents and developer perspectives. Resident concerns reflected responses to earlier questions in terms of the adequacy and timely provision of infrastructure to support new development. A number of Parish Councils and residents consider that the Council should stay with the Bearing Fruits Local Plan. However, this does not acknowledge the imperative to address the Government requirement for uplift in housing delivery and the need to plan for the period beyond 2031.

2.194 There was also a view that jumping to an alternative strategy to that set out in Bearing Fruits is wrong and invalidates the adopted plan. However, this does not acknowledge that all of the land allocations in Bearing Fruits (once reviewed) will count towards the uplift in housing targets. The key questions are whether we carry on allocating land to meet the uplift in the same way that Bearing Fruits does, and whether this is the most sustainable and deliverable way to tackle the challenge.

2.195 Developer views were focused largely around site specific interests that they were promoting and used that to argue for a similar or different development strategy. Others argued that housing should be provided wherever the market wants to go. As a generality, there seemed to be very much a 'cake and eat it' approach, where there was support for alternative strategies such as new settlements. However, many considered that there should be 'business as usual' in allocating other sites of all sizes which were seen to cover the short to medium term to take account of long lead in times to deliver new settlements.

2.196 Going forwards to generate reasonable alternative development strategies, the local plan process will need to ensure that it is compliant with the revised NPPF and Practise Guidance in its approach to identifying and meeting need. The whole of the evidence base will inform on the deliverability of potential alternative strategies and these will also be assessed using the Sustainability Appraisal. There is also the possibility of exploring the use of a stepped housing trajectory once the Council has chosen its strategy if this assists with appropriate infrastructure delivery (see para 2.87).

Q40 The local plan vision and settlement strategy: If the next local plan were to require a new vision, what are your views on the approach set out in table 8.1.1 over the page?

- 2.197 There were mixed reactions to this question with some respondents agreeing with the proposed vision, especially the environmental elements, but others who felt that a new vision (or Local Plan) wasn't required at this stage. There were lots of varied suggestions of things to add to the proposed vision such as meeting housing needs (especially affordable), air quality issues on the A2, the need for an FE facility in Swale, the need for infrastructure before development, support for development of small sites in the rural area and the protection of greenfield sites. There were a number of comments suggesting that the Local Plan should stop focusing on the Thames Gateway as this is outdated and not relevant and a lot of comments on the uneven split/distribution of development across Swale.
- 2.198 A few respondents thought that the vision was aspirational but unachievable and some wanted to see specifics as they felt that it was too general.
- 2.199 The revised NPPF states that Local Plans should provide a positive vision for the future of each area, so the Council must ensure that the new vision is in accordance with this. At this stage, the draft vision is still flexible and a reasonable working model. It can be revisited and firmed up as reasonable alternative strategies and a preferred option emerge from the evidence base. The 'specific' matters referred to by respondents could perhaps be more appropriately covered through an updated set of objectives for the plan, as these are the means by which the vision will be addressed.

Q41 Village housing: Parish Councils and rural communities are asked to consider whether they would be willing to consider limited releases of land in their areas to support housing needs?

- 2.200 Responses to this question were mixed. Some residents, Parish Councils and amenity groups were resistant to any new housing in their villages. Others accepted that some development is required but were adamant that it should be of an appropriate scale and of a locally distinct design.
- 2.201 Developers and planning agents were supportive of village growth and considered that the existing and previous settlement strategies have led to stagnation of the Borough's rural locations. The NPPF promotes rural housing that would enhance or maintain the vitality of local services, but also states that it should reflect local need.
- 2.202 The rural workshop held in July 2018 painted a similar picture to that outlined above. Attendees were generally of the view that appropriately sized rural development is necessary, but again concern was raised regarding the type and tenure of dwellings here.
- 2.203 To help inform these matters, a SHMA is planned to be undertaken as well as a rural settlement study which will look at the current level of service provision in our villages, amongst other factors. These, along with the SHLAA currently underway, will form important evidence bases when considering development capacity and requirements in the rural areas of the Borough; and what role they could potentially play in reasonable alternative development strategies.

Q42 Elements that could be included in our future spatial alternatives for the distribution and location of development: What elements should be further considered for inclusion as spatial alternatives for the distribution of development in Swale?

- 2.204 A wide range of alternative elements were suggested by respondents including:
- Brownfield only with town centre regeneration at high density close to public transport
 - Not greenfield, BMV, designated sites, site adjacent to conservation areas or in settlement gaps – protect setting of villages/character of settlements
 - Objections to garden villages as massive dormitory housing estates
 - New settlement strategy only being promoted to deliver junction 5a
 - Supports garden villages as can bring infrastructure – public transport key

- Development at Faversham (accessibility, viability) rather than Sittingbourne – remove 85/15 split
- Growth in the Thames Gateway area at Sittingbourne and rural areas eg Newington
- Organic, sensitive growth of existing settlements rather than a new settlement – support existing settlement hierarchy
- Development at proposed levels should be resisted. Only provide for local need.
- Balance dispersed growth across the borough.
- Consider all alternatives at this stage – from infill to new settlement to manage delivery, using small, medium and large builders. A combination of approaches and flexibility is required.
- Development away from A2 and A249 as this end of borough over developed and roads over capacity
- Bapchild appropriate as accessible to Sittingbourne’s services
- Boughton has capacity and like Faversham is viable
- Sheppey (less BMV)
- Sheppey is unviable
- Dispersed growth across rural areas not sustainable
- Growth at villages with supporting services could support villages (including Warden)
- Link Sheppey and Oare with new bridge and open up this end of the borough
- High quality design and creation of communities fundamental
- Delivery and infrastructure are concerns to be considered in choosing alternatives
- Natural England Sites argued that sites with the least environmental impacts should proceed for further consideration. The AONB Unit point out that full account of the AONB designation needs to be taken into account in determining appropriate development strategy which should allocated land of lesser environmental value

2.205 Many of the responses to this question repeated objections and suggestions covered under earlier questions, with opposing views again from developers and residents. Developers, unsurprisingly, sought to justify strategies which would favour their particular site promotion interests. However, there were no clear views among residents as to where development should be positively planned for in responses to this question, in terms of a settlement hierarchy. Responses to Q43 below focused more on broad geographical locations.

Q43 Possible locations for new development: Unless you have advised us already via one of our previous 'calls for sites', are there any locations or sites you think would be suitable for future development? If so, where, why and what for?

2.206 Respondents to this question were mainly developers, businesses and planning agents promoting their own sites for development. Unsurprisingly (while also taking into account the call for sites undertaken in Summer/Autumn 2017 and the sites brought forwards from the last SHLAA), the majority of locations submitted for consideration are in and around Sittingbourne followed by Western Sheppey and Faversham. Some smaller sites were promoted around the various villages and rural locations.

2.207 Responses from residents, Parish Councils and amenity groups included comments on sites which were felt to be unsuitable for development, such as at and around Kent Science Park, promoting the use of brownfield land and suggesting broad locations for development, such as the Isle of Sheppey and Faversham.

2.208 QQ Question 9 (Where should new housing land be focused?) showed a mixed picture as to where residents felt housing development should be allocated. The Top Preference result (see Appendix II) was Faversham which was the top preference for 46% of respondents. Sheppey and new settlements were the top preference for about 11% of people respectively.

Villages and Sittingbourne were the top preference of only 5% of respondents. This result may reflect the predominance of ME9 and ME10 (Sittingbourne) based respondents as discussed in para 2.21 above. The Overall Preference results, which smooths the results to look at the cumulative score of preferences overall, produces a somewhat different picture with Faversham getting 19%; Sheppey getting just under 30% (split between east and west Sheppey); and Sittingbourne just under 13%.

2.209 Additional sites have been added to the SHLAA (if they were not already submitted). Assessment of sites received is currently under preparation and initial reporting on this is anticipated for the January 2019 Local Plan Panel. The NPPF highlights the importance of the SHLAA in understanding the land available and deliverable. This will form an important piece of evidence when the time comes to consider the spatial options available and determine the settlement strategy.

Q44 Models for delivering new settlements: If new communities are to be taken forward, what models for their funding, delivery and stewardship should be considered?

2.210 There is some overlap in the responses here and with those in Q24. Residents, Parishes and groups are sceptical about the likely success of any model and some look to the problems that they would perceive new communities as causing to justify their view. There is though a strong view that the public sector must keep control of the process (and of planning decisions – a reference to the powers that could potentially be given to Development Corporations), perhaps with local community input via a steering group or via use of Community Land Trusts. Some highlight that SBC do not currently have the skills to give confidence to the community on this issue.

2.211 The watchword from developers is flexibility and that the model will depend on delivery and scale.

2.212 As with Q24, this is an issue which will continue to be examined, having regard to the eventual outcome of the agreed spatial strategy for the Local Plan.

Q45 New settlements: Should the Council consider the opportunities offered by new settlements, in particular those which have had regard to 'garden' community principles? If no, explain why. If yes, please explain why and where they should be promoted and at what scale.

2.213 A number of representations all relate to specific proposals as opposed to the general principle and as such are less helpful, although such concerns do legitimately reflect the need to consider the right locations and the right model of development (see Q24/44).

2.214 However, many consider that they should at least be considered, although with clear conditions, such as them being genuine discrete settlements that are in accordance with Government principles and legislation. The views of some are understandably coloured by the mistakes of the past, whilst others believe they are simply a response to London overspill and immigration policies and that they won't be of any benefit to existing residents. Some believe that the problems of existing settlements need to be sorted out first.

2.215 For the development industry, the overall approach should be about giving choice, in other words, the availability of all types of outlets, including new settlements. Some are not convinced that new communities will be able to maintain the delivery needed over the plan period.

2.216 The question asked where they should be considered. There is a strong view that it must be controlled by the Local Plan, but the suggestions largely relate to locations viewed as unacceptable – SE Sittingbourne, Sheppey - or that such proposals are not genuinely new settlements/Garden Communities, or should only be permitted on brownfield land. Such

locations as are positively advanced are generally from the promoters of the schemes themselves, although some residents point to the opportunities available at Faversham.

- 2.217 Q9 of the QQ asked where new development should be located. Only 11.1% made new settlement their first choice, but (as stated at para 2.211) a preference to rural Sheppey, the villages and Sittingbourne. When the 'Preference Scoring' was examined, new settlements slipped further down, with the answers highlighting the main settlements in overall preference.
- 2.218 Clearly this report is not the place to consider the role or otherwise of new settlements in the Local Plan. The Prospectus process is on-going and Members will need to consider their role in due course. What can be reasonably be assumed at this point, is that the land supply benefits of new communities will only be realised over the very long term. If progressed now, new communities may not be the whole solution to the question of where new homes should be built in Swale. The reason for this is that the longer lead in time for them may not enable the Council to maintain a land supply in the medium term and it may well be the case that other more traditional types of allocation will need to be considered in the interim. Whether this would be the case depends on a number of matters such as how much of the adopted Local Plan supply is implemented and whether or not the Council would be able to 'step' its housing target to allow for later delivery. This is a question that Members will return to at a later date.

Q46 Any other comments: Are there any other matters not covered by any of the other questions in this document that you would like to tell as about?

- 2.219 Residents, Parish Councils and amenity groups responded to this question in a manner critical of the LA consultation, particularly regarding its content and technical procedures. This matter has been discussed earlier in Section 2 above.
- 2.220 There was also some questioning of the need for the scale of the review given the final Inspector's report for the adopted Local Plan stating that an early review was required to deal with transport issues. The reason for the nature of the work being carried out has already been explained at previous Local Plan Panels.
- 2.221 Aside from these 2 matters, the remainder of the comments were mainly re-iterations of concerns regarding the potential scale of development and the impacts upon infrastructure, facilities and the environment as discussed in the big themes and elsewhere throughout the report.

3 Proposals

- 3.1 Members are invited to note this report on the consultation responses; to provide a steer to officers on the following issues; and recommend to Cabinet that these are agreed:
- i) *The Panel is requested to consider whether officers should give further consideration to the use of minimum density standards.*
 - ii) *The Panel is requested to provide a steer to officers as to whether evidence should, in the first instance, be researched in respect of the optional technical standards for water, space and accessibility.*
 - iii) *The Panel is requested to provide a steer on whether other measures to increase the deliverability of brownfield sites should be considered.*
 - iv) *The Panel is requested to give a steer on the inclusion of a specific Air Quality policy in the Local Plan Review with the opportunity to promote technical guidance on air quality and planning.*

- v) *The Panel is requested to consider whether officers should give further consideration to an evidence base on how the local plan can mitigate or adapt to overheating from rising temperatures as a result of climate change.*

4 Alternative Options

- 4.1 Whilst there is still a great deal of evidence to be collected and evaluated alongside the responses from this consultation, (and subsequent ones) in shaping the Local Plan Review, a number of concerns and issues have been highlighted, along with potential further research streams and it would not serve any useful purpose not to note the findings.

5 Consultation Undertaken or Proposed

- 5.1 This exercise is part of the pre-submission consultations undertaken under Regulation 18 of the Local Plan Statutory Regulations (SI 767, 2012). As such, it will be included in the Statement of Community Involvement which will list out all consultation undertaken and how it was used to shape the local plan. This statement is one of the documents which will accompany the submission version of the Local Plan when it goes for Examination in Public. Before then, further public consultation opportunities are planned on the Issues and Options stage of plan preparation, which will be reasonable alternative development strategies and potentially indicating a preferred option (anticipated autumn 2019); and on the Submission version of the plan which will be the fully worked up plan intended for submission for Examination in public (anticipated late 2020).

6 Implications

Issue	Implications
Corporate Plan	Supports the Council's corporate priorities for a borough and a community to be proud of.
Financial, Resource and Property	Within Local Plan budget.
Legal and Statutory	The Local Plan is prepared under the Planning and Compulsory Purchase Act 2004 (as amended); and in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (Statutory Instrument 2012 No.767) (as amended by SI 1244, Dec 2017).
Crime and Disorder	None anticipated at this time.
Sustainability	The Local Plan process will be subject to Sustainability Appraisal at key stages.
Health and Wellbeing	None at this time.
Risk Management and Health and Safety	None anticipated at this time.
Equality and Diversity	The Local Plan process will be subject to a Community Impact Assessments at appropriate points.

7 Appendices

- 7.1 Appendix I: Summary Table of Responses to Looking Ahead Consultation document
- Appendix II: Summary of Results from Local Plan Review Quick Questionnaire
- Appendix IIIa-d: Summary Notes from Technical Stakeholder Workshops

8 Background Papers

- 8.1 A verbatim report generated from the Objective online system of all responses to the Looking Ahead Consultation Document will be placed in the Members' Room. These may also be viewed online at <https://swale-consult.objective.co.uk/portal/> and click on 'Who said What'
- A verbatim report generated from the Objective online system of all the free text box responses on the Quick Questionnaire will also be available in the Members Room.

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Appendix I: Looking Ahead 2018 – Summary of Representations

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>Q3 Scope of the next local plan: Are there any specific matters that you consider the next local plan should be covering or amending from the adopted version?</p>	<p>107</p>	<ol style="list-style-type: none"> 1. Assessing and improving infrastructure problems including transport, healthcare, leisure and civic facilities, public services, utilities and education. This should be dealt with before new development. 2. Environmental issues such as air quality, water, flooding, landscape designations, global warming, the loss of Grade I agricultural land, ancient woodland, the provision of amenity green spaces, SSSIs and biodiversity. 3. Update the brownfield land register and use brownfield sites to reduce housing allocations in the countryside/rural areas/greenfield sites. 4. A close look at the land to the north of Faversham. 5. The impact of Brexit in general and upon population statistics. 6. The lack of technical and managerial jobs 7. Changing demographics, the ageing population and their social/health/housing needs. 8. The design and layout of buildings to create secure and comfortable living environments. 9. Housing figures should be lower than suggested and based on the needs of existing residents and their families and not on an influx of new residents. 10. Kent Science Park should not be allowed to expand; it is not full to capacity currently. 11. Fuller analysis of the jobs being created in London and the south-east as a whole, and the impacts this will have on commuters looking for housing in Swale. 12. Faversham needs to take its fair share of development. The whole borough should be treated equally. 13. Renewable energy generation and management should be more of a 	<ul style="list-style-type: none"> • Many of the matters raised will be covered by pieces of evidence base which are referenced more specifically in other questions. However, consideration given to the need for any further evidence not currently identified. • Determination of settlement strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>central issue. (Cleve Hill Solar Park Limited.)</p> <p>14. Greater protection of the AONB and agricultural land. Improved healthcare facilities before considering further population increases, Timely implementation of the upgrade of M2 Junction 5 and the A249. Accurate brownfield land register. Investment in public transport. (Bredgar PC.)</p> <p>15. The protection of the historic environment and the refresh of the relevant policies in light of the changes to the NPPF. (Historic England.)</p> <p>16. Address a level of growth in line with the Objectively Assessed Need by taking a visionary, creative and positive approach which may require a new interpretation of sustainable development. Strive for design quality of place making. Ensure that growth is viable and translates into built floor space delivered alongside necessary infrastructure. (Hume Planning Consultancy Ltd.)</p> <p>17. Policy DM 24 of the existing Plan and how the AONB setting is addressed. (Kent Downs AONB Unit.)</p> <p>18. The current local plan should be delivered as agreed last year. Failing to do so would represent a gross waste and misuse of public funds to which Swale BC should be held accountable. (Milstead PC.)</p> <p>19. Robust policies to ensure that biodiversity net gain is achieved, as per the Government's 25 year Environment Plan and the revised NPPF. (Natural England.)</p> <p>20. Removal of the 85/15 split between Sittingbourne and Faversham. Removal of local regional service hubs. (Newington PC.)</p> <p>21. A serious review of the restraint policies which have resulted in very little land being restraint free and able to meet housing requirements. (Peter Court Associates.)</p> <p>22. The current Local Plan is valid, should not be replaced so soon after being adopted and should only be reviewed in light of the infrastructure issues highlighted. There is no justification for new</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>settlements if they are only to support the infrastructure costs associated with an A2/M2 link road and motorway junction and there should be no significantly increased housing figures. Pay heed to the Landscape Designations Review in 2017 and improve protection of special landscapes, agricultural land and the natural environment. Improve healthcare facilities. Assess levels of home working in employment. Spread development evenly around the Borough. Improve the rail infrastructure. New parking standards must be adopted. Up to date brownfield land register. Increase density in major urban areas. Focus on high density employment in mixed used schemes. Urgently upgrade junction 5/A249. (Rodmersham PC and Tunstall PC.)</p> <p>23. Does the plan serve the people of Swale, or is it fulfilling London overspill?</p> <p>24. Heritage should be mentioned as a heritage review is currently being carried out.</p> <p>25. Town centre needs further regeneration (including looking at parking issues).</p> <p>26. No.</p> <p>27. Sittingbourne suffers from bottleneck traffic at rush hour and school times. Road crossing from the north to the southern side of the train station.</p> <p>28. Preventing urban sprawl and limiting the erosion of space between villages so they maintain their own character (protecting important local countryside gaps). Preventing rat running through villages.</p> <p>29. Impact upon energy requirements and natural resources.</p> <p>30. Current plan is valid and should not be replaced with a whole new plan, including new settlements. The current plan should be reviewed in light of existing infrastructure issues, particularly relating to Junction 5 of the M2 and the A249. The upgrade of junction 5 of the M2/A249 will not be complete until 2022 at the earliest. Objection to garden</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>towns or villages and significant increase in housing numbers. No updated Annual Monitoring Report and it is hard to establish current delivery. All infrastructure/facilities/utilities require upgrading. (The Five Parishes Group.)</p> <ol style="list-style-type: none"> 31. The use of trees to absorb air pollutants, shade buildings, conserve water, deter erosion and soften architectural edges. 32. Supports the forward thinking of Looking Ahead. (Faversham TC.) 33. Remove the proposed development in Wises Lane, Sittingbourne. 34. Housing development should be lower than suggested. 35. No, due to the current plan only being adopted in 2017. 36. An update to the SHMAA should be completed. (Kember Loudon Williams.) 37. We cannot have continued growth in both housing and employment. 38. Creating an identity for Sittingbourne. 39. Ensuring that housing need is met. Ensure that delivery is increased. Regeneration and transport. (MLN Land and Properties.) 40. Increased housing need will require the Plan to re-visit many of its fundamental building blocks. (Gladman Developments.) 41. Better understanding of the advantages of custom-build as opposed to self-build. 42. Consider MMO functions during the preparation of the Plan. (The Marine Management Organisation.) 	
<p>Q4 Evidence for the new local plan: Are there any specific topic areas that you think need further research?</p>	<p>101</p>	<ol style="list-style-type: none"> 1. Impact on (and dealing with) infrastructure (road and public transport capacity), air quality, education, the environment, flood risk, noise and light pollution, utilities, public services, healthcare, amenities, general quality of life and biodiversity. 2. Particular transport assessments of Stockbury roundabout and Barton Hill Drive. 3. Update traffic modelling for large housing developments which still have not been built out due to inaccuracies in the past and the fact 	<ul style="list-style-type: none"> • Many of the matters raised will be covered by pieces of evidence base which are referenced more specifically in other questions. However, consideration will be given to the need for any further evidence not currently identified. • Determination of settlement

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>this was highlighted as a big issue in the current plan.</p> <ol style="list-style-type: none"> 4. The loss of agricultural land in the light of Brexit and a possible need to be more food self-sufficient. Opportunities to increase the productive use of agricultural land. 5. The preparation of a heritage strategy is welcomed, as there is not one at the moment (Inc. Historic England.) 6. Housing needs, the needs of existing residents, projected increases and the potential for using currently unused accommodation. 7. Employment, including Kent Science Park's aspirations and the use of warehouses which are land hungry but provide little employment. Incentives to attract knowledge industries and small manufacturers which bring prosperity. 8. Review of existing allocations. 9. The public should be engaged in the decisions around hiring consultants rather than relying on developer-led appointments. 10. Housing should be fairly spread around Swale. 11. Any business case should consider a 'do nothing' option. 12. More about people's perceptions. 13. Access to the countryside. 14. A specific strategy for using brownfield sites and empty properties which could take some of the need. 15. Analysis of brick earth deposits, mineral sites and underground water sources. 16. How to proactively provide for electric cars and promote walking/cycling. 17. Economic modelling on the impacts of Brexit. E.g. industrial jobs may be lost and Swale could become more of a commuter feed for London needing better rail links. 18. Impacts of a new Thames crossing. 19. Changing employment patterns to more working from home and access to high speed internet/business links in rural areas. 	strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>20. Impact of greenfield development on water resources. Traffic modelling and air pollution. Building more roads will increase traffic volume not reduce it. Impact of housing growth on all infrastructure/services and requiring a deliverable plan to upgrade them. Creation of a register of flora and fauna. (Bredgar PC.)</p> <p>21. Good that an updated strategic flood risk assessment is to be carried out. With regards to groundwater and contaminated land, the main things to be looked at are: foul sewer provision in rural areas, SUDS design on brownfield sites, the risk of piling over aquifers and the expansion of cemeteries. (Environment Agency.)</p> <p>22. The deliverability of growth, especially in relation to the transport network, is vital. (Hume Planning Consultancy.)</p> <p>23. The Landscape Designation Review should be used to identify valued landscaper in the new plan, including those in the setting of the AONB. (The Kent Downs AONB Unit.)</p> <p>24. A detailed air quality assessment may be required. Furthermore, it may be appropriate to review the green infrastructure strategy to realise the delivery of environmental net gain. (Natural England.)</p> <p>25. Air quality on the A2 corridor, visibility of the priority of brownfield sites – a brownfield land register should be produced, special provision for people down-sizing due to the bedroom tax, the validity of research relating to transport links for settlements. (Newington PC.)</p> <p>26. Review the restraint policies, particularly around the AONB. (Peter Court Associates.)</p> <p>27. Assessment and upgrade of infrastructure including roads, leisure facilities, medical facilities, schools, water supplies and drainage, utilities, broadband services, flora and fauna, geographical features, buffer areas to the AONB and air quality. (Rodmersham PC and The Five Parishes Group.)</p> <p>28. Development should not involve the loss, or prejudice the use of, playing fields. The Playing Pitch Strategy should be updated annually.</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>Sport England's Active Design guidance provides a good opportunity for designing in and promoting physical activity in new development. (Sport England.)</p> <p>29. Assessment of housing needs and possible support from neighbouring Councils to ensure adequacy of resources and infrastructure. Investigate mineral/brickearth sites and water sources and aqueducts. Flora and fauna assessments. The loss of agricultural land, in the light of Brexit. Accessibility of new development to rail links. Infrastructure in place before building. (Tunstall PC.)</p> <p>30. In the light of changes to national policy, the Council should ensure that evidence relating to allocated sites is robust, up to date and based upon local evidence. This should be carried out on existing allocations too and the Council should be open to removing sites where delivery is uncertain. Where evidence is critical to determining a spatial strategy, it should be updated. (MLN Land and Properties.)</p> <p>31. Agree the new evidence base to underpin the local plan, but the Council should additionally consider detailed evidence on air quality, mineral safeguarding and facilities/demographics in rural settlements. (Gladman Developments.)</p> <p>32. Consider implementing a more flexible approach to remove designated local green spaces that can be developed more suitably whilst retaining an element of green space. (Kember Loudon Williams.)</p> <p>33. The standardised approach to calculating housing need will have a significant impact upon Swale and a broad range of sites will be needed to meet the challenging target. The need for employment land should not be neglected. (W.T Lamb Holdings Ltd.)</p> <p>34. Providing actual affordable homes rather than just saying they are.</p> <p>35. Impact upon small historic villages.</p> <p>36. How will recycling and waste be handled with the increased population?</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		37. What youth services will be provided? 38. Northern relief road must be completed, particularly for the residents of Great Easthall. A junction 5a (M2) would enhance this more by reducing traffic in the congested areas. 39. The Brett Associates report is biased towards garden towns and does not fully explore the alternatives. The population assumptions upon which the report is based are questionable and require research, particularly in the light of Brexit. 40. No. 41. Understand why people do not shop in Sittingbourne. 42. Look at how to ensure more people see these consultations e.g. through media coverage. 43. Planning applications rely on developer supplied information which is biased towards their own objectives. 44. The potential for Sheppey, which appears to have been ignored/played down. 45. The development of north Sittingbourne in a waste management area of regional importance needs to be considered and whether this has been referred to in the Kent County Council Minerals and Waste Plan. 46. Lorry parking. 47. Custom-build site requirements and how to promote this provision which is increasing.	
Q5 The big future questions: We have provided just a small digest of some of the big challenges that may face us. This is your chance to	89	1. There is no mention of Brexit, national governments and how they might impact upon immigration and housing need. 2. Worker flexibility may reduce commuting and result in a demand for additional local services such as leisure facilities, which are lacking in Swale. 3. No greenfield development should take place until a full study of local wildlife and migratory bird habits has been carried out. 4. The effects of new growth on air quality.	<ul style="list-style-type: none"> • Many of the matters raised will be covered by pieces of evidence base which are referenced more specifically in other questions. However, consideration will be given to the need for any further evidence not currently identified. • Determination of settlement

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>tell us your own thoughts about what the future may mean for us. What do you think?</p>		<ol style="list-style-type: none"> 5. Infrastructure for electric and autonomous vehicles. 6. Telecommunications infrastructure, particularly in rural areas. 7. Build on brownfield sites first/only. 8. Social care, housing needs and environmental issues are all important. Building dense housing with small gardens encourages people to escape to open areas. 9. Swale's greatest asset is its heritage, character and ancient landscapes which could all be lost under garden towns and sprawling housing estates. 10. Over-optimistic view of the switch to electric vehicles. Longevity of current vehicles. HGVs and diesel vehicles. Air quality issues will increase or persist. Concerned that housing is only viable with the correct infrastructure. (Newington PC.) 11. Agricultural land should be preserved in light of Brexit. This and the unsettled Asian and USA markets which will result in us needing to be more food self-sufficient. 12. Infrastructure must be prioritised over housing. Roads, railways, education, healthcare, pollution, terrorism, recycling, air quality and links with Europe all need reviewing. 13. Understand and quantify population projections so a brief can be developed identifying what type of housing and services will be needed. 14. Climate change is hard to predict. Sea level rise and dramatic weather patterns will have an impact on Swale in terms of flooding and sewage infrastructure. This is particularly an issue considering that garden villages/urban extensions would be built over agricultural land, changing the area's hydrology. 15. The local plan should promote the opportunities for renewable energy that Swale has to offer, particularly around solar and wind, with as few obstacles as possible, as per the NPPF. (Cleve Hill Solar Park Ltd.) 16. Climate change, food production, water supply. Preservation and 	<p>strategy.</p>

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>planning to maximise the use of natural resources must be top priority. Agricultural land and water catchment land must be given the strongest possible protection. Must not take other Council's housing allocations. (Bredgar PC.)</p> <p>17. The historic environment has the potential to contribute to sustainability through the re-use and adaption of historic buildings, parks, gardens and scheduled monuments. (Historic England.)</p> <p>18. Future plan making should focus on vision, creativity and building on the opportunities for growth and expansion, which should take proper account of higher value locations which can self-fund infrastructure provision, resolve highway issues and secure quality place-making. This will lead to greater investment confidence and trickle down to areas in need of regeneration. Niche housing, green technology, sustainable construction and reducing car use alongside improving public transport are all key issues. (Hume Planning Consultancy.)</p> <p>19. To meet the borough's future needs, greenfield development will be necessary, particularly in the eastern part, around Faversham and Boughton. (Redrow Homes.)</p> <p>20. The population values access to environmental resources, one such resource is the AONB whose resilience is under threat. The emerging plan must incorporate the environmental net gain principle. (The Kent Downs AONB Unit.)</p> <p>21. Difficult to address the issues while the NPPF has not been finalised or until the major infrastructure projects around the M2/Junction5/A249 have been delivered. The new Thames crossing will exacerbate traffic on the M2 and new settlements would damage local road infrastructure further, as agreed by Highways England during the last local plan examinations. Education and training, healthy housing development, healthcare, water supply, air quality and changing demographics are all key issues. (Rodmersham PC and The Five Parishes Group.)</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>22. Impacts of Brexit, job creation in the Thames Gateway, demographics and housing type. Sittingbourne as a market town. (Tunstall PC.)</p> <p>23. The delivery of housing should be considered as one of the big challenges for the plan to address. (MLN Land and Properties.)</p> <p>24. Ensuring enough deliverable land is allocated in the right places, with the right quality housing. Promoting the right sort of employment space. Anticipating and guiding technological innovation in the transport sector. Addressing the future of town centres. Providing the right infrastructure at the right time. (Duchy of Cornwall.)</p> <p>25. The local plan should recognise the value of smaller employment sites and not risk their decline to larger ones. The focus on housing should not be solely on need but also on how the need will be met in a continuous and sustainable way. Climate change, renewable energy and how infrastructure will accommodate additional supply are key issues. (W.T Lamb Holdings Ltd.)</p> <p>26. Fairer development split across the area, i.e. in Faversham.</p> <p>27. Footpaths to be kept clear.</p> <p>28. Great weight should be given to proposals which incorporate significant communal green/leisure space and biodiversity gains. Walking and cycling need to have greater significance in promoting health. Transport which become less of an issue as greener technologies develop.</p> <p>29. Located business here due to the rural nature. This may not be able to continue in light of increased expansion.</p> <p>30. Swale needs to be bold to prevent Sittingbourne becoming a commuter down. Infrastructure needs to be planned in advance.</p> <p>31. There should be villages specifically for older people which would free up existing housing stock and provide them with a better environment. People in areas at risk of flooding in the future will need re-homing.</p> <p>32. The Borough as it is should be made as good as it can be before more development occurs.</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>33. Increases in artificial intelligence and automation will increase the demand for leisure facilities. Dealing with the ageing population and clean growth are also key issues.</p> <p>34. How will Swale maintain its mix of rural and suburban areas?</p> <p>35. The northern powerhouse and other similar regional linkups would be better rather than continuing to feed the exceeded critical mass in London and the surrounding areas.</p> <p>36. Crime.</p> <p>37. All new builds should have solar panels.</p> <p>38. Retaining and improving the character of the area.</p> <p>39. Changes in transport and how it is used.</p> <p>40. The development of completely new communities seems the only viable way forward but it must be balanced with the loss of agricultural land and biodiversity.</p> <p>41. Affordable homes are required now and should be built in small lots so as to avoid creating slum areas. We will need to accept mass migration from countries most impacted by climate change, but they must be spread evenly around the country.</p> <p>42. Protection of agricultural land, particularly the land south of the A2 between Sittingbourne and Faversham.</p>	
<p>Q6 Swale's Strengths, weaknesses, opportunities and threats: Do you agree with this analysis of Swale's strengths, weaknesses, opportunities and</p>	<p>90</p>	<ol style="list-style-type: none"> 1. The potential labour issues as a result of our departure from the EU cannot be proved. 2. The impact of a direct rail link between Faversham and Ashford upon the AONB. (Kent Downs AONB Unit) 3. Swale has strong creative and cultural activity for example Sheppey Little Theatre and Avenue Theatre as well as cinemas, pubs and community centres. (Theatres Trust) 4. Area becoming less pleasant to live due to the amount of fly-tipping. 5. Why consider building over greenfield sites if positives are horticultural fruit production and outstanding natural environments and 	<ul style="list-style-type: none"> • Many of the matters raised will be covered by pieces of evidence base which are referenced more specifically in other questions. However, consideration will be given to the need for any further evidence not currently identified. • Determination of settlement strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>threats? If not, what should be added or taken away?</p>		<p>weaknesses are congestion and poor air quality.</p> <p>6. There is a contradiction in saying that migration from London is both an opportunity and a threat. This migration is putting pressure on the rail network which is at or over capacity. Skilled people will not migrate from London because they can afford to live there. Those that do may be taking advantage of cheaper housing and still commute to London therefore not expanding Swale's skill base. It is a threat.</p> <p>7. Kent Science Park does not deliver the high employment opportunities suggested and the proposed junction 5a on the M2 would result in a significant increase in warehouse/distribution and lorry parking amounting to an inappropriate use of agricultural land which could be better used in the rural economy. There should however be improvements to the existing junction 5. It is not accepted that there is a dwindling supply of employment land. More attention should be paid to the management and accuracy of the Brownfield Land Register. (Inc. Bredgar PC.)</p> <p>8. Heritage assets are a strength that could be used as an opportunity to provide attractive environments. There is however a threat from poorly managed growth that can detract from the same assets. (Historic England)</p> <p>9. The weaknesses identified can be turned around with more confidence in the area and education/skilling of the workforce. There is a lack of further education. Poor land values are an opportunity to attract inward investment. (Hume Planning Consultancy.)</p> <p>10. Future housing growth should not be seen as a threat, but as an opportunity to foster economic growth, improve skill levels, and capture higher land values as a means to addressing the need for community services. (Redrow Homes.)</p> <p>11. We should develop the creative job opportunities market through educational establishment developments.</p> <p>12. Swale BC should preserve the rural identity of the area and should not</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>take any housing allocations from other boroughs. Current allocations should be spread more fairly and evenly.</p> <ol style="list-style-type: none"> 13. There should be an equivalent analysis for each of the three main areas, Sheppey, Faversham and Sittingbourne, to the correct imbalance and inequalities. 14. SWOT analysis is an outdated tool. 15. Vegetation is cut down and often not replaced. 16. Noise and light pollution should be kept to a minimum. 17. Milton Creek Country Park is a great amenity but not easily accessible. 18. Local health services and the nearest hospitals are at capacity. 19. Yes. (Inc. Newington PC and OSG Architecture Ltd) 20. Brownfield sites should be built on before greenfield sites. 21. Infrastructure must be prioritised over housing and to add more housing would exacerbate the existing issues such as road, rail, parking, healthcare and education capacity problems. 22. Greater assessment of opportunities represented by solar resources should be made, as Kent receives some of the highest levels of solar irradiation in the UK and is ideally placed to take advantage of developments in solar energy. Swale's proximity to important elements of national grid infrastructure is a valuable asset that is a major constraint that energy developers must face. (Cleve Hill Solar Park Limited.) 23. The natural environment is a huge asset and opportunity which is not recognised. The economic benefit and the health and wellbeing benefit from people engaging with their local environment should be considered a huge opportunity. (Natural England) 24. The analysis is sound but the crucial issue is whether the Council is genuinely prepared to tackle them. Allocating land for housing is difficult and the key issue is whether there is the political will for these matters to be addressed. (Peter Court Associates.) 	

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		<p>25. Any future large scale development would move strengths to weaknesses and opportunities to threats. Certain employment sites are given a higher profile, e.g. Kent Science Park which provides at best 1,800 jobs when other more important employment sites such as the "Sittingbourne Hub" area around Eurolink and the northern part of Sittingbourne/Kemsley Mill area provides in excess of 18,000 jobs. Swale BC should be careful how it prioritises these employment sites. Sittingbourne and Faversham would be swamped by any proposed Garden Town or Village development. (The Five Parishes Group.)</p> <p>26. Strengths should include: HS1 link with 4/5 main line stations in the Borough, good choice of selective and non-selective secondary schools, the beauty and tranquillity of the villages, Eurolink as a previous brownfield area where small and large businesses can thrive and excellent village schools with outstanding Ofsted reports. Sittingbourne as a market town should be encouraged along with Faversham. The natural environment is a strength not an opportunity. Large scale development would reverse strengths to weaknesses. The next generation of land owners may not wish to farm. The Government needs to support farmers, especially around the issue of Brexit. Opportunity lies in jobs being created in the Thames Gateway. A threat lies in London social housing with the requirement of additional support and funding. (Tunstall PC.)</p> <p>27. Question the inclusion of migration from London as a threat. It should be seen as an opportunity and it is highly likely that this trend will continue. (MLN Land and Properties.)</p> <p>28. Opportunities should include the development of sites that are well related and connected to villages. (Kember Loudon Williams.)</p> <p>29. The role that successful small employment sites play, such as Newington Industrial Estate, has been missed. There are significant opportunities for low carbon power sources and the Borough is well placed to be a focus for the renewable sector. (W.T Lamb Holdings)</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>Ltd.)</p> <p>30. Disagree with concept of 'relatively cheap houses', which are always relative to income and the ability to service a mortgage. Local wages are low compared to London and therefore local people will be unable to obtain large enough mortgages. This will result in Londoners migrating to Kent.</p> <p>31. Disagree that Swale should be encouraging large distribution centres and business parks as they attract cheap labour, heavy lorries, air pollution and congestion. Disagree that there is a dwindling supply of employment land with the potential to re-use brownfield sites. Housing growth would not be poorly managed unless Swale BC allows it to be.</p> <p>32. A lack of foresight about how things are going to go in an overcrowded area.</p> <p>33. Opportunities are underwhelming and unimaginative.</p> <p>34. The resulting priorities and emphasis may be flawed and not from a community level.</p> <p>35. Swale BC is influenced by business people and not listening to the ordinary people.</p> <p>36. Inadequate and overall lack of leisure facilities. Poor accessibility to Milton Creek and The White Horse Wood Country Park. The high speed is no faster than the normal trains and the roads are congested. There is no thought of future proofing in the planned junction 5 upgrade. Apart from cheaper housing there is little to commend the area. If plans go ahead for a "garden village" then huge investment is required in leisure, retail, employment and infrastructure.</p> <p>37. There is no consideration of employment, industrial and commercial development in Faversham or any mention of strengths etc. that relate to Faversham. The analysis is predicated on Sittingbourne and Sheppey. Development needs to incorporate the coastal offering which is not considered.</p> <p>38. The state of the High Street is a weakness and threat.</p>	

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		<p>39. Lack of understanding about the potential for Sheppey's history. No real tangible changes here for a number of years.</p> <p>40. There is no vision for what Swale wants to be.</p> <p>41. The town regeneration seems to be only an increase in food outlets and low end shops. High speed trains do not speed up access to London and there is no direct access to the continent. The proposed housing may not be very attractive.</p> <p>42. Poorly managed growth has already led to transport, social infrastructure and environmental pressures which will only be worsened and are the reason why business growth potential is poor. Investment stays away because of Sittingbourne's poor image. It should be marketed as an affluent market town with emphasis on the historic High Street and countryside. There is missed potential in the historic town of Milton Regis which is lost amongst industry and over development.</p> <p>43. New housing has been focused in town centres to the detriment of investment in rural areas which are now declining in services and infrastructure. There is an opportunity in controlled village and hamlet expansion.</p> <p>44. The Sheppey crossing should have been a tunnel not a bridge so it stays open. No southern relief road to the M2. M2 should have been upgraded to 3 lanes. Where are the doctors and schools?</p> <p>45. Swale's biggest asset is its fantastic location in the county with key access to places if the road infrastructure could be sorted.</p> <p>46. Lack of further education.</p> <p>47. Main strength is the available land close to London but only if the transport infrastructure is in place. Swale should seek this infrastructure from central government.</p> <p>48. Business parks are not strengths and Kent Science Park is not meeting its goals of bringing in skilled workers and is under immense pressure from competition parks. Sittingbourne town centre must be a</p>	

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		<p>priority to keep the community viable. Land values should not be a barrier to investment.</p> <p>49. Large warehousing tends to be low paid job and produces heavy lorry traffic. Heritage strength is limited. The latest highways agency plan for junction 5 improvements means the proposal for junction 5a would not be needed. Storage of power could be a great opportunity especially using newer technologies such as liquefied air systems.</p> <p>50. The strength of our high grade agricultural land (and mild, relatively dry climatic conditions) is mostly ignored and will be a massive opportunity post-Brexit in terms of self-sufficiency, improved landscapes and biodiversity. A new Bill is expected later this year to preserve and improve the health of the UK soils. This is one of the most important parts of sustainable development. Not enough is being done to ensure that planning conditions are properly adhered to.</p> <p>51. Pollution is a major threat that will increase with new housing and has serious health implications which need addressing. Advances in technology and artificial intelligence places a threat on employment opportunities. London migration will place further pressure on our transport infrastructure.</p> <p>52. The number of volunteers is reducing. There is an absence of social and really affordable housing and there is slow delivery on allocated sites where developers are maximising value by restricting supply. There needs to be a look at the mix of homes being built in Faversham.</p> <p>53. There is no mention of cycling or walking which have the potential to reduce traffic in town centres.</p> <p>54. Disagree that there is cheap land and house prices, that there is an open and flexible environment for businesses to thrive or that there is strong cultural activity (unless you live in Faversham). A lot has been spent on maintaining Faversham's heritage but the same has not happened for Sittingbourne. Disagree that there are outstanding</p>	

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		<p>natural environments. Sittingbourne town centre regeneration will not make it any better than it is. There will be shops of no substance and a new cinema is not required.</p> <p>55. Contradictions in the analysis such as saying a strength is the cultural activity but a weakness is the underdeveloped cultural offer. How can poor land values limit the potential for high quality development. The regeneration doesn't create more wealth just redistributes the retail spend. Brexit is an opportunity for both high and low skilled people to find work.</p> <p>56. Very few people want to be out in the town centres at night time. The rail link between Faversham and Ashford might benefit the people of Faversham, if it ever happens. The current services need to be improved. Scepticism regarding Sittingbourne town centre regeneration.</p>	
<p>Q7 The next generation of employment sites: Where should we be locating the next generation of employment sites?</p>	<p>66</p>	<p>Sittingbourne</p> <ol style="list-style-type: none"> 1. Sittingbourne town centre, around Milton Creek and land to the north of Sittingbourne train station. 2. Re-develop and clean up Milton Creek, as it currently puts potential employers off. 3. Expand the Eurolink Castle Road industrial estate, but ensure there is a sufficient road capacity. 4. Not in gridlocked Sittingbourne. 5. To the North of Sittingbourne where there are easy access to sea, rail and road connections. 6. Use redundant brownfield sites such as part of the Eurolink Estate. 7. Sittingbourne needs to adopt a USP and develop Sport and Art facilities to attract employers. <p>Sheppey</p> <ol style="list-style-type: none"> 8. Adjacent to the Port of Sheerness. 9. Anywhere on the Isle of Sheppey. 10. Sheppey, Medway and other port towns need to be focussed on. 	<ul style="list-style-type: none"> • These responses will need to be looked at in conjunction with the recently finalised Employment Land Review. • Members will need to give a steer as to where to locate new employment allocations.

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		<p>Faversham</p> <p>11. M2 Junction 7 opens up an area in Faversham east, Brenley corner and along either side of the A2 and Boughton and Selling (with an under used rail station.)</p> <p>12. Suitable sites near/between Faversham & Canterbury are available.</p> <p>13. Land available at Oare Road.</p> <p>Elsewhere</p> <p>14. Better site accommodation needed for agricultural workers (Tunstall PC.)</p> <p>15. J5a will give the Science Park and Teynham distribution hub an opportunity to grow.</p> <p>16. Kent Science Park should be included when considering future employment sites as it's preferable to sustain and expand established employment hubs which benefit from clustering. (Quinn Estates Ltd.) Kent Science Park has capacity.</p> <p>17. Kent Science Park is unsuitable due to poor access.</p> <p>18. Promote the use of subsidised small scale farms.</p> <p>19. Newington Industrial Estate has the ability to be extended in a sustainable manner and should be developed in preference to new sites. (W.T Lamb Holdings Ltd.)</p> <p>Other Locational Points</p> <p>20. Adjacent to the motorway/main roads, rail links and local ports.</p> <p>21. Develop and invest in the Swale, dredge Milton and Faversham creeks and develop waterfront leisure, industry and homes.</p> <p>22. Swale already has sufficient employment sites.</p> <p>23. Brownfield, close to transport links. (Tunstall PC.)</p> <p>24. There is sufficient brownfield land within the borough to support future employment. (Bredgar PC.)</p> <p>25. Make more of our waterfront locations.</p> <p>26. Priority should be given to existing employment sites.</p> <p>27. Located close to existing housing.</p>	

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		<p>28. Use existing sites to their full potential.</p> <p>29. Employment growth is spatially more footloose. (Hume Planning Consultancy.)</p> <p>30. Good public transport corridors between housing areas and employment nodes. (Inc. Hume Planning Consultancy.)</p> <p>31. Local wages do not provide enough money for young people to get on the housing ladder.</p> <p>32. Large scale distribution can damage landscape and should be located away from the AONB and its setting. (Kent Downs AONB.)</p> <p>33. Sites with the least ecological and landscape impacts should be used for employment use. (Natural England.)</p> <p>34. Need to be in locations sought by employers. (Peter Court Associates.)</p> <p>35. Release land in smaller settlements and in deprived communities. (Peter Court Associates.)</p> <p>36. Mixed with housing and located in town centres and using brownfield sites to a higher density. (Rodmersham PC, Five Parishes Group.)</p> <p>37. The whole model of employment will change due to technology and this needs to be factored into any modelling.</p> <p>38. Small employment units in our empty High Street.</p> <p>39. Employment in town centres to sustain retail and leisure. Each urban town centre must have specific regeneration plans. (Rodmersham PC, Five Parishes Group.)</p> <p>40. Equally spread across our borough.</p> <p>41. Not in the AONB or Grade 1 or 2 agricultural land.</p> <p>42. Smaller offices on or near industrial estates as they generate more jobs.</p> <p>43. No green belt or agricultural land should be used for employment.</p> <p>44. This depends on the type of employment being discussed.</p> <p>45. The types of employment require more thought, rather than just where.</p>	

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		<p>46. Is vital for SBC to allocate employment sites that deliver the necessary employment uses. (The Prudential Assurance Company Ltd (c/o Revera Ltd.))</p> <p>Other Points</p> <p>47. There will be more homeworking. (Bredgar PC, Rodmersham PC, Tunstall PC, Five Parishes Group.)</p> <p>48. We have enough, Sittingbourne is at capacity with the current infrastructure.</p> <p>49. There will be more London commuter based residents.</p> <p>50. What is the evidence for the forecast for Swale's economy to improve?</p> <p>51. Opportunities to increase employment within agriculture, tourism and artisanal activities should be sought. (Bredgar PC, Rodmersham PC, Tunstall PC, Five Parishes Group.)</p> <p>52. SBC is using a methodology based on landowner profits rather than community needs. (Newington Parish Council.)</p> <p>53. Not knowing the potential outcomes of Brexit will be limit decisions relating to investments in industry and training.</p> <p>54. Investment in skilled work on existing sites should be a priority.</p> <p>55. Swale overplays people commuting to London. (Newington Parish Council.)</p> <p>56. The inter-relationship of housing growth and economic growth need to be considered holistically and not in isolation. (Redrow Homes.)</p> <p>57. Better employment hubs across the borough. (Rodmersham PC, Five Parishes Group.)</p> <p>58. SBC should meet its employment needs within Swale. (Maidstone BC.)</p> <p>59. Who will provide the next generation employment sites?</p> <p>60. Improve employment type and density by actively encouraging reuse/recycling of employment sites to higher densities and pursue more office developments in the urban town centres. (Rodmersham</p>	

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		<p>PC and Five Parishes Group.)</p> <p>61. Warehouses provide relatively few jobs and are a poor use of Swale's employment land and create traffic. (Rodmersham PC and Five Parishes Group.)</p> <p>62. There needs to be more mixed-use areas with both employment and housing.</p> <p>Sites submitted for consideration:</p> <p>63. Lamberhurst Farm, Dargate; 22.5 hectares, business-type campus with between 150,000 and 200,000 sq ft of predominantly B1 floorspace and residential development on 6.5 hectares. (LandCap.)</p> <p>64. 2 sites for any form of strategic development from residential to commercial. Site 1 - Foresters Lodge Farm and land, Foresters Farm, Dunkirk, ME13 9LG and Site 2 - Land off Canterbury Road (adj. Village Hall) (OSG Architecture Ltd.)</p>	
<p>Q8 The Swale economy: Do you agree with our assessment of what we need to provide to ensure that the economy is sustained? How can Swale ensure that its current positive economic forecasts come to fruition and are sustained?</p>	<p>66</p>	<ol style="list-style-type: none"> 1. Agree. (Inc. OSG Architecture Ltd, Newington Parish Council) 2. Strong, diverse retail offering, which is not readily available online. 3. Restaurants and cultural activities in town centres. 4. Strive for a diversified economic base, including a choice of employment sites. (Hume Planning Consultancy.) 5. Recognise the role of leisure, and tourism/holiday accommodation and farm diversification. (Hume Planning Consultancy.) 6. Mix job creation through light industry units into housing development to reduce travel time and pollution. 7. Further consideration of the economic benefits from Swale's rich environmental heritage as part of Swale's economy. (Natural England.) 8. Sittingbourne has too many industrial sites; those in disrepair should be renewed. 9. New sites is not the answer, we must be more efficient. 10. Ensure that links by sea, rail and road are improved; especially 	<ul style="list-style-type: none"> • These responses will need to be looked at in conjunction with the recently finalised Employment Land Review.

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		<p>Sheerness and Ridham Docks.</p> <ol style="list-style-type: none"> 11. Build on brownfield, not greenfield. 12. Attracting skilled people into the area does not help the unskilled to find work. 13. An up-skilling of existing residents is needed and an FE college in Sittingbourne and Faversham. (Inc. Bredgar PC.) 14. To create real wealth in an area we have to create goods or services that are needed elsewhere. 15. Suitable high-quality housing must be provided for business owners and entrepreneurs. 16. Improve Sittingbourne High Street. (Bredgar Parish Council) 17. Free transport to Canterbury. (Newington Parish Council) 18. The Council will need to provide sufficient floorspace in its varying forms in appropriate locations. (Peter Court Associates) 19. Small businesses, often where people work from their homes, are the life-blood of the local economy. (Peter Court Associates) 20. Don't waste money on Spirit of Sittingbourne. 21. Look at Swale's history with regards to ability on forecasting. 22. Swale has little currently to attract quality people and more needs to be made of the coastal areas for leisure. A large upmarket marina is needed. 23. Sittingbourne is emphasising on the wrong kind of employment; heavy industry is no long suitable or beneficial and is a blight on infrastructure and the environment. 24. The spread of development should be allocated more evenly around the borough. 25. Kent Science Park has good facilities and could attract more employment. 26. A better mix of jobs across Sittingbourne is needed. 27. Need to rebrand Sittingbourne to make more of history and provide new heritage building. 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>28. Existing facilities and infrastructure needs upgrading first. Key is to overcome the infrastructure constraints which hold back economic activity e.g. the completion of the Northern Relief Road. (Inc. Quinn Estates Ltd.)</p> <p>29. Reduce cost of travel to and from London.</p> <p>30. In the longer term become candidate site for Elon Musk hyperloop concept.</p> <p>31. How many food stores does one town need?</p> <p>32. Creatively develop Sittingbourne High Street; high quality living accommodation, independent retailers/cafes/restaurants, a museum. (Inc. Bredgar PC and Tunstall PC.)</p> <p>33. Sittingbourne has a thriving economy, Faversham does not and it would be beneficial for them to have more industry opportunities.</p> <p>34. Points 7.2.4 - 7.2.7 are good and insightful.</p> <p>35. Swale needs a USP via creating centres of excellence in particular sectors. "The Garden of England" is an unexploited brand.</p> <p>36. Opportunities for social and cultural interaction help attract and retain talent and support other businesses. (Theatres Trust.)</p> <p>37. Too subjective and a poorly phrased question. You should be looking at how Swale sits with its peers and its relationship to London. (Rodmersham Parish Council, Five Parishes Group.)</p> <p>38. Provide a proper museum in Sittingbourne. (Tunstall Parish Council.)</p> <p>39. Encouragement for local cafes in the rural areas. (Tunstall Parish Council.)</p> <p>40. The Port of Sheerness is a major source of employment in Swale, both directly and indirectly. (Peel Holdings (Land and Property) Ltd.)</p> <p>41. Agrees the LP must provide sufficient opportunities to ensure that the economy of Swale is sustained. (Peel Holdings (Land and Property) Ltd.)</p>	

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		<p>42. There is also a need to ensure that the lower value uses, which in some instance support the higher value uses, are not ignored and form an integral part of the LP's economic strategy. (W.T Lamb Holdings Ltd.)</p> <p>43. The Government is committed to the 'Northern Power House' and therefore work opportunities will be shifting north.</p> <p>44. Infrastructure first.</p> <p>45. In Faversham, need to improve the retail/banking/office and restaurant centre.</p> <p>46. Provide good linkages to town centres.</p> <p>47. We can expect more people to be self-employed and working from home.</p> <p>48. The question is unfocussed and too generalised.</p> <p>49. More focus on vocational skills.</p> <p>50. What are you doing to attract more businesses into the area?</p> <p>51. Your assessment does not show what steps you are taking to grow the economy.</p> <p>52. The need for housing in the area should be driven by an improved economy and job prospects.</p> <p>53. In 2038 shopping will be on line and distribution centres can be out of town.</p> <p>54. Swale should seek to increase local employment opportunities across the Borough for all skill levels.</p> <p>55. Brexit will change all economic forecasts.</p> <p>56. Super-fast broadband is needed throughout.</p> <p>57. The assessment is based on speculation.</p> <p>58. The key issue is that of quality.</p> <p>59. Yes, we need to sustain the economy but not at the expense of destroying rural communities.</p>	
Q9 Making our	64	1. Better and more diverse education opportunities, especially further	<ul style="list-style-type: none"> • Many of the suggestions are

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<p>communities more resilient: What will Swale need to do to make its most deprived communities more resilient in the face of future economic change?</p>		<p>education, for children and adults, especially in entrepreneurialism. (Inc. Five Parishes Group, Rodmersham PC and Tunstall PC.)</p> <ol style="list-style-type: none"> 2. Create more inclusive communities, engage them and create community leaders. 3. Apprentices and work experience should be valued. 4. By ensuring that any economic development is guided by the skills and qualifications of the workforce. 5. Deprived areas such as Murston need more social input. 6. Improve rail links to Isle of Sheppey to increase residents work opportunities. 7. A radical change to business rates to encourage businesses into Swale. 8. Spend on health and social care and provide efficient, good quality and responsive Borough and County council services. 9. Better rural internet and phone coverage and high speed WiFi throughout Swale. 10. Climate change is likely to be much more important, even with the problems of "Brexit." 11. Provide affordable housing. 12. Encourage more companies to build in the area by offering incentives to companies to use local labour. 13. A strong service sector will not work unless the value has been added elsewhere. 14. Garden/allotment schemes. 15. Enhanced investment into Sittingbourne & Sheerness Town Centres with a strategic vision for them. 16. The creation of small enterprise funds to encourage SME set up. 17. Regeneration of existing housing estates with more sport, leisure and cultural facilities. 18. Positive discrimination in planning and investment towards deprived communities. 	<p>unable to be delivered through the planning system so the Council will need to liaise with other agencies (such as KCC Education, BIS, the Treasury.)</p>

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>19. Deprived communities are in this position as they offer cheap affordable accommodation and improve transport improvements in these areas. If they are that deprived understand why and rectify.</p> <p>20. There should be specific plans for the most deprived neighbourhoods. (Five Parishes Group and Rodmersham PC.)</p> <p>21. Litter groups cleaning beaches and parks.</p> <p>22. Ensure adequate funds for day care centres.</p> <p>23. Swale's greenspace and green infrastructure strategy can help with resident's health and wellbeing if an integrated approach is included through the LP. (Natural England.)</p> <p>24. SBC needs to invest the same level of care and attention in Sittingbourne and Sheerness as Faversham. It may be necessary to re-organise local government and funding to achieve this. (Inc. Bredgar Parish Council.)</p> <p>25. Stamp out drugs, and more policing at night.</p> <p>26. Reduce the growth of permanent caravan towns in the countryside for fruit pickers.</p> <p>27. Improve the infrastructure to encourage investment, pay proper wages, and reduce reliance on benefits and the state.</p> <p>28. Make sure transport is cheap and available and reliable.</p> <p>29. The NHS, Social Services, Schools, Police, Business and Swale need to work together as a team to minimise deprivation. There needs to be a complete re-vamp of the national social and healthcare offer.</p> <p>30. The deprived are more concerned with having a decent roof over their heads than living in an affluent area.</p> <p>31. Highsted Park will provide a wide range of employment opportunities and a general increase in job opportunities. (Quinn Estates Ltd.)</p> <p>32. Increasing the provision of housing is crucial to addressing this problem as it will stimulate the economy. (Peter Court Associates.)</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		33. There will be trickle-down growth from the development successes of the district. (Hume Planning Consultancy.) 34. Growth should be across the Borough? (Inc. Newington Parish Council, Five Parishes Group and Rodmersham PC.)	
Q10 Our town centres: What do you think the future planning policy should be toward our town centres, in particular, how can we ensure that the areas beyond the core retail areas remain vibrant and how can we ensure the vitality and viability of our centres as a whole?	70	<ol style="list-style-type: none"> 1. Free parking to ease congestion, a park and ride scheme, an integrated transport system and good public transport. (Inc. Bredgar Parish Council, The Five Parishes Group, Hume Planning Consultancy.) 2. Build on brownfield sites. 3. Ensure they are safe, clean and attractive. 4. SBC to have a display/stands locally to engage with the public. 5. Future High Street will be about leisure/amenities. 6. Encourage pleasant and safe walking/cycling routes in and pedestrianize Sittingbourne High Street. 7. Change streets like East Street, West Street and the High Street in Sittingbourne to housing. 8. Higher density, build on supermarket roofs and shops, flats above shops. (Inc. Rodmersham Parish Council, Rodmersham Parish Council) 9. Encourage pop up shops and craft centres in empty stores. 10. Get rid of gambling places and charity shops. 11. A reactive policy to what the Town needs at anyone given time. 12. Re-use shops as offices and office cubicles for rent. 13. Low cost units for start-up businesses in the creative tech industry. 14. Apart from Faversham, improve the cultural side of the town centres. 15. More parks. 16. Consider impact of multi-nationals on small, local businesses. 17. Areas of affordable housing, easily accessible by foot/cycle. 18. Encourage a mix of retail/restaurants/housing/cultural. (Bredgar Parish Council, The Five Parishes Group) 19. Reduce building rents and business rates. 	<ul style="list-style-type: none"> • Will need to take into account the results of the Retail and Leisure Study which is in hand. • Member steer may be required required on more flexible planning policies for town centres (as supported by the NPPF)

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ul style="list-style-type: none"> 20. CPO empty units. 21. Build a large, out of town retail centre. Furniture stores and larger goods retailers are better in retail parks where parking is easier to collect goods. 22. Stop building on car parks. 23. Introduce more social ventures where people can meet and chat in the High Street. 24. The Government needs to implement a tax system across online sellers to rebalance the costs associated with High Street/Town Centre shops. 25. Heritage and cultural resources can make a positive contribution to the revitalisation and enhancement of town centres. Recycling of historic buildings for active cultural and economic uses can support regeneration of town centres. (Historic England.) 26. The focus on Town Centre policy is outmoded and exasperated by high parking charges. (Newington Parish Council.) 27. Allow more flexible leisure, residential and community uses. (Hume Planning Consultancy.) 28. Set up a scheme for small retailers to encourage them back to the town centre by offering incentives 29. Exploit what already exists. 30. There is missed potential with linking up Sittingbourne High Street and the historic town of Milton Regis. 31. Individual shops should be encouraged. (Inc. Rodmersham Parish Council, The Five Parishes Group) 32. Need to encourage existing traders to stay and improve. 33. Concentrate on improving what we have; Sittingbourne High Street has some beautiful buildings. 34. Consider an upmarket, high quality, approach to attract independent successful businesses. 35. Consider future shopping/living habits and to adapt accordingly. 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>36. Preserve integrity of the buildings in the town centres with policies to enforce landlords to clean up old properties that are becoming derelict and dilapidated.</p> <p>37. Sittingbourne Sheerness and Faversham should each have a bespoke regeneration/town plan. (Inc. Rodmersham Parish Council)</p> <p>38. Good pedestrian access and areas.</p> <p>39. There are NO core retail areas, the Council have ignored this for decades.</p> <p>40. Clean up what we have before spending OUR money on any new developments.</p> <p>41. Re-establish Chamber of Commerce or similar support groups.</p> <p>42. Total upgrade of all Swale leisure centres.</p> <p>43. Should not vastly expand our population and turn areas into commuter dormitories and keep the focus on local employment/and facilities.</p> <p>44. In Sittingbourne any events are focussed on one end of the high street and not the full length.</p> <p>45. There needs to be greater promotion of the history of the individual buildings to bring pride and want people to take an interest.</p> <p>46. The future is developing compact smart growth in cities.</p> <p>47. Shops are needed in the town centre because many people cannot afford to travel to out of town retail centres like Bluewater.</p> <p>48. Encourage boutique shops to Sittingbourne along the lines of Whitstable and Faversham.</p> <p>49. In Sittingbourne the retail footprint is not large enough to encourage large retail outlets.</p> <p>50. Future business opportunities are likely to be driven by technology and tourism. (Bredgar Parish Council)</p> <p>51. SBC to purchase high street retail properties to ensure low rents.</p> <p>52. Assistance with improving the look of the current High Street, some extremely architecturally attractive buildings need restoring. (Tunstall PC.)</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>53. A total upgrade of leisure facilities in the town centre i.e. the Swallows. (Tunstall Parish Council.)</p> <p>54. SBC needs to implement policies that improve the maintenance and management of our town centres. (Bredgar Parish Council)</p> <p>55. Planning policies must improve the quality and density of housing near town centres. (Inc. Bredgar Parish Council, Rodmersham Parish Council))</p> <p>56. Each town Sheerness, Sittingbourne and Faversham should have their own regeneration/town plans. (Inc. Rodmersham Parish Council, The Five Parishes Group.)</p>	
<p>Q11 Existing strategic employment locations: How can the economic and other opportunities of our existing strategic employment locations be more fully realised?</p>	<p>54</p>	<ol style="list-style-type: none"> 1. Infrastructure must be in place, especially the road network. (Inc. Hume Planning Consultancy.) 2. Use brownfield sites. (inc. The Five Parishes Group, Rodmersham Parish Council.) 3. Create a plan, support it with resources including finance then engage with the wider business community. 4. Development will evolve without major unjustified intervention as needs arise. 5. Proactively incentivise Swale jobs (via business rates) to be offered to Swale residents. 6. Continued investment on existing strategic employment sites. (Inc. The Five Parishes Group, Rodmersham Parish Council.) 7. Reduce the number of low employment warehouse units and look at redevelopment of existing sites to create higher density employment with less traffic. (Inc. The Five Parishes Group, Rodmersham Parish Council, Tunstall Parish Council.) 8. Ensure that the M2 J5 improvements are implemented asap. (Inc. Bredgar Parish Council.) 9. Developing what is left of the industrialized area will help by making it easier to get permission to develop industry there; manufacturing 	<ul style="list-style-type: none"> • Consider in conjunction with the Employment Land Review. • Will need to be considered when deciding ion the settlement strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>is the fundamental way to create wealth - retail just moves it about.</p> <ol style="list-style-type: none"> 10. Building any manufacturing or processing site will always get protesters from the local area but many of the protests are often based on miss-information. The Council have to see through this, make unpopular decisions and sometimes take some flak. 11. Employment locations should be as close to new developments to reduce the need to travel. 12. Swale needs a local technical college and strive to increase the skills and qualification level of the local workforce the area. 13. Incentives and tax breaks, donations from philanthropists with connections to the area. 14. Not with mass housing developments. 15. Put new employment locations closer to road/rail access....what about upgrading Swale Halt? 16. These areas need to be pro-actively managed and subject of continued investment to raise productivity. (Quinn Estates Ltd.) 17. In order to grow businesses need to be able to attract people to work there and provide attractive places for people to live. (Quinn Estates Ltd.) 18. It is disappointing that Question 11 only focuses on strategic employment sites given the valuable contribution that existing smaller employment locations make. 19. Put the needs of the population before those of developers who have no stake in the area. 20. Businesses should be part of long term planning. 21. All existing employment sites should be allocated/safeguarded for employment uses. (W.T Lamb Holdings Ltd.) 22. Expand employment sites in greater areas of affluence such as at Faversham as the rail link at Faversham is better than the rail link at Newington. (Comment by Newington Parish Council.) 23. Swale should be looking at more strategic locations and attract 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>white collar establishments. (Comment by Newington Parish Council.)</p> <p>24. With the increase of local retail parks we need to re-think our High Streets.</p> <p>25. Finish the Northern Link road. (Inc. Quinn Estates Ltd, Trenport Investments Ltd.)</p> <p>26. Build a decent Sheppey Crossing so land on the island can be fully utilised for industry along with a decent road across the island.</p> <p>27. Need to be able to link the West of the town/KSP through the town and as far to Sheerness Docks.</p> <p>28. The Port of Sheerness is a major economic driver within Swale and the wider region. (Peel Holdings (Land and Property) Ltd.)</p> <p>29. Peel has prepared the Sheerness Port Master Plan (November 2014) that sets out the vision for the Port over the next 20 years. This masterplan has ambitious and expansive plans for investment and growth in the Port of Sheerness, which will benefit all within the Swale region. (Peel Holdings (Land and Property) Ltd.)</p> <p>30. The new Local Plan should consider the potential Rushenden Marshes offers for Port and/or housing/mixed use development. (Peel Holdings (Land and Property) Ltd.)</p> <p>31. Eurolink needs an improved road network.</p> <p>32. Kent Science Park is not really a "strategic employment location."</p> <p>33. Ensure that KSP is used for high technology science businesses only. (Inc. Bredgar Parish Council.)</p> <p>34. The Science Park needs to have a major educational establishment linked to it to give it any credibility as a 'Science Park'.</p> <p>35. What source of R & D is expected to become involved promote the growth and prestige of the Science Park?</p> <p>36. There is vacant land and some vacant units at Oare Road, which should be strongly marketed.</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>37. Shepherd Neame should be encouraged to improve the appearance of their buildings to help with their spin-off tourism business.</p> <p>38. Stronger measures should be taken to keep unnecessary lorry traffic out of Faversham town streets.</p> <p>39. Additional employment could be provided near Brenley Corner.</p> <p>40. Need to improve the road connection to Ashford.</p> <p>41. Further development Sheerness to make it into a viable alternative to Dover post-Brexit.</p>	
<p>Q12 The approach to housing numbers: What would the implications be for Swale if it were to adopt either the Government's 'starting point' for housing targets or a higher level of provision?</p>	<p>107</p>	<ol style="list-style-type: none"> 1. Adverse impacts on health services (and infrastructure in general). 2. Not enough water and loss of aquifer. 3. Increased risk to food security. 4. Adverse impacts on flora and fauna. 5. Greater pollution without increase in bus services. 6. Increased parking and need for more parking spaces in towns. 7. More community facilities needed, but developers will use viability to wriggle out of providing them. 8. Situation is not as bad as is made out. 9. Building more houses to improve economy is spurious as it is about infrastructure. 10. Government target is already too high and does not take into growth that has already occurred. Should not aim for higher and should reduce settling in the SE from outside. Build absolute minimum for Swale needs and build on brownfield sites only. 11. Taking in people because of a better environment will damage the environment they seek. 12. Do nothing as Local Plan is being reviewed too early. Should wait for national picture to emerge. New homes not for people of Swale (Rodmersham PC, Five Parishes Group). 13. Review only being done to push Quinn estate scheme through, need 	<ul style="list-style-type: none"> • Progress assessment to determine development capacity, although work already undertaken does not currently indicate exceptional circumstances.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>to sort out existing infrastructure needs.</p> <ol style="list-style-type: none"> 14. A disaster for rural communities whose infrastructure could not sustain it. 15. Tell the Government it is an impossible demand. 16. Creation of slums and loss of identity, amenities and quality of life. 17. The housing numbers won't be delivered. 18. Government's housing number method should be revisited (Bredgar PC). 19. Targets should be a minimum and Council should not use a stepped approach (Hume Consultancy, Redrow Homes). 20. A higher target could only be supported if it did not impact upon the AONB (Kent Downs AONB). 21. Need to consider Brexit before proceeding (Newington Parish Council). 22. Higher targets bring benefits – economic growth, increased delivery, more affordable homes and improved infrastructure and facilities (Peter Court Associates, Esquire Developments). 23. Gridlock, pollution, loss of agricultural land, strain on water, utilities and health, natural environment, loss of rural identity, loss of community cohesion (inc. Rodmersham PC, Five Parishes Group, Tunstall PC). 24. Would need step change in delivery and this could not be achieved from existing strategy (Trenport Investments Ltd, Crown Estate, MLN Land and Properties). 25. Standardised method is 'starting point'. Higher target is needed to meet London's unmet need (Esquire Developments). 26. No exceptional circumstances to provide anything other than the required provision (MLN Land and Properties, Gladman Developments). Concerns about community infrastructure and the environment are not adequate reasons not to adopt the Government's approach (Peel Ports). 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		27. Higher targets will unlock sites in rural areas (Kember Loudon Williams). 28. Implications depend on how development is distributed.	
Q13 Co-operating with other councils to meet development needs: Do you believe that Swale should consider asking it's council neighbours to provide for its unmet development needs? If so, what reasons would the Council give, who would it ask and why would they be well placed to help? Likewise, if asked by a neighbouring council to consider meeting their unmet development needs, what should be our	73	<ol style="list-style-type: none"> 1. Swale not well placed to meet unmet needs from neighbours – struggling to address own needs, let alone others – represents the majority view. 2. Swale should ask for assistance – AONB/SSSI, topography, aquifers, agricultural land, no A&E services, coast, designated landscapes and gaps (inc. Five Parishes Group, Rodmersham PC). 3. Development should go to the north of England. 4. Would only be used for politician's pet projects such as J5A. 5. Swale has reasonable choice of own sites/should not look to other Councils to meet need/no evidence given as to why need cannot be met, but should look to take unmet need from elsewhere – minority view (MLN Land and Properties). 6. Need to consider what is meant by 'unmet need'. 7. Maidstone likely to meet its need so Swale should commit to doing the same (Maidstone BC). 8. Co-operation over integrated transport systems between areas would be useful. 9. Need to provide housing near to mainline stations across all Councils on HS1 line (inc. Tunstall PC). 10. Only Thanet could be asked because it will benefit their economy. 11. Should encourage Govt. to invest in other areas of the country. Council's should get together to argue for this. 12. Other Councils should not shift their obligations onto Swale. 13. Should ask neighbours once all brownfield land has been identified. 14. How would Swale benefit from taking the development that others did not want? 15. Doing away with planning areas should ensure adequate sites are 	<ul style="list-style-type: none"> • Outcomes are subject to assessment of development capacity (see Q12). Regardless dialogue with neighbours continues and there will be statements of common ground prepared in due course.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
response and why?		<p>available.</p> <ol style="list-style-type: none"> 16. Should be dialogue with London/should not be a London overspill (inc. Newington PC). 17. Should look at how Manchester area is co-operating as good example. 18. Would be prudent to engage with other Council's (Natural England). 19. Could only work where a local authority has a small geographical area. Council should review AONB boundary (Peter court Associates). 20. Loss of aquifers is reason to divert development to other areas (Bredgar PC). 21. Would be surprised if Swale could meet its own target let alone anyone else's. 22. Rely too much on adjacent areas for healthcare so this needs to be addressed. 23. Needs to be fair. 24. Can be met with small developments. 25. Should consider commuting for employment into Swale from certain areas where Swale cannot provide the jobs from own population. 26. Could consider higher quality health and FE provision in Swale to meet wider needs. 27. It will depend on which areas have the strongest case for environmental and/or infrastructure problems. 28. Need can be met if infrastructure led plan is pursued (Esquire Developments). 29. Need can be met if villages are considered (Kember Loudon Williams). 30. Need to consider whether Swale remains a stand-alone HMA or whether a wider Memorandum of Understanding is required (Gladman Developments). 31. Housing will put an end to cultural and community events as well as 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>cultural diversity.</p> <p>32. Don't worry about elsewhere; let's have a plan for Sittingbourne for a change.</p> <p>33. Other Councils have better infrastructure.</p> <p>34. Keep calm and make a sensible plan for the Borough.</p> <p>35. If there is harm to AONB/setting then other Councils should be requested to assist, however, many have the same issues (Kent Downs AONB).</p>	
<p>Q14 Departing from the standardised housing number methodology: What compelling circumstances could there be for the Council to take a different approach to the standardised method of arriving at overall housing numbers?</p>	<p>62</p>	<ol style="list-style-type: none"> 1. Govt. need to rethink whole approach/Govt. needs to be challenged. 2. Do not understand what methodology is. 3. Saturation with housing and loss of countryside, agricultural land, wildlife, AONB, ancient woodland, and stress on health facilities (most frequently highlighted), water, aquifers, sewerage, pollution, traffic chaos. Land subject to flooding (inc. Tunstall PC, Five Parishes Group, Rodmersham PC). 4. Should provide for local need first, followed by migration (if we have to) and then the need to provide local employment and transport. 5. Start with what the town needs, not what Govt. wants. 6. No circumstances (Crown Estate, MLN Land and Properties, Redrow, Esquire – minority resident's view). 7. Start out with the standard methodology and then review it (Peter Court Associates). 8. Brexit means that it should be reviewed (inc. Newington PC). Developments, Gladman Developments). 9. Meeting affordable housing and providing for flagship projects may be reason to depart from standard methodology (Hume Planning Consultancy). 10. Geographical and geological constraints – coast and Island with limited transport provision. M2 reduces opportunities to the south. The result is an unrealistic reliance on agricultural land which the 	<ul style="list-style-type: none"> • Progress preparation of Strategic Housing Market Assessment (SHMA) to determine approach, but at this point it should be assumed that 1,086 dpa will be the starting point.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>country as a whole should be protecting.</p> <ol style="list-style-type: none"> 11. Stop blaming the Government; it is greedy farmers, developers and Councillors. 12. The need to provide more affordable housing, remove the incentivise profits instead of meeting needs and the ability of developers to sit on land. 	
<p>Q15 Increasing housing delivery: How can the Council speed up the delivery of new homes in Swale?</p>	<p>76</p>	<ol style="list-style-type: none"> 1. Take more control of process. 2. Keep brownfield land register up to date (inc. Five Parishes Group, Rodmersham, Tunstall and Bredgar PCs). 3. Use time bounded consents to prevent land-banking (most popular comment, inc. Five Parishes Group, Rodmersham, Tunstall and Bredgar PCs). 4. Use empty properties first, use more brownfield and unused land. 5. Work pro-actively with developers through early engagement (Anderson Group). 6. Encourage smaller developments in each village/smaller more widespread developments. 7. Split development sites to increase number of developers. 8. Don't speed up delivery – creates suspicion as to motives. 9. Use social housing and not for profit organisations to facilitate affordable housing. 10. Create jobs first rather than 'build and then they will come'. 11. Invest in infrastructure projects. 12. Include windfalls in five year supply. 13. New communities will not be able to deliver enough, should plan for a mix of sites in different locations (The Crown Estate, 14. Encourage modular construction (inc. Newington PC). 15. Build smaller developers in wider locations and in places where people want to live. 16. Improve the efficiency of the planning department. 	<ul style="list-style-type: none"> • Many of the actions listed are outside of the Council's remit and are or have been considered by Government. • The NPPF will expect Councils to adopt measures such as ensuring a proportion of allocated smaller sites. • Determining the settlement strategy will also have a bearing on delivery rates, i.e. the use of more viable areas and/or the role of new settlements or large allocations which could have multiple outlets. Likewise infrastructure led schemes may speed up delivery. • Depending upon the settlement strategy, the use of a stepped approach to delivery (and for calculating the land supply) may need to be explored.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 17. Release land where there is market demand and do not frustrate development with unrealistic requirements (Peter Court Associates). 18. Large strategic scale sites that creates major investment. Smaller schemes cannot do this. Large schemes can include mix of delivery methods (Quinn Estates Ltd). 19. Assess more thoroughly the deliverability of allocated sites by using a SHLAA working group (MLN Land and Properties). 20. Review DM procedures – Member training, more delegation, improve report accuracy, review appeal decisions (MLN Land and Properties). 21. Improve pre-app. Experience at SBC poor –delays, changing of staff and conflicting and incomplete advice (MLN Land and Properties). 22. Need more evidence if a larger windfall allowance is to be made (MLN Land and Properties). Does not think it appropriate. 23. Establish infrastructure committee using General Powers of Competence to stop bullying powers of developers and keeps development within strategic planning (MLN Land and Properties). 24. Direct housing to higher value areas (Hume Planning Consultancy Ltd.). 25. Force areas to take development. 26. Strategy will require greenfield and brownfield sites and small sites as well larger ones/focus on smaller schemes to supplement larger ones (inc. Redrow, W.T. Lamb Holdings Ltd., Esquire Developments, Kember Loudon Williams, Gladman Developments). 27. Speed up S106 process (Trenport Investment Ltd.). 28. Stop relying on Quinn Estates to run future strategies. 29. Evidence shows that early delivery of schools can speed up housing completions (Education and Skills Finding Agency). 30. Council should use prudential borrowing to build its own houses. Would provide local employment, allow control of development plans, provide affordable housing and avoid profiteering. There is more land on Sheppey that could benefit from housing. 	<ul style="list-style-type: none"> • Further consider the establishment of a SHLAA working group to more closely examine delivery.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		31. You can't increase housebuilding without undermining existing residents/Council must prove demand. 32. More pro-active discussion with developers. 33. Increase choice of locations. 34. Reduce not speed up – appeal to Europe! 35. Incentivise people to walk. 36.	
Q16 Affordable housing: How can the Council increase the amount of affordable housing that is currently built?	75	1. Close viability loophole, stick to percentages with no appeals, enforce quota (inc. Newington PC). 2. Provide more rented accommodation and make sure it cannot be sold on (majority comment), more Council and housing association properties (inc. Tunstall and Bredgar PCs). 3. Do joint ventures with Network Rail to provide homes close to stations to incentivise sustainable location and travel. 4. Enforce allocations on new developments. 5. Focus on what is needed, not 4/5 bed houses, force developers to build what is needed (inc. Tunstall and Bredgar PCs). 6. Council should use own capital to invest. 7. Use Community Land Trusts, exception sites. 8. Local residents to form groups to buy plots of land and 'group build' them. 9. More smaller properties within town centre and to include houses above shops (inc. Tunstall and Bredgar PCs). 10. Set housing target to support more affordable homes (inc. Peter Court Associates, Kember Loudon Williams, Gladman Developments, 11. Current definition of affordable housing is not affordable. Social housing is the genuine provision. 12. Developers are the problem. 13. Developers should set aside land for low cost self builds. 14. Get more Neighbourhood Plans started.	<ul style="list-style-type: none"> • Determine affordable housing need via Strategic Housing Market Assessment. • Explore more pro-active policy position for Community Land Trusts, exceptions sites and self builds, inc. the role of large sites in encouraging these. • Explore lower affordable housing threshold for rural areas (cross over between SHMA and viability evidence).

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 15. Build more Rent to Buy and undertake new SHMA to understand how new tenures will contribute to meeting housing need (methodology for approach included) (RentPlus UK). 16. Build more in viable areas where affordable housing can be provided (Hume Planning Consultancy Ltd.). 17. Buy up empty homes and commercial premises, use more brownfield sites, town centre locations. 18. Affordable rented units by the private sector should not be included. They should be provided by institutions, the Council and housing associations. No affordable units for sale and there should be a higher proportion of affordable units at higher densities in central urban areas (inc. Rodmersham PC, Five Parishes Group). 19. Will never be enough as successive Governments have not been up to the task. 20. If people want affordable housing, they should move elsewhere. 21. Greenfield sites able to contribute more affordable housing than brownfield (Gladman Developments). 22. Spread housing more evenly around Borough. 23. Would support affordable housing to sustain AONB communities and would support lower threshold for sites within the AONB e.g. 5 units or less (Kent Downs AONB). 	
<p>Q17 Meeting the future needs for Gypsies and Travellers: What approach should we be considering to making further site provision for Gypsies and</p>	<p>58</p>	<ol style="list-style-type: none"> 1. In line with Government policy, but nothing more. 2. There are already adequate sites which need policing and enforcing (majority view). 3. Tax payers will not want you to make any provision. 4. Talk to existing site residents about whether it can be extended or whether it is fit for purpose. 5. Improve enforcement on illegal incursions. Needs to be criminal offence. 6. No further provision needed in Upchurch. 	<ul style="list-style-type: none"> • Finalise new GTAA and policy position in respect of policy and cultural needs. • Progress a call for sites if required. • Depending on need for site allocations, consider approach for making provision on large

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
Travellers?		<ol style="list-style-type: none"> 7. Require new developments to make provision for one pitch for every 50 dwellings. Needs further consultation with both Travellers and settled communities. 8. A detailed report is required. 9. Sites should be controlled to ensure only those who live there are eligible. 10. Critically review current sites. 11. Consider sites with the least environmental impact (Natural England). 12. Ensure GT definition is met in all cases (inc. Newington PC). 13. Better enforcement to maintain the credibility of existing register of sites (Bredgar PC). 14. Use existing LP policy (Five Parishes Group, Rodmersham PC). 15. Swale should commit to meet its GT needs within its own administrative boundaries and engage with MBC (Maidstone BC). 16. If they pay no taxes or abide by same rules as rest of society then no consideration should be given. 17. Should be built in remote location so that GTs can maintain their own communities. 18. Needs assessment should be fair and should engage with Travelling Community, including those who fall outside of definition. You should allocate sites and provide a fair criterion based policy (National Federation of Gypsy Liaison Groups). 19. AONB must be given highest priority for protection. 20. Let other Boroughs increase their provision. 21. Make fair balance of the rights of the Travelling Community and those of the settled community. 22. Decline of fruit picking begs the question as to whether further provision is required. 23. Site assessment should be based on suitability and sites with temporary permission should not be taken as influencing a site's allocation. Sites within the AONB need to be of the highest quality 	mainstream housing sites.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>Q18 Mix of dwellings: What mix of new houses should we be trying to build in the future and how can we ensure that the housing market provides for all housing needs?</p>	<p>69</p>	<p>(Kent Downs AONB).</p> <ol style="list-style-type: none"> 1. As per Europe, provide more long term rented, with high standards of maintenance (inc. Tunstall PC). 2. For older people (inc. Tunstall Parish Council, Newington PC). 3. Small first time homes and also family houses. 4. Houses for more people working from home. 5. To accord with market signals and need. There should be flexibility to ensure that development is not restricted. For e.g., small flats may be a need, but may not always be appropriate. Council should not be prescriptive (Anderson Group). 6. Less 4/5 bed houses – force developers to stop this. 7. Less aimed at people from London, large houses encourage this. 8. Housing market will never meet all housing needs as population is growing too fast. 9. Via Community Land Trust 10. High density housing on brownfield land. 11. Affordable housing. 12. Small estates with mixed houses so good for community. 13. Housing to attract down sizers, but sheltered housing is degrading. 14. Council should build own social rented housing/should be more affordable rented (inc. Newington and Rodmersham PCs, Five Parishes Group). 15. Need for life time homes (and use of Lifetime Homes Standard). 16. Entry level housing. 17. Housing to keep people independent disabled access. 18. Modula homes (inc. Newington PC). 19. More bungalows (with restriction to prevent extensions in the roof space) to free up housing stock. 20. 5/6 bed executive housing (minority view), targeted in areas to rebalance housing stock. 	<ul style="list-style-type: none"> • Progress preparation of Strategic Housing Market Assessment (SHMA) to determine housing mix and type. • Consider viability implications of housing mix. • Explore more pro-active policy position for Community Land Trusts, exceptions sites and self builds, inc. the role of large sites in encouraging these.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 21. Guided by past completion rates to see if need is being met. 22. Developments with wider roads and more parking. 23. More community based living for single people. 24. Should be a market led approach, not prescriptive (OSG Architecture Ltd, Peter Court Associates, Hume Planning Consultancy, Trenport Investment Ltd., minority residents view). 25. Don't let developers hide behind viability assessments. 26. Urban sites likely to generate smaller units, whilst urban extensions and rural sites will generate family housing. Promoting larger family homes will help draw in high achievers who then invest – as used by Thanet and Ashford (Redrow). 27. Cannot be solved at local level – a national infrastructure strategy is required. 28. Need gardens. 29. In old farm buildings. 30. Depends on evidence. 31. Houses close to urban areas with easy access. 32. Smaller homes in villages. 33. Discourage extensions to existing homes. 34. Not high rise apartments. 	
<p>Q19 Self and custom build: How best should the local plan make provision that will enable people to build their own homes?</p>	58	<ol style="list-style-type: none"> 1. Put designated self-build plots on development sites (inc. Tunstall and Rodmersham PCs, Five Parishes Group). 2. Parish Councils/villages should determine where self builds should go. 3. Allocate sites in rural locations. 4. Should have same constraints as all sites. 5. On brownfield land. 6. Numbers should be kept low. 7. Give support to self-builders by facilitating contact between them and guiding them through planning process. 8. Requirements for self-build plots should not delay overall housing 	<ul style="list-style-type: none"> • Progress preparation of Strategic Housing Market Assessment (SHMA) to determine level and approach toward self and custom build. • Explore more pro-active policy position for self builds, including the role of large sites in encouraging these.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>delivery.</p> <ol style="list-style-type: none"> 9. Should be encouraged by giving Council Tax 'holiday'. 10. Could use companies who can put up homes very quickly. 11. Custom build opportunities are low in Swale and must be addressed. Such building is bespoke and offers better standards than housing estate models. Potton Homes should be contacted so that discussions on how custom build can be advanced in Swale. 12. Is this a big enough sector even worth considering?/not aware of this being a problem/stick to issue of building more affordable homes. 13. Please consider a Community Land Trust for Faversham. 14. Should require a percentage of custom build plots. 15. Should have another call for sites specifically on this issue (Peter Court Associates). 16. Make large areas of land available for them. 17. Only where land is allocated to prevent speculative development (Newington PC). 18. If allowed they should provide alternative energy features. 19. Where someone can demonstrate commitment to the local community. 20. Only within new communities. 21. Should not be quota led (Gladman Developments). 22. Make sure they are not executive homes. 23. Will not help in quest for numbers, but do not be deceived by developers who may use this argument. 24. Getting planning permission should be faster. 	
<p>Q20 Optional housing technical standards: What evidence is there that Swale should</p>	<p>52</p>	<ol style="list-style-type: none"> 1. Should make housing which are better designed internally and externally with more parking (majority point) and waste areas, include means to conserve water and energy (inc. Bredgar PC, Newington PC). 2. Where are the resources to do it? 	<ul style="list-style-type: none"> • Members to determine whether optional water and space standards should be pursued. If so, evidence base (including impacts on viability) to be

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
set additional housing technical standards in the next local plan?		<ol style="list-style-type: none"> 3. Be balanced to ensure town is attractive as surrounding areas. 4. Learn lessons from past from existing Swale estates – appalling parking layouts and problems, access and waste collection etc. Use Building for Life and real life parking standards. More green standards (majority view) (inc. Rodmersham and Tunstall PCs, Five Parishes Group). 5. Need standards to ensure eco-friendly development, retention of trees, new hedges, meadows and wildlife corridors (Bredgar PC). 6. More accessibility and independent living. 7. Existing LP did not bring forward standards so evidence will be needed to show impacts. Swale is one of the weaker housing markets so minimum space standards could counter delivery of housing (Esquire Developments, W.T. Lamb Holdings Ltd.). 8. Questions whether there is need as customer satisfaction surveys would indicate that size is not an issue in Swale (W.T. Lamb Holdings Ltd.). 9. Without them developers will engage in race to the bottom i.e. Grenfell. 10. Should cover those things that set the development apart in the first place with legal covenants enforced. 11. Water standards needed because of importance of aquifers. Inadequate information often on planning applications. 12. New buildings should be built to last for generation to come. 13. Landscaping standards are really important. 14. Build parking beneath homes as in France. 	gathered.
Q21 Making effective use of land: How can more effective use of brownfield land	69	<ol style="list-style-type: none"> 1. Keep register up to date and accurate and enforce it (inc. Tunstall, Rodmersham and Bredgar, PCs, Five Parishes Group). 2. Encourage high density (inc. Tunstall PC). 3. Build above shops and leisure amenities. (inc. Tunstall PC). 4. Work with developers. 	<ul style="list-style-type: none"> • Progress brownfield sites for allocation via SHLAA and in accordance with Government policy. • Brownfield land register to be

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be achieved?		<ol style="list-style-type: none"> 5. Encourage development on any site with a previous use, even if it is not PDL (Anderson Group). 6. Exhaust brownfield land before using any high quality agricultural land/build on brownfield before green. Should be a presumption in favour of brownfield land. 7. Tidy up peripheral sites. 8. Consider sites across the whole of the Borough. Should be considered regardless of sustainability. 9. Force developers to build on brownfield, they do not like building on them because profits are less. 10. Convert empty office blocks/warehousing/space conversion into affordable housing for singles/couples. 11. Identify missed opportunities e.g. Norton Ash Garden Centre. 12. Use carrot and stick incentives inc. CPO/LDO. 13. Build on under-used car parks. 14. Biodiversity value of brownfield sites should be fully considered to ensure sites with least environmental impact are progressed (Natural England). 15. We have massive chalk pits which could be regenerated. 16. Brownfield land should only stand for one year without an application being submitted. 17. Brownfield land requires assessment of heritage (Historic England). 18. Although supportive, will not be sufficient to meet needs in isolation (Hume Planning Consultancy Ltd, Redrow, Kember Loudon Williams). 19. Prevent land-banking. 20. Less land for retail outlets should be used, move waste site to Ridham, use land better in town centres. 21. Brownfield register has deliberately been kept short to push the need for major greenfield development. Should include all brownfield land and consider use of such land for employment as well (Five Parishes Group, Rodmersham PC). 	updated at end of 2018.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		22. Eurolink land could be used for housing. 23. Can see vast areas around Swale that could be redeveloped. 24. Give developers a tax break. 25. Not all brownfield sites within the AONB will be suitable e.g. where they fail to relate to existing settlements or would not be appropriate to particular locality or character. Brownfield sites would normally be better suited to employment or community based uses (Kent Downs AONB).	
Q22 Density: Should the next local plan set minimum density standards? If so, what standards should we be considering?	63	1. Should set variable standards – urban high, rural low (inc. Tunstall, Rodmersham PCs and Five Parishes Group). 2. Denser developments can create more car parking problems (majority view) and residents are more likely to annoy each other through noise. People will be crammed like sardines. 3. Higher density could create more vehicles and strain on infrastructure. 4. Use population figures and adopt a percentage standard e.g. 2%. 5. Address density as part of wider design code. 6. Should set minimum standards with greater use of terraces and reduce space for roads. 7. Not high rise for Faversham. 8. Should be design led rather than by a specific standard. 9. Each case on its own merits/carry on current approach (inc. MLN Land and Properties Ltd., Hume Planning Consultancy Ltd.). 10. Exception should be given to custom build. 11. Build no more houses in Swale, no area should have to take 5K or 11K homes. 12. Cars must be kept off the roads, people should have no more than 1 car per bedroom. 13. Should be no standard (OSG Architecture). 14. Question is ambiguous. 15. Less space needed for low cost affordable homes for young and	<ul style="list-style-type: none"> Members to resolve whether to consider setting density thresholds. If so, evidence base to be determined in support.

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		<p>elderly.</p> <ol style="list-style-type: none"> 16. Need green standards as well. 17. Use minimum and maximum standards as appropriate. 18. Undertake consultation with communities to see what works. 19. Houses already too close with no gardens. 20. Use minimum standards, use three storey buildings and more terraces, but no high rise and better standards of parking (Newington PC). 21. Minimum standards needed to ensure developers don't prioritise high return housing. Policies need to be applied sensitively with regard to location, e.g. Bredgar could have some infill on road frontages, but not back filling (inc. Bredgar PC). 22. Sites with sea views could have high density. 23. High standards should have green standards. 24. Inventive design would be needed to make such housing attractive. 25. Minimum standards might be appropriate at transport hubs or on brownfield site, but should not be used elsewhere – should be context led as standards would affect viability and deliverability (Gladman Developments). 26. Gardens already too small with no opportunity for caravan or additional car. 27. Use standards advocated by Duchy of Cornwall. 28. Most developers will be happy to increase densities as it will mean higher profits. 29. High density homes for the elderly population who are staying in their homes till death which is not the most practical use of housing stock. 30. In the AONB it is unlikely that higher densities would be reflective of AONB qualities (Kent Downs AONB). 	
Q23 Social and physical	70	<ol style="list-style-type: none"> 1. In totality, the full range of social and physical infrastructure is highlighted as priorities. However, health (hospital, GP and dentists, 	<ul style="list-style-type: none"> • Continue dialogue with infrastructure providers with

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<p>infrastructure: What do you consider the broad social and physical infrastructure priorities should be for Swale in the coming years?</p>		<p>but also other facilities with health related benefits – i.e. sport and open space, reducing pollution), education, transport and sport/open space are notable in the level of responses.</p> <ol style="list-style-type: none"> 2. Site specific provision includes: <ol style="list-style-type: none"> a. Sittingbourne station parking. b. Northern Relief Road. c. J5/A249 improvements. d. Extra motorway junction south of Sittingbourne. e. No link road between A2 and M2 – not needed and M2 is overloaded. f. M2 widening. g. 20mph limit in Faversham. h. A2 from Western Link to Brenley Corner to become a street. i. A Swale general hospital/new hospital at Brenley Corner. j. Memorial Hospital too small. k. Leisure facilities should be subject to consultation to assess what people want. l. Protect AONB to maximise its benefits to the Borough. m. Invest in Sittingbourne High Street, rents too high, need decent shops to attract shoppers back from other towns. n. A Swale incinerator to reduce journeys to dispose waste. 3. Needs to be provided before housing is approved and enforced if not provided. Infrastructure already under stress. Current system is flawed. Other means to fund infrastructure is also required. 4. No further development should be approved until issues are sorted out. 5. Jobs required supported by transport and green infrastructure to attract employers to Swale. 6. Need environment that supports larger population of older people. 7. Improve village interconnection to improve social mobility. 8. Multi-functional green infrastructure to be a part of all allocations 	<p>Infrastructure Delivery Schedule prepared in due course.</p>

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		<p>(Natural England/Kent Downs AONB).</p> <p>9. No rainwater should be allowed to enter the sewerage system on new developments to reduce burden on water treatment plants and help retain water reserves.</p> <p>10. Development should meet Guiding Principles (Southern Water).</p> <p>11. Linking green infrastructure with wider infrastructure needs is causing neglect of former. GIF identified funding gap of £39M for GI across Kent. Needs to be addressed with investment at strategic level – enhance existing green spaces and create new areas, reduce impacts of new development and provide alternative green space, specifically, AONB impacted by increased footfall and increase use of rural infrastructure (Kent Downs AONB).</p>	
<p>Q24 Capturing land values for social and physical infrastructure: What more can be done by the Council to ensure that the infrastructure needs generated by new development are matched by a developer's financial contributions? Should more</p>	<p>62</p>	<ol style="list-style-type: none"> 1. Large developments should not be considered unless they undertake all infrastructure/infrastructure should be up front (majority view) (inc. Bredgar Parish Council). 2. Strict regulations and enforcement should be imposed and financial penalties used. 3. If developer fails to comply, they should not be considered for future applications. 4. Scandinavian countries have interesting, community focused solutions. 5. Contributions should be higher for greenfield. 6. Government should be pressed for contribution as developer contributions are not enough. 7. Contributions need to be sufficient to deliver the additional school places. ESFA would be interested in the progression of any CIL. If large residential developments are to be pursued, then emerging ESFA proposals for forward funding of schools may be relevant and would be happy to meet to discuss this opportunity further (Education and Skills Finding Agency). 	<ul style="list-style-type: none"> • Approach likely to be a mix and, in some cases, bespoke, but will be dependent upon the settlement strategy and the range of sites allocated.

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radical approaches toward 'land value capture' be considered?		<ol style="list-style-type: none"> 8. Infrastructure should be in place before development. 9. Should introduce CIL to cover all costs and monies should be in a bond at the planning application stage (inc. Newington and Tunstall PCs). 10. Too big brother and will not work. You need to incentivise and work with developers. 11. Persimmon CEO bonus does not tally with land viability complaints. No land banking. 12. Committees of non-political members of the public should be formed to ensure money is spent for the good of the community. 13. Make sure we are on a par or better than neighbouring Councils. 14. SBC should use the money for what it is intended and not divert it off elsewhere. 15. Highest levy on greenfield land with value of environmental/amenity quality set. 16. Should have standard nationwide charge based on Council Tax band as one off payment. 17. Develop best practice model to use as brief. 18. Answers to this question will be from people bias toward developers. 19. Current system gives developers too many loop-holes. 20. Developers need to show social responsibility/stewardship. 21. What if the landowner is also the developer? 22. Developers also need to fund additional staff in public services. 23. If developers are made responsible for the infrastructure to last a lifetime for the site then they will build something that lasts. 24. Yes more radical approaches to land value capture must be considered. 25. Lack of AMR means that it is difficult to ascertain what developer contributions have been collected and how they have been spent. Highlights High Court case that affordable housing cannot be bypassed by using viability assessments. For large schemes, 	

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		<p>requiring significant infrastructure, these should not lie in the hands of the private sector, but fully accountable to local people. Council also does not have expertise to examine viability assessments. Have seen many developments where infrastructure is promised and reneged upon. There is now a huge backlash from residents on these failings (inc. Rodmersham PC, Five Parishes Group).</p> <p>26. Land value capture will only work on developments of a certain scale, but is an untested and complex approach. Would deter investment as developers like more traditional approaches and would go elsewhere. Site specific policy on infrastructure could be used, ensuring that the cost of the infrastructure is factored into the overall land value. Early engagement on such projects is essential to avoid delivery risks. Highlights model used by Quinn Estates at Highsted Park (Quinn Estates).</p> <p>27. Farmers should not be allowed to sell for housebuilding – we need farming for the welfare of society.</p> <p>28. Locate growth to high value areas (Hume Planning Consultancy Ltd.).</p> <p>29. CPO is ultimately land value capture.</p> <p>30. A matter for national government, not the local plan (Redrow).</p> <p>31. Merit in master developer and plot passport approach. Consider use of Development Corporation to consider infrastructure across a number of large sites. However there are issues about speed of delivery on larger sites. For smaller sites, the usual rules should apply.</p> <p>32. Current system is imperfect and even if LVC is used, the value of the land in the first place will be part of it (and therefore the fact that some areas will generate more than others). In schemes of circa 150 dwellings contributions between £1-£2.5 can often be secured. However, value of contributions is undervalued and local communities are not presented with the full contribution. LVC is not without its problems – highlights North Essex Garden Communities where the</p>	

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		<p>peak levels of debt could make overall delivery a significant challenge. Unless landowners are given an incentive to sell, they may wait. In these cases CPO is the only option. Council should therefore use CIL/S106 (Gladman Developments).</p>	
<p>Q25 A Swale Community Infrastructure Levy? Should Swale introduce a Community Infrastructure Levy on the development of greenfield sites to housing across Swale?</p>	<p>64</p>	<ol style="list-style-type: none"> 1. Low CIL for brownfield land and high for high quality agricultural/greenfield land (majority view). 2. An independent management company should be formed to control projects funded by CIL. Should comprise political parties and the public. 3. CIL will ruin the countryside because it makes the process easier. 4. Yes as S106 can be side stepped by developers. 5. No, but fines should be applied if infrastructure not carried out. 6. CIL charge should be so high as to discourage all housebuilding, thereby frustrating Government attempts to force the Borough to destroy the character of the area. 7. What will CIL achieve? It will be politically hijacked as per Southern Relief Road (Five Parishes Group). 8. Yes if it means we have control over the projects that will be funded. 9. Should take into account Government review on such matters. However, CIL is a blunt tool with no requirement for it to be spent on specific infrastructure. Payments in kind are also complex. Tariff-based approach not appropriate for larger developments. Can deliver the infrastructure without the changes indicated and scheme should therefore be excluded (Quinn Estates). 	<ul style="list-style-type: none"> • A decision on whether or not to pursue a CIL Charging schedule will need to be made on the basis of viability evidence and what would best support delivery of the chosen development strategy.
<p>Q26 Mitigating impacts of climate change: How can planning policies positively influence climate</p>	<p>58</p>	<ol style="list-style-type: none"> 1. Acknowledgement of pollution/climate change and impacts on health, species and habitats. New housing will be detrimental. 2. Learn about low 'maintenance' houses from abroad. 3. All new houses to have solar power and general encouragement for renewables eg wind farms, wave power and community energy, water efficiency measures, grey water systems, sustainable planting, green 	<ul style="list-style-type: none"> • Will need to consider need for further evidence and policy review light of revised NPPF policy.

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change outcomes or mitigate their impacts?		<p>space provision, eco-friendly building products, sustainable transport and good accessibility to services (including Newington Parish Council and Tunstall Parish Council).</p> <ol style="list-style-type: none"> 4. Adopt and enforce innovative technical standards on build quality (renovations and new build) including for geo-thermal heating, permeable road, drives, car parks. 5. Develop standards with neighbouring boroughs. 6. Promote design quality. 7. Improve infrastructure. 8. Allow/require solar panel arrays and small scale wind turbines and water efficiency measures. 9. Green energy is one of Swale's most valuable assets, particularly in combination with electrical grid infrastructure and Swale has a duty to ensure they make the most of this valuable resource at a NSIP scale. Planning policy can positively influence development to address climate change (Arcus Consultancy Ltd of behalf of Cleve Hill Solar Park Ltd). 10. Penalise developers for poor workmanship. 11. Design and promote greener development including insulation/energy efficiency, solar PV and thermal, ground source heat pumps, sustainable drainage coupled with vegetation (particularly important during more intense weather events), grey water systems, eco building products. 12. Financial incentives eg council tax reductions for eco homes. 13. Protect agricultural land for food production, land drainage and to mitigate for climate change. 14. Encourage farmers not to sell land for development. 15. Avoid developing greenfield sites as can lead to flooding. Only develop brownfield sites. Avoid building on floodplains. 16. Protect and promote countryside and open/green spaces (including green roofs, hedges and trees) to mitigate pollution, urban heat gain, 	

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		<p>climate change, pollination.</p> <p>17. Plant more trees for amenity value, to improve air quality, provide shading, cool urban areas and mitigate noise pollution. Swale poor at this. Protect hedgerows and wildlife and orchards – wildlife corridors (including Tunstall Parish Council).</p> <p>18. Keep things local to reduce private transport needs. Provide good public transport and cycle and walking routes (including rural) and bring health benefits. Smart technology to improve transport network. Emphasise access to HS1, build near rail stations and promote eco travel (including Tunstall Parish Council).</p> <p>19. Reduce speed limits to 20mph in residential areas to make cycling /walking safer, make it less easy for driving and reduce emissions.</p> <p>20. Reduce congestion through improving road network so engines aren't idling. Enforce this.</p> <p>21. Swale need to assess impact of move to electric vehicles and prepare for this . Require EV charging points in all major car parks.</p> <p>22. Tarmac/tiles reflect sun's heat and contribute to warming. Promote solar energy recovery. (?)</p> <p>23. Planning department already has policies in place to avoid development in floodplain and cut down trees.</p> <p>24. Avoid land subject to flooding such as Iwade, Wises Lane and Pond Farm Road and don't concrete over Garden of England.</p> <p>25. Council ignore impacts of climate change as evidenced by flooding in Teynham.</p> <p>26. Planning decisions should reference advice from CPRE, KWT, conservation trusts.</p> <p>27. Allow shale gas extraction as will reduce CO2 emissions.</p> <p>28. Increase capacity of sewage and drains and lower roads relative to properties to reduce risk of flooding.</p> <p>29. Conservation of historic buildings is an inherent sustainability activity (Historic England).</p>	

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		<p>30. Use existing buildings rather than new build as more sustainable. Adapt existing building to be more eco.</p> <p>31. Be mindful of growing demand for water. Don't build in areas of water stress, such as Swale.</p> <p>32. Unsure/no opinion.</p> <p>33. Sceptical that planning can have an influence on climate change.</p> <p>34. Control population and carbon footprint of existing residents before new development.</p> <p>35. Plan for worst climate change scenarios.</p> <p>36. Provision for waste collection and recycling needs to be improved.</p> <p>37. Don't build developments which require new roads as will increase pollution.</p> <p>38. Difficult to influence climate change, but keep trying.</p> <p>39. Consider issue of food miles – Kent has historically provided food for London.</p> <p>40. Mitigation for environmental damage is not possible. However, possible options include: stop developing on greenfield sites; renewables /community power; 'green' construction; water recycling/efficiency; tree planting and green space provision and high quality landscaping; accessibility to public transport including rail; improve existing road infrastructure (eg smart measures) and avoid building new roads which move existing problems elsewhere (inc Five Parishes Group & Rodmersham Parish Council).</p> <p>41. Proper use of fuel facilities (?).</p> <p>42. Minimise economic impacts (Hume Planning Consultancy).</p> <p>43. Effects of climate change including coastal squeeze must be fully integrated into plan's policies and site allocation. Ecological networks (with neighbouring authorities) key to climate change adaptation. Landscaping important for urban cooling (Natural England).</p> <p>44. Planning policies must protect AONB and countryside, high quality agricultural land. New development eco-design, self-sufficient in</p>	

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		<p>power, water recycling and efficient. Emphasis on tree, hedge, woodland planting including urban areas. Affordable, efficient and accessible public transport – consider subsidies. Don't build new roads or links to M2 as generates more traffic (inc by Bredgar Parish Council).</p> <p>45. Utilise existing rivers as water features.</p>	
<p>Q27 Green energy: What opportunities do you see in green energy for Swale and how should our planning policies seek to encourage or manage them?</p>	<p>55</p>	<ol style="list-style-type: none"> 1. Encourage recycling. Refuse (waste to energy) can provide energy/heat and reduce landfill. 2. Green energy eg solar panels should be compulsory and enforced. Incentivise green energy particularly in industrial areas (wind, solar) and residential areas (eg reduced council tax). 3. Make solar panels, EV charging, underground heat sources a requirement (Tunstall Parish Council). 4. Solar farms instead of housing, in appropriate locations. 5. Solar farms can blight landscape. 6. Wind farms to east of Isle of Sheppey and offshore. Encourage wind turbines more generally (relax restrictions) as well as in rural communities to reduce electricity bills. Visual impact should be mitigated. 7. Encourage battery storage including from nuclear and wind. 8. Maximise opportunities for renewables. 9. Hydropower in Faversham and Milton creeks. 10. Standard requirements for new development: solar panels, electric charging points, underground heat sources to enable self-sufficiency. 11. More planning officers. 12. Green energy too expensive when cost passed to residents. 13. Swale are doing well, carry on and encourage green energy. 14. No development should impact environment. 15. No fracking (if environmental impact). 16. Allow shale gas and nuclear. 	<ul style="list-style-type: none"> • The policies in the adopted local plan will be reviewed and updated in light of the revised NPPF to ensure they provide a positive strategy for renewable energy.

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		<p>17. Should be strategically planned.</p> <p>18. Cleve Hill Solar Park is greatest opportunity for green energy in Swale (350MW – energy for 110 homes) Development Consent Order determined by Secretary of State before adoption of 2022 Local Plan. Consider a site allocation. Consider updating planning policy to assist with preparation of Local Impact Report and assist other sustainable energy projects in Swale (Cleve Hill Solar Park Limited).</p> <p>19. Swale suitable for decentralized renewable energy. Energy from waste and battery storage also opportunity and important eg alongside solar farm and other forms of development. Both should be supported by policy which differentiates between permanent and temporary uses. Reference KCC’s Energy Opportunities Map. Commitment to exploring such proposals on land at Faversham (WT Lamb Holdings Ltd).</p> <p>20. Swale has multiple opportunities for green energy.</p> <p>21. Clairfy what is ‘new and different infrastructure’ in our communities and landsapes?</p> <p>22. Consider green polices for existing development, before future development.</p> <p>23. Swale House/Borough Council should lead by example.</p> <p>24. New planting and landscaping.</p> <p>25. Local grants for householder green energy.</p> <p>26. Renewable energy schemes need to benefit local communities</p> <p>27. Each property generate own power also community power schemes (Five Parishes Group).</p> <p>28. Mitigation is a farce (Five Parishes Group).</p> <p>29. Policy should support green energy (Hume Planning Consultancy Ltd).</p> <p>30. Positive design.</p> <p>31. Supports renewables where no unacceptable environmental impacts</p>	

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		<p>(Natural England).</p> <p>32. All future properties should have green energy designed into them to make them net contributors to power network (inc. Bredgar Parish Council).</p> <p>33. Wind turbines should look like windmills.</p> <p>34. Solar farms make managing electrical network difficult.</p> <p>35. Generation glass should be prerequisite.</p> <p>36. Large car parks should incorporate solar panels.</p> <p>37. Air quality a concern (Newington Parish Council).</p> <p>38. Repetitive question (Rodmersham Parish Council).</p> <p>39. Any renewable energy development of significant size in AONB would only be acceptable in exceptional circumstances and in public interest. Local Plan should refer to opportunities to use wood fuel as renewable energy with other benefits in employment, woodland management, landscape and biodiversity. Reference AONB's Position Statement on Renewable Energy again in the next Local Plan (Kent Downs AONB).</p> <p>40. Central government has a role to play.</p> <p>41. Air quality will get worse unless investment in public transport eg monorail.</p> <p>42. Council should identify areas where renewables are suitable and be consistent in decision making.</p>	
<p>Q28 Improving the capacity and environment of the A2 corridor: What solutions should we be considering for improving the A2</p>	<p>75</p>	<ol style="list-style-type: none"> 1. New system at M2/J5 Stockbury to include underpass/ flyover to Maidstone and direct link from A249 to M2. 2. Implement M2/J5 improvements as soon as possible to stop build up of traffic on A249 as could make big difference. (Residents and Bredgar Parish Council) 3. Upgrade M2/J5 and A249 improvements (Tunstall Parish Council; Bapchild Parish Council; Five Parishes Group; Rodmersham Parish Council). 	<ul style="list-style-type: none"> • M2/J5 is already funded by Highways England and a preferred route announced and construction to commence as part of RIS 1. • A249 junction improvements; and A2500 Lower Road improvements are the subject of Housing

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corridor?		<ol style="list-style-type: none"> 4. Improve M2/J5 and J7 and widen the M2 to three lanes where required to encourage more traffic to use that route. 5. Additional junctions on M2. 6. Consider a new bridge link from eastern end of Sheppey. 7. Better flow management on Key Street roundabout needed to stop blocking exit. 8. Build on brownfield sites first to avoid roads destroying communities as in the Whiteway, Cromwell Rd case. 9. None - building more roads will generate more traffic and congestion. Roads cannot cope currently. 10. Restrict development in the area. 11. Cumulative impact of development over recent past has exacerbated problems on A2. Essential that no more is allocated in the corridor. 12. If more roads have to be built make developers responsible for long term maintenance and repair. 13. Not much can be done on A2 – some widening and dual carriageways, perhaps 3 lanes in places. At capacity now. Improvement would mean unacceptable loss of homes. 14. Improvements elsewhere unlikely to relieve the Key St – Gillingham stretch of the A2 corridor. 15. Does not consider a new A2/M2 link road will solve problem, but will add to congestion if it has to be funded by further development on top of Wises lane proposal. 16. Against A2/ M2 link and road improvements being paid for by new housing as 10,000 houses means 30,000 more cars. 17. Provision of A2/M2 link by developers holds the area to ransom of developers and road is unlikely to be provided in time. 18. Increased development plus A2/M2 link will bring this part of Kent to standstill and worsen accident and fatality figures. 19. Development to SE of Sittingbourne would double size of town and create more problems than would solve (for traffic, biodiversity and 	<p>Investment Fund Bids and will be supplemented by developer funding from land allocations in the Bearing Fruits Local Plan.</p> <ul style="list-style-type: none"> • Strategic transport modelling is in hand (jointly undertaken with Kent County Council Highways to inform choices on reasonable alternative development strategies and options for the local plan review. • Further more detailed modelling will be required to support whatever strategy is chosen for local plan. This will also be used to inform a local transport strategy prepared in cooperation with Kent County Council Highways and transport operators; as to a range of measures to support new development from reducing the need to travel; to means to encourage more walking and cycling; to improving public transport; and potentially for any future public funding bids to support such initiatives. • Joint working with KCCH and Sustrans imminent on a cycling

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		<p>prime agricultural land) – A2/M2 link a sprat to catch a mackerel.</p> <ol style="list-style-type: none"> 20. A2/ M2 link will have immense impact on the village (not specified which one). 21. A2/M2 Link would attract more traffic toward Sittingbourne from the east and exacerbate the situation (residents; Bredgar Parish Council; Five Parishes Group; Rodmersham Parish Council). 22. Highways have stated A2/M2 link is not viable, sensible or required. 23. Complete Sittingbourne Northern Relief Road and see what this achieves first before further development added at Sittingbourne. 24. Resolve the SNRR route – prefer east of Bapchild , near cricket pitch, which would facilitate the A2/M2 link if that is put forward (Bapchild Parish Council). 25. Settle SNRR alignment as soon as possible (and seek funding for the road) to relieve uncertainty over delivery of East Hall Farm extension. Would urge that route does not disturb existing development allocations. Will improve A2 corridor, open up other major development opportunities and be of wider benefits for Sittingbourne and Swale economy (Trenport Investments Ltd). 26. Complete SNRR to provide a better link from Ridham to east Sittingbourne avoiding ring road north of the town and Iwade area. 27. Complete SNRR to divert Coolchain lorries away from the town. 28. Complete SNRR and connect it to a new A2 which bypasses Murston, Bapchild, Teynham and Faversham and joins with Brenley Corner M2/J7. 29. Deal with SNRR problems including mass parking of HGVs on the road network causing litter and obstruction issues for other users (Five Parishes Group; Rodmersham Parish Council; residents). 30. Need to improve and repair roads we already have and improve flow by rethinking and reducing traffic lights to improve flow. 31. Improve traffic management through Sittingbourne by reducing the number of traffic lights (residents and Bredgar Parish Council). 	<p>audit, which will feed into evidence base and subsequently transport policy.</p>

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		<p>32. Replace traffic lights at Sittingbourne Retail Park and Snipes Hill; with smart traffic lights, better layout or roundabouts to improve flow. (residents; Tunstall Parish Council; Bapchild Parish Council; Five Parishes Group; Rodmersham Parish Council).</p> <p>33. Sort out Swanstree Ave traffic light problems (Bapchild Parish Council).</p> <p>34. Sort out road layout at junction of Chalkwell Road and A2 as traffic turning right into Chalkwell Rd holds up traffic flow on A2.</p> <p>35. Lower Road should be improved and better maintained to handle occasions when A2 is closed.</p> <p>36. Traffic management solutions – all pedestrian crossings should be bridges or tunnels. Replace traffic lights with roundabouts. Ban all right turns in vicinity of a roundabout.</p> <p>37. If houses are to be built to the south of Sittingbourne then a new link to the M2 and J5A is essential. Would enhance effectiveness of SNRR and ease A249 pressures.</p> <p>38. The proposed KSP A2/M2 link looks good.</p> <p>39. An A2/M2 link is critical to improve the A2 corridor and this is a longstanding goal for the Council. It will relieve the A2 corridor; and reduce pressure on the A249 and M2/J5; and has the potential to relieve air quality issues along the A2. A new approach is needed to Swale's future growth and investment rather than continuing piecemeal. Only the Quinn Estates proposal is capable of funding and delivering this (Quinn Estates).</p> <p>40. Would accept M2/J5A and some development up to KSP only - but traffic must be satisfactorily dealt with.</p> <p>41. A2 extends from Faversham to Rainham – document has too much focus on east of Sittingbourne (Newington Parish Council).</p> <p>42. Give Teynham and Newington bypasses higher priority so as to make better use of their HS 1 stations, with housing within walking distance of the station and schools.</p>	

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		<p>43. Bypass Bapchild.</p> <p>44. Bypass Ospringe, Teynham and Newington to avoid choke points and find funding for them(residents and Newington Parish Council).</p> <p>45. HGV ban through Newington or consider charging and emission zone to reduce use of polluting HGVs (residents and Newington Parish Council).</p> <p>46. Do not permit any more HGV traffic generating developments along the A2.</p> <p>47. Only allow HGV traffic at night.</p> <p>48. Expand A2 corridor to accommodate Danaway Road.</p> <p>49. No further development should be allowed at Sittingbourne. All major new development should be at SE Faversham to take advantage of existing excellent road infrastructure there.</p> <p>50. Capacity of A249 is limited if there is further development at the western end of the Borough – development potential at Faversham and Boughton Street should be considered (Redrow Homes).</p> <p>51. With more housing the A2 (Faversham) will become a street and should be planned for accordingly. Traffic lights are more appropriate than roundabouts as they can be phased to allow for pedestrian crossings and promote permeability.</p> <p>52. Bypass Ospringe to M2/J6 to ease pressure on A2 east. Could also consider a bridge link from Oare to Harty Ferry to open up Eastern Sheppey.</p> <p>53. Dual carriageway to link M2 Faversham with M20 Ashford to provide alternative solution when there is a problem on the motorway.</p> <p>54. Insufficient knowledge to comment on Faversham road capacity.</p> <p>55. Rail network should be a key growth corridor. Further growth at Queenborough could take advantage of this, assist modal shift and sustainable transport patterns which would be accordance with NPPF (2012) para 35 and avoid A2 corridor problems (Wood PLC for Crown Estates).</p>	

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		<p>56. Given geography of Swale, additional development will require improvement to A2 corridor, which will need to relate to the scale and location of development and the contribution such development can make (Gladmans).</p> <p>57. Plan development growth nearer to motorway junctions and through localised road link improvements, plus public transport to address town centre congestion. (Hume Planning Consultancy).</p> <p>58. Existing planned development and needs to be dealt with first. New development should not be allowed until existing problems solved. Requires strategic thinking and future proofing. A2 will already be further burdened by Bearing Fruits Local Plan development to 2031 (residents; Five Parishes Group; Rodmersham Parish Council).</p> <p>59. Impact of local trips (school and shopping) on traffic appears ignored to date and has a real impact.</p> <p>60. Provide pick up and drop off facility at Westlands School which is off the A2.</p> <p>61. Provide parking facilities of the A2 for residential properties with no curtilage parking.</p> <p>62. Improving local schools should reduce pupil 'commutes' and reduce congestion.</p> <p>63. Parking already a nightmare around Sittingbourne Memorial Hospital.</p> <p>64. Make town centre parking easy to access (Five Parishes Group; Rodmersham Parish Council).</p> <p>65. Car ownership on the rise due to the housing crisis and more adults still living at home which will worsen the problem.</p> <p>66. Provide more and better subsidised public transport services (residents and Bredgar Parish Council).</p> <p>67. Improve existing rail stations and build new ones if necessary. Consider new railways or tramways or monorail.</p> <p>68. Road improvements need to be part of a wider package of measures including improvements to public transport, better access to rail and</p>	

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		<p>modal shift to reduce stress on roads (Gladmans).</p> <p>69. Plan development with easy walking and cycle access to HS 1 rail stations (Gladmans).</p> <p>70. Arriva Click system in Sittingbourne offers potential to get people out of cars (Gladmans).</p> <p>71. Encourage use of public transport by making some buses 'fast' - not visiting all villages. Consider specialist commuter buses to link villages to rail stations. Bus services to rural areas just between 9am – 5pm do not address need.</p> <p>72. Higher council tax according to number of cars owned.</p> <p>73. Air quality issues caused by A2 congestion needs to be considered with greater use of electric vehicles and should improve things in time. Require more charging points and solar panels for these in new developments.</p> <p>74. 20 mph limit on A2 to reduce pollution will make the problem worse.</p> <p>75. Why cannot the Faversham Town Council initiative seeking a 20mph limit at Ospringe be applied to the whole A2 corridor?</p> <p>76. Extend 20mph zones through all conservation areas.</p> <p>77. National policy on emission standards needs to be tightened. Could also be used to displace lorry traffic.</p> <p>78. Pollution restrictions on A2 may not be feasible because of the businesses needing access to town centres and existing employment areas..</p> <p>79. Make Sittingbourne Town Centre electric cars only, freight will move to motorways and people will use local transport options for local journeys.</p> <p>80. Sittingbourne geography with railway and A2 bisecting the town causes traffic delays, a clean urban travel system should be considered.</p> <p>81. Ban HGVs from the A2 and require them to use the motorway – only allow use of smaller roads for 'last mile' delivery only within specified</p>	

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		<p>time windows to minimise impact on residents.</p> <p>82. Stop HGVs using rural roads as short cuts.</p> <p>83. Coolchain at Teynham causes A2 congestion at Teynham – should be on Eurolink Estate with better road links.</p> <p>84. Repair potholes and fabric of roads - likely to cause serious accident (see Central Ave / Ave Remembrance/ Manor Grove). Roads signs not visible in some places.</p> <p>85. Suggests voluntary charge for residents towards road repairs.</p> <p>86. Whatever solutions are found countryside gaps between Rainham, Newington, Sittingbourne, Teynham and Ospringe must be retained.</p> <p>87. Footpaths and vegetation along A2 better maintained and widened for cyclists and walkers, but management regimes need to respect wildlife.</p> <p>88. Needs more in depth study – greater use of M2 and M20 (and railways) for HGVs and freight may help A2, but worsen the motorways.</p> <p>89. Question is outside remit of Natural England.</p> <p>90. Unfamiliar with Swale area, so not able to offer suggestions.</p> <p>91. Future modelling and consultancy should be independent of developers as they are likely to influence results in favour of reducing mitigation costs.</p> <p>92. The A249 is a major road linking Maidstone and Sittingbourne as well as the M20 and M2, and Maidstone Borough Council would welcome early engagement and discussions regarding any transport modelling work and any identified impacts upon the Kent Downs Area of Outstanding Natural Beauty and Maidstone Borough.</p>	
<p>Q29 Improving access from the eastern end of the Isle of</p>	<p>37</p>	<ol style="list-style-type: none"> 1. Bypass direct from Sheppey crossing to Leysdown to be paid for by developers who wish to build on Sheppey. Needs to be a dual carriageway. 2. Build on brownfield sites before green fields (why was Whiteway 	<ul style="list-style-type: none"> • Strategic transport modelling is in hand (jointly undertaken with Kent County Council Highways to inform choices on reasonable alternative development

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<p>Sheppey (the A2500/B2231): What further measures could be considered to improve accessibility to and from the eastern end of the Isle of Sheppey?</p>		<p>Cromwell road community destroyed and not replaced).</p> <ol style="list-style-type: none"> 3. A new bridge from East Sheppey to Faversham linking to M2 via Western Link and an Ospringe bypass should be Council's main transport aim. 4. New bridge with better road links from eastern end of Sheppey. Crossing from Harty Ferry to Oare to open up poor quality land for development and an alternative route off the island. 5. Crossing from Leysdown to Conyer, but cost likely to be prohibitive without public finding. 6. Improve road and rail links and open up Eastern Sheppey for commercial development – new roads to be funded by development. 7. Capitalise on new Sheppey crossing by modernising roads to the east. 8. More dual carriageways. 9. Improve existing roads and road management on the island. 10. Improve Lower Road to increase traffic with better links to the two bridges. The diverge traffic with new links to Medway Towns and Faversham with better links to M2. 11. Widen the Lower Road and build a roundabout at junction with Barton Hill Drive. 12. Improve access by water to carry goods to London or Europe. 13. Improve public transport (and cycle links) by allowing new development on the Eastern side of Minster. Scocles Road site could make further improvements to the A2500, specifically through providing a roundabout at junction of Scocles Rd and A2500. (DLP Planning Ltd for MLN Land and Properties). 14. Use old rail line for cycle access. 15. Consider building a rail /tram / monorail link system to the eastern end of the island. Reinstate the light railway within the island. 16. Extend train services if there is clear demand, especially direct Sheppey to London and Canterbury. 	<p>strategies and options for the local plan review.</p> <ul style="list-style-type: none"> • Further more detailed modelling will be required to support whatever strategy is chosen for local plan. This will also be used to inform a local transport strategy prepared in cooperation with Kent County Council Highways and transport operators; as to a range of measures to support new development from reducing the need to travel; to means to encourage more walking and cycling; to improving public transport; and potentially for any future public funding bids to support such initiatives.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 17. Extend the click and ride small bus services (like Sittingbourne) to the island. 18. Better bus service. 19. Develop Sittingbourne instead. 20. Study suggests Sheppey has no value or use for development – allow it to stay rural by not improving transport. 21. Current nature trails could be widened to allow both walkers and cyclists, but this would create more traffic as with everywhere else in rural Kent. 22. Question marks as to whether current values can sustain road infrastructure improvements to improve accessibility in this part of the district (Hume Planning Consultancy). 23. Not aware of any real requirement for improved access – no strong view. (Bredgar Parish Council) 24. Limited knowledge, but if strategy is to bring employment to the island, the accessibility problem needs addressing. 25. Question is outside remit of Natural England. 26. Question better answered by Sheppey residents. (Tunstall Parish Council; Rodmersham Parish Council; Five Parishes Group; and residents). 	
<p>Q30 Sustainable transport projects: What are the next big sustainable transport projects that should be being considered?</p>	64	<ol style="list-style-type: none"> 1. Non car travel must be higher on the agenda than car based travel. 2. Improved rail network; services; and service reliability a must to keep people off the roads. 3. Better direct train service from Sheerness to London. 4. Improve all train services from Sheppey including linking to HS1 at Sittingbourne. Will cater for increased levels of migration to Swale from London for those in search of more 'affordable' homes and first time buyers. (DLP Planning for MLN Land and Properties). 5. Encourage use of rail links at Kemsley and Swale Halt and Selling. 6. Trams (or trolley buses) like Croydon or Manchester. 	<ul style="list-style-type: none"> • National policy (NPPF 2018) is clear on the need for local plans to focus development at locations which are or can be made sustainable through minimising the need to travel and offer a choice of modes of transport. The local plan review itself will need to respond to all of these issues through its development strategy;

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		<ol style="list-style-type: none"> 7. Persuade High Speed trains to stop at fewer stations to make it a faster service to London. Service from Sittingbourne slower than 30 years ago. 8. High Speed link to London Victoria. (residents; Five Parishes Group; Rodmersham Parish Council). 9. Extend rail network with extra stations and / or trams / monorail off the existing network. 10. Direct train link to Maidstone would vastly reduce traffic. 11. Rush hour train services are inadequate to support and increase population. (Bredgar Parish Council). 12. Better services for smaller stations on the London main line (Newington Parish Council). 13. We need to make best use of ALL of the train stations within the borough. This includes Newington, Sittingbourne, Teynham, Faversham, Selling, Kemsley, Swale, Queenborough Sheerness. Unclear how much Swale BC can influence rail operators and network rail in this matter (Five Parishes Group; Rodmersham Parish Council). 14. Retain train link between Faversham and Ashford as A251 will not cope. 15. Kemsley station has poor facilities, but serving many more houses. 16. New settlement outside Sittingbourne would not provide means for commuters to get to the station. 17. Accessibility to existing stations should be a key consideration in location of all development. 18. Encourage rail rather than road freight, especially for eg manufacturing and distribution at Kemsley. 19. More parking needed at Sittingbourne Station. 20. Free community transport system to get cars off the road. Public transport is too expensive – explore options for cheaper local travel. 21. Consider subsidising bus and train use in the Borough to encourage high use (Bredgar Parish Council). 	<p>policies to facilitate transport infrastructure provision; the design, layout an access elements of land allocation policies; and development management policies.</p> <ul style="list-style-type: none"> • Use information from cycle audit

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		<p>22. Increased and regular local bus service. Reliability and regular services important for an ageing population and would have positive effect on A2.</p> <p>23. Smaller electric buses for rural communities especially to assist ageing population.</p> <p>24. Electric car ownership only on sensitive employment sites such as KSP.</p> <p>25. Work with local bus services on more creative schemes to encourage people not to take cars into Sittingbourne. Proper bus terminal in Sittingbourne Town Centre.</p> <p>26. Regular and reliable bus links needed to Medway, Maidstone, Faversham and Canterbury with hop on - hop off method of paying to save time. Levy for private car use unless medical emergency.</p> <p>27. Improved bus transport would be ideal, but not viable without subsidy.</p> <p>28. Dedicated electric bus routes and cycle routes to KSP/Eurolink – any expansion should be linked these policies.</p> <p>29. Implement Park and Ride on site at Foresters Lodge Farm (OSG Architecture Ltd).</p> <p>30. Reduce parking for petrol cars and prioritise electric car parking.</p> <p>31. Reduce parking overall and build high density homes (with integrated parking) on existing car parks.</p> <p>32. HGV only routes throughout Swale on brownfield land as the A2 and A251 cannot cope with HGVs.</p> <p>33. Encourage the Aviva click bus system.</p> <p>34. Enterprise areas with transport from station on demand.</p> <p>35. Worth another effort to make cycling a viable option.</p> <p>36. Cycling network essential to combat obesity, create stronger communities and avoid school run congestion. Essential to encourage children to walk or cycle further to school.</p> <p>37. Encourage cycling as ecologically sound (Bredgar Parish Council).</p> <p>38. Non car based solutions such as dedicated cycle paths and safe</p>	

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		<p>pedestrian paths should be encouraged.</p> <p>39. Walking within towns and cycle routes extending further afield.</p> <p>40. Look at footpaths in rural areas.</p> <p>41. Cycle routes should be included in all development plans.</p> <p>42. Cycle storage needed eg at railway stations.</p> <p>43. Turn the Saxon Shore Way into a cycle path.</p> <p>44. Cycle paths are generally badly planned and maintained and are unsuitable for road bikes.</p> <p>45. Technology will play a major role in reducing pollution.</p> <p>46. Pedestrianize town centres except for deliveries 10mph limit and put more trees in town centres. More trees everywhere especially evergreens to absorb pollution.</p> <p>47. At Faversham: use link from Love Lane Phase II as a route from the sites either side of the A2 street. Could lead to better designed speed management in Whitstable Rd but having regard to fact this is a bus route. A 20mph limit across Faversham would be a big and affordable sustainability project. Footpaths from the outskirts of town to centre should be improved and maintained eg Preston Lane; Sumpter Way; footpath via Long Bridge/ Bramley Av and Selling Rd. Improve and add to crossings over A2 as this becomes a town street.</p> <p>48. Implement M2 J5 improvements. (Bredgar Parish Council; residents).</p> <p>49. Implement M2/J5 improvement before reviewing Local Plan and implementing radical change to development strategy through garden towns and villages. Impact on AONB of rat running. A2/ M2 link not fully justified, will impose unfair local cost burden; should focus on local road improvements.(Five Parishes Group; Rodmersham Parish Council).</p> <p>50. Adopted Local Plan does not require M2/J5A, review not required until at least 2031. Await new NPPF.</p> <p>51. Sittingbourne Northern Relief Rd should be completed before other big changes.</p>	

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		<p>52. Another M2 junction needed east side of Teynham.</p> <p>53. Would welcome early engagement discussions regarding sustainable transport projects and the implications that will be created on Maidstone's transport infrastructure. Swale Borough Council's future highways mitigation schemes should also consider mitigation for any impact upon the Kent Downs Area of Outstanding Natural Beauty (AONB), and in particular road users, using the A2 as a cut through and the damaging effect of this on the AONB and the environment. (Maidstone Borough Council).</p> <p>54. Upgrade /widen M2 (residents; Newington Parish Council).</p> <p>55. Upgrade Brenley Corner.</p> <p>56. Sheppey Crossing bridge pillars degrading - need to plan Sheppey Crossing 2.</p> <p>57. Upgrade much of the A249 and A2.</p> <p>58. Complete Sittingbourne Northern Relief Rd.</p> <p>59. Bypass Faversham and Ospringe, Teynham and Newington.</p> <p>60. Link Harty Ferry to Oare and A2.</p> <p>61. Focus should be on improving the road network, not increasing spend on major public transport initiatives.</p> <p>62. Unlikely to persuade people away from cars. Car is king in Swale area.</p> <p>63. Cars will remain principal means of transport in rural areas for the foreseeable future.</p> <p>64. None rail network is already physically full; and road network already upgraded to maximum capacity – building new roads will only generate more traffic.</p> <p>65. Question is outside remit of Natural England.</p>	
<p>Q31 Planning, congestion and air quality: How</p>	<p>60</p>	<p>1. Technology will play a major part in reducing pollution. (residents; Five Parishes Group; Rodmersham Parish Council)</p> <p>2. Technology cannot be relied upon to provide an imminent fix, so the</p>	<ul style="list-style-type: none"> • Policy will need to be reviewed in the light of the revised NPPF; transport evidence; and inform

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>much should we be relying on future technological fixes to address air quality and congestion problems? What can be practically achieved by the planning system to mitigate or remove the adverse impacts upon air quality?</p>		<p>current situation is increasingly worrying for health. Needs action now not in future. Needs high level political action and funding in response to public concern to drive this. SBC should support and implement any government initiatives on this matter. (residents; Newington Parish Council).</p> <ol style="list-style-type: none"> 3. Technology is not a short term solution especially for HGVs. Strategic network improvements including the Sittingbourne Northern Relief Road to help cars avoid town centres and villages is essential. Also encourage more walking and cycling for short local journeys in urban areas. (Montagu Evans for Quinn Estates Ltd). 4. Encouraging development of retrofitted particulate filters and emission improvements to existing vehicles rather than vehicle scrappage schemes that increase carbon footprint instead of reducing it. Encourage development of cars to last 25 years with tech upgrades throughout lifecycle. 5. A2 and other routes need to be improved, or little success. 6. All new developments should have electric car charging points. Provide charging points at suitable locations in existing towns. Promote use of electric cars and reduce dependence on diesel / petrol cars. 7. Seek to make local public transport (buses and taxis) reliant on clean energy. 8. Technological advances for HGHVs less predictable than for cars. HGVs should have time limited access to anything other than motorway routes. 9. Ban HGVs in AQMAs (Newington Parish Council). 10. Move more freight by rail. 11. Stop building in AQMAs, or where EU limits close to exceedance. Don't allow developers to take cases to High Court where AQ known to be poor (residents; Newington Parish Council). 12. De-allocate local plan allocations in areas where AQ known to be poor 	<p>choice of development strategy.</p>

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>rather than seeking money for mitigation.</p> <ol style="list-style-type: none"> 13. Do not build more than the absolute minimum and sort out existing infrastructure problems. 14. Charge drivers for pollution. 15. Restrict vehicle ownership to 2 per family. 16. Charge developers for pollution arising from their developments for the lifetime of the road. 17. Unreasonable to expect to reduce numbers of cars and lorries, but better traffic management and free flow can reduce pollution. Introduce sensible speed management; remove speed bumps and 20mph zones which restricts flow of traffic and creates congestion. 18. Improve traffic flows by removing signals and replacing with roundabouts which flow better (eg at Sittingbourne Retail Park). 19. Pedestrianize more town centres (except for deliveries and disabled badge holders) and have a 10mph limit. 20. More trees in the town centres. 21. Encourage walking and cycling, especially to new developments through provision of safe routes.(residents; Bredgar Parish Council). 22. Convenient bus routes which have frequent and reliable services. 23. More trains buses and cycle lanes. 24. Increased planting of trees/ hedgerows flora and fauna can be encouraged by the planning system. (residents; Bredgar Parish Council). 25. SBC must focus on both NOX and particulate matter. That latter is a significant problem where there are heavy traffic flows, especially where they are in close proximity to residential properties. Particulate matter must be addressed with regards to existing road surfaces and new ones. (Five Parishes Group; Rodmersham Parish Council). 26. Particulate matter, industrial pollution; agricultural pollution; A2 and motorway pollution needs to be addressed. (residents; Five Parishes Group; Rodmersham Parish Council). 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>27. A2 in Faversham should be planned and managed as a street.</p> <p>28. Phase out long distance commutes both by train and road. We should encourage train use in the opposite direction to peak travel. Perhaps hot office/desking locally and commuting to London 2/5 days per week.</p> <p>29. Require parents to take children to local schools as this major cause of traffic in term time clearly reduces in school holidays.</p> <p>30. Enforce more zig zags outside schools and no parking within half a mile at drop off and pick up times.</p> <p>31. Schools should have AQ monitors outside their perimeters.</p> <p>32. Can only stop pollution by halting population increase of the area. Too many houses already built which increases cars and air pollution. Further 10,000 houses will negate any road improvements impact on AQ , as would airport construction.</p> <p>33. Disappointed at inconsistency in decisions at Pond Farm and r/o 99 High Street Newington despite being only a few hundred yards apart. Any increase in traffic in the narrowest part of Newington likely to cause more accidents and health problems. Feels residents not listened to on this matter.</p> <p>34. Maidstone Borough Council would welcome early engagement to assess the implications of proposed future development patterns in Swale and the potential traffic congestion and air quality impacts upon Maidstone. In any future strategic air quality modelling associated with Swale's growth plans, the assessment and any identification of mitigation measures should extend to include the impacts on air quality within Maidstone Borough.</p> <p>35. Air quality issues require further investigation through the Local Plan process. (Hume Planning Consultancy).</p>	
Q32 Securing net	56	1. Yes, adopt formal best practice standards eg Building with Nature.	<ul style="list-style-type: none"> • Further evidence base/research

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<p>gains in biodiversity: What steps should we be taking to ensure that all projects, as far as possible, bring with them the necessary measures to secure real enhancements for biodiversity?</p>		<p>(Inc. Newington PC, The Five Parishes Group, CPRE, Tunstall PC.)</p> <ol style="list-style-type: none"> 2. National Policy expects huge new developments plus net gains in biodiversity. (Natural England, Environment Agency.) 3. Biodiversity does not develop overnight. 4. Policy provision and the input of key expert consultees, like KCC Ecology/Natural England/Kent Wildlife Trust already secure this. (Hume Planning Consultancy.) 5. The LP needs to recognise work on delivery of the Medway Estuary and Swale Shoreline Plan and associated Strategy. Where compensatory habitat sites are identified, they need to be protected from development as per the NPPF. (Environment Agency.) 6. There is a growing use of houseboats in North Kent and they can be point sources of pollution - discharge of waste from galleys and heads. (Environment Agency.) 7. Would expect there to be protection for natural habitats, net gain from the planning system for all developments and promotion of biosecurity measures including requirements for the use of native species. (Inc. Environment Agency.) 8. Habitat/Biodiversity protection, enhancement and maintenance, with a strong integration blue/green infrastructure within all development proposals must be considered essential. (Inc. Environment Agency.) 9. Need a policy requiring planning applications to be accompanied by a Biodiversity Mitigation and Enhancement Plan (BMEP) that has been approved by a biodiversity officer or ecologist employed by the Council. (Natural England.) 10. Clear indicators will need to be embedded within the monitoring framework for the LP and the need for the long-term management of habitats to be secured. (Natural England.) 11. Applications which include extensive landscaping should be 	<p>may be required, such as a water cycle study and a green infrastructure strategy, as well as adhering to the NPPF's new "development must achieve a net gain in bio-diversity."</p>

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>supported in rural areas where supported by the relevant LVIA and Biodiversity Statements.</p> <p>12. Preserve all current agricultural land and encourage local farmers to support as much bio diversity as possible. (Inc. Newington PC.)</p> <p>13. An important role is for education to provide information and raise awareness -- both for children and adults.</p> <p>14. Biodiversity should be built into standard planning permission. (Tunstall PC.)</p> <p>15. Is important to protect all forms of wildlife, flora and fauna.</p> <p>16. House building on farmland and greenfield sites is a major contributory factor to the decline in biodiversity. (Newington PC.)</p> <p>17. Green spaces should be mandatory to all developments and adequate parking so residents do not have to pave over gardens.</p> <p>18. Not all species require an urban type of habitat, rural areas must be robustly protected.</p> <p>19. Need to protect our current countryside gaps.</p> <p>20. Large developments should be on brown field sites first.</p> <p>21. Protection of specific margins (hedges, tress and woodlands as well as wetlands) need to be included in the LP. (Inc. Tunstall PC.)</p> <p>22. Ensure proper waste management to stop fly tipping impacting.</p> <p>23. Encourage green spaces even if they are not designated nature reserves and create parks within urban areas and community green spaces.</p> <p>24. Make the developments, if they have to be done, small so the impacts are small, spread them around not just concentrated in several large areas.</p> <p>25. Protect the AONB and create an ANOB buffer zone and protect ancient woodland. (Bredgar PC,</p> <p>26. Assess the effect by light, noise and air pollution.</p> <p>27. To survey protected species does not capture the whole picture of bio diverse environment.</p>	

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		<p>28. Developers, landowners and farmers alike should be accountable to keep or provide wildlife areas.</p> <p>29. Building houses and thinking you can "manage" nature misunderstands what nature is.</p> <p>30. Encourage farmers to better manage hedgerows, shaws and woodland; restoring those that have been recently grubbed out. Consider funding of such environmental work to ensure that change for the better happens. (Inc. Bredgar Parish Council.)</p> <p>31. Encourage wild meadows, and areas of natural wilderness that is managed rather than destroying our natural habitats.</p> <p>32. Do not allow development on any greenfield sites. (Inc. Newington PC.)</p> <p>33. Sensitive management and conservation is essential to the survival of the AONBs important biodiversity heritage and landscape quality. (Kent Downs AONB.)</p> <p>34. The Local Plan should include requirements for securing net gains in biodiversity in respect of applicable development proposals. (Kent Downs AONB.)</p> <p>35. Should be looking to expand Swale's productive agricultural land.</p> <p>36. Small scale developments have less detrimental impact on biodiversity because they allow corridors between areas.</p> <p>37. Insist on tree planting in all projects (native species and semi mature plants).</p> <p>38. Maintain/provide linked waterways to assist with drainage and habitat.</p> <p>39. Plant wild flower meadows.</p> <p>40. Build in nest boxes, bat boxes in any buildings, swift nest boxes, hedgehog routes where there is a known population and have nest boxes attached to any tall structures (grid towers, telegraph poles, etc.)</p> <p>41. Ensure funding is available for long term maintenance.</p>	

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		<p>42. After Brexit we should promote the production of our own crops and halt the need for so much container delivery on our roads.</p> <p>43. SBC should be checking and monitoring the site at the time the planning application goes in and then at regular intervals before planning application is reviewed.</p> <p>44. Current hedges and trees need to be preserved and properly maintained and an inventory created. (Inc. Tunstall PC, Rodmersham PC, The Five Parishes Group.)</p> <p>45. Specific specialist local knowledge at SBC in these fields is absolutely critical. (Rodmersham PC, The Five Parishes Group.)</p>	
<p>Q33 Locally designated land: What should the approach be to the existing 'local designations' in the next local plan?</p>	<p>83</p>	<ol style="list-style-type: none"> 1. Complaints that the question itself is inflammatory. Designations are not only valued by local communities, as stated in 'Looking Ahead', but are in place as a result of a political process and of value to more than 'local communities'. 2. Retain and extend countryside gaps and don't build on them. They prevent urban sprawl/coalescence and protect natural environment across the borough (esp Sittingbourne). This will aid compliance with Government's 25 year Environmental Plan (including Five Parishes Group, Rodmersham Parish Council, Tunstall Parish Council and Bredgar Parish Council). 3. Countryside gaps keep town centres vibrant, preserve village identity, wellbeing and social networks and contribute to Sittingbourne's and villages' long and rich history and economic viability. Gaps also provide a setting to villages, help air quality, bring biodiversity to communities, mitigate risks to soil erosion and surface water run-off and provide sustainable natural drainage (including by Bredgar Parish Council). 4. Stop the moving of countryside gap boundaries (eg as at Stones Farm, Bapchild) (Five Parishes Group, Rodmersham Parish Council). 5. Faversham's countryside is protected more than Sittingbourne's. 	<ul style="list-style-type: none"> • In terms of the local plan review, the policies DM24 (Conserving and enhancing valued landscapes) and DM25 (The separation of settlements – Important Local Countryside Gaps) will need to be reviewed and updated in light of the revised NPPF and reflect future development strategy.

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		<p>Wises Lane development is not keeping settlements separate. Massive garden village would swallow up existing villages and be an act of vandalism.</p> <ol style="list-style-type: none"> 6. Enforce existing policies (and protection of gaps) before building new developments. 7. Build on brownfield before greenfield and do not allow more development creep. 8. What is a local designation and who decides what they are? Protect farmland. 9. Existing designations work well and should be retained. 10. Maintain and protect local designations and don't build on them – those who want to get rid of them have ulterior motives. Designations have value to local community and can help protect biodiversity, ancient woodlands, hedgerows etc. They also contribute to Swale 'feed-good'. 11. Preserve quality environment and create new local designations where required. 12. Keep local designations to preserve landscape and settlement character (Historic England). 13. Small scale development can be integrated into designated land, but not garden village proposals. 14. NPPF provides guidance on approach to be adopted. At revised draft this is at paragraphs 172 and 173 (Natural England). 15. Support review of local landscape designations to inform the Borough's development strategy, identifying suitable sites for development along with sites that need to be protected (Kent Down AONB). 16. Local designations are material consideration but reduce weight in certain situations eg custom build. 17. Apply a flexible approach to development of designated sites whilst retaining green space for community benefit (Kember Loudon 	

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		<p>Williams on behalf of client).</p> <p>18. Need to review landscape designations and countryside gaps including to west of Bapchild which should be allowed to grow organically (DHA on behalf of client).</p> <p>19. Review to ensure they remain of significant value to Swale in context of needs which need to be met. Eg local designation south east of Sittingbourne could enable the town to grow sustainably and can be designed to minimize/remove landscape harm (Gladman Developments).</p> <p>20. In line with governmental guidance, policy makers' spatial choices should be influenced by higher order environmental designations (Hume Planning Consultancy Ltd).</p> <p>21. Review to ensure appropriate.</p> <p>22. More flexibility needed.</p> <p>23. Countryside gaps and AHLV are important but can have effect of concentrating development in other areas which further devalues these sites. (Newington Parish Council).</p> <p>24. Countryside gaps and AHLV should not be retained as they prejudice the LP's ability to meet area's housing needs. (Judith Ashton Associates on behalf of Redrow Homes).</p> <p>25. Promote new conservation areas around villages and proper enforcement of such (including by Tunstall Parish Council)</p> <p>26. Preserve and protect AONBs and Conservation Areas (Milstead Parish Council).</p> <p>27. Preserve setting of AONB and create a buffer zone north of the M2 (including Five Parishes Group, Rodmersham Parish Council, Tunstall Parish Council and Bredgar Parish Council).</p> <p>28. Bring in extra designation below AONB.</p> <p>29. Some building in designated areas (eg AONBs) can be less damaging than building outside AONBs. Designations can put pressure on undesignated landscapes which also need protection.</p>	

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		<p>Rebalanced approach needed.</p> <p>30. Landscape Character Area Appraisal may need to be updated to take account of allocations.</p> <p>31. Consult with locals for their views.</p>	
<p>Q34 Achieving good design: How can the local plan help bridge the gap between ordinary and extraordinary design?</p>	<p>51</p>	<ol style="list-style-type: none"> 1. No need for this question as no further houses should be built. 2. By having a vision on what to have and building guide lines around that vision. Not going for the cheapest option. There should be minimum standards which should be included in the plan and below which developments should not be permitted. These standards should be expected in all applications. The ethos of 'in keeping' design should continue. 3. Extraordinary designs have their place but much of the history and character of the area is being lost as it is deemed to have little value. These things should be considered before extraordinary designs detract from areas they are supposed to be enhancing. 4. Applications which include designs exceeding the national standards should be given more weight than those that do not, i.e. better than 25% improvements on the current building control regulations. Some of the highest house design standards are to be found in custom/self-build applications. Land owners who live and will remain living on a site after a development are often uniquely positioned to enforce higher than usual house design standards. They are not subject to the same commercial pressures as a developer and often have more of a vested interest in an exceptional outcome. Applications brought forward by such land owners should be afforded additional weight over house builders and developers. 5. It can't. All design should be in keeping with the area's history and design. Historic villages should not be surrounded by any new, mass housing developments, especially when the Council is constantly telling people that we live in a conservation area. 	<ul style="list-style-type: none"> • Review the existing design policies and SPDs and consider how they could be strengthened, for example through the formal adopted of 'Building for Life 12'. • Review any changes to national design guidance in the new NPPF.

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		<ol style="list-style-type: none"> 6. Small well designed hamlets across Swale in keeping with the area they are in, with well thought out infrastructure to reduce pollution. Special focus on the biodiversity of the area, protecting wildlife, woodlands and the local landscape. Tunstall School is a good example of poor design not in keeping with the area it was placed. Local people would have been more welcoming if the building was in keeping with others in the village and not left with the legacy of a large modern ugly construction that has blighted the landscape. 7. Have innovative designs as the designs in Sittingbourne and many other towns are the same. Encourage the public to input and run competitions. Give the developers the incentive to produce better design. 8. The design of local housing already built e.g. Iwade, Sonora, Great Easthall due to the high density of dwellings and lack of decent roads and parking are the sink estates of the future with all the problems to be found in such an area. 9. Traditional designs are not necessarily bad anymore than extraordinary designs are good. Small scale developments tend towards more diverse design rather than massive development which tend to repeat similar designs because that's easier. 10. The protection of listed buildings needs to be extended much more widely to consider the setting they are in beyond the land owner's barrier. Whilst the listed building owner has strict planning rules they have to abide by to maintain these valuable assets the land in the vicinity has no such protection. 11. The move to enable building on green field grade 1 agricultural land has created a race to develop and receive maximum returns. 12. Not sure who this question is directed to. The public is not in a position to comment on this without further understanding of the problems and how the current system works. I cannot see landowners, particularly farmers, being concerned about good design, 	

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		<p>they just want the money. It would seem the council is not happy with the current scheme and if good design is not embedded as kite mark of excellence automatically into developments then that is a major concern. If you already see there is much room for improvement then that's what you should be trying to do.</p> <p>13. By never going for the lowest common denominator in costs or design and by having the greatest possible number of companies tendering for any work.</p> <p>14. The Council is well aware of what extraordinary design is, it is its willingness to not settle for anything less.</p> <p>15. By building in long-term developer financial responsibility for the maintenance of the buildings and infrastructure they build. That is the only way to ensure that standards of design and infrastructure are the best they can be. As an inducement, a portion of the council tax paid by the residents in the building would go to the developers, but there would be severe financial penalties levied on the amount that developers receive if there are maintenance failures.</p> <p>16. More rigidity on environmental and technical standards, but a more open mind on design.</p> <p>17. If massive housing developments are given the go ahead common sense will tell you that you will end up with a poor result – anything mass produced is almost by definition generic and built with the lowest common denominator in mind. If you genuinely want extraordinary design then give permission to smaller developments which are bespoke to the environment in which they are being built.</p> <p>18. Ensure housing and landscaping are maintained to a high standard by requirements set at the beginning of development.</p> <p>19. Good design can be achieved in many ways and there should be scope for high quality modern design to be supported. Historic character can be a template for promoting good design but new buildings do not have to slavishly copy or be pastiche in appearance</p>	

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		<p>to fit well into existing areas' historic character. Guidance on this matter could be included in the local plan and/or supplementary planning documents. (Historic England.)</p> <p>20. By taking account of historical "ordinary" buildings and incorporating new design as history has always done.</p> <p>21. Explore other designs of architecture – be mindful of our discoveries of free solar – what architecture has proved to last in the past? Invite ideas and designs, not only from academics but from the public and school children.</p> <p>22. Housebuilder confidence needs to be increased in lower value areas, where higher quality materials and improved standards of design are more difficult to achieve. This can be addressed by creating greater confidence in the district, starting with directing a proportion of future growth to higher value areas of the district. (Hume Planning Consultancy Ltd.)</p> <p>23. The use of independent design panels should be encouraged on larger scale developments; however the planning policies of the local plan and/or relevant SPDs should be the mechanism to control development. These should not be overly restrictive so as to create viability and deliverability issues but should seek to control 'any place' design.</p> <p>24. Good design also considers the provision of multifunctional green infrastructure and environmental net gain. (Natural England.)</p> <p>25. The local plan should include policies to safeguard against ill considered poorly designed developments and encourage use of materials that will not degrade swiftly. Design factor should include consideration of sustainable use of resources. (Bredgar PC.)</p> <p>26. The current system is developer-led and motivated by profit. The Council likes the idea of design standards. (Newington PC.)</p> <p>27. Set high design standards and be able to defend the Council's position by disseminating and properly analysing developer viability</p>	

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		<p>assessments or any alternative that might arise. The Council must not compromise on design because of cost pressures from developers. The Council must look at more imaginative design options that will last for many years. The problem we often see is that cheap external surfaces often degrade relatively quickly because of poor maintenance or poor construction and then look terrible and impact the whole streetscape. Proper consideration of the type of external surfaces must take into account their durability. If surfaces need regular maintenance then covenants or conditions should be put in place at the outset, this particularly important in large developments. We would suggest you look at development such as Eden Village or Toy Town to understand the issues here. (Rodmersham PC and The Five Parishes Group.)</p> <p>28. Build a vision of good design as part of planning permission/building regs, for example the Duchy of Cornwall/Kevin McCloud site. Offer architectural prizes/sponsorship/apprenticeships for Swale People Homes for Life – Design. More engagement with the Swale public on their vision – easy to understand questionnaires readily available in supermarkets with incentive of prizes to complete. (Tunstall PC.)</p> <p>29. Design is subjective, from what I have seen of RIBA designs; they should never have got off the ground. They need to be innovative but not outlandish and as far as possible blending with surroundings.</p> <p>30. We need homes that are affordable for local people, we need bungalows that cannot be extended, we need proper “green” homes with solar panels, but we need to recognise our historic areas. We should not be allowing unsuitable designs in areas of high or special landscape value.</p> <p>31. The guidelines developed by the Faversham Future Forum are indicative of what could be achieved and could feed into a future neighbourhood plan. The points discuss issues such as conserving the built and natural environment, pedestrian and cycling networks,</p>	

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		<p>traffic and parking, housing type, infrastructure and sustainability. (http://www.favershamtowncouncil.gov.uk/UserFiles/Files/FFF%20Development%20Criteria%20v5.pdf). The Council should use Building for Life, Building with Nature and BREEAM where it can. Ensure that layout, landscaping and materials are not creating an ‘anywheresville’ development. Oare Gunpowder Works appears as more imaginative. The two sites anticipated at Faversham are both very large which could be planned more as a master plan rather than a standard developer approach. This approach including Enquiry by Design is used by the Duchy of Cornwall.</p> <p>32. Conservation and heritage is a good thing but where materials are unavailable or not cost effective, an agreement should be made so it is possible to maintain the existing. Some listed or newly listed buildings can become prohibitive cost wise to maintain. In order to prevent neglect, some help and encouragement for alternative ways.</p> <p>33. Development within or affecting the Kent Downs AONB should include reference to development proposals needing to demonstrate how they have complied with the Kent Downs AONB Management Plan and its supporting guidance. Additionally, the AONB Unit produces guidance documents such as the Landscape Design Handbook, Managing Land for Horses, Farmstead Guidance and Rural Street and Lanes – A Design Handbook. Reference to these should also be included to assist in meeting the objections of the NPPF and 2000 CROW Act. By using the term ‘Management Plan and its supporting guidance’ covers any new guidance which may become available over the life time of the plan. (The Kent Downs AONB Unit.)</p> <p>34. Building for Life is a good tool to achieve great design and has been shown to reduce objections as well as speed up the granting and delivery of permissions. (LRM Planning.)</p>	
Q35 The built	53	1. Build on brownfield sites before greenfield (high quality) sites.	<ul style="list-style-type: none"> • Similarly to Q34, review the

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<p>environment: What initiatives should we be pursuing through the local plan to improve the built environment, including for historic buildings, structures and areas?</p>		<ol style="list-style-type: none"> 2. Raise the profile of our historic past by publishing details of the history of orchards, brickmaking, papermaking and transportation by water on our creeks (Milton, Sittingbourne, Faversham, Oare). 3. Local historians should visit schools to explain our heritage. 4. Build a new museum with easy access and parking. 5. Regeneration and maintenance of housing estates, including bringing them back into public ownership so that they can be repaired or replaced with higher density housing where appropriate. These areas should be included in the local plan with the intentions worked up into a supplementary planning document. If estate regeneration affects annual target dwelling numbers, this should be progressed as an aim within the local plan. Some may need to be demolished with a view to building better accommodation while others may be fit for purpose by the modification of existing structures. This should improve the quality of life for those living there. 6. Increasing a multiple of council tax on empty properties once a building has been empty for more than one year and taking neglected properties into council ownership. After repair, they should be used for council housing, renting out properties for a peppercorn rent and allowing the tenants to improve them and maintain their tenancy for a required number of years. 7. Levies or developer contributions should be imposed to protect heritage assets affected by development. Ensure that proposals that will enhance existing assets are given support. Applications could be combined so that, for example, a small rural development could be permitted if it included measures to also protect and enhance a nearby heritage building, where such an approach had demonstrable local support. 8. Urban heritage should also be supported when considering traffic impacts and pollution. Steps should be taken to take action against owners who allow historic buildings and structures to fall into neglect. 	<p>existing design and heritage related policies and SPDs and consider how they can be strengthened, taking into account the new NPPF and the heritage strategy currently under preparation.</p>

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 9. Provide grants to enable conservation works and provide advice to owners as to how to access funding for conservation/restoration of historic houses, listed building and heritage sites. 10. Higher profile of our historic past. Local historians should visit schools and encourage children to understand their roots. Use one of our historic buildings as a museum and make it an interesting experience – our current heritage centres in disused shops do not have the appeal. History of our orchards, bricks and paper. The Council should provide funding/grants and the relaxation of council tax to enable the improvement of buildings in the current Town Centre. Many are architecturally invaluable, the cinema is 1920's Art Deco, being on the A2 and an old market town we have historic buildings hundreds of years old. (Tunstall PC). 11. Article 4 directions should be used to try and improve the appearance of conservation areas, which should be maintained and reviewed to ensure they cover all areas of architectural merit. Conservation areas should be irreversible and set in stone. 12. Consider adding to listed buildings and non-designated heritage assets. There should be policies compliant with the NPPF to consider the impact of proposals on heritage assets and their settings. Greater protection should be given to their setting. A local list should be initiated. 13. More use should be made of Section 215 of the Town & Country Planning Act 1990 to maintain standards of buildings and land within the Borough. 14. Concerning that the Council does not have a major heritage assets strategy. 15. New developments should complement the local area and be sympathetic to existing old buildings. Historic buildings should be a core part of design. Trees and grassed areas should be included as well as areas where communities can come together to sit, talk and 	

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		<p>enjoy the environment. There should be more green space around all future development including schools, with a no car zone which would improve children's obesity and air quality.</p> <ol style="list-style-type: none"> 16. Ensure High Street face fronts have character. 17. Maintain and improve our heritage and historic buildings. The built environment should not interfere with them. Maintain them, where appropriate, through planning permission for minor modifications. 18. New housing should not be allowed to have an adverse impact on small rural villages where Grade 1 and 2 buildings exist, particularly in terms of traffic generating rat runs. Furthermore, lorry traffic should be restricted on rural roads as they cause damage to buildings and cause congestion. 19. There are a range of actions and programmes that could be adopted to conserve and enhance heritage assets. These should be addressed through the heritage strategy now in preparation. (Historic England). 20. Enforcement to ensure that owners of heritage sites keep them in prime condition. (Newington PC.) 21. Encourage conservation of heritage items through support of tourism and grant funding special projects. Preserve and extend existing land designations. (Bredgar PC). 22. Encourage alternative uses, particularly in town centres. For example, previous retail premises used for accommodation. 23. Better use of local materials to make new buildings blend in more. 24. Not allowing the building of any new mass housing developments within 5 miles of any conservation area. 25. Make it known that people willing to refurbish buildings of historic merit will be looked favourably upon. 26. The current policies restricting damage to or demolition of Listed or Scheduled Buildings should be maintained and enhanced. 27. Provide advice to owners on how to access funding. In addition, the 	

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		<p>Council should provide funding/grants to enable works to improve the built environment which could be fed into regeneration/town plans. (The Five Parishes Group and Rodmersham PC.)</p> <p>28. The plan should ensure that unoccupied buildings or those in poor repair are renovated. Many could have change of use from commercial to dwellings which will help ease the pressure on social housing.</p> <p>29. Engage locals in our history of this area by speakers, local press, posters in the library and post office etc. Have a stall at the local markets displaying our history, have a stall at the Kent County Show. Ideas from school children with prizes as a form of engagement. Repair our roads, plant trees; deliver Swale as a place to be proud of.</p> <p>30. Councils need a more pragmatic approach to work with owners rather than being perceived as an obstacle. This requires experienced inspectors.</p> <p>31. Re-instatement of the VAT relief on Listed Buildings would assist owners who would then have an incentive to maintain and repair heritage assets.</p> <p>32. Access to Conversation Officers needs to improve.</p> <p>33. Countryside gaps must be respected.</p>	
<p>Q36 Agricultural land: How can Swale keep the loss of agricultural land to development to a minimum, especially the highest quality land? Where high</p>	<p>92</p>	<ol style="list-style-type: none"> 1. Prioritise brownfield land first and incentivise (majority view) (inc. Rodmersham, Tunstall and Bredgar PCs, Five Parishes Group). 2. Build higher densities and taller (inc. Tunstall PC). 3. After brownfield land used up, build on lowest quality agricultural land. 4. Use of any farmland is unfounded (inc. Milstead PC). 5. By not permitting development on agricultural land. 6. Put financial value on such land (inc. Tunstall PC). 7. Farming practices already putting land quality under threat. AONB and aquifer has particularly suffered. 8. Food production important to UK, finite resource/will be more 	<ul style="list-style-type: none"> • Further consider the balance in Swale between using lower quality land and other considerations, i.e. viability and landscape quality. • Consider whether a potential development strategy option should prioritise lower quality agricultural land.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>quality land is being considered for development, how can we balance the need for new development with the value and quality of agricultural land, particularly best and most versatile?</p>		<p>important because of Brexit (majority view), need to be more self-sufficient/increase food security.</p> <ol style="list-style-type: none"> 9. Follow the NPPF (Natural England). 10. Preserve until 80% of brownfield sites developed. 11. Council gave insufficient weight in previous plan to the prioritisation of sites on lower quality land (MLN Land and Properties). 12. NPPF should give it higher priority. 13. Loss of such land is inevitable (inc. Hume Planning Consultancy Ltd., Quinn Estates). 14. Swale is surrounded by local quality land use – use this. 15. Lobby Govt. for a more balanced concentration of housing across the whole country, rather than in the SE (Bredgar PC). 16. As a last result, agricultural land of less quality, but for small developments only. In worst case scenario, should also consider impacts on adjacent land (Five Parishes Group, Rodmersham PC). 17. Town centre land could be better utilised to provide live work units, offices, small work units, retail as well as residential (inc. Five Parishes Group, Rodmersham PC). 18. To focus all development on Sheppey where there is low quality land would be at the detriment of an appropriate strategy (inc. Esquire Developments, Gladman Developments). 19. CPO agricultural land for a series of small land holdings for young farmers. 20. Use caution using Natural England maps as more detailed surveys show differences (Gladman Developments). 21. Undertake an urban capacity study. 22. Develop coastal areas. 23. Create centres of excellence for agriculture so that land is seen as a producer of jobs and source of local pride. 	<ul style="list-style-type: none"> • In due course, seek agricultural land quality surveys from shortlisted prospective development allocations.
Q37 Green	60	<ol style="list-style-type: none"> 1. Increase open space provision and exceed minimum requirements 	<ul style="list-style-type: none"> • Further investigation of all of the

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
<p>spaces: How can we better integrate green space needs so that we provide multi-functional spaces to both maximise health and well-being and biodiversity? Should we be increasing open space provision above that currently sought and should we be considering the adoption of existing best practice for providing green infrastructure, such as those offered by 'Building with Nature'?</p>		<p>for green spaces. Need to ensure adequate funding to maintain in perpetuity.</p> <ol style="list-style-type: none"> 2. Look at best practice. (Inc. Natural England.) 3. Integrate green spaces into new developments. (Inc. Bredgar PC and Bapchild PC.) 4. Garden Villages must have significant recreational spaces but also easy access to the surrounding countryside e.g. new public footpaths. 5. Allow access to school's open space in the holidays/weekends. 6. The AONB is widely used; it is healthy, green and biodiverse already. Don't build an unneeded J5a to the M2 on it. 7. Pressures from population growth are the most important long term reason for the demise of nature. 8. We must protect keystone sites where either biomes or selected species are thriving and these sites must be given protection. 9. Maintain and create "wild life corridors." 10. Green spaces are vital for mental health, quality of life. 11. Funding must be set aside to maintain green areas for everyone to access them. (Inc. Bapchild PC.) 12. Building with Nature should be adopted. (Inc. Bredgar Parish Council, Bapchild PC.) 13. Our natural green spaces are perfect - we do not need developers to attempt to construct artificial green spaces. 14. There must be connectivity and development must not shut off corridors for wildlife. (Tunstall Parish Council.) 15. Just a green area for play has limited use and often in new developments becomes more of a problem rather than an asset. (Tunstall Parish Council.) 16. Should make it legally impossible for them to be built on. 17. There are green spaces that are better suited to low-intensity use because of the archaeological and natural interest they contain. 	<p>different types of best practice for green space provision and maintenance required.</p> <ul style="list-style-type: none"> • Ensure the GI Strategy and Open Space Audit evidence covers the issues being raised.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>18. There is a need for a range of green spaces.</p> <p>19. Create green spaces to encourage people to get out and exercise.</p> <p>20. Green spaces need to be multi-functional and accessible to the whole community; including those with disabilities.</p> <p>21. Support the provision of accessible, multifunctional greenspace which is within easy walking distance of developments. This will help to deliver health and wellbeing benefits for people along with habitat and corridors for wildlife and helping to mitigate the effects of climate change. (Natural England.)</p> <p>22. Measures should be secured to retrofit greenspaces to existing residential areas with the borough wherever possible. (Natural England.)</p> <p>23. Support the adoption of best practice criteria. (Natural England.)</p> <p>24. False mini green spaces do not allow for recreational pursuits such as hacking and rambling.</p> <p>25. By continually allowing development on our high grade agricultural land, you are causing the problem.</p> <p>26. We need bigger buffer zones around villages near the ANOB (Kent Downs.)</p> <p>27. Embrace the Government commitment to 25 Year Environment Plan.</p> <p>28. Build on brownfield not greenfield sites.</p> <p>29. Green spaces can be important because they are heritage assets, not just those designated as Registered Park and Gardens. (Historic England.)</p> <p>30. A nice utopian vision.</p> <p>31. We already have our green space; it's called the countryside.</p> <p>32. Green infrastructure should be provided alongside development. (Inc Hume Planning Consultancy.)</p> <p>33. Green spaces are needed around schools.</p> <p>34. Countryside wardens (possibly voluntary) would keep the</p>	

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		<p>countryside accessible whilst protecting nature.</p> <p>35. Revision of councils waste sites policy.</p> <p>36. Hydroponics, fruit and veg grown on walls, etc and roof gardens are needed.</p> <p>37. Noise and light pollution needs to be considered.</p> <p>38. Cycle lanes needed.</p> <p>39. Appoint a Cllr with this particular brief.</p> <p>40. Instead of designating LGS's integrate green space within new developments. (Kember Loudon Williams.)</p> <p>41. There must be connectivity. (Inc. The Five Parishes Group, Rodmersham Parish Council.)</p> <p>42. A Landscapes Officer and the specialist skills of a Tree Officer should be used to review designs and suggest improvements. Inc. (The Five Parishes Group, Rodmersham Parish Council.)</p>	
<p>Q38 The Swale challenges: Do you agree that the challenges for Swale in Statement 2 opposite represent the big challenges for Swale? If not, what would you include or remove?</p>	<p>58</p>	<p>Agree</p> <ol style="list-style-type: none"> 1. Agree in general. (Inc. MLN (Land and Properties.)) 2. Endorse those challenges that promote and protect the historic environment. (Historic England.) 3. Generally concur providing the environmental protection and enhancement includes the Kent Downs AONB. (Natural England.) 4. Focus on what we have already - HS1. (Tunstall Parish Council.) 5. Swale faces a number of complex challenges, broadly summarised in Statement 2. (Altimat Property Ltd and DHA Planning and SW Attwood & Partners.) 6. How can any of them can be delivered? <p>Include</p> <ol style="list-style-type: none"> 7. Making the best of our USP (5 mainline HS1 stations.) 8. Opening up our waterfront locations. 9. Valuing in financial terms our countryside to understand opportunity 	<ul style="list-style-type: none"> • Issues to be considered at spatial alternatives stage ad in the CP and DM policy drafting.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>cost of development. (Tunstall Parish Council.)</p> <p>10. More skills training and apprenticeships needed.</p> <p>11. Challenge of meeting the increased demand for energy and the challenge of transitioning to a low-carbon economy. (Cleve Hill Solar Park Ltd.)</p> <p>12. Agricultural land as an amenity, encourage walking and put a financial value on the countryside. (Tunstall Parish Council.)</p> <p>13. Planning for and delivering new homes should be a main priority. This is not clearly expressed. (Altimat Property Ltd and DHL Planning and SW Attwood & Partners, MLN (Land and Properties.))</p> <p>14. Protect our countryside, villages and agricultural land.</p> <p>15. Improved transport links, leisure provision, green spaces, restaurants and shops.</p> <p>16. A lack of pre-school provision.</p> <p>17. Housing is needed but not at the levels suggested.</p> <p>18. Impartial and competent governance.</p> <p>19. Protect and enhance our countryside, green belt, rural villages, encourage wildlife and make more green spaces, which will aid air quality.</p> <p>20. More local employment.</p> <p>21. Ensuring developers provide community facilities and necessary infrastructure.</p> <p>22. Protection of the AONB, woodland and agricultural land.</p> <p>23. Define 'superb environment'.</p> <p>24. Green transport hub for Sittingbourne.</p> <p>25. Swale must address the perception that it is a poor and unattractive borough.</p> <p>26. Provide sustainable transport networks.</p> <p>27. Number one challenge you have is winning over the electorate.</p> <p>28. Rising lawlessness.</p> <p>29. Poor quality new builds and poor design.</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>30. Any development in Swale should be on brownfield sites. 31. Concentrate on making Swale better not just bigger. 32. Policies and plans for managing water, sewage and waste. 33. Broadband fit for the 21st century. 34. Traffic models to better inform decision making about development. 35. Capitalise on our historical assets.</p> <p>Remove</p> <p>36. Your thoughts seem to be from a developer's brochure - remove or re-word it. 37. Superb place to live and socialise- this is already not the case.</p> <p>General Comments</p> <p>38. Emphasis on traditional town centres too great. (Newington PC) 39. Strongest labour market link is London and that is not changing. (Newington PC.) 40. Need right mix of housing in the right places. 41. Better consultation with residents on future plans. 42. Statement 2' is broad reaching and generic. (Bredgar Parish Council.) 43. Support the maintenance of the natural and agricultural environment while encouraging sustainable development to meet the actual housing needs of the Borough. (Bredgar Parish Council.) 44. The natural environment also presents significant opportunities to achieve sustainable growth and much wider ecosystem services and health and wellbeing benefits for current and future residents.(Natural England.) 45. Statement 2 is too generic and subjective. Is a lovely wish list but what does it achieve (Rodmersham Parish Council and Five Parishes Group.)</p>	

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		<p>46. Keep spend in borough by best practice leisure/environment/countryside. (Tunstall Parish Council.)</p> <p>47. Meaningless words and 'pie in the sky'.</p> <p>48. Meet more of the housing needs of our existing population, rather than 'attracting' new people.</p> <p>49. Is this an extract from a children's book?</p> <p>50. Where is the statement going and how is it going to get there?</p> <p>51. Infrastructure necessities go beyond the obvious.</p> <p>52. This is like asking a child whether he hopes for good presents at Christmas.</p> <p>53. This level of growth is untenable.</p> <p>54. Statement 2 represents a big challenge.</p> <p>55. Swale challenges are the results of other people's greed.</p> <p>56. Not necessarily a useful nor achievable target.</p>	
<p>Q39 The current approach to meeting development needs in Swale: What would be the possible consequences of continuing with the current approach to meeting development needs in the Borough as set out by the existing adopted local plan</p>	<p>74</p>	<ol style="list-style-type: none"> 1. Massive infrastructure problems (majority view), not solved by garden communities (inc. Tunstall PC). 2. Road (inc.A2) problems – congestion ('gridlock') and air pollution (inc. Newington PC). 3. Stick with current Local Plan/fit for purpose (inc. Tunstall PC). 4. Should reject any new approach as will create conurbation from Strood to Canterbury/stand up to Government/Swale becoming urban sprawl instead of mixture of communities/Swale like London without the benefits. 5. Thames Gateway is an anachronism/scrap planning areas. Will Faversham get more housing instead of Sittingbourne? Faversham = precious, Sittingbourne not so. Wrong that Faversham only gets 15% share when they are getting a new motorway junction. 6. Sclerotic Sittingbourne – too many houses, not enough infrastructure. 7. Erosion of rural nature of Borough. 8. Promotion of unsustainable growth to the west of the Borough, 	<ul style="list-style-type: none"> • Any decisions on new spatial development strategy will need to be NPPF compliant in meeting housing targets. The revised NPPF concept of a 'stepped' housing trajectory could be considered assessing deliverability of alternatives. • Issues to be considered via spatial alternatives process. Begin to scope what the spatial strategy alternatives should be and how well the evidence and Sustainability Appraisal supports them.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
vision and settlement strategy?		<p>creating less attractive and less popular places to live (inc. Newington PC).</p> <ol style="list-style-type: none"> 9. Ensure a fair allocation, looking at south and east Sittingbourne, Teynham, Norton Ash and Lewson Street. Areas can benefit from existing infrastructure. 10. All brownfield land should be considered. 11. New M2 junction should be between Teynham and Faversham. 12. If you don't continue with the current approach it means you got it wrong. Jumping to an alternative is not a guaranteed fix. It means the adopted Local Plan should never have been adopted. 13. Loss of natural environment and farmland. 14. Increased crime. 15. Best to wait and see how current plan and Brexit pans out. 16. Smaller schemes would be more manageable, but garden settlements not as will blight areas for years. 17. (Quotes Looking Ahead) – “The truth is that the current planning and development model, which meets housing needs...by pressing sequential development into and up against existing communities, drives high densities and low quality, and so ramps up local people's opposition to development. Such development, building on the next field, endlessly adding to existing communities, directs development to the very bits of environment most precious to people – at the end of their garden, the gateways to the town, the fields they most treasure precisely because they are on their doorstep. It makes new housing development politically toxic for local politicians. As a consequence, limited land releases result in high density, poor quality estates, often without services or jobs, without so much as a café or shop. Each proposal is fought at the planning stage as if it were the last word (stop it and protect the town), yet in reality each is just a small step on a never ending conveyer belt – gradually encircling the community with ever more dormitory housing estates” (inc. Newington PC). 	

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		<p>18. Destruction of local communities leading to loneliness and alienation/social and cultural identity would be destroyed.</p> <p>19. More residents going elsewhere to shop.</p> <p>20. Concrete jungle with feral youths, rising crime and obesity.</p> <p>21. Lack of parking in towns.</p> <p>22. Hospitals full.</p> <p>23. Sufficient deliverable and developable land must be identified in places where people want to live and where therefore the market is likely to bring forward. Infrastructure must be paid for by developers even if paid for first by public authorities. Highly unlikely that current strategy will deliver the number of homes in the required timescale. Delivery has been over-optimistic and allocations made in locations with viability difficulties. Figure of 1,054 per annum will be higher to make up for under-delivery. Also key infrastructure will not be delivered as smaller scale of growth does not facilitate major infrastructure. Bolt on approach will only deliver same undesirable results. A new road link is needed to relieve pressures and this can only be done by large scale developments (Quinn Estates).</p> <p>24. Current strategy should remain largely in place, especially higher scales of growth in Thames Gateway, in particular on Sheppey. It is more affordable. An alternative strategy focussed on minimising high quality agricultural land loss should be considered.</p> <p>25. Will exacerbate affordable housing need and lack of infrastructure because of lower land values (Redrow, Hume Planning Consultancy Ltd.).</p> <p>26. Current plan is perfectly acceptable, but flawed because of delay in road improvements/upgrades. The main flaw/consequence of continuing with the current approach is that infrastructure (not just roads but health, education, welfare etc.) cannot be achieved because of the Councils failure to adopt a CIL. Focusing on a new A2/M2 link road and motorway junction 5A will be prioritised ahead of far more</p>	

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		<p>essential improvements on the existing local road network. Building New “Garden” Towns and Villages is not the solution and will not address the needs of the existing communities. Main issue is to the delivery of schemes with permission and to stop land banking as this leads to more land being required. A2/M2 link road, junction 5a and completed Northern Relief Road support is not democratic plan making. Plan is being reverse engineered into this consultation and has been predetermined. Quinn’s Highsted Park scheme will be presented as a “fait au complet”. This is a fundamental breach of process and not in line with NPPF, there is no evidence to show the need or the impact of these schemes (Five Parishes Group and (part) Rodmersham PC).</p> <p>27. Implement J5 first.</p> <p>28. Need a radical change in strategy to meet housing and economic development needs (Trenport Investments Ltd).</p> <p>29. Adopted LP provides secondary focus of Faringdon. This ignores Faversham and it should therefore have a more advanced role with more sites identified that could improve the A2 (W.T. Lamb Holdings Ltd).</p> <p>30. Current strategy is NPPF compliant and should be continued (Esquire Developments).</p> <p>31. Should extend the range of settlements being considered, particularly those with good access to services. Greenfield sites will be required as there is a lack of brownfield sites (Kember Loudon Williams).</p> <p>32. Statement 3 does not reflect experience of urban extensions – there are good and bad examples. Current settlement strategy is understood, but need to look at a wide range of development locations and types/sizes. Rural areas have not been well served e.g. Upchurch/Newington, whilst a new garden suburb will also be needed to meet long term development needs for LP review and post plan (Gladman Developments).</p>	

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		<p>33. People would move from Sittingbourne and Sheppey.</p> <p>34. There will be no point in trying to get off the Island at peak times and during summer holidays.</p> <p>35. Garden villages are a flawed approach. Putting them on edge of existing towns and pretending they are not an urban extension is manipulative and deceitful. They would have to be a significant distance for existing towns and large villages which would mean going into 'untouchable' areas like landscape designation.</p> <p>36. Developers have no concerns of existing residents; no private sector funding should be used. PPI contracts provide the warning.</p> <p>37. Should development places like Halling and Swanscombe Peninsula – Councils should share sites like these of little landscape value/brownfield.</p> <p>38. You are scaring the readers – the world won't end.</p>	
<p>Q40 The local plan vision and settlement strategy: If the next local plan were to require a new vision, what are your views on the approach set out in table 8.1.1 over the page?</p>	<p>69</p>	<p>Comments on the alternative vision</p> <ol style="list-style-type: none"> 1. Welcomes the environmental aspirations for the Borough within the alternative local plan vision. (Natural England.) 2. Pie in the sky. 3. The settlement strategy is agreed. (Hume Planning Consultancy.) 4. The historical focus on the Thames Gateway should be revisited. (Hume Planning Consultancy.) 5. No new vision required. (Inc. Bredgar Parish Council.) 6. Broadly in agreement, but there is an in-balance in the distribution of development around Swale. 7. Would not be overly concerned at this stage about a revised vision. (Historic England.) 8. Does not mention meeting the boroughs housing needs, especially affordable housing. (Redrow Homes.) 9. Should address the air quality issues along the A2 corridor. (Quinn Estates Ltd.) 	<ul style="list-style-type: none"> • A diverse range of suggestions for both inclusion and deletion in the vision. Members will need to give a steer on what to include in a new vision, prior to development of reasonable alternative development strategies.

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		<p>10. A vision to attract a further education facility to the Sittingbourne to strengthen the local workforce. (Quinn Estates Ltd.)</p> <p>11. Agree with the broad principles set out in the vision. (Gladman Developments.)</p> <p>12. Concerned about the use of LVC and suggest the vision consider a range of means by which infrastructure, services and assets can be paid for. (Gladman Developments.)</p> <p>13. Current LP vision is still relevant for the future.</p> <p>14. A reasonable vision. (Inc. MLN Land and Properties.)</p> <p>15. Fantasy.</p> <p>16. Aspirational but unachievable.</p> <p>17. Bullet point 2, in the 'We have accomplished' section, should be expanded to recognise the role of the other towns on Sheppey should play in rejuvenating communities on the island. (MLN (Land and Properties)).</p> <p>18. Each town should have a fair share of new development and has the right to retain its own 'special, distinct and separate identity'.</p> <p>19. It's not an alternative, it's a misleading statement of what the council think they might be able to achieve.</p> <p>20. How will the alternative vision be achieved? What "flexibilities" can suddenly achieve this utopian miracle? The new version has to be drastically different.</p> <p>21. The next local plan does not require a new vision except to consider sharing housing development quotas more equally.</p> <p>22. Is a whimsical force and has no place in factual document.</p> <p>23. The last paragraph "At our rural communities" would be hard to believe if Swale continues with their current policy of build wherever.</p> <p>24. Looks undeliverable if the concentration of development is focused on Sittingbourne and Sheppey over Faversham.</p> <p>25. Table 8.1.1 is pure fantasy; was it composed by consultants with</p>	

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		<p>only rudimentary knowledge of the local area?</p> <p>26. I would love to live in this perfect scenario but I am a realist and to deliver all such ideas?</p> <p>27. Would like to see specifics, this is too generalist.</p> <p>28. Get the infrastructure in place that has been planned or discussed for 10 years or more first.</p> <p>29. Ensure when planning for new houses or new development is given the timescales for completion are met and penalised if not.</p> <p>30. Ensure investment in skilled jobs is a priority not low grade jobs that are at risk of being lost through automation.</p> <p>31. Use the assets we have in Sheerness, Sittingbourne and Faversham town centres not create more sprawl.</p> <p>32. Ensure brownfield sites are reviewed and identified for priority development.</p> <p>33. Ensure we maintain our bio diversity and protect the villages and green boundaries that the wildlife needs.</p> <p>34. Return the land to agriculture use in light of Brexit.</p> <p>35. New employment needs to be quality employment.</p> <p>36. An FE facility is needed.</p> <p>37. It is not fact but based on trends.</p> <p>38. Stop aiming for more, except as really necessary to accommodate the current population, and aim for better.</p> <p>39. The Thames Gateway is the area where growth should be concentrated, and is less likely to impact environmentally.</p> <p>40. The approach in the table sounds great - as long as it doesn't involve building on greenfield sites.</p> <p>41. The vision is quite ambitious but is a desirable programme to work towards.</p> <p>42. A new vision with HUGE assumptions of what you might have achieved in the future.</p> <p>43. Expansion for fewer houses in Doddington, Newnham, Eastling,</p>	

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		<p>Sheldwich Lees, Upchurch, Lynsted. This would accommodate families or provide priority for families already in these areas.</p> <p>44. Include the recognition of the need to include development of suitable sites in rural areas to meet its needs for housing and employment. (Kember Loudon Williams.)</p> <p>45. Should provide the opportunity to review that the role of suitable sites within the countryside. (Kember Loudon Williams.)</p> <p>46. It is open to many different interpretations and provides no detail. (Inc. Newington PC.)</p> <p>47. A more positive and encouraging approach should be given to the development of sites that are located within the countryside but well relates to existing villages. (Kember Loudon Williams.)</p> <p>48. Alternatively let's look at Sittingbourne 2038: so many houses have been built that the housing market has collapsed, no sustainability in the job market and road infrastructure is inadequate. (Milstead PC.)</p> <p>49. Please refer to table 8.1.1 (page 34) and relate it to any known facts. (Milstead PC.)</p> <p>50. This proposed vision is supported, particularly the elements that refer to "fresh and innovative approaches to new locations for growth and their long term management". (Owners of land at Ashford Road.)</p> <p>51. Support the section of the vision that relates to Faversham, stating that "development has exploited accessible locations to achieve economic success and has shaped a special, distinct and separate identity that respects the town." (Owners of land at Ashford Road.)</p> <p>General Comments</p> <p>52. Build any further housing in Scotland.</p> <p>53. A2/M2 link a must.</p> <p>54. The vision set out under 8.1.1 is quite ambitious but is a desirable</p>	

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		<p>programme to work towards. Overall, it would create a better Swale while retaining the character of the area. In Faversham, if there can be an improvement in services, then this would be welcomed but is not all in Swale's control.</p> <p>55. Important to maintain valued elements of local character such as historic environment and the good quality of the local countryside around Faversham.</p> <p>56. More emphasis should be placed on developing skills for the 21st century economy.</p> <p>57. The regeneration of the town centre should include residential.</p> <p>58. Garden Villages could provide the best opportunity to provide quality housing.</p> <p>59. Development of KSP and Eurolink is a must for much needed jobs.</p> <p>60. Share development equally across Swale and build more in Faversham and Boughton. (inc. Tunstall PC.)</p>	
<p>Q41 Village housing: Parish Councils and rural communities are asked to consider whether they would be willing to consider limited releases of land in their areas to support housing needs?</p>	<p>61</p>	<ol style="list-style-type: none"> 1. Bapchild has minimal land left following the 600 house Stones Farm development. The most important open space remaining on the South side of the A2 is a designated countryside gap which should be upheld. 2. No, not in and around Newington. Development has been beyond capacity in past years and organic growth is the right way to increase rural housing. There has been irreversible loss of best and most versatile agricultural land. The same is said for Upchurch and Hartlip. (Inc. Newington PC.) 3. A small amount would not result in over 12,000 new homes and the biggest house building scheme in England at present. 4. The principle is good but only for small pockets that would not impact upon the village, conservation areas or neighbouring villages (coalescence and identity). 5. Yes but proportional to the current village population and designed to 	<ul style="list-style-type: none"> • Progress work on the rural settlements study as a piece of evidence base when considering the sustainability of village expansion. • Progress work on the SHLAA and SHMA to consider the type and tenure of dwellings required and the sustainability of sites submitted in village locations. • Determination of the settlement strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>be in character with the village so they are not swamped and their setting harmed. (Inc. Bredgar PC.)</p> <ol style="list-style-type: none"> 6. Build on brownfield sites before greenfield sites and use empty properties first. Each Parish Council should keep a register of brownfield sites. 7. No. Biodiversity is being killed off. 8. Not opposed to any new housing in the AONB, particularly if development increased the supply of affordable housing for those with proven local needs. However, it would need to relate well to existing villages, be of a limited scale and complimentary to local character in form, setting, scale and contribution to settlement pattern. Advocate the use of landscape capacity studies to ascertain the capacity of AONB villages. Opportunities for growth at Neames Forstal are considered very limited. (Kent Downs AONB Unit.) 9. Providing impacts to designated nature conservation sites and the Kent Downs AONB are avoided and the least environmentally constrained sites considered. (Natural England.) 10. Yes, this should be dense. (OSG Architecture.) 11. What do you mean by limited releases of land? For example, 10 units in pocket development could be considered but no substantial increases that would undermine the fabric of the villages. Parish councils aren't against all development but it needs to be relative to the scale of each village. Much of the as yet undeveloped land is agricultural and its protection would tend to exclude housing development. (Rodmersham PC, Tunstall PC and The Five Parishes Group.) 12. Further development in Teynham would be foolhardy due to a lack of transport and community infrastructure. If a suitable local with good road links could be identified, the new settlement proposal is attractive. (Teynham PC.) 13. It is vital that villages grow so as to prevent the problems of 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>demographic change and subsequent viability of local services. There is considerable untapped potential for well designed, appropriately scaled new development in rural areas which could give rise to investment in services and infrastructure if the needs are properly considered. Villages should have the opportunity to grow in a way that creates links with larger settlements. (Gladman Developments and Kember Loudon Williams.)</p> <p>14. It is wrong to ask this of parish councils and rural communities who live there for a reason and forgo the other perks of living in a town.</p> <p>15. Small amounts spread around the villages, in a way that would not destroy current communities, would be fair (including rectifying the fact that Faversham has always seen less development for housing).</p> <p>16. The charm and appeal of our villages should be protected and not underestimated.</p> <p>17. Apart from small-scale housing to meet local needs for local people (including bungalows), villages should not be the focus for development. There may be limited scope on a piecemeal basis but this would not provide anywhere near enough.</p> <p>18. Parish councils should have more say and power to decide what land should be offered. Some have worked hard to develop their own plans. Swale BC ignores these – why ask if you are not going to listen.</p> <p>19. The Council's current/previous policy to prevent most villages expanding has also prevented their natural growth and viability, leading to the current issues.</p> <p>20. This is a statement not a question and is already happening. The whole of Swale should be treated fairly as Faversham has only received 15% of housing allocations. The release of rural land should be a last resort. Many communities have little or no infrastructure. None should be released where there would be an impact on heritage assets, wildlife habitats, health, education and congestion.</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>21. Small amounts of housing are needed for villages and hamlets to survive, but these must be affordable to people who currently live there. E.g. 4 locally restricted houses could be built alongside 2 market houses, or 2 & 1. This could amount to houses being tastefully and inclusively incorporated. Minimising the loss of BMV agricultural land is essential. Building on Sheppey needs to be accompanied by a second exit from the island east towards Faversham. This would help regenerate this end of the island and provide greater employment and leisure flexibility between the 2 extremes of the borough. A new link from the island onto the Western link and a new connection with the M2 around Ospringe would have huge benefits. New settlements have to be entirely away from existing towns and large villages, all of which have been pushed beyond reasonable growth in recent years and away from the A2/A249 corridors which are beyond capacity.</p>	
<p>Q42 Elements that could be included in our future spatial alternatives for the distribution and location of development: What elements should be further considered for inclusion as spatial alternatives for the distribution of development in Swale?</p>	<p>67</p>	<ol style="list-style-type: none"> 1. Main Issue. 2. Support for focussing more development at Faversham but not on Grade 1 agricultural land or other land that is high value for wildlife, flora or fauna. 3. New development should only take place on brownfield land 4. Develop brownfield land first before greenfield sites. 5. Larger scale developments should not take place adjacent to historic villages due to the detrimental impact it will have on their character. 6. Avoid allocating development on land that impacts designated nature conservation sites and the Kent Downs AONB. Sites with the least environmental impacts should proceed for further consideration through the Local Plan process (Natural England) 7. Objects to 'garden villages' as concerned they will create dormitory housing estates on a massive scale. 8. Consider all sites put forward. (OSG Architecture) 9. Building on Isle of Sheppey needs to be accompanied by additional access towards the east near Faversham. 	<ul style="list-style-type: none"> • Will be considered alongside all other evidence and Sustainability Appraisal in identifying reasonable alternative options for development strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 10. Minimise the loss of BMV agricultural land. 11. New settlements should be located away from existing towns and large villages as these have already been developed to the limit. 12. New settlements should be located away from the A2/A249 corridors that are way beyond capacity. 13. Councils should take a holistic approach and work together to provide housing where there are good transport links and infrastructure. 14. High density development should take place in central locations. 15. New development should include, as a minimum, pre-school, school, GP surgery and shops. 16. A hybrid approach of the options is required. Building blocks of the Local Plan should be to focus on Sittingbourne with appropriate growth (Where deliverable) in other settlements in the Thames Gateway. Supplement this with growth in the rural areas and consider what can be delivered in the Faversham area. 17. Support 'new settlements' approach to housing delivery around Sittingbourne and rural areas.(Gladman Developments). 18. Piecemeal developments could result in better integration of new residents and should be focussed around mainline stations. 19. Ensure retention of character and 'sense of place' of villages. 20. Piecemeal developments could result in better integration of new residents and should be located around main line stations and town centres. Large developments will need infrastructure and delivery timescales are longer – this approach could undermine the Local Plan. (Tunstall Parish Council) 21. Full account of the AONB designation needs to be taken into account in determining an appropriate development strategy. The strategy should favour the allocation of development on land of a lesser environmental value. (Kent Downs AONB Unit) 22. The Local Plan should contain criteria based policies against which proposals for any development on or affecting landscape areas will be 	

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		<p>judged and should contribute to conserving and enhancing the natural environment. (Kent Downs AONB Unit)</p> <p>23. The spatial strategy should take into consideration:</p> <ul style="list-style-type: none"> • The need to deliver assessed housing need, within the plan period and at a higher rate than experienced recently • The need to avoid the loss of higher quality agricultural land • Making improvements to public transport and accessibility across Sheppey and links to HS1 and London. <p>24. The quantum of development on Sheppey could be increased.</p> <p>25. The inclusion of a new settlement should not distract from the benefits of maintaining or increasing growth levels on Sheppey.</p> <p>26. It is unlikely that a new settlement will deliver a significant proportion of new homes within this plan period (MLN Land and Properties Ltd).</p> <p>27. Preserve agricultural land and protect the countryside gaps between towns and villages and around villages.</p> <p>28. It is considered that the options for growth and development set out in “Looking Forward” should all be considered as part of the preparation of a new local plan, provided that the objectively assessed development needs are planned for with the allocation of additional sites for new housing and employment. As such, whilst minimising the loss of high quality agricultural land should be encouraged, this would depend on the availability of appropriate sites (S W Attwood & Partners).</p> <p>29. A greater degree of flexibility in relation to the future distribution of housing within the Swale Borough is supported.</p> <p>30. There should be a presumption in favour of new housing development at other established settlements in the Borough where the site can demonstrate good sustainability characteristics. Organic growth in sustainable locations is the best solution to increasing the housing stock in the Borough rather than focussing new housing in one location The Council should also revisit the potential capacity for increasing the</p>	

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		<p>number of units at current allocations (Anderson Group).</p> <p>31. Objects to idea of Garden Village south of Sittingbourne on the basis of the negative impacts on loss of farmland, wildlife and biodiversity. The impacts will result in the urban sprawl of Sittingbourne. Expansion of Faversham is a better alternative as it has good train links and is well located for the M2.</p> <p>32. Coalescence of settlements should not be allowed. Sittingbourne has taken more than its fair share and other areas should now be considered.</p> <p>33. Garden villages will require considerable infrastructure and their locations should be given careful consideration.</p> <p>34. Convert derelict and empty town centre properties for residential use, build on brownfield sites.</p> <p>35. Stop building retail development when there is a large number of vacant shops already on our High Streets.</p> <p>36. New garden towns and strategic urban extensions that can deliver infrastructure and are located where land and sales values can sustain not only infrastructure provision, but quality design and development. (Hume Planning Consultancy Ltd).</p> <p>37. Regardless of the future growth strategy, environmental and infrastructure capacity constraints will need to be reviewed to ensure that the full growth requirements are appropriately delivered. Subject to there being no significant constraints identified which could not be overcome through the Local Plan process we support the continuation of the current approach.</p> <p>38. Supports growth around the Thames Gateway area at Newington and Sittingbourne.</p> <p>39. Support for high density development on brownfield sites. (Bredgar Parish Council)</p> <p>40. More balanced and evenly distributed growth pattern across Swale Borough is supported. This will allow pressure to be reduced on</p>	

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		<p>physical and social infrastructure in Sittingbourne and enable a more balanced approach to development to be taken across Swale, potentially with the allocation of a greater proportion of sites around Faversham. (Owners of Land Ashford Road, Faversham).</p> <p>41. The Local Plan strategy should seek to plan for small in-fill developments through to entirely new settlements. Given the practical challenges of delivery (including the availability of manpower), the strategy should open up opportunities for small builders, through regional development companies, to the largest national housebuilders, each of which compete for slightly different segments of the market. Without taking this approach, the important contribution that smaller sites that are in and adjacent to lower-tier settlements can make to improved and accelerated delivery is lost. Concentrating employment uses in a small number of areas does not maximise opportunities for using available infrastructure across the whole of the borough or access to all sub-markets. (Landcap).</p> <p>42. Remove the 85/15 split of allocations in favour of the Thames Gateway. The new plan should adjust the balance remedying the effect of previous years to support more development outside of the Thames Gateway. (Newington Parish Council)</p> <p>43. Faversham should be a location for new development.</p> <p>44. New settlements should be assessed using criteria such as those in Peter Brett but also in other criteria about sustainability in the NPPF and other policies in the local plan</p> <p>45. Boughton has the capacity to accommodate more housing and should be given greater consideration.</p> <p>46. The Council should be looking to the eastern part of the borough where land values are higher and the scale of affordable housing provision can be greater</p> <p>47. Minimising the loss of high quality agricultural land and as such focusing growth on the Isle of Sheppey is not in our opinion a</p>	

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		<p>sustainable option as it focuses growth in low value areas where affordable housing and infrastructure delivery will be significantly less than could be achieved elsewhere – esp. in the eastern part of the borough around Faversham and Boughton. Similarly, for the reasons set out in para 8.2.18, we do not believe that the identification of a new rural settlement is a realistic option in Swale, or that a dispersed approach to development within the rural areas is a sustainable or appropriate option. (Redrow Homes)</p> <p>48. There should be an equal share of housing spread across the borough rather than focussing on the Thames Gateway. No more infill development around the A249 as its at saturation point.</p> <p>49. Make more use of the Faversham area around M2J7 / Thanet Way and A2 towards Canterbury, multiple existing access routes already existing.</p> <p>50. If Oare and Eastchurch were connected that opens up a large area of untapped potential land on the mainland and island.</p> <p>51. Ensure a fair allocation of future development and economic opportunity across the whole Borough rather than focussing on Sittingbourne and the Thames Gateway.</p> <p>52. All the options for growth and development should all be considered as part of the preparation of a new local plan, provided that the objectively assessed development needs are planned for with the allocation of additional sites for new housing and employment.</p> <p>53. OAN should not be at the detriment to the character of settlements and therefore consider that the sensitive expansion and intensification of existing settlements, supported by essential infrastructure, would also be a sustainable and suitable approach.</p> <p>54. The majority of new development and growth is encouraged in and around the main urban settlements in the existing settlement hierarchy and that the needs of rural communities should also be planned for. To do this further expansion of villages with the provision of supporting</p>	

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		<p>services is needed. (Altimat).</p> <p>55. Consider all options although it is likely a combination of approaches will be needed to secure the range of options to ensure development is delivered from small to large scale and short to long term.</p> <p>56. Supports the removal of the 85/15 split.</p> <p>57. Supports a greater proportion of development needs being met in Faversham area.</p> <p>58. Supports the maintenance of gaps between settlements to protect their character and communities.</p> <p>59. More information/explanation of the infrastructure needed and how it will be provided is required.</p> <p>60. New housing should be evenly spread around each area of town so that the impact is shared but not at the level suggested. Sittingbourne should not have to bear the brunt of the need identified.</p> <p>61. All options should be fully explored, not just New Settlements. If New Settlements fail to deliver, the whole local plan will be undermined creating bigger problems.</p> <p>62. A flexible approach is needed to meet future growth which comprises a mix of the spatial alternatives identified within the Looking Ahead document.</p> <p>63. The focusing of growth towards a specific location, such as new settlements is a logical approach but given the levels of growth needed, it should be combined with other alternatives. Growth at larger existing settlements in sustainable locations and dispersing rural growth across a wide range of villages is needed. Bapchild is an appropriate location for growth because it is in a sustainable location close to the services and facilities of Sittingbourne, and will enhance or maintain the vitality of rural communities as per the NPPF. The land proposed for allocation at Bapchild has the ability to deliver retail and/or community facilities as well as housing, thereby directly helping to enhance the vitality of the Bapchild community.</p>	

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		<p>64. A strategy of 'new settlements' is not justified. Failure to deliver or delays to the delivery of new settlements will undermine the whole local plan.</p> <p>65. Does not agree with the housing need figures identified. Considers new housing should be for local need only.</p> <p>66. Question the validity of the options presented and consider the 'new settlements' strategy is purely being promoted to deliver new junction on M2 (The Five Parishes Group, Rodmersham Parish Council).</p> <p>67. A strategy of 'new settlements' is not justified. Failure to deliver or delays to the delivery of new settlements will undermine the whole local plan.</p> <p>68. Does not agree with the housing need figures identified. Considers new housing should be for local need only.</p> <p>69. The current settlement strategy does not enable all parts of the housebuilding market to make an active contribution to the delivery of housing in the Borough. There should be a greater range of small in-fill developments through to entirely new settlements. The strategy should open up opportunities for small builders, through regional development companies, to the largest national housebuilders, each of which compete for a slightly different segment of the market. By focussing delivery on large sites in higher-tier settlements the important contribution that smaller sites that are in and adjacent to lower-tier settlements can make to improved and accelerated delivery is lost.</p> <p>70. Similarly, concentrating employment uses in a small number of areas does not maximise opportunities for using available infrastructure across the whole of the borough or access to all sub-markets. (Landcap)</p> <p>71. All options for growth and development should all be considered as part of the preparation of a new local plan, provided that the objectively assessed development needs are planned for with the allocation of additional sites for new housing and employment. As such, whilst</p>	

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		<p>minimising the loss of high quality agricultural land should be encouraged, this would depend on the availability of appropriate sites.</p> <p>72. Higher density re-development of brownfield sites within existing settlements (close to transport nodes) should be encouraged but not be at the detriment to the character of existing settlements. The sensitive expansion and intensification of existing settlements, supported by essential infrastructure, would therefore be a more sustainable and suitable approach.</p> <p>73. The majority of new development and growth should be encouraged in and around the main urban settlements in the existing settlement hierarchy but the needs of rural communities should also be planned for with the even expansion of villages. Dispersed growth is therefore encouraged.</p> <p>74. Support the delivery of a new locally led garden community as an approach to delivering medium to long term growth, provided suitable sites were put forward that were deliverable within a reasonable time frame. We are of the view that suitable sites should have well established transport links offer the potential for improvements to public transport infrastructure.</p> <p>75. The coalescence of settlements and villages is not supported and any new settlements should be located in areas of limited landscape value.</p> <p>76. The strategy must be changed to enable all parts of the housebuilding market to make an active contribution. This should be done by planning for small infill developments through to entirely new settlements.</p> <p>77. Given the practical challenges of delivery (including the availability of manpower), the strategy should open up opportunities for small builders, through regional development companies, to the largest national housebuilders, each of which compete for slightly different segments of the market.</p> <p>78. The current settlement strategy does not positively enable this. The</p>	

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		<p>important contribution that smaller sites that are in and adjacent to lower-tier settlements can make to improved and accelerated delivery is lost.</p> <p>79. There are a number of sustainability benefits to developing smaller sites in lower-tier settlements, including:</p> <ul style="list-style-type: none"> • more balanced growth rather than concentrating growth in larger communities (which is not always the most sustainable option) • there is likely to be more capacity on highway networks compared with the main towns where infrastructure is a known constraint on housing delivery • it provides new housing stock for local family units which can prevent people from moving out of the village / parish out of necessity when they form new households; • it can deliver much-needed affordable housing as well as CIL receipts given that such locations tend to be more viable than, for example, large regeneration sites; • it enhances the viability of local businesses such as shops and pubs because of the increased customer base; • it similarly provides more users of public facilities and thus can help to prevent their closure or consolidation with facilities in other settlements • it can create new local jobs; and • they provide ideal plot sizes for smaller housebuilders which can help to accelerate delivery. (Quinn Estates). <p>80. Concerned about the infrastructure requirements and the need to deliver homes at pace, particularly given the persistent patterns of under delivery in the Swale Borough. It is unlikely that a new settlement could maintain the requisite level of growth over the full Plan Period. To support this level of growth and a wholly new settlement, significant infrastructure delivery is required including a wholly new junction (5a of the M2). This is on top of a substantial investment in social infrastructure (schools, health and open space), new roads and</p>	

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		<p>drainage infrastructure. The level of investment required at a new settlement will hinder the delivery of new homes in a timely manner and it poses a significant risk to the deliverability of the Plan within the time horizon to 2038. This is likely to hinder the Council in maintaining a deliverable supply of housing at a time when the five year housing land supply is already marginal.</p> <p>81. Therefore, a new settlement is likely to be only part of the solution. To save placing reliance on a new settlement to maintain a rate of delivery, the Plan should allocate a mix of sites, including alternative urban extensions in settlements such as Queenborough. This will provide flexibility in supply and thereby allow the Council to more quickly respond to fluctuations in delivery than the approach which is over reliant on a new settlement. This will be able to deliver homes more quickly given the range of facilities and infrastructure immediately adjacent to the site. The Local Plan should provide a responsive and flexible supply of housing to maintain housing delivery achieved through allocating more sites and making it clear that sustainable development will be supported in order to comply with the NPPF. (The Crown Estate)</p> <p>82. The Council needs to ensure that any proposed spatial strategy identifies a portfolio of sites to ensure housing delivery and believe that sustainable urban extensions to existing main settlements including Sittingbourne and Faversham should form an integral part of the strategy. Land at Ufton Court Farm, Sittingbourne presents an opportunity to provide a residential development on the edge of the principal town in Swale. (Hallam Land Management).</p> <p>83. Land at Graveney Road) could fall within a number of spatial options, notably 1, 2, and 4, and therefore has the flexibility to accord with the Council's preferred strategy, once decided. The Site is of a scale and in a location that means it could come forward separately and in the first 5-years to bridge the gap between the start of the plan period and</p>	

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		<p>the delivery of a larger new settlement(s) that would take time to come forward given likely infrastructure requirements. If existing allocated sites are unlikely to come forward for the use they were allocated for (i.e Land at Graveney Road), and are instead allocated for residential use then a lower number from new sites would need to be identified. (The Prudential Assurance Company).</p> <p>84. The levels of housing growth which the new Local Plan will be expected to deliver is greater than that which has historically been achieved within the Borough. It is therefore submitted that a flexible approach is needed to meet future growth which comprises a mix of the spatial alternatives identified within the Looking Ahead document.</p> <p>85. The focusing of growth towards a specific location, such as a new settlement represents a logical solution to achieving a high level of growth although unlikely to be capable of delivering housing in the short term. It therefore needs to be combined with other alternatives, and given the level of growth which needs to be achieved that should comprise growth at larger existing settlements, identifying key settlements in sustainable locations, and dispersing rural growth across a wide range of villages.</p> <p>86. In particular, in the context of the promotion of the site in question at Warden, the dispersing of rural growth across a wide range of villages is considered to represent an important element of the growth strategy for the borough. It will allow for an appropriate level of growth on smaller sites in rural areas which are suitable for the infrastructure available in the villages throughout the Swale area. The inclusion of smaller sites will allow those to be delivered by small and medium sized enterprises, which will assist with the rates of housing delivery as set out in the NPPF. (Owners of Land at Warden).</p> <p>87. Any reasonable option should be considered but sometimes it may not be possible to deliver a level of housing without unacceptable detrimental effect. Large scale house building on green field land is a</p>	

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		<p>permanent destruction of the environment.</p> <p>88. The existing infrastructure is inadequate and there are concerns that it will be in place when needed.</p> <p>89. To reiterate we are getting close to the point when we really need to consider how many houses our current infrastructure in North Kent can really sustain to an acceptable measure of success.</p> <p>90. Support for more dispersed pattern of development, not just around Sittingbourne.</p> <p>91. In considering any future spatial alternatives the implications of congestion including air quality and the impacts on habitats should be considered, including the impact upon neighbouring authorities (Maidstone Borough Council).</p> <p>92. Does not support the expansion of Sittingbourne at the scale proposed.</p> <p>93. Address transportation first before considering strategic options for additional growth.</p> <p>94. Develop where you can on brownfield sites and maintain and enhance infrastructure, particularly in rural areas.</p> <p>95. Create places where folk feel they want to be part of a community and with good infrastructure.</p> <p>96. Objects to options (1) and (5). Supports (3) "Minimising the loss of high quality agricultural land" and (4) "Focussing growth in a new settlement" although they may be mutually incompatible if the idea of "Garden Villages" suggests that these should consist of a minimum of 5000 houses (with built in infrastructure) then the figure of 9.800 probably needing to be built on greenfield sites would indicate 2 of these "Garden Villages". As the future is so unpredictable then it would be undesirable to build more that the required quota. In 20 years' time the situation can be reviewed. Incremental building with 85% directed at Sittingbourne and Sheppey would utterly destroy any of the utopian visions of the future.</p> <p>97. Maintain green gaps between villages etc.</p>	

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<p>Q43 Possible locations for new development: Unless you have advised us already via one of our previous 'calls for sites', are there any locations or sites you think would be suitable for future development? If so, where, why and what for?</p>	<p>61</p>	<p>98. All elements should be considered not just new settlements.</p> <ol style="list-style-type: none"> 1. Not possible to answer without having sight of land being offered by owners. (includes Tunstall PC). 2. Brownfield sites before greenfield sites. E.g. docks on the Isle of Sheppey, Funton brick works, Faversham Creek, Oare creek side and Sheerness steel works. The Council doesn't know what brownfield sites are out there. 3. Faversham and its villages, as the majority of previous housing has been around Sittingbourne. Faversham only has 15% of growth planned for the next 20 years and can take more for housing and employment. 4. Isle of Sheppey for employment which will encourage people to live and work there. 5. No development required and no new settlements required. 6. Land at Oare Gravel Works is appropriate for residential development. The allocation should be retained and increased to approximately 510 dwellings. (Anderson Group.) 7. Land south of The Street and south-west of Colonel's Lane, Boughton for housing. The current Local Plan includes a housing allocation to the south-west of Colonel's Lane which establishes the principle of residential development in the area. It is proposed to share the access with the existing allocation and provide a mix of housing in line with the Council's strategy. The land is relatively unconstrained and would be a logical rounding off of development in this part of Boughton. Overall, it amounts to a sustainable location which is in close proximity to facilities and transport links. (Goddard Planning Consultancy.) 8. Bell Road, Sittingbourne. 9. The Swan Quay, Faversham allocation should be changed to a mix of retail, employment and housing so that development is more likely to happen. 	<ul style="list-style-type: none"> • Progress work on the SHLAA and SHMA to consider the type and tenure of dwellings required and the sustainability of sites submitted (both here and from the previous call for sites). • Determination of the settlement strategy.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<ol style="list-style-type: none"> 10. At the A2, from the western link to the end of Ospringe. This is a sensible prospect for housing development and is relatively sustainable. 11. Land either side of the A2 between Salter's Lane/Love Land and Brenley Corner which already have motorway access. These sites should include some business, retail, new schools, health facilities, amenity space and should include retention the retention of existing footpaths and provision of cycle ways. 12. Apart from the Peter Brett document relating to Garden Villages, of which only two in Faversham seem appropriate, none. The call for sites will reveal more. 13. Any site that is underused and would add value to the surroundings and the town as a whole. Steer away from the easy option of using farmland. 14. The area south and east of Sittingbourne and Teynham, specifically the area around Norton Ash and Norton Ash garden centre which is an opportunity to use previously developed land. Good accessibility to the services and infrastructure of surrounding towns and is not constrained like much of the borough. A mixture of development possible. 15. Don't know. 16. No comments provided that impacts on designated nature conservation sites and the Kent Downs AONB are avoided and that overall, sites with the least environmental impacts proceed. (Natural England.) 17. Foresters Lodge Farm and land, Dunkirk and Land off Canterbury Road, adjacent village hall. (OSG Architecture.) 18. The east end of Sheppey and Oare served from a new M2 junction 5A link via Faversham. 19. Not Highsted Park. The area suggested for a garden village is more like a city of 10,000+ homes which will decimate the villages of 	

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		<p>Tunstall, Highsted, Milstead, Bredgar, Rodmersham and Bapchild. That is not sustainable.</p> <p>20. Wellbrook Farm, Boughton. (Hobbs Parker Property Consultants.)</p> <p>21. Areas to the south of Sittingbourne are more attractive to the commercial housebuilding market. 580 hectares with a yield of 11,250 homes could be provided through the Highsted Park proposal, starting as early as 2023 and providing a steady supply throughout the new plan period. New homes, supporting uses and necessary infrastructure will bring significant wider benefits (particularly around transport issues) at no cost to the public purse by facilitating “land value capture”. Additionally, land at Bapchild between the A2 and existing northern relief road which could facilitate the Council’s long-held aspiration for its completion. (Quinn Estates.)</p> <p>22. Land at Scocles Road, Minster. There have been consistent enquiries about this site from housing associations, care and retirement operators and house builders looking to provide a range of development which is a signal of demand and under supply in the local market. 450 to 600 units could be provided. (MLN Land and Properties.)</p> <p>23. Rushenden Marshes for the creation of either further port operations and/or new housing. Peel Port’s plans will be led by the requirement for additional port land, but if this could be met elsewhere, the site could deliver a Garden City of up to 2,700 homes. Housing plays a significant role in supporting economic growth. Garrison Point also provides an opportunity for land reclamation as part of this site. (The Peel Group.)</p> <p>24. Land north of The Street/Canterbury Road, Boughton. Approximately 70 dwellings capable of providing significant levels of affordable housing, play areas and contributions to local services. Despite previously being considered unsuitable and unachievable, the site would sit well with the existing development and would round off the</p>	

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		<p>settlement boundary. A well thought out, landscape led scheme could promote and protect the character of this Area of High Landscape Value. The site is relatively small and promoted by a national housebuilder and so there should be little concern regarding achievability.</p> <p>25. Locations in higher value areas or where there is a track record of deliverability or where important infrastructure can be delivered as part of a strategic package (Hume Planning Consultancy.)</p> <p>26. The need for small additional numbers of housing within villages and rural communities is recognised. These should be in character to the location, proportionate to its size and should not fundamentally change the setting. (Bredgar PC.)</p> <p>27. The small triangle of land going out of Bredgar towards Tunstall just before the M2 crossing. The rectangle of land next to Bredgar village hall and possibly land behind if the owner was willing. Could allow for increased parking and a footpath through to the village shop as well as a footpath approaching the school. Neither would be significantly detrimental to the village.</p> <p>28. Although the draft revision to the NPPF suggests that higher density re-development of brownfield sites should be encouraged, it is considered that the sensitive expansion and intensification of existing settlements, supported by essential infrastructure, continues to be a sustainable approach. This should remain in the main urban centres but the needs of rural communities should also be planned for. (Altimat Property Ltd.)</p> <p>29. The Former Garden Hotel, Boughton-under-Blean. The principle of residential development here has been established through previous applications, although these have not been implemented due to viability concerns. A more expansive scheme is required to secure the restoration of the listed building. Most of the current allocations in Boughton are to the south of the settlement due to the higher valued</p>	

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		<p>landscape to the north. This should continue. The site is capable of delivering 25-30 dwellings and would bring back a heritage asset into viable use. (Altimat Property Ltd.)</p> <p>30. Land at Fox Hill/School Lane, Bapchild. A logical and proportionate extension to Bapchild. Mixed use development of housing, retail and community provision. The allocation would address the policy issues raised in the recent refusal on the site in relation to development in a countryside location and countryside gap designation. It would also consider capacity of the A2 and general highways implications, the location of a southern relief road (particularly important), minerals and agriculture land resources, retail impacts and heritage assets. The previous wastewater issue can now be overcome and there are no overriding environmental constraints. It would be deliverable early in the Plan period. (DHA Planning.)</p> <p>31. Highsted Park and housing schemes around Kent Science Park or along a convoluted A2/M2 link road south of Sittingbourne are not suitable or sustainable. (The Five Parishes Group and Rodmersham PC.)</p> <p>32. The old economic insurance building on the A2, redundant garages on the A2 Bapchild, the Milton Creek area, old garden nurseries and Artlab office, Oad Street, the High Street upper floors. The land in the perimeter of KSP could be used for housing but the infrastructure needs to be in place first. Who is going to profit from the building? Accountability must be transparent.</p> <p>33. Land at Canterbury Road, Dunkirk has the potential for 25 self-build dwellings. There is considerable demand for this locally and it will form an important element of future housing delivery in the Borough. The proposal will take advantage of an established landscape setting, in proximity to existing dwellings and commercial development. It is in a sustainable location with immediate access to regular public transport services between Canterbury and Faversham and direct access to the</p>	

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		<p>A2. It will support local facilities and services in the village. (Quinn Estates.)</p> <p>34. Swale BC acknowledges the challenges faced and sets out a range of potential alternatives for meeting development needs in the future. These should all be considered as part of the preparation of a new local plan provided that the objectively assessed needs are planned for with the allocation of additional sites for new housing and development. Whilst minimising the loss of high quality agricultural land should be encouraged, this would depend on the availability of appropriate sites. (S.W Attwood & Partners.)</p> <p>35. Land east of Queenborough presents a logical and sustainable location for new housing provision and could provide around 600 dwellings. A sizeable portion would be retained for green space and footpath links could be enhanced. The location offers multi-modal access, a good amount of facilities, would have limited landscape impacts and has no overriding environmental or strategic constraints. It is however acknowledged that the site is within a designated countryside gap. There is concern about the delivery rate of a new settlement whereas this site is deliverable in the shorter term. (The Crown Estate.)</p> <p>36. Land west of Warden, Sheppey offers a logical extension to the settlement of Warden while providing beneficial economic effects for east Sheppey's rural community including Leysdown which is 1.5km away. The site is not remote or isolated from existing development and there are bus routes nearby. It could provide 30 dwellings, but with the opportunity for more considering the growth needs. The site is free from overriding environmental constraints and would be deliverable early within the Plan period. (DHA Planning.)</p> <p>37. Land at Newington Industrial Estate and land to the west of Western Link. (W.T Lamb Holdings Ltd.)</p> <p>38. Crown Quay Lane.</p>	

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		<p>39. The following sites would be suitable for the implementation of 'dispersed rural growth': land to the north of The Vallance, Lynsted and land to the west of The Street, Lynsted. Both about the built up area boundary and would provide a mix of housing. The sites are available and achievable and ideally located to accommodate sensitively designed village homes with green space, amenity space and an enhanced landscape. (Kember Loudon Williams.)</p> <p>40. Sittingbourne, Newington and Upchurch. (Glandman Developments.)</p> <p>41. Land between Sittingbourne and Faversham.</p> <p>42. Hartlip.</p>	
<p>Q44 Models for delivering new settlements: If new communities are to be taken forward, what models for their funding, delivery and stewardship should be considered?</p>	<p>43</p>	<ol style="list-style-type: none"> 1. Infrastructure must be fully funded/in place ahead of development. Ideally such infrastructure should also be for the benefit of Swale as well. 2. Consider master developer model (inc. Tunstall PC). 3. Consider Community Development Corporation (inc. Tunstall PC). 4. Communities need to see the benefits of new settlements. 5. Garden community concept would not apply to areas between Sittingbourne and villages. 6. SBC must keep control of development so they are not isolated. Should not allow local authorities to take control. Neighbouring areas must be transparently involved in their set up, growth and planning (inc. Tunstall PC). 7. Need to control greed of developers and landowners. 8. Depends on size and ownership. If a large developer then a memorandum of understanding should be progressed with a local community steering group. 9. No skills locally to set up Development Corporation, but Community Land Trusts could get involved on parts of sites. 10. Faversham site is urban extension so how is it to be planned to support the town? 	<ul style="list-style-type: none"> • Continuing research and discussions on models for delivery.

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		<ol style="list-style-type: none"> 11. Such communities bring many social problems. 12. Must have CIL and new communities are too big a task for Swale. Danger of project being taken out of their jurisdiction. 13. Detrimental environmental and infrastructure problems would occur. 14. Learn from the past. 15. Planning decisions must remain in the hands of the Council. 16. Borrow money and build houses rather than rely on developers. 17. Green infrastructure, mitigation and net gain should all be subject to long term management (Natural England). 18. All options outlined should be considered. 19. Should be Government funded with profit to exchequer. 20. Is premature as NPPF not finalised. 21. Should be driven by delivery and scale so that a range of approaches can be used (Quinn Estates). 22. Use statutory development corporations, facilitated by Community Land Trusts (Newington PC). 23. May not be possible for Council to deliver all of assessed need due to constraints. Duty to Co-operate must also be fully explored. Must consider impacts that will arise close to the Swale SPA or functionally linked habitats (RSPB). 24. SBC to supervise alongside local communities, including parishes (Bredgar PC)s. 25. It's set up must not isolate it from Swale Borough Council or the neighbouring parishes or town. These neighbouring bodies must be able to influence its set up, growth, planning decisions, and politics. Swale/local authorities are not competent developers and should not be developing new towns/villages. SBC has no experience in developing land/property and private sector has not been reliable. New communities must held in public ownership/stewardship with significant and majority control by local residents and communities - Community Land Trusts. This would capture the most land value and 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>potentially be able to deliver the most infrastructure and they would be responsible for their on-going stewardship (inc. Five Parishes Group, Rodmersham PC).</p> <p>26. Such projects fail to produce sustainable communities e.g. Iwade and estate shopping parades which fail. People always return to the bigger picture.</p> <p>27. Too early to prescribe model. Caution any approach that appears burdensome on landowner (Gladman Developments).</p> <p>28. Put it to the vote.</p> <p>29. None, as you don't need to take new communities forward.</p> <p>30. Only the current system should be used, but more effectively with stronger enforcement.</p> <p>31. Developers will not work in best interests of the community.</p> <p>32. Swale does not have same benefits as Ebbsfleet and thus such schemes would pressurise infrastructure and environment.</p> <p>33. A big marketing sell, an easy road to hell/nowhere.</p> <p>34. Could lead to CPO of land leaving the countryside and rural communities vulnerable.</p> <p>35. Options are very expensive and won't create affordable housing, just expensive ones for London migration.</p>	
<p>Q45 New settlements: Should the Council consider the opportunities offered by new settlements, in particular those which have had regard to 'garden'</p>	<p>92</p>	<ol style="list-style-type: none"> 1. Could be considered, but only in accordance with Govt. legislation as discrete settlements not as an extension of existing settlement (inc. Tunstall PC, Five Parishes). 2. Comments on specific Duchy proposals at Faversham – elitist development, with no children playing. 3. Master developer model may allow speedier development. 4. Will not generate enforceable standards and reduce this area to a brick and concrete agglomeration. 5. Not in south Sittingbourne, loss of agricultural land (food security), village character, congestion, overstretched services, destroy land of 	<ul style="list-style-type: none"> • Continue to undertake investigation of new communities.

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
community principles? If no, explain why. If yes, please explain why and where they should be promoted and at what scale.		<p>high landscape value/AONB and important 'lung' for Sittingbourne, new roads would give pressure for more development on east side, water shortages (inc. Sittingbourne Society).</p> <ol style="list-style-type: none"> 6. In principal, but there is no area in Swale suitable for them once designations, water and profit requirements are taken into account. Also loss of agricultural land, impacts on infrastructure, air quality, rail and health services etc. (Bredgar PC). 7. All sites required to give choice. Other sites should be considered first to meet short to medium term needs (inc. Hume Planning Consultancy, Gladman Developments). 8. Could consider new settlements, but would not be appropriate within AONB and less constrained areas outside would still be within its setting. Development here may not meet NPPF tests for AONB (Kent Downs AONB). 9. It is the way to go, but not in SE Sittingbourne. 10. Must be controlled by the Council via the Local Plan. 11. Planning intentions of Swale bear no relations to Ebenezer Howard, more akin to irresponsible urban sprawl (Milstead PC). 12. Ideas do not meet the criteria set out by Govt. Housing is not for local need, neither is it centred on proper public transport links. Currently all are urban extensions (inc. Five Parishes Group, Rodmersham PC). 13. Should not put all eggs in one basket as delay could undermine whole LP. 14. Fails to meet Government criteria for settlements to use previously developed land (Five Parishes Group). 15. We do not want to get ahead of the housing numbers game (Five Parishes Group). 16. London should find its own space for residents (inc. Sittingbourne Society). 17. Not convinced about deliverability of new settlements and whether they could maintain levels of growth over the plan period (The Crown 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>Estate).</p> <ol style="list-style-type: none"> 18. Should plan for majority of growth around existing settlement hierarchy (Altimat). 19. All options should be considered (SW Attwood and Partners). 20. Should not be on Sheppey as this would prejudice existing regeneration programmes (MLN Land and Properties). 21. Supports TCPA principles, but two may give concern in Swale context: (i) land value capture and (ii) community ownership of land as some land might need to be retained by developers e.g. SuDs. Pragmatic approach needed (Quinn Estates). 22. Supports new settlements, land south of M2 at Faversham would be suitable and more straightforward than other options (Owners of land Ashford Road, Faversham). 23. Consider, but refuse. Get existing settlements sorted first and send housing and jobs to the north. 24. No, unless brownfield site can be found, other land will be blighted for years. Smaller sites more manageable. 25. Won't be of any benefit to existing residents. 26. Don't know. 27. Statement about being separated from settlements but functioning in a way as to support the main settlement is contradictory. 28. Fraudulent term, they are housing estates tacked onto already creaking infrastructure and are because of uncontrolled immigration pursued by Govt. since 1997. 29. M2 at Faversham should be the boundary of town, with land to the south incorporated into AONB. 30. Yes, but make best use of USP – Rail connections. Should consider a visualisation of proposals so as to make it easier to understand. 31. Should not be a Sittingbourne V Faversham debate. 32. Look at www.gardencitiesinstitute.com. 33. Quinns is not the way forward for achieving a garden community. 	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>34. Council needs to collectively own the process in taking it forward.</p> <p>35. It would defocus attention on the three main towns.</p> <p>36. New settlements mean higher housing numbers, should tell Government 'no'.</p> <p>37. Make residency a requirement in high value London homes and penalise/prevent foreign investment in properties.</p> <p>38. West Malling Airfield has had all sorts of problems.</p> <p>39. Not supported by draft NPPF.</p> <p>40. Most are on brownfield sites – airfields, racecourses.</p> <p>41. On land away from Swale.</p> <p>42. Walderslade does not work.</p> <p>43. Is easy route because Sheppey and Sittingbourne are third world towns.</p> <p>44. Already thousands of houses being built at Ebbsfleet, surely Swale schemes would be too close?</p> <p>45. Houses close to the AONB on A251 would spoil area and create too much traffic. Scheme adjacent Faversham is more realistic.</p> <p>46. Could consider scheme at Sittingbourne/Teynham if it reduces traffic on the A2.</p> <p>47. Gives scant regard to air quality issues.</p> <p>48. Comments relating to PBA work and Duchy publications as opposed to Looking Ahead.</p> <p>49. Why are specific locations being considered at this stage?</p> <p>50. Why is one set of landscape designations superior to others and why is the green area where most people live considered less worthy of consideration?</p> <p>51. Improvements at Brenley Corner could have impacts on where people want to live.</p> <p>52. Selling Station has untapped potential.</p> <p>53. Brenley is an ideal location, linked to hub at Graveney (inc. Newington PC).</p>	

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		<p>54. Communities should be at maximum of 100 houses each, with each a quarter of a mile apart along a spine road leading to the main town. Fields can be farmed between, but parks and woodland made available where this is not possible.</p> <p>55. Faversham's heritage should not be damaged if they are to be considered.</p> <p>56. Provide on Sheppey where there is the greatest need.</p> <p>57. Yes, on poorer greenfields with new access to A2 and M2, also at Faversham and on Sheppey.</p> <p>58. Yes, the capacity of existing communities and infrastructure has been far exceeded.</p> <p>59. SBC model goes against the principle of garden villages by building on green belt between towns and villages, thereby creating urban sprawl.</p>	
<p>Q46 Any other comments: Are there any other matters not covered by any of the other questions in this document that you would like to tell as about?</p>	<p>65</p>	<ol style="list-style-type: none"> 1. The roads in the Sittingbourne area are already congested at peak times, particularly the A249, town centre and retail park. The proposed improvements will only alleviate the current situation. Traffic has increased dramatically over the years due to the Science Park, the school run and the local routes to the A249 and beyond. The Southern Relief Road has been rejected by an independent government inspector and now more traffic is proposed. The building of 10,000 new houses in Sittingbourne would add double, if not more, traffic. 2. Local roads are clogged with cars due to insufficient parking spaces and town centre parking is at a premium at peak times. 3. A message should be sent to government that their demands are contradictory in terms of environmental protection versus increased housing targets. 4. Pollution is bad due to the traffic, parking, areas with traffic lights instead of roundabouts, the school run and extra houses would add to this. 	<ul style="list-style-type: none"> • Many of the points raised here are repeated in other questions and will be covered by the various pieces of evidence base.

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		<ol style="list-style-type: none"> 5. Public transport is woeful. There are insufficient buses, which run late because of traffic problems. The town centre 'bus station' behind the Forum cannot cope at present. Trains are often full leaving Sittingbourne with people standing. 6. Schools are over full and no new schools having been built to cater for recent housebuilding which increases car travel, parking problems and pollution further. 7. Health care is an increasing problem with insufficient doctors. The extra pressure on Medway would be intolerable. 8. Infrastructure and utilities in general need urgently looking at, particularly with huge developments. 9. The countryside is being built over and will soon be confined to history. 10. There is no provision for sport facilities. 11. The questionnaire is not user friendly and has been made as difficult to respond to as possible. It will cut off a proportion of the community who would love to comment. There is uneasiness about the document and the KALC have been spoken to regarding its validity and usefulness. It has been designed not to allow true freedom of opinion and includes leading questions; dead ends and outdated management tools (SWOT) that any management consultancy prepared to spend taxpayer's money on should be disregarded for. 12. Contrary to the recently published SCI, the public is not being given a real opportunity to respond to the consultation. The pre-amble to the questions is too generalised and not specific to the needs of Swale residents. Perhaps our answers will be used to strengthen the evidence for the Council's or developer's case rather than that of the residents. Has the Leader or Deputy Leader considered meeting with the supporters of BRAD and engaged in meaningful discussion surrounding the proposed development in Wises Lane? If not, why not? The group is a true cross-section of people and yet the Council 	

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		<p>has not even tried to engage despite the recommendation for this in your Statement of Community Involvement 2018.</p> <p>13. The ability of people to cope with the online portal has been underestimated, which is confusing, complex and time consuming. The general view is that this has been intentional to dissuade people from replying so that responses can be skewed to suit the pre-determined outcome. It is a sad indictment of the Council and means that people have well and truly lost faith in it.</p> <p>14. You have not covered how the bribery act will be monitored, implemented and disclosed should any one of the proposed schemes proceed.</p> <p>15. You have not referenced or sourced the information in a satisfactory manner which raises the question of collusion.</p> <p>16. Build on brownfield sites before greenfield sites (incl. agricultural land which needs to be preserved).</p> <p>17. The complexity of the questionnaire makes it inaccessible to a great number of Swale residents and individual views will not be accurately reflected and the consultation will be non-representative. The questions are poorly worded and the corresponding document does not tally or relate to every question. We believe that few members of the public will actually respond therefore it will fail in its purpose. The short questionnaire is anonymous and therefore open to abuse as a means of collecting views. (Bredgar PC, Tunstall PC and The Five Parishes Group)</p> <p>18. Water quality issues – diffuse and point source pollution. Target to reduce nutrients in freshwater streams caused mainly by agricultural run-off. Reduce agricultural and diffuse pollution sources. Historical problems in the estuary with modifications and residues from chemicals including anti-fouling paint. Conflicting recreational, development and access issues. Population growth. Tidal Thames heavily trafficked by shipping. Invasive species. Some parts of</p>	

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		<p>catchment heavily modified for industrial or transport use. (Environment Agency.)</p> <p>19. The populous in general will be unable to associate with most of the questions in this questionnaire and will not be able to give an informed opinion. This amounts to democratic strangulation of the residents of Swale. We feel this document is biased to an outcome that is preferred by SBC. This document flies in the face of the civil rights of the people to contribute not only to their future but to the future of their families. (Milstead PC.)</p> <p>20. This consultation has been unduly complicated and the documents simply do not tally; Looking Ahead questions actually start with question 3. Questions 1 & 2 aren't questions they are personal information on a separate form and the document is called 'Notices and Permissions' and nowhere in this document does it does refer to being either questions 1 or 2. This is confusing and potentially respondents could find their comments are excluded from the consultation if they fail to return this information. We have had many complaints about not only about the consultation but also about the portal. Residents have got so fed up trying to use it they've resorted to old fashion letters and submitting by hand or by email. Surely this then defeats the whole purpose of the online portal? This consultation has been nothing short of a fiasco; made overly complicated, littered with errors, obtuse and difficult to submit. Yesterday our Chairman had at least 10 people come up to her at our annual jazz event on the village green to say they could not submit their responses either Thursday, Friday or indeed over the weekend! I've also had many phone calls saying the same thing. We believe the Council has left itself wide open to fraud by allowing anonymous responses to the short questionnaire. (Rodmersham PC.)</p> <p>21. There are challenges ahead but with scope for significant, high quality and transformational growth. Location and infrastructure</p>	

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		<p>improvements will be key. As well as opportunities to the south-east of Sittingbourne, there are also those in the surrounding towns and rural areas. New settlements may well play a role in the longer term, but we would urge caution in the Council relying on significant delivery from them over the Local Plan period. Funding and delivery mechanisms should be well thought out as these have been seen to be contentious elsewhere. (Gladman Developments.)</p> <p>22. It appears the Swale BC is too closely associated with a specific developer and most of the consultation is directly worded to support their aspirations, rather than that of Swale residents. You would also appear to want responses to unknown policies that have yet to be confirmed. The 'garden city' proposal bears no resemblance to actual policy or to the extent of actual principles, rather than creating an urban extension of Sittingbourne at the decimation of parts of our Borough which I do not support. You should have waited until the new NPPF was formalised. This is not a proper consultation rather than the ideas of SBC for the next 40+ years. The expansion of housing should be reconsidered until it can be done in a sustainable way.</p> <p>23. Get a better hall for public consultations at Swale House, as the last one I attended was too small, you could not hear or see what was going on.</p> <p>24. Sheppey shouldn't be disregarded as per the Peter Brett analysis and should be made more desirable and economically viable. The desirability issue on Sheppey is understood but surely there is good opportunity for affordable homes here. The port is important to industry and job creation. Add to this improved rail links and Sheppey would begin to lose its downmarket reputation.</p> <p>25. Faversham seems to have escaped housing allocation in the current Local Plan but is well placed for expansion outside the old town.</p> <p>26. Industrial, warehouse and distribution should be adjacent to junction 5A. Infrastructure is key to future development.</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>27. Many believe responding to the consultation to be a waste of time as the decision to build the “garden city” has already been made. It feels as if this is a formality to tick the proverbial boxes of the planning department.</p> <p>28. The impression is that the profit for developers is more important to the Council than the views of the people. If this is to change then more consideration needs to be given to people who will be directly affected by the current local plan and its forthcoming revisions.</p> <p>29. Adopting the garden plan approach would help make a very difficult problem of providing more houses easier for everyone to accept, however thought should be given to placing facilities in areas where you will have to use a car to access them. E.g. the school in Tunstall.</p> <p>30. Would like to know about developments on Roman Burial Grounds as I believe these are not permitted.</p> <p>31. Remove Wises Lane from the Local Plan as housing numbers are reached and there is no need for it.</p> <p>32. The government needs to be told to sit down and work out how it is going to cope with out of control population growth. It, and this plan, will not be sustainable.</p> <p>33. The worst questionnaire I have ever completed, and the shorter one is worthless.</p> <p>34. Lack of consideration for those wishing to downsize into bungalows.</p> <p>35. Lack of acknowledgement of the role that our historic churches play in the communities.</p> <p>36. We already have a Local Plan adopted by the inspector which has cost a great deal of money. We should only review the concerns of the inspector on road links and continue with this plan. Any new proposals may not be adopted by the inspector and will waste even more tax payers’ money. The improved M2 Junction 5/A249 would be the major road improvement. More localised small improvements could then be considered. We have many years before a review is due – why</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>reviewing now? This development will decimate the south of Sittingbourne, small blocks of development I understand but 10,000 homes is beyond belief.</p> <p>37. The assumption has been made that Government will impose increased housing targets on us, but what if they don't this could change the future plans.</p> <p>38. What influence do councils have on Government? How can the message be put across that demands regarding the size of development against environmental considerations are in major conflict.</p> <p>39. Would it be possible to do more with the old quay in Sittingbourne as part of its regeneration? It is essential to avoid the planning mistakes of the past such as the Forum and existing housing estates.</p> <p>40. Objection to the proposal for a motorway junction and 10,000+ houses to the south east of Sittingbourne over prime agricultural land, orchards, and essentially joining villages up to Sittingbourne to completely alter the landscape. At the final discussions of Bearing Fruits a new junction 5a with the M2 did not have support from Highways England and the Planning Inspector did not include it in the final draft. To conjure up a new Local Plan seemingly with the express purpose of trying to push these plans through is morally wrong. To ask landowners to come forward with plans when these plans have already been drawn up is scandalous. Sustainability of new houses should include not only transport by road by road but also rail, with access to medical facilities. There is currently a deficit in NHS funding for the Swale. Impact upon protected woods, i.e. Cromer woods.</p> <p>41. Make developers have long term responsibility for what they produce – a lifetime guarantee, rather than a 2 year warranty, for things such as infrastructure, pollution. This will make them build real quality. Bind them in with rewards and penalties in a long-term 'reverse PFI' style partnership. Better results for Swale and the developers will still make</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>a profit.</p> <p>42. Not enough proposed development around Faversham or Upchurch and other areas away from Sittingbourne. The proposed upgrade of Key Street and M2 J5 show a lack of common sense and the result will be more traffic during and after the works. The area has become a dumping ground from London, which is not being fought by the MPs. Inspectors at local, county and national level have been more concerned with protecting Sevenoaks, Tunbridge Wells and West Kent in general for many years.</p> <p>43. Parish Council should have more input. There is little in the Plan beyond housing. First priority must be the planet. After Brexit we may need to be more self-sufficient and Grade 1 agricultural land must be preserved. The young population need to be engaged. Secondary Schools should have the opportunity to know the heritage of the town and how to preserve it.</p> <p>44. SBC appears to be unable of accepting the Inspector's final report (on the current Plan). Soon after adopting Bearing Fruits, the Council was already in negotiations with a certain developer regarding the expansion of Kent Science Park which would not amount to a Garden City but an urban extension of Sittingbourne. Delivery is already an issue. By having a development order plan in place, setting out when developers expect to start and finish, there will be less disruption to the highway network and other essential services. Much stronger control over development in the borough is required as part of the review. Suggesting that the Plan is unsound beyond 2022 is unhelpful and unfair to the Planning Inspectorate and serves to encourage developers to use this against you. There is an adopted Local Plan with an end date of 2031. The review was to liaise with Highways England over the additional sites required. It was not a way to force through more development or create a new plan. This is based on future alterations to the NPPF and the review should have waited for</p>	

Looking Ahead Questions	Number of respondents	Summary of responses	Potential local plan actions to be taken forward for further consideration
		<p>this to have been published.</p> <p>45. Planners should encourage co-operation between the developers of the two potential development sites on either side of the A2 approaching Brenley Corner. Industrial employment is and will remain fundamental to the prosperity of the town, employment and to the character of Faversham, which the Faversham Society strongly supports. Planners should look at opportunities to relieve traffic pressure on Faversham by re-thinking the location of industry. There is the opportunity to rebalance this if sites become available to the south and east of the town which would be closer to the motorway. Currently it is located in the north and west.</p> <p>46. Loss of habitat for birds, insects and mammals.</p>	

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Appendix II

Summary of Main Issues Raised in the Quick Questionnaire

The Quick Questionnaire consisted of 11 questions, 10 of which required respondents to order their preferences to that question. Respondents also had the opportunity to provide additional comments to questions 1 to 10. Question 11 provided a final opportunity for respondents to explain their thoughts about the need for more housing and the risks that this might bring, highlighting what the local plan should prioritise whilst positively providing for housing.

The main issues raised are summarised in the table below.

QQ Question	Main Issue	Comment
Q1. How can the next Local Plan create a positive economy for Swale?	<ul style="list-style-type: none"> • Ensure adequate infrastructure is provided, e.g. roads, doctor surgeries, schools etc. • Develop brownfield sites only • Develop brownfield sites before building on greenfield sites • Build more affordable housing • Complete the Northern Relief Road • Bring quality retail provision to the Borough • Create lorry parks to stop lorries parking on the roadsides and slowing up traffic • Invest more in the Borough's heritage • Improve the high streets • Improve leisure and recreation facilities • Promote the area • Move industry away from residential areas • Build by-pass for villages on A2 	<p>Evidence for the local plan will identify the infrastructure requirements of the Borough. This will be set out in the Infrastructure Delivery Plan.</p> <p>The capacity for brownfield sites to meet the Borough's objectively assessed development needs will be fully investigated and assessed as the local plan progresses.</p> <p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the allocation of land and local plan policies.</p>
Q2. What should the Local Plan do to make our town centres more economically successful?	<ul style="list-style-type: none"> • Affordable or free car parking in centres • Encourage more restaurants and coffee shops in centres • Improve train and bus services • Improve the road infrastructure • Curtail the number of cafes and take-aways • Encourage more multinational and larger retailers • Reduce the number of multinational and larger retailers • Improve our heritage • Improve town centre environment, including cleanliness 	<p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the town centres, allocation of land and local plan policies.</p>
Q3. How can the	<ul style="list-style-type: none"> • Provide better infrastructure (GP 	<p>Evidence for the local plan will</p>

<p>Local Plan make our communities stronger?</p>	<p>surgeries, schools, dentists etc.).</p> <ul style="list-style-type: none"> • Build on brownfield land before developing greenfield sites • No more new housing • Access for communities to local amenities • Improve road network including access to the M2 and a second access road • Protect wildlife • Protect villages • Tackle poor quality private rented housing • Create more social opportunities for young people • Allow only small scale housing development up to 500 units. • Support small local shopping areas • More sport and recreation facilities • Allow affordable housing only • Improve services for the elderly • Protect and enhance green space and the countryside • Create more jobs • Bring empty homes back into use 	<p>identify the infrastructure requirements of the Borough. This will be set out in the Infrastructure Delivery Plan. The government requires local planning authorities to, as a minimum, provide for objectively assessed needs for housing and other uses.</p> <p>The capacity for brownfield sites to meet the Borough's objectively assessed development needs will be fully investigated and assessed as the local plan progresses.</p> <p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the allocation of land and local plan policies.</p>
<p>Q4. What should the Local Plan's approach to housing targets be?</p>	<ul style="list-style-type: none"> • Object to government's housing targets • Use brownfield land first before building on greenfield land • Provide starter homes first • Object to new housing development • Build affordable homes • Put in the infrastructure first before the new homes • All areas of the Borough should take an equal share of the housing numbers 	<p>Evidence for the local plan will identify the infrastructure requirements of the Borough. This will be set out in the Infrastructure Delivery Plan.</p> <p>The capacity for brownfield sites to meet the Borough's objectively assessed development needs will be fully investigated and assessed as the local plan progresses.</p> <p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the allocation of land and local plan policies.</p> <p>The government requires local planning authorities to, as a minimum, provide for objectively assessed needs for housing and other uses.</p>

<p>Q5. What tenure of housing should the Local Plan be seeking?</p>	<ul style="list-style-type: none"> • No more housing needed • More retirement housing • More affordable housing for young people • Self builds • More flats • More high rise buildings • More bungalows • More smaller housing for those looking to downsize. 	<p>The government requires local planning authorities to, as a minimum, provide for objectively assessed needs for housing and other uses.</p> <p>The evidence base will provide detailed information on the types of housing needed and the suggestions can be incorporated into that work through the Council's approach to housing density and design.</p>
<p>Q6. What type of housing should the Local Plan be seeking?</p>	<ul style="list-style-type: none"> • Larger affordable homes • There is already too much housing planned • More single storey dwellings for the elderly • More bungalows • More flats and high-rises • Whatever is required • A mixture • More eco housing • No more large houses • Social housing • A good mix of housing to benefit all requirements 	<p>The government requires local planning authorities to, as a minimum, provide for objectively assessed needs for housing and other uses.</p> <p>The evidence base will provide detailed information on the types of housing needed and the suggestions can be incorporated into that work through the Council's approach to housing density and design.</p>
<p>Q7. What infrastructure should the Local Plan seek to deliver?</p>	<ul style="list-style-type: none"> • More GP surgeries and other health care facilities • Entertainment venues • More jobs • More schools • Social housing • Better road infrastructure • Footpaths and cycle routes • Better car parking • Community centres 	<p>This consultation feedback, along with evidence for the local plan will identify the infrastructure requirements of the Borough. This will be set out in the Infrastructure Delivery Plan.</p> <p>New development does also present opportunities to improve infrastructure.</p>
<p>Q.8 How can the Local Plan protect the environment and mitigate the effects of Climate Change?</p>	<ul style="list-style-type: none"> • Develop brownfield sites first before building on greenfield sites • Stop building more houses • Protect the countryside • Capitalise on solar power • Monitor air quality and aim to improve it along the A2 corridor • Protect biodiversity • Do not build on grade I agricultural land • Reduce the number of planned houses 	<p>This consultation feedback, along with evidence will help to inform the local plan strategy in terms of where development should be located and the policies and proposals to protect the environment and mitigate the effects of climate change.</p>

<p>Q.9 Where should new housing land be focused?</p>	<ul style="list-style-type: none"> • A2 corridor • Sittingbourne • Faversham • Sheppey • No new housing in South East • Only on brownfield sites • Equal distribution across Swale Borough • Not around villages • Near train stations and motorway junctions 	<p>The government requires local planning authorities to, as a minimum, provide for objectively assessed needs for housing and other uses.</p> <p>The capacity for brownfield sites to meet the Borough's objectively assessed development needs will be fully investigated and assessed as the local plan progresses.</p> <p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the allocation of land and local plan policies.</p>
<p>Q.10 Where should new employment land be focused?</p>	<ul style="list-style-type: none"> • Develop/improve Eurolink • On the Marshes • Faversham • Sittingbourne • Sheppey • Anywhere • On brownfield sites only • Kent Science Park • New island on the Thames • Sites accessible to M2 • Sites accessible to public transport • Distribution across all of Swale • In town centres • Adjacent to existing employment areas • Other areas away from the Borough. 	<p>The capacity for brownfield sites to meet the Borough's objectively assessed development needs will be fully investigated and assessed as the local plan progresses.</p> <p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the allocation of land and local plan policies.</p>
<p>Q.11 Explain your thoughts about the need for more housing and the risks that this might bring, highlighting what the local plan should prioritise whilst positively providing for housing.</p>	<ul style="list-style-type: none"> • The countryside should be protected at all costs as once it's gone, it's lost forever • The existing infrastructure will not cope with additional housing, especially roads and doctors surgeries • Infrastructure provision must come first if new homes are to be built • Share the housing required with other local authorities to preserve Sittingbourne's character. • Community facilities, education provision and the road network is 	<p>These issues will be fully investigated and considered along with the relevant evidence base in forming a draft strategy for the allocation of land and local plan policies.</p>

	<p>already inadequate, it will not cope with more housing</p> <ul style="list-style-type: none">• Train services are inadequate and will not cope with the additional numbers.	
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Quick Questionnaire – quick report:

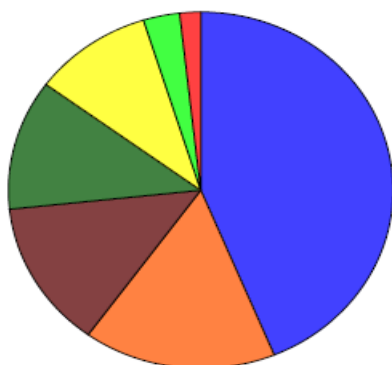
The charts below show the top preference and overall preferences as people ranked their responses to the questions.

The Top Preference pie chart shows how many people had that topic as their top priority as a percentage. For example Q1 shows that 43.48% of respondents considered that improving roads was their top priority and 16.09% had improving the quality of the built and natural environment as their top priority.

The Overall Preference analyses topics by looking at how people prioritised their second and subsequent topic rankings and allocating cumulative 'scores' to those topics which gives an idea of how important people felt the other issues were. This in effect 'smooths' out how specific sections of the community may view these issues (eg roads may be the top issue for those who commute, but less important for others) and enables other nuances to be observed. For Question 1 for example, we can still see that improving roads and improving the quality of the environment are still the top two priorities across the whole consultation question, once that smoothing exercise is done, but improving public transport moves up the priority order when the responses are looked at in this way. It is a lower priority for most people than roads, but still an important issue when all responses are taken into account.

Question 1: How can the next Local Plan create a positive economy for Swale?

Top Preference:



	% Total
Improve roads	43.48%
Improve the quality of our built and natural environment	16.09%
Improve Swale's image as a place to live, work and invest	13.26%
Other, please specify in 120 characters or fewer:	11.74%
Improve public transport	10.00%
Allocate more land for employment	3.04%
Allocate more land for housing	1.74%
[No Response]	0.65%
Total	100.00%

Overall preference:



	% Answer
Improve roads	21.75%
Improve the quality of our built and natural environment	18.40%
Improve public transport	17.01%
Improve Swale's image as a place to live, work and invest	16.95%
Allocate more land for employment	10.66%
Other, please specify in 120 characters or fewer:	8.26%
Allocate more land for housing	6.98%
Total	100.00%

Question 2: What should the Local Plan do to make our **town centres** more economically successful?

Top Preference:



	% Total
Upgrade the appearance of our town centres and improve design quality	29.78%
Make town centre parking easier	21.96%
Protect and promote the heritage of our towns	20.43%
Improve public transport to our town centres	7.39%
Other	7.39%
Promote the temporary use of empty shops e.g. as pop-up enterprises/galleries	7.17%
Allow non-shopping uses and housing in the centres of our town	5.65%
[No Response]	0.22%
Total	100.00%

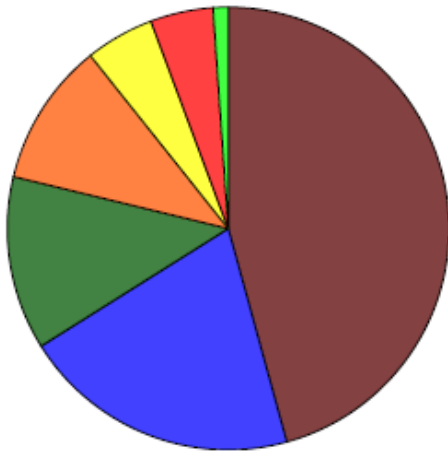
Overall preference:



	% Answer
Upgrade the appearance of our town centres and improve design quality	19.05%
Protect and promote the heritage of our towns	17.99%
Make town centre parking easier	17.78%
Improve public transport to our town centres	15.11%
Promote the temporary use of empty shops e.g. as pop-up enterprises/galleries	14.49%
Allow non-shopping uses and housing in the centres of our town	10.59%
Other	4.99%
Total	100.00%

Question 3: How can the Local Plan make our **communities** stronger?

Top Preference:



	% Total
Ensure new development is supported by the infrastructure it needs	45.43%
Improve facilities and access to education and training	20.22%
Other	12.61%
Ensure development enables people to lead more active and healthier lives	10.43%
Improve access to jobs	5.00%
Provide more affordable housing	4.57%
Allocate more land for housing	1.09%
[No Response]	0.65%
Total	100.00%

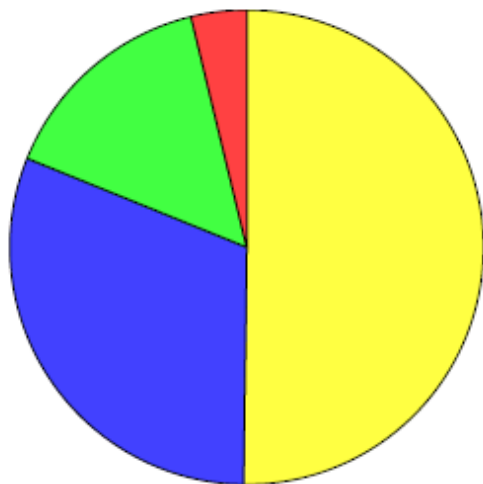
Overall preference:



	% Answer
Ensure new development is supported by the infrastructure it needs	21.91%
Improve facilities and access to education and training	19.74%
Ensure development enables people to lead more active and healthier lives	17.53%
Improve access to jobs	15.92%
Provide more affordable housing	11.56%
Other	6.95%
Allocate more land for housing	6.39%
Total	100.00%

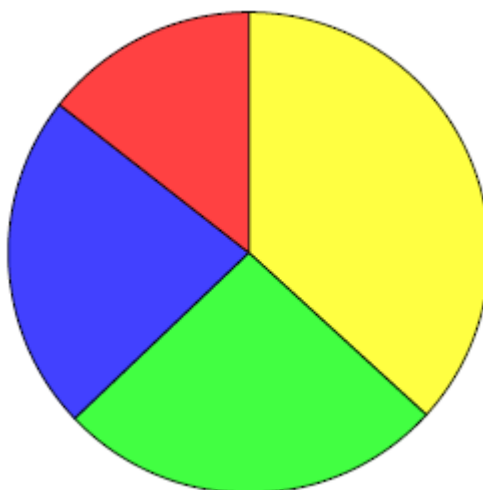
Question 4: What should the Local Plan's approach to **housing targets** be?

Top Preference:



	% Total
Ask neighbouring local authorities to meet some of Swale's housing numbers	49.13%
Other	30.22%
Meet Government targets for Swale	14.78%
Go beyond Government targets	3.70%
[No Response]	2.17%
Total	100.00%

Overall preference:



	% Answer
Ask neighbouring local authorities to meet some of Swale's housing numbers	36.78%
Meet Government targets for Swale	26.11%
Other	22.66%
Go beyond Government targets	14.44%
Total	100.00%

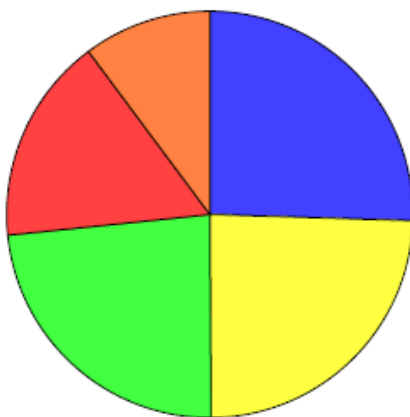
Question 5: What tenure of housing should the Local Plan be seeking?

Top Preference:



	% Total
More housing for affordable rent / social housing	28.26%
More housing for private ownership	26.74%
More housing for shared ownership / low cost home ownership	23.04%
Other	16.74%
More housing for private rent	2.17%
[No Response]	3.04%
Total	100.00%

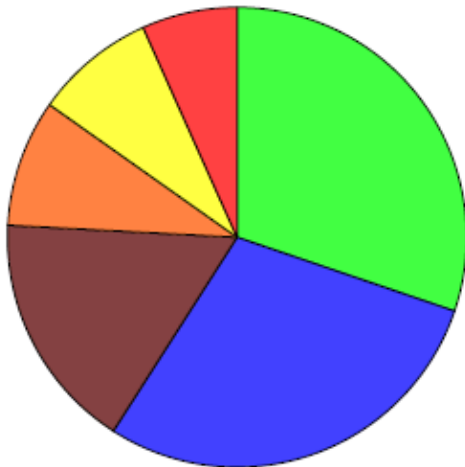
Overall preference:



	% Answer
More housing for shared ownership / low cost home ownership	25.49%
More housing for affordable rent / social housing	24.42%
More housing for private ownership	23.46%
More housing for private rent	16.43%
Other	10.19%
Total	100.00%

Question 6: What type of housing should the Local Plan be seeking?

Top Preference:



	% Total
■ More family housing	29.35%
■ More specialist housing e.g. to meet the needs of the ageing population	28.04%
■ Other	16.30%
■ More supported housing e.g. to meet the needs of those in care	8.70%
■ More single person housing	8.26%
■ More housing for couples	6.52%
■ [No Response]	2.83%
Total	100.00%

Overall preference:



	% Answer
■ More specialist housing e.g. to meet the needs of the ageing population	22.32%
■ More family housing	20.40%
■ More supported housing e.g. to meet the needs of those in care	17.95%
■ More housing for couples	16.90%
■ More single person housing	14.97%
■ Other	7.47%
Total	100.00%

Question 7: What infrastructure should the Local Plan seek to deliver?

Top Preference:



	% Total
Roads	32.39%
Health care	22.61%
Green infrastructure – parks, tree planting and green spaces particularly where they enhance biodiversity	17.61%
Public transport	8.04%
Other	5.43%
Education	5.00%
Energy & utilities (including water and drainage)	4.35%
Social care	2.17%
High speed broadband	1.52%
Libraries, sporting and community facilities	0.22%
[No Response]	0.65%
Total	100.00%

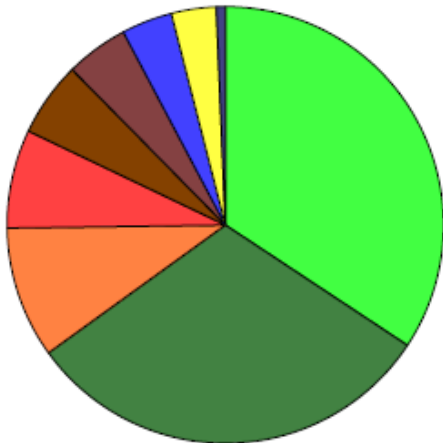
Overall preference:



	% Answer
Health care	15.10%
Roads	13.60%
Education	12.42%
Green infrastructure – parks, tree planting and green spaces particularly where they enhance biodiversity	12.10%
Social care	10.33%
Public transport	10.10%
Energy & utilities (including water and drainage)	9.24%
Libraries, sporting and community facilities	8.87%
High speed broadband	6.18%
Other	2.08%
Total	100.00%

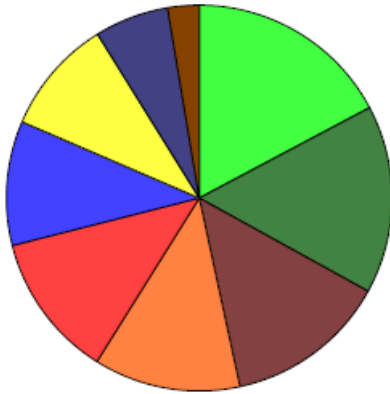
Question 8: How can the Local Plan protect the environment and mitigate the effects of Climate Change?

Top Preference:



	% Total
■ Protect and enhance the countryside, particularly that designated for biodiversity and landscape	33.70%
■ Protect high quality agricultural land	30.22%
■ Provide safer roads and alternative transport means (e.g. safer cycle routes)	9.57%
■ Require higher standards of sustainable construction and small scale renewables (e.g. solar panels on roofs)	7.17%
■ Other	5.43%
■ Promote green infrastructure (e.g. parks and green spaces) which enhance opportunities for biodiversity	4.57%
■ Promote the use of innovation and technology to improve transport and air quality (e.g.	3.70%
■ Support the delivery of large scale green energy (e.g. solar parks, off shore wind farms)	3.26%
■ Increase housing density to protect the open countryside	0.65%
■ [No Response]	1.74%
Total	100.00%

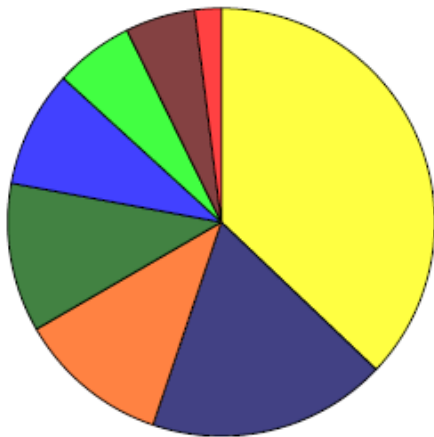
Overall preference:



	% Answer
■ Protect and enhance the countryside, particularly that designated for biodiversity and landscape	17.24%
■ Protect high quality agricultural land	15.79%
■ Promote green infrastructure (e.g. parks and green spaces) which enhance opportunities for biodiversity	13.59%
■ Provide safer roads and alternative transport means (e.g. safer cycle routes)	12.29%
■ Require higher standards of sustainable construction and small scale renewables (e.g. solar panels on roofs)	12.14%
■ Promote the use of innovation and technology to improve transport and air quality (e.g. electric vehicles, car sharing)	10.43%
■ Support the delivery of large scale green energy (e.g. solar parks, off shore wind farms)	9.69%
■ Increase housing density to protect the open countryside	6.21%
■ Other	2.63%
Total	100.00%

Question 9: Where should new housing land be focused?

Top Preference:



	% Total
Faversham	36.52%
Other	17.83%
Sheerness/Queenborough/Minster	11.30%
In a new settlement or settlements within the borough	11.09%
Rural Sheppey	8.70%
Across the larger villages on the mainland	5.87%
Sittingbourne	5.22%
Across the smaller villages on the mainland	1.96%
[No Response]	1.52%
Total	100.00%

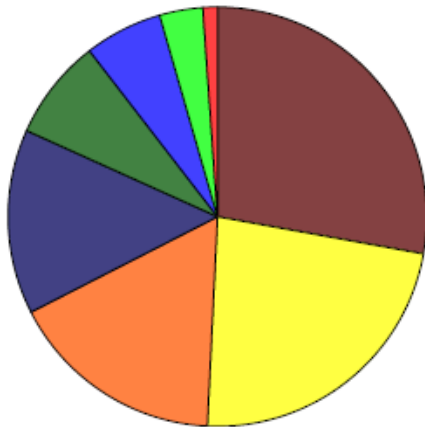
Overall preference:



	% Answer
Faversham	18.99%
Sheerness/Queenborough/Minster	16.12%
Rural Sheppey	13.70%
Sittingbourne	12.73%
Across the larger villages on the mainland	11.89%
In a new settlement or settlements within the borough	10.19%
Across the smaller villages on the mainland	8.93%
Other	7.46%
Total	100.00%

Question 10: Where should new employment land be focused?

Top Preference:



	% Total
Sittingbourne	27.17%
Faversham	22.39%
Sheerness/Queenborough/Minster	16.30%
Other	13.91%
In a new settlement or settlements within the borough	7.61%
Rural Sheppey	5.87%
Across the larger villages on the mainland	3.26%
Across the smaller villages on the mainland	1.09%
[No Response]	2.39%
Total	100.00%

Overall preference:



	% Answer
Sheerness/Queenborough/Minster	18.42%
Faversham	18.29%
Sittingbourne	17.71%
Rural Sheppey	12.21%
Across the larger villages on the mainland	10.86%
In a new settlement or settlements within the borough	9.25%
Across the smaller villages on the mainland	7.72%
Other	5.54%
Total	100.00%

Appendix IIIa

Swale Borough Local Plan Review

Note of Infrastructure and Utilities Workshop Discussion

Council Chamber, Swale House, Tuesday 12 June 2018

Organisations Represented :

Southern Water	Environment Agency
NHS Swale CCG	Maidstone Borough Council
Swale Borough Council (Coastal Defences)	Swale Borough Council (Planning)
Peter Brett Assocs (for Swale BC) (PBA)	AECOM (for Swale BC)
Kent County Council Highways	Kent County Council (Education)
Kent County Council (Development Contributions)	
Highways England	Network Rail
Canterbury City Council	Medway City Council (Planning & Transport)

Apologies:

Stagecoach	South East Water
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1. Introduction

Swale BC explained the purpose of the workshop as we embark on local plan review and seek this opportunity to engage with infrastructure providers, to understand issues facing them and potentially any showstoppers. As SBC have now concluded the initial public engagement and scoping exercise for the new plan there is some new material to help inform the workshop. SBC intend that this will be a useful starting point for further engagement and discussion as the plan process progresses.

The Swale Local Plan (Bearing Fruits) was adopted in July 2017. A review has already commenced, in response to the Inspector's recommendation that a review should be adopted by mid 2022 to address infrastructure capacity in respect of the capacity of the A2 corridor between Teynham and Newington. The review will cover the period 2022-2038. The new NPPF and standard methodology for housing targets also signal a step change in the amount of housing to be provided for. For Swale (incorporating the latest population projections) this represents an increase from 776 dwellings per annum (dpa) to 1080 dpa and is 'capped' at this level as it is a 40% increase on the adopted local plan. This increase means that land for an additional 10,000 houses needs to be found over an above that allocated in Bearing Fruit (totalling some 17,000 for the new plan period) and of course, infrastructure to support them. This raises significant challenges as to whether the Bearing Fruits development strategy (which itself has changed little to that pursued for the last 20 years or so) is capable of this level of delivery.

2. Strategic Overview of Existing Infrastructure in Swale

Swale is dominated by the east – west axis of much of its infrastructure and geography. This includes comprising the M2/A2/and North Kent railway, with north –south links comprising principally the A249 and the A251. Swale has the deep water Port of Sheerness; 9 railway stations; 3 motorway junctions; two water companies and other drainage authorities; an east

west high voltage power line; high pressure gas main; and a major proposal for the Cleve Hill Solar Farm near Faversham. Social infrastructure includes 2 CCGs; 20 GP centres; 3 minor hospitals; looks to Medway or Ashford for district general hospital services; some 60 schools and other KCC social services. Some of these are not unique to Swale, but the east –west orientation of much of the infrastructure has influenced the planning process historically. Capacity issues are now emerging with existing provision and timing of improvements needed to support new development is an issue even when development contributions can be collected.

The existing settlement strategy is urban focused, Current and proposed levels of growth are now raise questions as to whether we can continue to build on existing infrastructure and services in an incremental way, or are we close to breaking point? Congestion in the A2 corridor, air quality issues, negative impacts on environmental quality at the urban fringe are a negative context for plan development and are prompting exploration of the potential for alternatives.

3. Existing Infrastructure Problems and consequences of continuing the current Swale development strategy for providers.

Infrastructure providers were invited to outline current key issues for their services and facilities and how they saw the implications of continuing with the current development strategy for the next 20 years or so.

a) Transport

Kent County Council Highways (KCCH): General perception of current issues is basically correct. Correct. Despite perceptions of A2 and A249 corridors gridlock is not yet a frequent occurrence. However, continuing the existing development strategy with increasing pressure on existing networks is seen as untenable for the future. Air quality is an issue rising up the priority list especially at Newington and Ospringe. Bus networks are reasonable for the largest settlements, but at locations beyond this struggle to achieve viability. The North Kent railway is close to capacity at peak times and Swale has significant out commuting to Medway, Maidstone and Canterbury which is likely to continue. Whilst it is acknowledged that future local plan strategies proposals will be subject to transport modelling, evidence from current development proposals are showing that Sittingbourne town centre junctions are likely to be over capacity by 2023. Incremental growth strategies are unlikely to be able to provide sufficient mitigation to the highway network as there is such limited space within the A2 corridor to provide this. Considered that car use unlikely to go down much and that contributions to large scale infrastructure would be necessary.

In considering PBA's question as to whether there are currently any underused parts of the local highway network, which could be exploited, the view was that all of it converges in the town centres. Alternative ways to focus growth, and access to the strategic road network, for example at Faversham and different ways to move traffic to the current situation should be considered – although this would certainly not solve all of the problems.

The type of traffic using the local network, eg HGV use of the historic parts of the A2, are a significant part of the problem, damaging buildings and contributing to air quality issues. Scope

for taking large lorries off the A2 and situating appropriate land uses closer to the strategic road network therefore need consideration.

Highways England (HE): Agreed that in the event of continuing existing development strategies, KCCH would need to demonstrate that individually and cumulatively, all developments have nil detriment on the strategic highway network (with mitigation). All junctions on the strategic network are stressed. Modal shift to maximise capacity within the local and strategic networks not seen as a realistic proposition in this area as the infrastructure to support that is not there. M2/J5 improvements are provided for within RIS 1 and are expected to be completed 2022-23. This junction is expected to take growth from further afield and current modelling takes account of adopted local plans, plus some headroom; but not the local plan growth which will emerge from NPPF review. HE have proposed an improved scheme for M2/J5 following the 2017 consultation, and are trying to address the funding shortfall this implies (acknowledging KCC contributions which have been made). Beyond this major planned improvement, there is little scope for further improvement at J5, due to the topography of the area.

In response to a query about what would trigger the need for widening the M2 between J5 – J7, it, HE indicated that there are set flow standards per lane. When these flows break down, they impact the whole network. Solutions to increase the capacity such as converting to smart motorways and using the hard shoulder as a running lane would be considered. There are no current plans to this with the M2. The distance between junctions is also an important consideration, due to the propensity to generate weaving movements and loss of acceleration and deceleration lanes. Provided junctions are 3km or more apart they do not impact on each other, so this is a factor in considering how new junctions can assist with capacity.

M2/J7 has very little scope at present for further improvement to those already committed from development schemes at Canterbury and Faversham. Major improvement of this junction will be considered as part of the national RIS 2 package. This is still under preparation (due 2019).

Medway City Council: Issues for the A2 corridor (Newington – Rainham) were noted. Public transport links to Medway Maritime Hospital are poor and future plans for the hospital are not yet known but transport issues arising for Swale residents likely to be considerable.

Although Medway are unlikely to be pursuing strategic scale development in the Rainham area (other than a school), they are seeking to improve station car parking – noting the potential negative amenity effect of decking it. Commuting from the east is an issue as the A2 corridor in this location is at saturation point and sensitive to growth in neighbouring areas.

Air Quality issues in this corridor were of particular concern. It was considered that although recent planning applications are showing limited impact in Swale, the impacts could be felt more in Medway, due to the network congestion there. It was acknowledged that detailed transport modelling will be needed to address this. Scope for air quality mitigation within the A2 corridor was very limited due to space for network growth. Although technological advances in cars would help in time, evidence is still in short supply. Modal shift was therefore considered to have an important role and shifting development away from air quality hotspots. Use of the railway from Faversham / Sittingbourne to Medway off peak was seen as worthy of pursuing.

Network Rail: Noted an increased workload through the need to take account of step changes in local plan growth and the need to engage with this. Sittingbourne is ranked 10th in the list of

London commuters as measured by entrance /exit passenger numbers at 2.6M per annum. Faversham has 1.5M, so massive usage of this section of the network. Queenborough's numbers have increased to 153,000 since introduction of the direct London service. Sheerness with 43,200 and Swale Halt at 4,500 suggest potential capacity there. Network Rail's focus is on whether stations have the right physical facilities – would scope for extending these stations and associated parking mean the direct services could be better used. Operator franchise results will be out in Nov 2018. The Kent Routes Study was also highlighted – this acknowledges that to date services are very much east-west focused and north south links are much poorer, as a result of geography and the focus on London to the ports routes. Examination of a Faversham – to Ashford route was dropped due to gradients. The potential for a park and ride station at Canterbury where lines cross was suggested, so as to avoid the city itself (Canterbury west noted as now taken over as the dominant use with Canterbury East now the 'branch' line). Discussion is needed on funding and development to encourage people out of cars eg to use the train to access William Harvey Hospital at Ashford.

It was noted that Sittingbourne station is not yet at capacity, but local plan growth might trigger the need for S106 contributions to improve the station, eg by extending canopies to spread platform load. Train capacities are seen as acceptable at Sittingbourne currently, but by the Rochester point on the line - no seats are available for the London commute. Swale growth may therefore not be the issue in rail terms, but would contribute to problems further downstream. Eventual links with cross rail at Abbey Wood were seen as a game changer, with through routes then becoming possible all the way to Heathrow.

b) Health - Swale CCG: The CCGs work as a group across North Kent and Medway. A key issue for them is the review of acute hospital usage over the next 15 years. Within the CCGs, GPs under considerable strain with many being lost to retirement. Milton Regis and Lakeside are problematic within Swale.

A GP' average list is approximately 1800 patients, but Swale is closer to 2500 currently.

S.106 contributions are small, although it is acknowledge that CCGs relatively late to the table on this matter. A critical issue with new development is often that a new health facility is generally unaffordable to the NHS or GPs. Public funding does not generally arrive until 3-5 years after the growth in catchment population.

Primary care is the key issue – looking at additional use of community hospitals and GP virtual hubs and extended access.

On new provision or incremental growth, it was considered that new settlements would need new facilities. Additionally, existing facilities often do not have space to expand into.

The acute hospital provision was also noted as an issue, with travel from Swale a particular concern. Ongoing engagement between the CCGs and north Kent planning authorities with the providers is noted as vital.

c) Education and Social Services:

KCC: Continuing with the current development strategy raises issues. Pressure is currently more on secondary school places; but new development may raise development back on primary schools.

Secondary school sites are an issue due to the funding gap between S106 contributions and build costs. Viability issues arise as developers negotiate very hard on giving potential

development land. Less and less public forward funding is available. New sites are preferable due to the impact secondary schools have on the road network. Although well used by students, buses are very slow on the network. Moving schools to allow them to grow does not qualify for new money. Expansion in situ or completely new schools are therefore the only options.

It is seen as critical to retain more students on Sheppey to take the pressure off transport and Sittingbourne schools; and also to improve the perception of Sheppey itself. KCC are working with DfE backing to work up detailed solutions for the island (such as academies). Major expansion in education at Sittingbourne could potentially undermine this initiative and is not seen as tenable by KCC.

DfE forward finding is focused on current need - not that arising from new development. KCC has to meet this through S106 or constant re-prioritising. Primary schools are less problematic than secondary, as this often involves additional costs and building in phases.

Swale is fairly typical of East Kent (other than the Sheppey issues). Cross boundary travel patterns with Medway are noted and increased travel patterns could result due to phasing issues, although Swale is more self contained than other Kent districts.

Schools are working to link up on the question of further education facilities.

Medway CC: Noted that a new 5fe secondary school is planned at Rainham to deal with local Medway growth. Otherwise, main pressures are expected to be in the western part of Medway.

KCC Services: Social Services pressures in respect of the ageing population were particularly highlighted. Broadband also an issue.

d) Water and Drainage

Southern Water (SW): SW serve Sittingbourne and Sheppey in respect of both water supply and waste water management. There are 5 wastewater treatment works in the area at Sittingbourne, Queenborough, Teynham, Faversham and Eastchurch. There is a duty to serve all new development. SW operate a five year cycle in planning infrastructure and are currently working on plans for 2020-2025 which involves some £65M of investment in capacity at Sittingbourne, Queenborough and Faversham.

SW consulted on their Water Resource management Plan early in 2018 and this will be finalised later in the year.

SW noted the public perception that local plan growth and suitable provision was incompatible given that Swale is in an area of water stress. To tackle this, there are other programmes. These include measures such as leakage reduction and targeting measures in new development to reduce usage to 100 litres per day per person through efficiency measures. Developers pay a flat fee for connection to water supply which can be waived if sufficient efficiency measures are built in to new developments. Economic development uses are more difficult to plan for along with increased housing growth but the former is also factored into SW planning.

SW of the view that location was the determining factor as to whether new settlements or continuation of the existing development strategy are preferable in terms of water infrastructure. It would be very difficult to find a new site for waste water treatment works. Expansion of existing facilities would be easier and continues to be the case for Sittingbourne. Much also depends on the quality of water received and technical mitigations possible eg to deal nitrates and phosphates.

Environment Agency (EA): Noted in the light of the above that there are constraints on what wastewater a receiving water course can take as under the provisions of the Water Directive Framework, water quality cannot deteriorate as a result.

In terms of whether any water services are already at capacity, SW noted that the duty to provide, solutions would be found, although timing is an issue that will need care. EA noted that large scale new developments would therefore need care as infrastructure would need to be in place before development.

e) Coastal Defences:

Environment Agency (EA) noted that large new developments close to coastal defences would need to be matter explored through the Strategic Flood Risk assessment. Climate change is also likely to put significant pressure in habitats and the Swale and Medway Shoreline Management Strategy has a key role to play in how this will be implemented. SBC noted that this is currently not funded.

4. Discussion on alternative development strategies for impact on infrastructure and opportunities for future provision.

SBC introduced the work which had been done by PBA in looking at potential ways to meet the required growth in housing targets. All areas are constrained to a degree especially in terms of infrastructure. Sheppey and the A2 corridor are the least constrained areas in terms of environmental issues, although the former has viability issues.

New settlements were looked at in term of their ability to create new sustainable communities and build in new infrastructure from the outset.

For a settlement of 5000 people, infrastructure was estimated at some £14,000 per dwelling exclusive of transport.

Potential locations and a SWAT analysis were looked at. The call for sites carried out by SBC in late 2017 did not necessarily cover these.

A prospectus has therefore been launched to gauge market appetite for new settlements (minimum size 2,500 dwellings) - albeit with a very high bar in terms of quality of development and demonstrable sustainability in infrastructure terms, at minimal cost to the public purse. Expressions of interest have been submitted and further submissions of detailed information are expected by mid August 2018. The Council will then determine whether new settlements are feasible as one of our strategic options for accommodating growth in the new local plan.

New settlements have a long lead in time to deliver development (estimated 5- 10 years for first housing) and have substantial up-front infrastructure costs. A critical consideration is whether and to what degree infrastructure provision is a deal breaker.

SBC introduced the 6 – 7 potential new settlements proposed by landowners and developers through Expressions of Interest and sought early reactions of service providers as to whether these indicated some potential; involved 'showstoppers' or whether, by comparison, continuing with the existing development strategy appeared preferable.

SBC are keen to emphasise that there is much further work to be done including further engagement with service providers. This workshop is very much to introduce the possibilities

and help scope the extent of possibilities and supporting work which will be needed, so the comments here are seen as very much the first step of the process.

a) South East Sittingbourne:

This site is for 11,000+ dwellings and expansion to the Kent Science Park; plus an A2/M2 link road (the Sittingbourne Southern Relief Road SSRR) and a new junction 5A onto the M2. It was also submitted to the 2017 call for sites when it included land to the north of A2 at Bapchild and completion for a further 1000 or so dwellings and completion of the Sittingbourne Northern Relief Road (SNRR).

Key infrastructure questions include: can we divorce the SSRR and SNRR from each other?

Would a new M2/J5A help relieve the A2 corridor in traffic and AQ terms?

How could housing be delivered in the short – medium term if a J5A were to be constructed?

Will this site impact on existing water abstraction facilities? Would it require new wastewater treatment facilities?

KCCH: Considered that the SNRR and SSRR would be inextricably linked to facilitate this scheme and satisfactorily relieve the A2 corridor and that this should be a key message back to the site promoter. They consider that there is a case for the SSRR and its use to take lorry traffic especially via the M2 to avoid the AQMA at Ospringe. A junction 5A could probably relieve the A2 corridor on either side of it.

Highways England (HE): HE generally prefer not to encourage new junctions onto the strategic road network, because of the additional 'weaving' movements to access and egress the motorway and consequent safety issues. However, at 11-12,000 dwellings such a development would be regarded as strategic in scale and confer economic benefits to the region. Modelling to demonstrate that this development could not proceed in the absence of a new junction, but hard to see how it could be feasible in its absence. Appropriate design standards for lane safety and manoeuvring between M2/ J5 and 5A would need to be demonstrated. It was not seen as a showstopper subject appropriate modelling work. The latter would need to factor in other land uses such as employment, leisure, retail and other local services and facilities to demonstrate the degree to which this was a self contained settlement.

KCCH: In terms of housing delivery and where this should start from in relation to provision of new road infrastructure, modelling would be critical. However, considered starting anywhere other than at the M2 end of the site with a new junction in situ would be likely to be very problematic in terms of impact on the A2. Provision of the SNRR, north of the A2 could assist if it was provided first. The SNRR could function independently of the SSRR, but less clear the other way around.

Provision of public transport (eg bus only links) was not seen as offering significant benefits in this scenario as buses would be caught in A2 congestion.

HE: Advised that lead in times to navigate the approvals process for a M2/J5A would be 2-3 years prior to any activity on site. Issues with providing lane on / lane off could extend that as this would not be within the developers control. Modelling would be critical to phasing of development and critical to the way forward.

Network Rail: Considered that bus links to the station from such a development would be essential. If 10% of the population were using the train, this would equate to 1000 cars for parking. This would also be equivalent to a 12 carriage train. Station capacity would be ok, but probably not in terms of train seat availability in peak hour. Significant problems could be expected closer downstream to London as the trains would fill up further out.

Medway CC: felt that such a settlement would have a significant impact on air quality and that modal shift would be needed, especially for transport to the town centre (developer funded for a period at Ebbsfleet and Dartford). Modelling again the key.

Environment Agency: Considered that a Water Cycle Study was very important and should look at all aspects of such a development including; water efficiency (to 90 litres per person per day); surface water treatment (SUDS); waste water treatment impact at Sittingbourne; and groundwater protection issues.

Southern Water: Considered that timing would be an issue. Their programme for 2020-25 is based on the adopted Local Plan population increases to 2035, although they are well aware of the implications of the new NPPF and increased development targets for much of Kent. This is strategic issue and will have big implications for their next five year plan to enable delivery. SW nevertheless considered it possible that their planning to 2035 could be 'compressed' to enable new development to come on-stream and allow headroom for the next five year plan to catch up with increased development targets.

b) Rushenden Marshes, Sheppey (Peel Ports)

This site could accommodate approximately 2,500 dwellings. It is based on a river dredgings site; abuts the Special Protected Area; and would raise SFRA flood risk concerns, which would be dealt with by land raising and hence likely to affect other shoreline management strategy issues. Access is also problematic. The site is adjacent to the Queenborough wastewater treatment works which would present amenity issues. Natural England would also be likely to have major concerns.

c) NSS Land, M2/J6 and A251, Faversham South

Capable of accommodating approx. 5,500 dwellings. Abuts, but lies outside the AONB.

d) Lees Court Estate, Faversham South – linked and lying to south of c)

Estate extends south into Ashford. Most lies within the AONB and has Historic Park and Garden status. A modest area lying outside it could take approx. 500 dwellings. Promoters looking to justify development to support AONB management.

KCCH: Expressed a number of concerns. The A2/A251 has no capacity and no room for expansion in this location. The A251 is substandard for accommodating side junctions which would be needed to serve such development – widening throughout and impacts on landscape. There is a gap in land controls which mean any alternative route could not be demonstrated. A2/A251 and M2/J6 junctions all insufficient to accommodate this scale of development. Pressure on the A251 accessing Ashford would affect the whole A251 corridor (inadequate width and alignment) and adversely affect villages within it.

HE: Considered to be a showstopper in terms of no additional capacity at M2/J6 (this would need to be completely re-designed). The knock on effects to M2/J7 would be unacceptable. J6 and J7 would have to be looked at as a complete package. It was not considered that J6 would be likely to figure in RIS 2 or indeed in a RIS review in the foreseeable future.

Network Rail (NR): Concerns insofar as Faversham station is more than the 'watershed' one hour commute to London. In this situation, driving to Ebbsfleet to park and train is generally preferred to High Speed 1 and would be likely to put even more pressure on the road network. In response to developer suggestions that Selling Station could be closed and moved closer to Faversham to create a park and ride solution, NR considered that this was unacceptable.

Environment Agency (EA): EA did not consider this scheme to be acceptable.

e) South East Faversham:

Comprises Duchy of Cornwall land between A2 and M2, capable of taking up to approx. 4000 dwellings, plus potentially other smaller landholdings to the north of the A2.

KCCH: Concerns over the capacity of the A2/ A251 junction and further Ospringe AQMA. Would new links from the area to the north of the A2 direct to the town centre be possible to avoid the A2? These would be potential walk cycle distances, but connectivities would have to be improved.

Highways England (HE): Considered that M2/J7 would not cope with this scale of development even with improvements from currently committed developments; and there is little capacity for any development beyond current commitment without significant improvement. The whole junction would need to be reviewed for any or all of these site options. It could also impact on M2 /J6. J7 was nevertheless felt to be a more achievable solution, potentially as part of the RIS2 programme. Timescales would depend on the nature of the scheme required – a major scheme with land take outside of the current highway boundary could take up to 10 years to implement subject to design and build being included within RIS2. Design only in RIS2 to 2027 would not achieve construction prior to 2027. Combining all development options in the Faversham area to achieve 11,000+ dwellings would not necessarily confer any strategic advantage in road network terms - at this scale a different junction solution would be needed. It was also noted that M2/J7 will also need to serve higher development needs arising from the much of the rest of East Kent (Canterbury, Thanet and Dover).

Network Rail (NR): NR considered that this scheme would be likely to require car parking expansion at Faversham Station. They are already looking at sale of land to facilitate this and fast bus routes to the town centre.

KCC Education: At 11,000 dwellings a new secondary school would be required.

Environment Agency: EA did not consider this scheme to be acceptable.

f) Bobbing, West of A249, Sittingbourne

This site would be capable of taking approx. 5,500 dwellings

The A249 main gas and water pipelines to Sheppey are of poor quality and would also be likely to need major upgrading.

KCCH: Concern about dependence on the A249/A2; Impact on Key St junction and M2/J5.

MedwayCC: Rainham AQMA would also be seriously impacted.

Network Rail: Issues would arise with footpath crossing over the railway. There are also issues with the Bobbing Bank embankment stabilisation.

5. Round Table – Concluding Comments

Participants were invited to make any general comments or share thoughts and plans which others may need to be aware of.

KCCH: Re-affirmed their continuing work with SBC on transport modelling to assess future development scenarios; and which would eventually feed into a Local transport strategy to support the new local plan.

Highways England: Stated that mitigations to accommodate the adopted local plan need to be bottomed out first, before moving onto the issues generated by the review.

Network Rail: Drew attention to the Kent Route Study (June 2018). Peak hour trains could be enlarged to 12 carriages to cope with demand. However, more users at Swale would impact at Medway and other stations towards London. Implementation of a theme park at Ebbsfleet, is a potential game changer and impossible to predict consequences.

KCC Education: Options for the way forward for Sheppey secondary education should be published at the end of June. Updating of the Commissioning plan will follow.

Medway CC: A2 / Rainham and AQMA remain a key concern. Initiatives aimed at behaviour change and modal shift essential eg; Apps for commuter buses to the station; clean air / emission zones; designing new estates to facilitate bus access within the estates.

Southern Water: Summarised that their currently emerging investment plan would cover the period 2020-2025 and was expected to be agreed with the Regulator in September. The next plan will be completed in 2023. Whilst this will be after the expected adoption of the Swale local plan review in 2022, SW confirmed that if population increases arising from this start to materialise sooner then contingencies are available to meet demand.

Maidstone BC: Considered that the plans would not directly affect Maidstone. They are aiming for concentration around transport hubs and 'walkable' self contained communities. A significant 'critical mass' needed to achieve this level of independence.

Canterbury CC: Local plan adopted 2017. Going forwards, increased development targets; impact on the A2 and M2/J7 are of particular interest.

Swale BC: Coastal Management /Engineering: Noted the Coastal Management Plan is not currently funded. Saw further pressure on Sittingbourne Town centre parking and on street parking issue for both existing and new developments. Supported the idea of local commuter buses to the station to alleviate parking pressures.

Swale BC: Noted the housing targets are likely to be a minimum, which have to be found or there is a risk of ad hoc applications and Appeals, which preclude proper planning for infrastructure. Average household sizes are still falling and perhaps this may need to be investigated to see if it can create some headroom for infrastructure and services. Additionally, not all of the housing target will be in new settlements, even should this strategic option be pursued. The need to maintain a 5 year housing land supply would also necessitate a pipeline of smaller sites coming forwards at least in the early years of the new local plan.

6. Next Steps

Going forwards, we anticipate consultation on Issues and Options and a Preferred Option during summer 2019, progressing to a submission version of the plan in 2020.

The new settlements work will be taken forward through following up the expressions of interest and seeking full submissions by early August 2018. Assessment will then take place and presentation of potential options to Members in the autumn. This will inform a steer on the way forward for the plan is then anticipated early 2019.

SBC noted that the work shop had been extremely useful starting point and that as work progresses on the Local Plan review we will be seeking 1 to 1 meetings with all the stakeholders and service providers, but we are grateful to hear any additional thoughts from stakeholders. Please email the team at any time.

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Appendix IIIb

Swale Borough Council – Local Plan Review

Natural Environment Discussion Workshop

Swale House, 22nd June 2018

Attendees:

Nathan Coughlan, KCC	Anna Houghton, Maidstone Borough Council
Mark Loos, Medway Swale Estuary Partnership	Martin Randall, RSPB
Hayley Taylor, Birdwise/Medway Council	Tom Reid, Environment Agency
Mark West, Environment Agency (WFD)	Amanda Corp, NFU
Thomas Kennedy, KCC PROW & Access	Catherine Smith, Medway Council
Kate Ahern, LUC	Jennifer Wilson, Environment Agency
Cllr Gerald Lewin, Swale Borough Council	Karoline Allu, Environment Agency
Cllr James Hunt, Swale Borough Council	Nick Johannsen, Kent Downs AONB
Jon Byne, Environment Agency	Graeme Tuff, Swale Borough Council
Gill Harris, Swale Borough Council	Sally Evans, Mid Kent Downs Countryside Partnership
James Freeman, Swale Borough Council	Dora Querido, RSPB
Alan Best, Swale Borough Council (AB)	Lyn Newton, Swale Borough Council
Lisa Gadd, Canterbury City Council	Natalie Earl, Swale Borough Council
Matthew Woodcock, Forestry Commission	Anna Stonor, Swale Borough Council
Rosemary Godfrey, Natural England	
Georgia Patt, Natural England	

Strategic Overview of Natural Environmental Assets

1. AB welcomes everyone and begins the afternoon with an introduction to Swale's natural environmental assets. There is a very large natural resources in Swale. 2012 Habitats Survey illustrates breadth:
 - a. In terms of landscape there are 3 National character areas, 10 Kent Local Landscape Character Areas, and 42 Swale Landscape Character Areas. 59% of landscapes in SBC are designated.
 - b. Land uses include arable, horticultural and improved grassland. Swale has 20% of Kent's traditional orchards, 20% of Kent's neutral grassland including BAP habitats. Swale has 56% of Kent's coastal marsh. Swale has a low percentage of woodland – about 6% (4% of that top priority BAP woodland).
 - c. 26% of Swale has a national or international biodiversity designation (2,000 hectares) 20% of Swale is within the Kent Downs AONB, 40% of SBC is BMV agricultural which is estimated as contributing £250m to the economy. Each 100 hectares lost is a loss of £1.7m in agricultural output.
2. One issue is that GI is not mapped (hedges, veteran trees, etc), however all contributes to natural capital.

Local Plan Review and Future Growth

3. AB introduces the Local Plan Review. Bearing Fruits (the adopted Swale Borough Local Plan) was adopted in July 2017. SBC now required to undertake a review to 2038. Updated revised NPPF likely to require SBC to build 17.5k dwellings – 40% above current targets. (776 dwellings per

annum from 2017 plan amended to 1086 dwelling per annum – this is an additional 10k over the Bearing Fruits pipeline).

4. Government's Environment Plan is the background to NPPF – the new Local Plan will need to be responsive to biodiversity (net gain) and air quality.
5. SBC aim to adopt mid 2022 – very tight schedule. Issues and Options consultation (including strategic options and likely to include preferred option) scheduled for summer 2019. There will be further workshop opportunities to discuss issues.
6. Looking Ahead is a scoping document. SBC received a good response to this and it will be analysed in the next few weeks.
7. One option to consider is 'Business as usual' ie continue development strategy at Sittingbourne, Sheppey and Faversham's urban areas plus larger villages – this strategy has been around for 20+ years. South Sittingbourne, West Minster, SE Faversham, Teynham and Iwade likely to be in the frame with this.

Future Growth General Issues – Round table discussion

8. Natural England – air quality a concern. Support for GI (Green Infrastructure) – good plans already and keen to support. Important that access and people are at the heart of a GI strategy. Starting an early conversation with NE is beneficial to get all stakeholders at the forefront.
9. AB pointed out that a GI Strategy is to be commissioned. During the Bearing Fruits process housing targets went up at a late stage so hard for GI to respond. This time it will be done in the 'right order'. Alan asked if NE were concerned about level of growth SBC might be asked to take on. Natural England – not unduly worried at this stage. Marshes/SPA a concern, also the Downs due to recreational pressure, including secondary recreational pressure. Habitat may require a SAMMS type approach due to growth requirements of regional local planning authorities. Monitoring for disturbance will be key as well as building in buffers. Restricting access to different types areas may be required. GI an opportunity.
10. RSPB – concern about SPA – mitigation essential. Development up to SPA boundary brings a lot of questions which should be dealt with via SA/HRA. Building close to the SPA boundary is an immediate concern. Mitigate strategy in place should not be undermined. Pointed out that additional mitigation may be required adjacent to the SPA.
11. The issue of sites next to the SPA being the most favourable sites was discussed. Less favourable regeneration sites might be left behind. Alan Best agreed that planning is driven by delivery to ensure 5 year HLS and delivery test. Cherry picking of the most attractive sites is likely.
12. Medway Council – Good GI offers opportunities. Strong concern amongst local communities and stakeholders regarding the impact on the SPA. We need to strive for more than just not making things worse – how can we improve/net gain? Housing plus infrastructure brings viability challenges. GI should be a top of the list, but is always challenged by developers at site level. Medway Council officer stressed the need to hold on to planning ambitions for the environment as strongly as possible. Stressed that the debate is always about housing and environment is always 'poor relation' via mitigation. Environmental Strategy equally important and need to make sure it doesn't slip down the agenda. Integral part of strategy. Air Quality also needs to be made a significant social and cultural priority – this issue can't all be managed through the planning process.
13. AONB – strong support for what Medway Council set out. Natural Environment is a resources which is very important in this area. In SBC double natural environment of protected areas. Very challenging to balance with development. Government intention is environmental net gain not just nil detriment. Natural environment is not doing well. KCC predict 25-33% population

increase in the next 13 years. This massive scale of growth will have an impact on valued environments. The plan review has to be made in the context of population increase. Recreational impact is very important. Many parks/National Trust properties are turning people away on busy days. Farming also important. Biodiversity representatives are also expressing concern now before the main population increases kick in. Therefore needs very creative thinking. Environment for its own sake and quality of development must be a key issue in the debate. Plan and ambition must be assertive.

14. AONB Unit explain the current review of AONB/National Parks – are they fit for purpose? One question is parity between National Parks and AONBs – national parks only have to take local need. Planning will be at the forefront of this debate. This could have an impact for LP review, but timescales tight – review will be reporting due late 2019 for 70th anniversary of AONB Act. The outcomes are unclear at this stage, but expected to contribute to environmental net gain.
15. AB noted that most GI offsetting comes from new development. GI not a public spending top priority.
16. Environment Agency – suggested reviewing and grading SAMMS payment according to distance from the SPA boundary. Salt marsh/coastal habitats – very few wardens or implementation of protections. SAMMS needs teeth. Importance of blue as well as green infrastructure.
17. EA also stressed the importance of the water environment– water quality and stress. Councils take some responsibility to ensure river quality doesn't deteriorate. Flood risk is a constraint on development. Medway Estuary and Swale Strategy (MEASS) needs to be taken on board. This should be finalised in September 2011. Development needs are not necessarily alarming but need to respect the water environment. A revised SFRA is needed – EA happy to work with SBC on this. (EA explained that compensation for lost salt marsh is as a result of climate change, not development.)
18. NFU – issues for farmers include: development impacts on water supply; planners ignorance; transport from farm to other business; PROWs conflict with farming. NFU has flood management plan too.
19. AB reminded group that SBC has a significant percentage of the UK's BMV. He then brought up the issue of future development in SBC will be likely to use some BMV, particularly in the A2 corridor. This directly relates to the current settlement strategy. BMV doesn't have same status as other designations and therefore is not a showstopper. However, there are food security and environmental issues so it is an issue for the Local Plan. The value of agricultural land may change post Brexit. Alan asks when is scale of loss becomes significant? NE said they had no intelligence on this but would feed back.
20. Forestry Commission gave example of the South Downs National Park – development should support wider infrastructure of the National Park. Ancient woodland has equal status to AONB – NPPF reinforces this. Forestry Commission argued for less development and buffers eg as part of GI? SANGS schemes are problematic – SANGS should not be sites of most environmental value. Local Plan needs to find ways to add value to development product which also supports the environment. There is generally a lot of focus on the SPA, but disturbance on woodlands is not so obvious or well monitored – mitigation strategies for woodlands need to be carefully set out.
21. Forestry Commission also argued that local wood should be used in construction. Modular housing has less local impact and design of homes can reduce their environmental impact. Where heat is required use lower quality local wood which has air quality benefits. GI has value. They also discussed problems with woodland diseases.
22. Canterbury City Council said that they have a GI Strategy currently out to consultation. This is aimed at developers and planners and highlights issue of linking with cycle/walking strategy. No major cross-boundary issue with Swale.

23. AONB stressed that trees outside woodland also very important. It should be a goal to increase woodland cover across the borough. What does this mean for the local plan?
24. Air Quality - Natural England – will consider the expectations on LPAs and follow up in writing.
25. KCC stressed the pressure on water resources and water quality due to urbanisation. Southern Water are only planning for BF's growth – engagement needed.
26. KCC also stressed involvement of KWT and integration with their strategies for water voles, otters, etc which are being prioritised in Kent.
27. LUC – stressed the fantastic landscape resource (including marshes and downs) in Swale. Not all landscapes are designated and this means there will need to be subtlety at individual site level as all landscapes have value. There are opportunities around SBC's town and villages where there can be poor urban-rural transitions which could be worked on and enhanced.
28. Forestry Commission – nightingales very close at Medway. There are opportunities to create successful habitats in fairly short timescales.
29. AONB – agricultural environmental payments are a huge opportunity which can serve the public good. There are many challenges to farmers but also opportunities. Plan making equals an opportunity for evidence gathering.

Future Growth - a new settlement/s as a choice for housing growth?

30. AB introduces the subject of new settlements as a potential different strategy – not yet committee to this. Bretts high level study looked at the potential for garden cities based on geography. In terms of designations the A2 corridor and northern Sheppey are less constrained areas – but they not without issues eg A2 has some of the best BMV in the country. Nowhere is totally unconstrained.
31. AB explained the new settlement prospectus – looking for settlements of 2.5k or more and assessing market appetite. Expression of interest period closed in early June and 3rd August is deadline for submissions of detailed proposals. The workshop is seeking instant reactions and potential showstoppers and will help with the assessment. Alan makes point that there is a long lead in time to delivery of new settlements so new settlements will not be the whole land allocation story which may stretch over several LP reviews. The question to look at in the workshop is whether people at the table considered the new settlement approach might be better for the natural environment than the incremental 'business as usual' approach - a 40% of open space will be required.
32. Whilst SBC officers and Bretts have looked at potential sites for Swale, all of the sites discussed at workshop are promoted by landowners/developers so market generated.

South East Sittingbourne

33. This scheme is for approximately 11.5-12k dwellings and includes expansion of the Kent Science Park. Site includes dry valleys and mostly agricultural land with some woodland, including ancient woodland at Cromers Wood. New M2/J5a (including AONB) and South Sittingbourne Relief Road to A2 and onward to Northern Relief Road are included.
34. KCC PROW – stressed importance of maintaining existing PROW network and creation of new links. An attractive walking and cycling networks can be an alternative to short car journeys. Can be integrated with GI strategy and green corridors. Early engagement with stakeholders and partners important.

Rushenden Marshes

- 35. Scheme is for 2.5k dwellings. Site abuts SPA, flood zone and waste water works at Queenborough.
- 36. EA point out flood risk at this location where no active intervention/maintenance is planned so will flood. A developer could try to maintain the defences but this would need to be a sustainable commitment – they cannot just walk away once built.
- 37. RSPB ask about the knock on effect of land raising? For instance it will have a great impact on birdlife. RSPB would like buffers around the whole estuary to mitigate for less habitat created by climate change and sea level rise.

Faversham A2/A251 and Lees Court Estate

- 38. Scheme is for 5-6k dwellings amongst/adjacent to historic parkland, AONB – also veteran trees and Ancient Woodland. The Lees Court Estate is proposed for supporting GI - not clear how many or what development is proposed in the AONB. One question is how a scheme here could meet the NPPF's AONB test?

South East Faversham

- 39. Site is owned by the Duchy of Cornwall and the scheme proposes 2.5k homes. The site could extend north of the A2 to the railway/Graveney Road – this would add another 1k homes, totaling 3.5k. All of the site is BMV agricultural and intensively farmed. It is felt that this is the best of the options so far due to connectivity to existing community. Site abuts AONB but the M2 provides a boundary – already pedestrian links under the M2. Duchy also looking to use AONB land holdings to support this new settlement.

Bobbing

- 40. Scheme is for 2.5k dwellings, and lies west of A249 and north of Newington. A2 & A249 are problems which have been ignored by promoters so far. Intensively farmed site with some woodland. GI strategy north of Keycol and south of railway proposed. Includes Rook Wood ancient woodland.

Round Table discussion of plans and strategies and final comments

- 41. Forestry Commission explained the situation at Milton Keynes where 40% GI requirement was outlined from Day 1 – led to behavior change. Look at example of Jaskins in Gravesend – woodland and meadows and integrated open space on edge of town created from rapeseed prairie. This was supported by a Central Government grant, but lots of other resources can be tapped into.
- 42. LUC make point that masterplanning will be essential. EA believe GI is more achievable when all environmental stakeholders can be involved in new settlement. Landscapes outside designations are important.
- 43. AONB – how are alternatives such as urban intensification being looked at? Evidence is needed – eg impact on exiting urban areas.
- 44. EA – MEASS due end of 2018. Further flood risk modelling needed.
- 45. James Freeman adjacent areas of land to those promoted which could be integrated.
- 46. Cllr Lewin – new settlement does change land value. Prospectus makes clear that uplift must cover infrastructure. OAN not confirmed yet, but if it is then it's an opportunity.

47. KCC PROW – PROW under review (10 yearly) and looking at how PROW needs to be developed. Out to consultation June 2018 – should be cross referenced in Local Plan Review. Opportunities for integrating cycling and walking.
48. MBC – are also reviewing PROW plan. Biodiversity should be seen as an asset rather than a barrier to development.
49. SAMMS Officer – only careful permitted access to SPAs on estuary. Species list to developers for biodiversity in new planting. SUDS also need to be pushed in new developments especially as an adaptation to climate change
50. MSEP - Design should be local vernacular – useful Defra Guidance document. Incorporation of small details such as swift bricks is an easy win. JF – developers report mixed feedback on these
51. RSPB – Ecology environment not viewed in holistic way. Increasing connectivity/green corridors between green areas increases their value.
52. AONB – the management plan for the AONB is just starting as well as a Government Review of National Parks and AONBs.
53. Mid Kent Downs / KCC – don't forget orchards and horticulture especially in Faversham's Fruit Belt – a national asset. Community orchards within developments should be considered.
54. EA – ground water protection and water efficiency measures should be pushed – promoting 90 litres pppd. Water cycle study will provide the evidence base for this. No development on top of culverted rivers/water courses – open up if possible for biodiversity and amenity.
55. Medway Council – Local Plan will be at Regulation 19 stage later in 2018. Includes development on Rainham/SBC boundary. GI integral to improve degraded landscapes.
56. Canterbury City Council – GI strategy includes education as to what green infrastructure actually is – speaking to landowners and agents early on. Allotments and city gardens in strategic sites
57. Maidstone Borough Council at early stage of LP review. Green and Blue Infrastructure strategy integral.
58. Forestry Commission – tree-scapes important as are integrated landscape. CPO can be quite negative – instead work with landowners to draw in via constructive schemes.

Local Plan Next steps:

59. Follow up discussions will be held as necessary.
60. Next key milestone is the Issues and Options consultation in summer 2019.
61. The GI Strategy at SBC needs to be accelerated as a key bit of evidence.

The comments below were received from Mark Loos of the MSEP following the workshop:

- *Recreational disturbance is an important issue on the water as well as on land – due to the impact on intertidal and sub-tidal habitats. Users of estuary should be encouraged to use official launch sites.*
- *New marine and moorings facilities should be encouraged to have proper facilities for cleaning boats out of the water as well as pump out facilities to reduce amount of sewage entering the estuary.*
- *Green Infrastructure – SBC (or MSEP supported by SBC) could write a guide to GI which encourages native plants/trees and provides habitats.*
- *Green energy – encourage SBC to support solar panels on housing to avoid large scale solar farms.*
- *Developments should reflect local vernacular and sense of place – Peters Village on the Medway is an example where this hasn't worked well.*
- *Promote SUDS.*
- *Promote a buffer around the SPA.*
- *Promote value of scrub as a habitat.*

Appendix IIIc

Swale Borough Local Plan Review

Minutes of Heritage and Culture Workshop Discussion

Committee Room, Swale House, Thursday 28 June 2018

Organisations Represented:

Swale Borough Council	Historic England
Historic Swale Blue Town Heritage	Kent Gardens Trust
Historic Swale	Ideas Test
Sheppey Local History Society	Historical Research Group of Sittingbourne
Centre for Kent History and Heritage, CCCU	Faversham Society
Kent County Council	The Sittingbourne and Kemsley Light Railway

1. Introduction

Swale BC gave an introduction to the Local Plan review and how all Local Planning Authorities must have a Local Plan in place to guide planning decisions which should include policies relating to heritage. The Local Plan will set out policies and development needs to 2038. A Heritage Strategy is currently being prepared separately to the Local Plan, although there will be linkages between them.

2. Strategic Overview of Heritage in Swale

Swale has a very diverse historic environment including a naval dockyard, creeks, ports, a particularly high concentration of listed buildings in Faversham, conservation areas, historical parks and gardens, undesigned heritage assets and areas of potential archaeological importance. There is an untapped potential regarding Swale's history in defense and aviation plus circa 20 bridge and structures (including industrial structures) over some 500+ sites. Swale has a long history in best and most versatile agricultural land and accompanying timber framed farmhouses, historic marsh landscapes, woods and an Area of Outstanding Natural Beauty. The A2 forms a Roman route and link to the channel and the local geology (brickearth, chalk etc.) has influenced its railways and industrial location which historically included gunpowder production. With reference to historical parks and gardens, Swale BC does not maintain a local list and KCC's has no statutory weight or protection. This could be picked up in a Local Plan policy. The Faversham Society noted that living culture heritage is also part of Swale's heritage and can be damaged by planning decisions, something which needs policy recognition.

3. Local Plan Review, Future Growth and Strategic Discussion

Swale BC provided a more in depth explanation of the Local Plan review and the future growth scenarios being looked at to deal with a significant increase in housing numbers and asked what the implications the current and future settlement strategy might have for our heritage. An option for new settlements has been included. Historic England raised concern about the prospect of new settlements as they are often in areas where heritage exists and the issue is often not being raised early enough in the process, but noted that they are not in a position to challenge the Government's growth agenda and will continue to support authorities in mitigating impacts.

It was noted that new developments need to be designed well so as to avoid existing problems such as traffic on historic routes, impacts on the settings of listed buildings, noise and air pollution. With regards to the subject of town centres, Swale BC raised the question as to whether we need to move to more non-retail uses, although retail evidence will be fed into the new Local Plan. The Faversham Society considered this to be inevitable but the 'how' will be very important. Previous development to the north of Faversham has been detrimental to the town centre, but something to the south could be better planned.

Heritage led regeneration and heritage quarters would be a good idea and would help to improve the perception of particularly Sheppey and encourage people to live, work and spend time there. Other matters raised were the lack of road signage to navigate heritage attractions.

4. Key Heritage Issues

There are conservation areas at risk as well as buildings at risk, with Sheppey Museums noting that there are many on Sheppey. It was also suggested that the dockyard buildings should be integrated better as they have a strong heritage.

Concern was raised about the lack of local power to refuse development harmful to heritage and the lack of enforcement of Article 4 directions. However, the question was also raised as to whether we need to preserve everything. For example, the paper mill at Sittingbourne was demolished. How should we decide what to keep or let go? Historic England considered that the bar is set deliberately high and we are keeping what we should keep.

Swale BC introduced the question, what does heritage give us economically and culturally and how can we increase visitor spend? We are committed to the Visitor Economy Framework and it values the input from the heritage sector. The Heritage Strategy is important too and involved in a proactive way to promote heritage assets. A concern is the need for a better understanding of any gaps in knowledge and to understand what people are coming to experience. The Heritage Lottery Fund is restructuring and we need to tailor what we do to this. Tourism = experience and heritage and culture should be at the top of the agenda.

The Swale Museums Group noted that the visitor numbers were 56k during 2017 and are increasing year on year. Museums are run by volunteers and need support in things such as marketing. The Faversham Society noted that Faversham attracts a lot of visitors but most attractions do not charge entry, with the spend being on food. The townscape depends on Article 4 directions and conservation areas but there is a concern as to the level of enforcement. This, along with new development and traffic issues in the town centre detract from heritage assets and need management. Tourism itself makes no contribution to supporting heritage, it is a maintenance problem and the public realm requires investment.

Policy needs to recognise that Swale is made of distinctly different areas with different attractions which require different initiatives and The Faversham Society recommended that phraseology is differentiated within policy to reflect the individuality of place. Overall, it is considered that the visitor economy is a key issue and gap.

In terms of a specific planning role, it was noted that focus is required on the competitiveness of town centres – is it currently an advantage or a barrier to a vibrant heritage economy. There is a negative perception of the role of planning and The Faversham Society noted that enforcement can be weak and that new development often degrades heritage assets.

5. Round Table

Other points raised for considerations were:

- Veteran trees, ancient woodland and planting for the future.
- Theatres and music halls.
- Resources to address heritage.
- Music/culture/heritage projects.
- The need for the Local Plan to present heritage in a proactive and positive way.
- Archaeological finds still sitting in crates due to not having a place to display them.

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Appendix III d

Swale Borough Council Local Plan Review

Minutes of Rural Communities Workshop Discussion

Committee Room, Swale House, Wednesday 04 July 2018

Organisations Represented:

Swale Borough Council	Rural Kent
Cllr Gerry Lewin	Kent Downs AONB Unit
Eastchurch Parish Council	Cllr Nicholas Hampshire
The Campaign to Protect Rural England	Cllr James Hunt
English Rural Housing Association	Diocese of Canterbury
Kent County Council	Produced in Kent Ltd
Action with Communities in Rural Kent	

1. Introduction

Swale BC gave an introduction to the current Local Plan review and advised that a separate rural settlement study will be taking place to feed into this.

2. Overview of rural communities in Swale

Swale BC noted that approximately 40% of the Borough's population live in rural areas and 23% of the land area falls within the AONB. Therefore, consideration of our rural communities will be an important issue for the next Local Plan. Agriculture (including fruit production) is strong here with the 2nd largest agricultural workforce in Kent making a contribution to the UK's foody supply. This will need to keep pace with issues such as climate change and Brexit. Wine making is an increasing opportunity in Kent. There are pockets of deprivation, poor environments and some rural services are in decline. Is the vision with the current Local Plan going to remain relevant for the rural communities? There are many small businesses which contribute to an important rural economy, however with the growth of digital and home working; rural broadband connection is an issue. We have a significant woodland resource for leisure, woodland management and forest schools. Where do we get the most up to date demographic statistics for rural areas? CPRE advised that a recent report might help and that this can be sent over to Swale BC. How can all of this be dealt with through policy?

3. Local Plan review, future growth and strategic discussion

Swale BC introduced the reasons for the current Local Plan review taking place and explained the new NPPF would likely significantly increase the housing need for the Borough. Is the 20 year old settlement strategy going to be sustainable for the future? It has for example resulted in more services and facilities at Iwade, but it took a lot of housing to achieve that. Other villages which have seen smaller growth have not received additional facilities.

One potential new settlement strategy could be new settlements and a consultation has been carried out to gauge the appetite for this. The submissions are going through assessment at the moment and will go to Members for a steer next year.

KCC Highways & Transportation noted that dispersed growth doesn't provide sufficient investment to make improvements to the transport. Eastchurch Parish Council raised concern that infrastructure always seems to follow housing growth and that new settlements may facilitate this better. The CPRE noted that the Brownfield Land Register should be used to ensure brownfield sites are the focus to begin with.

The English Rural Housing Association commented that parishes are keen on affordable housing and that the protection of villages from development is not viable. There is a need for downsizing. Windfall sites are useful. A development has recently been approved for a mixture of local and open market housing and this is supported by parish councils.

KCC Education commented that there is a difficult balance. Dispersed growth makes it difficult to address education needs and it is often hard/impossible to expand rural schools. On the other hand, a new community would need to be able to forward fund the provision of new schools.

Cllr Hampshire considered that the current approach is not working and that we are still playing catch up following the recession some 10+ years ago. Faversham has been protected for some time but has the capacity to be opened up, especially considering that infrastructure improvements are only just starting to be planned in the Sittingbourne area. Swale is a commuter area with many people living, but not working here. This needs to be considered transport wise – Sittingbourne is in the top 10 areas for London commuting. The Diocese of Canterbury commented that infrastructure issues are already present and that once land is built over, it is gone forever.

SBC commented that affordable housing is most required in areas where it is the least viable and this is a big issue. Concern was raised that we are building housing for people who can't afford them.

4. What role should rural settlements play in meeting future development needs in Swale?

Cllr Hampshire commented that villages are not saying no to any development and parish councils would like to see 10 or 20 affordable homes built for local people. However, the fear is that the Borough Council would then add more housing on top of this. There are no small developers. SBC commented that a good technical exercise needs to take place to differentiate the capacity between different settlements. Medium sized villages could benefit from good quality development – quality is just as important as quantity. We need to get the right SPD in place around design.

The CPRE asked how many applications we get for rural exceptions housing and said that more needs to be done around assessing need. SBC countered that we do look at needs and carry out site walkabouts etc., but then the process stops – why is this? Rural exceptions have provided thousands of houses nationally but it is a slower process and needs a strong will from parish councils. Some have it but find it hard to take the objections. Many people who don't qualify for affordable housing also can't afford open market housing.

Rural Kent noted that everything is ready for house building except for the land – there is a supply issue which requires Government led action.

Cllr Lewin commented that this is an important question because there are so many rural communities here. Many were untouched by the last Local Plan. For those not seeing development there is a need to assess local housing needs. More elderly housing, starter homes and disability adapted housing is required. Future policy should reflect that demand. Eastchurch PC raised concern that bungalows are disappearing and there needs to be planning action on this because people can't find the bungalows they need, with the costs rising simultaneously. This is a big challenge in villages.

Cllr Hampshire raised the prospect of having more apartment style builds with car parks underneath which are less land hungry. English Rural Housing Association said that there are lots of villages with few or no facilities. It's the people that make places sustainable. There can be very few facilities but the community is often strong. 99% have a village hall. It is not necessarily about providing services. Cllr Hampshire noted that if you swamp villages with housing, it's the people that stop the community spirit.

SBC commented that is it not just about sustainability in a social manner, but also environmentally. For example, we don't want everyone having to drive everywhere. How can we use town planning to make the future better and get development working for us? This is required of us by the NPPF.

Rural Kent noted that super-fast broadband needs to be rolled out across rural areas, which is not happening at the moment. The ever growing online based economy is struggling to take place in villages. However, it is about the community first. Broadband could form a policy although Swale noted that KCC already has a project for urban and rural broadband.

Should we be looking at social care co-operatives to support the elderly population in rural areas? KCC considered that we need to be talking about health care when discussing new settlements. We have an active role in health but are not thinking about it spatially at the moment. We need to build healthier communities.

Cllr Lewin noted that positive planning policies are needed to re-inforce the community feeling in villages. They are often seen as idyllic places but suffer many problems in terms of infrastructure, employment etc. How can the Local Plan support this?

Cllr Hampshire raised the issue of town centres and how these may look in 10 years. There will be a lot of vacant retail space. We could create much higher/denser built centres. Secure internet is just as important as high speed. There was mention of the insufficient parking standards.

The Diocese said that overall, the next 5-10 years presents a big unknown. Work patterns are changing and there is a need for 500 rural GPs in Kent. Also, we are becoming significantly under resourced in fruit pickers. Some areas are already deciding which orchards are not going to be picked.

SBC officers noted that employment creation is going to be lower due to automation. The issue of possibly being asked to take housing from neighbouring authorities was raised; however SBC said that at this time, nobody is indicating that this will happen.

5. Round table of any final points

Cllr Lewin concluded that many of the key issues are not within our remit but that we need to focus on local needs housing, changing demographics and the population's requirements. The CPRE concluded that they would continue to lobby the Government on what they consider to be the key issues. Rural Kent raised the issue of local authority resourcing in having to deal with these issues. SBC confirmed that there would be a community housing fund starting soon. English Rural Housing Association and the Kent Downs AONB concluded that we should keep the rural exceptions policy because it does work. Sevenoaks has a robust one and it works very well. There was a final discussion around the critical role of design in creating a distinct design in villages. Cllr Hampshire concluded that rural areas do not have the capacity to take so much development and that a new strategy is required.

Local Plan Panel Meeting	
Meeting Date	29 October 2018
Report Title	Revised NPPF and implications for the Swale adopted local plan and the emerging local plan review
Cabinet Member	Cllr Gerry Lewin, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Gill Harris
Key Decision	No
Classification	Open
Recommendations	Members are invited to note the content of the report and the implications of the revised National Planning Policy Framework and Practice Guidance for the emerging local plan review; and adopted Local Plan policy.

1 Purpose of Report and Executive Summary

- 1.1 The Ministry for Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF) on 24 July 2018 following consultation on the draft in March 2018. The revised NPPF became a material consideration for decision making from the date of publication but only applies to local plans submitted for examination after 24 January 2019. Therefore, the local plan review for Swale Borough will be assessed against the revised NPPF.
- 1.2 This report provides a brief overview of the key points in the new NPPF. The appendices provide more detail in terms of the content of the NPPF; how well the adopted Bearing Fruits Local Plan complies; and what may need to be reviewed and addressed in the emerging local plan review.

2. Background

- 2.1 A copy of the revised NPPF has also been made available in the Members room. Appendix I of this report provides a summary of the main sections of the new NPPF of note to Swale for the emerging local plan review. Key points are highlighted in this report below to provide further information.

- 2.2 Appendix II provides a high level audit of the Bearing Fruits adopted local plan policies, within the context of the revised NPPF and identifies what may need to be reconsidered in the emerging local plan.

Overview

- 2.3 The National Planning Policy Framework (NPPF) was specifically revised to incorporate the proposals set out in the 'Housing White Paper: Fixing Our Broken Housing Market' to facilitate delivery of the government's ambition to build 300,000 new homes a year by the middle of the next decade. The alterations to the NPPF to significantly boost housing delivery are those which will impact most on Swale both in terms of local plan review and in decision making.
- 2.4 The final NPPF is not considerably different to the consultation draft but reasonably so from the 2012 version, particularly in terms of structure. The revised NPPF is based on subject related chapters but is still to be read as a whole. There is an emphasis on the need for up-to-date local plans, joint working and ensuring that planning permissions are brought forward to deliver new homes.
- 2.5 The core planning principles in the opening paragraphs to the 2012 NPPF have been deleted although their content is largely reassigned to the relevant chapters, achieving sustainable development remaining at the heart and centre of the framework.
- 2.6 The revised NPPF retains the presumption in favour of sustainable development in paragraph 11 although some changes have been made to the wording. In summary:
- For plan-making the amended working includes the requirement to provide for objectively assessed needs for housing, as well as any needs that cannot be met within neighbouring areas.
 - For decision-taking, approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date granting permission (also referred to as the tilted balance).

The 'Tilted' Balance

- 2.7 The titled balance means that in the absence of relevant up-to-date development plan policies, the balance is tilted in favour of sustainable development and granting planning permission except where the benefits of the proposal are 'significantly and demonstrably' outweighed by the adverse impacts or where specific policies in the NPPF indicate otherwise. Potentially this remains one of the most important areas for the Council where planning permission is sought on unallocated sites or for which the development plan supports a refusal of planning permission. In this context, a new footnote to paragraph 11 clarifies the meaning of 'out-of-date' in relation to housing. It includes situations where the Council

cannot demonstrate a five year supply of deliverable housing sites (with an appropriate buffer) or where the Housing Delivery Test indicated that the delivery of housing was less than 85% of the housing requirement over the past three years.

Determining Housing Targets

- 2.8 The determination of Objectively Assessed Need and hence determination of the housing target for the Swale local plan review by a standard methodology is confirmed. This is based on:
- the ONS generated household projections;
 - application of an affordability adjustment;
 - the application of a 40% cap on any increase in the previously adopted target provided that target is being reviewed within 5 years of adoption.
- 2.9 Practice Guidance has been issued on this, but may be subject to further review as the recently issued 2016 – based household projections are not compliant with the government objective to deliver 300,000 dwellings per annum. Swale’s household projection has not followed the downward trend shown in many other areas and therefore the anticipated housing target is not likely to change significantly from the 1054 dpa estimated in the ‘Looking Ahead’ consultation document.

Housing Delivery Test

- 2.10 The introduction of the Housing Delivery Test commences from November 2018 and will apply to the performance in delivering the ‘Bearing Fruits’ housing target. Members have already received a briefing on how this will operate and the implications for Swale’s Five Year Housing Land Supply. The figures will be issued by MHCLG for all districts in early November and will then be used to complete the Housing Land Supply statement. Depending on whether or not a five year supply can be demonstrated, the ‘tilted balance’ in favour of sustainable development proposals outlined at para 2.7 above may apply.

Statements of Common Ground (SoCG)

- 2.11 The introduction of the SoCG seeks to put the Duty to Cooperate which was present in the previous NPPF onto a more formal footing. The new Practice Guidance on Local Plans goes into some detail on the form and function of these. The expectation is that any cross boundary topics between local planning authorities; or topics such as infrastructure which may be dealt with by non planning authorities can be established and agreement on these topics kept up to date through published SoCG.

National Planning Practice Guidance (PPG)

- 2.12 Also of note are the most recent changes to the Planning Practice Guidance to support the revised NPPF.

- 2.13 The PPG on viability assessments and assessing housing and economic development needs were updated when the NPPF was published. The revised PPG on viability supports paragraph 34 of the NPPF that sets out the expectation that local plans set out the contributions expected from development but that such policies should not undermine the delivery of the Plan. The main difference is the increased emphasis on testing viability of sites at the plan-making stage. For decision-taking, paragraph 57 places the burden on applicants to “demonstrate whether particular circumstances justify the need for viability assessment at the application stage”. The decision maker must then decide the weight to be given to the viability assessment ‘having regard to all the circumstances in the case’.

Implications of the new NPPG for the Adopted Bearing Fruits Local Plan

- 2.14 The main thrust of the revised NPPF is focused on increasing housing delivery. There are major changes to how the overall housing targets will be derived, which is a matter for local plan review. The Housing Delivery Test (HDT) may have the most immediate impact on the performance of the adopted local plan policies, in the imperative to deliver more housing. The HDT will be based on the Bearing Fruits target from November 2018.
- 2.15 Going forwards, accommodating new development targets will entail new land allocations and potentially revisions to the development strategy, which will be dependent on the updated evidence base.
- 2.16 The more generic development management and strategic policies within Bearing Fruits still have a high degree of compliance with the revised NPPF. As such, no major and immediate changes in policy context are expected for decision making through Planning Committee. Subject to any updated evidence on the relevance or spatial extent of such policies within Swale, these policies may not need substantial change via the local plan review. A detailed assessment will however, be carried out, so that the Local Plan can be maintained as the most up to date and comprehensive context for determining development proposals.

Next Steps

- 2.17 Further Practice Guidance is expected autumn 2018 on how Government will adapt the standard methodology for assessing housing targets in the wake of the ONS 2016 based Household Projections.
- 2.18 The revised NPPF will have fully bedded in by the time the Council submits the emerging local plan for examination and new or revised policy will need to be drafted in accordance with it. Officers will continue to keep an eye on reported best practice as well as new or revised guidance in the NPPG.

3. Proposals

- 3.1 Members are invited to note the content of the report and the implications of the revised National Planning Policy Framework and Practice Guidance for the emerging local plan review; and adopted Local Plan policy.

4. Alternative Options

- 4.1 The revised NPPF is now adopted as national planning policy and supported by revised PG. Para 2 of the NPPF (2018) states:

‘Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions.’

- 4.2 The NPPF further states at para 35 (d), that one of the ‘tests of soundness which will be applied by an Inspector is that the plan must be consistent with national policy. Consequently, the emerging Swale local plan review does need to be in accordance with the revised NPPF and there are no realistic alternatives to recommend to Members.

5. Consultation Undertaken or Proposed

- 5.1 The revised NPPF has been subject to consultation by the MHCLG. It is now adopted national planning policy and is not open to further consultation through any local plan consultation process.

6. Implications

Issue	Implications
Corporate Plan	Supports the Council’s corporate priorities for a borough and a community to be proud of.
Financial, Resource and Property	None identified at this stage.
Legal, Statutory and Procurement	The Local Plan is prepared under the Planning and Compulsory Purchase Act 2004 (as amended); and in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012 (Statutory Instrument 2012 No. 767)
Crime and Disorder	None identified at this stage.
Environment and Sustainability	The NFFP is the government’s framework and has been subject to its own sustainability appraisal.
Health and Wellbeing	None identified at this stage
Risk Management and Health and	None identified at this stage.

Safety	
Equality and Diversity	None identified at this stage, although the Local Plan Review itself will be subject to equality impact assessments at key stages as advised by the policy team.
Privacy and Data Protection	None identified at this stage

7. Appendices

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

- Appendix I: National Planning Policy Framework (July 2018): Key Points and Implications for Swale Local Plans
- Appendix II: Bearing Fruits 2031: The Swale Borough Local Plan 2017 – NPPF (2018) Compliance

8 Background Papers

8.1 National Planning Policy Framework (2018) can be found online with associated Practice Guidance at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Appendix I:

National Planning Policy Framework (July 2018): Key Points and Implications for Swale Local Plans

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
General	<p>The NPPF was published on 24 July 2018 following consultation on the draft back in March. It became a material consideration from the date of publication but only applies to local plans submitted for examination after 24 January 2019. Therefore, the emerging plan will be measured against this version of the NPPF at examination when the time comes.</p> <p>The NPPF is to be read as a whole (including footnotes and annexes). It should also be read in conjunction with the Government’s planning policy for travellers sites, and its planning policy for waste.</p> <p>The revised NPPF is relatively similar to the consultation draft published in March 2018. The main changes from the NPPF of 2012 is to incorporate policies set out in the Housing White Paper, supporting the government’s objective of increased housing delivery.</p>	<p>The new NPPF is a key consideration in progressing the emerging Local Plan Review, particularly in respect of identifying new housing targets and delivering them.</p> <p>A high level assessment of the performance of the adopted Local Plan, ‘Bearing Fruits’ policies (particularly the development management policies) concludes that the policies and proposals are generally compliant with the revised NPPF that was published on 24 July 2018. There are however, some changes to government policy that raise the profile of certain topic areas such as design, air quality, climate change and viability, which will need to be taken into account as the evidence base for the new plan emerges and consideration can be given as to whether new policy is required; rewording is needed; or the policy is compliant with NPPF and reflects the local evidence base and consequently does not require review.</p>
2. Achieving sustainable development	<p>Achieving sustainable development remains at the forefront of the NPPF with the inclusion of three overarching objectives (economic, social and environmental) to achieve this. The NPPF’s main focus continues to be a presumption in favour of sustainable development, sustainability being the</p>	<p>‘Bearing Fruits’ sets out the Council’s strategy for delivering sustainable development. It positively seeks opportunities to meet the Borough’s development needs through various policies that allocate land for development and regeneration. The Local Plan Review will need to demonstrate this too in</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>golden thread that runs through each and every policy. Of note is paragraph 11. For plan-making, this means that local plans should positively seek opportunities to meet the development needs of their area, planning to provide for their full OAN for housing and other uses.</p> <p>The footnote to para 11 continues to support national and international designations for natural and built heritage as strong considerations in the overall scale type or distribution of development in the plan are.</p> <p>For decision-taking, paragraph 11 requires planning permission to be approved where proposals accord with an up-to date development plan. This is also referred to as the ‘tilted’ balance.</p> <p>Where local planning authorities substantially fail the Housing Delivery Test (where the Housing Land Supply figure for the previous 3 years is less than 75% of the Borough’s housing target), the policies of the adopted local plan are rendered out-of-date and proposals are assessed against the NPPF only, the presumption being in favour of sustainable development.</p>	<p>the context of an updated evidence base.</p> <p>The Housing Delivery Test comes into effect on 1 November 2018 and will assess each local planning authority’s housing delivery against their housing targets. Figures will be issued by MHCLG based on data submitted by local planning authorities. If the amount of housing delivery is less than 75% of the total target, the local plan becomes ‘out of date’ and cannot be used when considering planning applications for housing.</p> <p>In blunt terms, this means the council may not be able to defend local designation policies at Appeal if it has been unable to deliver 85% or more of its housing target over a 3 year period.</p> <p>The Council’s housing land supply and housing delivery test will be a matter of public record and will be reported to this Panel in due course.</p>
3. Plan-making	<p>The planning system continues to be plan-led. Development plans should provide a positive vision for the future of the area and address housing needs and other economic, social and environmental priorities. Policies should be positively prepared (aspirational but deliverable), shaped by early engagement.</p>	<p>The Bearing Fruits Local Plan had a clear set of strategic policies and development strategy which was separate to the more detailed local policies and allocation policies.</p> <p>The level of detail in non strategic and allocation policies will need to be supported by evidence, but is likely to be valuable in ensuring good quality</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>The development plan should contain strategic policies that set out the overall strategy for the patterns, scale and quality of development and make sufficient provision for the Borough's development needs identified through a proportionate evidence base. This includes the need for housing (and affordable housing), employment, retail, leisure and infrastructure needs as well as policies to conserve and enhance the natural, built and historic environment including landscape and green infrastructure and planning measure to address climate change mitigation and adaptation.</p> <p>Non-strategic policies in the development plan should be used to set out more detailed policies for specific areas and can include local-level detail on site allocations, establishing design principles, infrastructure requirements and other development management policies.</p> <p>For neighbourhood plans, NP policies, if more recent, will take precedent over non-strategic policies in an adopted local plan covering that neighbourhood area where they are in conflict but if the adopted local plan is more recent, the local plan policies will take precedent. Local plan policies should be reviewed to assess whether they need updating at least once every five years (and then updated as necessary). Relevant strategic policies will need to be updated at least once every five years if there is a significant change to the local housing need figure or if it is expected to change significantly in the near future.</p> <p>Local plans should also now set out the contributions</p>	<p>development and setting key themes and considerations for strategic scale sites for incorporation into master planning; and important design and layout considerations for smaller sites.</p> <p>The emerging local plan review will need to continue this general document structure, but the development strategy and settlement strategy may of course be subject to review.</p> <p>Local plans are no longer required to demonstrate the proposed strategy is the 'most' appropriate but 'an' appropriate strategy. Evidence that informs this will need to be collected and analysed as before; and choices will be evaluated through the Sustainability Appraisal at each key stage in plan making.</p> <p>The soundness tests for local plans remain the same.</p> <p>The Swale local plan review was commenced on the recommendation of the Bearing Fruits Inspector, but the imperative for five yearly reviews has been confirmed and implies a tight timescale reflected in the Swale Local Development Scheme (Sept 2018)</p> <p>Swale Borough Council has a strong history of collaborative working with neighbouring authorities and other stakeholders. At this stage ongoing 'Duty to Co-operate' with neighbouring authorities, has not indicated any approaches for development needs</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>expected from development. This includes setting out the level and type of affordable housing provision required along with other infrastructure requirements. The test of soundness for Local Plans continue to be:</p> <ul style="list-style-type: none"> • Positively prepared • Justified • Effective • Consistent with national policy <p>The local plan is now required to have <i>an</i> appropriate strategy (rather than <i>the most appropriate</i> as with the old NPPF) and that it must provide for the identified needs as a minimum.</p> <p>Plan proposals will need to deliverable during the plan period.</p> <p>Duty to Co-operate remains a key feature for the preparation of sound local plans with the additional requirement to prepare and maintain ‘Statements of Common Ground’ setting out the cross-boundary matters which may need a joint approach with neighbouring authorities and how they are likely to be resolved.</p>	<p>from those areas to be met in Swale. Until the evidence base is more complete, it may not be possible to identify any new issues may need an ongoing collaborative approach. The format and process for establishing any necessary Statements of Common Ground has yet to be established.</p> <p>Part of the work for the new local plan will continue to include an viability audit of policies that relate to local standards will need to be assessed to establish that they will policies should not undermine the delivery of the plan and as such there may be a need to identify the priority requirements.</p>
4. Decision-making	<p>The focus continues to be on making decision in accordance with the development plan unless material considerations indicate otherwise.</p> <p>Decisions on applications should be made as quickly as possible. Early engagement and front-loading continues to be encouraged as a practice to speed up the application process. There is plenty of onus placed on the applicants to engage with the various stakeholders and the public, taking an early, pro-active</p>	<p>The practical requirements for pre application and efficient and timely consideration of planning applications has already largely been embedded in local practice.</p> <p>From a policy perspective, all ‘Bearing Fruit’ policies, particularly the development management policies will be audited as part of the local plan review, not only for their compliance with NPPF, but for how they have</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	approach.`	work in practice from the development management perspective.
5. Delivering a sufficient supply of homes	<p>Strategic policies that determine the minimum number of homes needed should be informed by an assessment of local housing need using the standardised methodology set out in NPPG.</p> <p>Paragraph 65 further reiterates the need for a housing requirement figure to be established and for the Council to identify the land required for that need which reflects the overall strategy for the pattern and scale of development across the Borough.</p> <p>Paras 73-76 deal with the need to set and expected housing trajectory for the plan period and the need for an annually updated Five Year Housing Land Supply. The interaction of this with the new Housing Delivery Test determines the land supply buffer to be applied and hence the Five Year Supply.</p> <p>The NPPF also allows for the possibility of a stepped housing trajectory where there are large strategic sites with long lead in delivery times and or are dependent upon the delivery of key enabling infrastructure</p> <p>Specific, deliverable sites for the first 5 years of the local plan are to be identified. Specific, developable sites or broad locations for growth are also to be identified for years 6 to 10 and, where possible for years 11 to 15 of</p>	<p>The NPPF has been revised in light of the Housing White Paper to incorporate the changes to government policy that seek to significantly boost the delivery of homes. The implications of this are the key areas upon which the revised NPPF bites.</p> <p>The revised NPPF confirms that the housing need methodology set out in national planning guidance is to be used for calculating housing need across different forms and tenures based on a wide range of factors, including affordability. The government has promised further consultation on the details of the standardised methodology in due course. For Swale this is not expected to change the target figure significantly from the 1050 dwellings per annum estimate.</p> <p>The means for identification of potential sites for their development needs is set out in detail in the National Planning Policy Guidance (NPPG) and there should be a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Work is currently under way on a new Strategic Housing Land Supply Availability Assessment for Swale; and four potential new settlements are being promoted.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>the plan period. It is essential that this includes a range of sizes of sites; which could include large urban extensions or new settlements . However, there is a requirement for at least 10% of the housing requirement to be provided on sites no larger than 1 ha. The allocation of small and medium sites is essential for maintaining a healthy housing land supply position, particularly during the early years of the plan. If the Council cannot demonstrate a 5 year housing land supply there may be significant consequences. As previously mentioned, this includes the status of the adopted local plan being 'out-of-date' that would result in a loss of control in planning and development decisions.</p> <p>Planning policies should specify the type of affordable housing required if a need for affordable housing has been identified. Affordable housing need should be met on site unless off site provision or an appropriate financial contribution can be robustly justified and this would contribute to the objectives of creating mixed and balanced communities.</p> <p>Affordable housing should be sought on major developments only (10 or more homes) in urban areas and in designated rural areas where the policies may set out a lower threshold of 5 units or fewer.</p> <p>Reductions in affordable housing can be sought on brownfield land where vacant buildings are being reused or redeveloped. New and broader definitions of affordable housing are included at Annex 2 to the</p>	<p>The new Housing Delivery Test becomes operative from 1 November 2018 in respect of the Bearing Fruits Local Plan and Members have already received a briefing on how this will operate.</p> <p>In determining its new development strategy, the Council will also need to be mindful of the requirement that 10% of the dwellings required should be provided on sites no bigger than 1 ha, which are considered easier to bring forward in the short to medium term.</p> <p>A Housing Market Assessment will also be needed to inform the house types and affordability needed as part of the overall need requirement.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>NPPF.</p> <p>There is an expectation that major housing development should expect at least 10% of the homes to be available for affordable home ownership as part of the overall affordable housing contribution from the site although there are some caveats to this.</p>	
6. Building a strong, competitive economy	<p>The NPPF emphasises the continued need to support economic growth and productivity with planning policies helping to enable this via a clear economic vision and strategy that ensures closer ties with Local Industrial Strategies and other local policies for economic development and regeneration including supporting a prosperous rural economy.</p> <p>Planning policies should set criteria or identify strategic sites for employment uses to meet the anticipated employment land needs over the plan period.</p> <p>Planning policies will need to be flexible to accommodate needs not anticipated in the plan and allow for new and flexible working practices and respond rapidly to changes in economic circumstances. The specific locational requirements of different sectors should also be recognised.</p>	<p>Planning for the full economic needs of the Borough is also of paramount importance and earlier paragraphs in the NPPF reinforce the need to make sufficient provision for employment.</p> <p>Paragraph 120 in 'chapter 11: Making effective use of land' does make specific reference to the need for planning policies and decisions to reflect changes in demand for land and to be informed by regular reviews, amplifying the need to promote the most effective use of land. This approach enables the release of employment land to meet housing needs where there is no reasonable prospect of the site coming forward for its intended use. (This approach is rolled forward from paragraph 22 in the original NPPF).</p> <p>There is however, no direct correlation between numbers of homes and jobs as per the old NPPF.</p> <p>The Swale Employment Land Review (September 2018) identified a handful of sites that are no longer suitable for employment use and concluded the</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
		<p>Borough's needs for B2/B8 for the new local plan period is approximately 40ha and 15ha for B1 uses.</p> <p>The 'Bearing Fruits' identified specific sites suitable for employment use whilst Policy CP1 supports employment development, particularly manufacturing, and safeguards strategic employment sites from loss to other uses. Policy DM3 is a criteria based policy that supports the sustainable development of the rural economy. This approach appears NPPF compliant and will be taken forward to the Local Plan review.</p>
7. Ensuring the vitality of town centres	<p>The 'town centre first' approach remains little changed with local plans being required to define a network and hierarchy of centres. The default threshold for Retail Impact assessment continues to be 2500 sq metres. Policies should promote vitality and viability, allow for growth and diversification and promote a mix of uses reflective of that centre's characteristics. Centres will need to be able to respond to rapid changes in the retail and leisure sectors and this should be facilitated through local plan policy.</p> <p>As previously, planning policies should define the extent of the town centre and the primary shopping areas and allocate a range of suitable sites to meet identified need, looking at least 10 years ahead.</p>	<p>There is little new in the NPPF on this topic, and surprisingly nothing on the impact of internet shopping, so local evidence will be key to informing policy choices.</p> <p>Specialist consultants have recently been commissioned and work is underway to assess the retail and leisure needs of the Borough for the new local plan period. This evidence, will inform the need for any new site provision and review the policy approach for the development proposals within the core and secondary shopping frontages and other retail locations.</p> <p>Should the Council follow a strategy that includes 'new settlements', the retail and leisure needs of the new communities will also need to be considered and will form part of the master planning of those settlements.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
8. Promoting healthy and safe communities	<p>Broad objectives that promote healthy and safe communities are set out in Section 8 of the NPPF and include the need to ensure the provision of the social, recreational and cultural facilities needed to ensure this. Education provision continues to be given importance in the revised Framework. Paragraph 95 states that local planning authorities should give “great weight” to the need to create, expand or alter schools through the preparation of plans and decisions on planning applications. The role and value of good design in creating healthy and safe communities is also outlined. Existing open space, sports and recreational buildings and land should not be built on unless there is evidence that it is surplus to requirements, it will be replaced with equivalent or better provision; or the benefits of the proposed development outweigh the loss of the current or former use. Public rights of way should be protected and enhanced. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Space should only be designated through the local plan process. Such designations are justified where the green space is in reasonably close proximity to the community it serves, is demonstrably special to a local community and holds a particular local significance and is local in character and is not an extensive track of land.</p>	<p>These objectives remain little changed in the revised NPPF and as pertinent as ever for planning policy and decision making. The Local Plan review will be supported by a new Implementation and Delivery Schedule for social and physical infrastructure which will be compiled in collaboration with the service providers. Early stakeholder involvement has already commenced, as reported elsewhere on this agenda. The Council is well aware of the health inequalities of its communities and Bearing Fruits Policy CP5 has sought to promote, protect and work to improve the health of Swale’s population and reduce health inequalities and this strategic policy should be taken forward in the review. Through the local plan review, the Council will also need to continue to provide, protect and enhance public open space and other important green spaces. Evidence from (amongst other sources an Open Space Study) is expected to inform a Green Infrastructure policy and strategy; as well as land allocation requirements arising from new developments.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
9. Promoting sustainable transport	<p>The revised NPPF is more explicit in terms of managing patterns of growth and development strategies so as to minimise the need to travel through focus on locations which are or can be made sustainable.</p> <p>Local planning authorities should consider transport issues at the earliest stages of plan making and identify additional development opportunities arising from strategic infrastructure investment.</p> <p>Opportunities to promote modes of transport other than the car should also be identified and explored.</p> <p>Paragraph 105 explicitly calls for the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.</p> <p>Maximum parking standards should only be set through local standards where there is a clear and compelling justification that they are necessary for managing the local road network or for optimising the density of development in central locations well served by public transport.</p> <p>The importance of providing adequate overnight lorry parking facilities is to be recognised in both planning policies and planning decisions.</p>	<p>As further information and evidence (particularly traffic modelling) becomes available, this information will be used to inform and shape the reasonable alternative development strategies for the local plan review and key infrastructure priorities.</p> <p>As the preferred development strategy is developed, the Council will continue to work closely with KCC in producing their Local Transport Plan; and a Local Transport Strategy for Swale specifically to support the Local Plan Review; and public funding bids.</p> <p>Ongoing collaboration with Highways England in respect of the Strategic Road Network priorities will also be key; as will collaboration with public transport providers.</p> <p>Ways of promoting real choices for alternatives to the car will be needed in both strategic policies in the local plan review; in land allocation policies in respect of design and layout; and in general development management policy.</p>
10. Supporting high quality communications	<p>Planning policies should support the expansion of electronic communications networks, including next generation technology (such as 5G) and full fibre broadband connections.</p> <p>Policies should set out how high quality digital</p>	<p>Much of the development of networks, masts and so on is permitted development.</p> <p>This type of development is not explicitly addressed in 'Bearing Fruits' although strategic Policy CP6 expects development proposals to provide for the installation</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in most cases, provide the optimum solution).</p>	<p>of such.</p> <p>It is unclear at this moment in time whether or not a specific policy to support high quality communications would be needed in the emerging local plan, for example to cover issues such as siting 5G network installations and whether it would be design or allocation oriented.</p> <p>This section makes clear that any policies or blanket ban (such as use of Article 4 Directions over wide areas) should not be used impose a ban on new electronic communications development.</p>
11. Making effective use of land	<p>This chapter of the NPPF focusses on the need to ensure that policies make the most effective use of land for both built development and green space. This includes the need for a clear strategy that makes as much use as possible of previously developed land, but there is still no policy priority to develop this before greenfield.</p> <p>Other policy approaches that make effective use of land include the mixed use schemes and taking opportunities to achieve net environmental gains, for example developments that would enable new habitat creation or improve public access to the countryside.</p> <p>Where existing uses are not safeguarded, the Council should take a positive approach to applications for alternative uses.</p> <p>There is a new section on achieving appropriate densities are used, making the optimal use of the potential of each site. Where housing land is in short supply, the use of minimum density standards is</p>	<p>The council has an active ‘Brownfield Register’ to promote the development of previously developed land.</p> <p>A general density allowance has been used in the past to estimate the yield of potential site allocations, but a clear policy context now exists to work up and extend a amore nuanced approach into local plan policy.</p> <p>Across the Borough, typical densities vary according to locational type with higher density development taking place in more central locations as would be expected.</p> <p>It may be possible to use a general density policy expressing a range for different locations, but taking a site by site approach to identifying an appropriate density provides greater flexibility and the ability to fully consider the site’s physical characteristics and impacts on surrounding areas – and may be more appropriate for specific allocation policies.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>expected for town centres and other locations well served by public transport. The use of minimum density standards or a range of densities for different part of the plan area is also recommended for consideration. The role of good design will be instrumental in achieving this.</p>	<p>A steer on pursuing a density policy is sought on this elsewhere in this agenda. The role of good design will continue to be paramount in the allocation and delivery of new developments regardless of their density.</p>
12. Achieving well-designed places	<p>The revised NPPF has an enhanced and much clarified section on good design with the need to have it embedded as a fundamental part of good place making.</p> <p>Refusal of planning permission for poor design remains a course of action for local planning authorities and setting out clear expectations for design in local plan policies is an avenue that could be explored further.</p>	<p>‘Bearing Fruit’ Policy CP4 Requiring Good Design sets out the Council’s criteria to be considered in development proposals. The land allocations policies in the plan provide some detailed design parameters where appropriate, and any master plans and design briefs are required to address the design requirements of the individual sites in more detail.</p> <p>The re-wording of this chapter of the NPPF enables greater use of supplementary design tools in relation to specific sites such as design codes. This will be explored further as the new local plan progresses and will be a critical element in delivering higher development requirements which are actually good places.</p>
13. Protecting Green Belt land	<p>Green Belt Policy is mostly unaltered in the revised NPPF and continues to be one of the most restrictive planning policies. Green Belt boundaries can only be altered where exceptional circumstances are fully evidenced and justified through local plan reviews. Authorities with Green Belt will be encouraged to be mindful of this where meeting their own development needs are challenging. They will need to be able to</p>	<p>Although Swale does not have any Green Belt land, unless Green Belt authorities on the edge of London and in Kent are prepared to undertake Green Belt Review, there is a possibility that unmet development need could be deflected to non Green Belt areas. So far Swale has not been directly approached for taking on any such need.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.	
14. Meeting the challenge of climate change, flooding and coastal change	<p>The revised NPPF shows little change in respect of these topics, although clarity has been improved. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.</p> <p>Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.</p> <p>Plans should provide a positive strategy to help increase the use and supply of renewable and low carbon energy and heat.</p> <p>Green infrastructure is highlighted as a key tool in mitigating and adapting to climate change.</p> <p>Strategic Flood Risk Assessment (SFRA) should inform local plan policies. Inappropriate development in areas at risk of flooding should be avoided and plans should take a sequential approach to the location of development to avoid, where possible, flood risk to people and property. Any residual risks should be managed.</p> <p>Major development should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.</p> <p>Planning policies should take account of the UK Marine</p>	<p>‘Bearing Fruits’ contains a number of policies related to meeting the challenge of climate change, flooding and coastal change. The Council’s approach to meeting these challenges has influenced the strategy for the Borough through the objectives in the Sustainability Appraisals that was used to assess the local plan and its policies. Development Management Policies DM19, DM20, DM21, DM22 and DM23 address these important issues and are still compliant with the revised NPPF.</p> <p>For the new local plan, the SA scoping report has already been agreed and provides a baseline for evaluating reasonable alternative development strategies and land allocations. These issues will be considered and addressed as the plan evolves, taking into account evidence as it emerges such as the SFRA and coastal change management plans. Technical standards for buildings and how the local plan can help mitigate and adapt to the risk of overheating from rising temperatures may also be considered for inclusion in policy to help address climate change issues.</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	<p>Policy Statement and marine plans in coastal areas. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.</p>	
15. Conserving and enhancing the natural environment	<p>Planning policies should contribute to and enhance the natural local environment and seek to minimise impacts on and providing net gains for biodiversity. Local plans should distinguish between the hierarchy of international, national and locally designated sites and should allocate land for development with the least environmental or amenity value.</p> <p>As per the previous NPPF, this chapter sets out how local plans should address issues of biodiversity, land stability, noise and light pollution and provides additional guidance on air pollution.</p> <p>Air quality evidence will now need to be an integral part of plan-making to ensure that the information is available to identify opportunities to improve air quality or mitigate impacts and is a strengthened element of the revised NPPF.</p>	<p>The Bearing Fruits plan has a comprehensive suite of natural environment policies which continue to be NPPF compliant.</p> <p>Air Quality evidence will be prepared and will inform the local plan strategy and identify areas where mitigation opportunities can be explored to improve air quality; and potentially new development management policy and practice on this topic.</p>
16. Conserving and enhancing the historic environment	<p>The revised NPPF makes little change to the section on the historic environment.</p> <p>Local planning authorities are expected to maintain 'or have access to' a historic environment record (paragraph 187). One of its purposes is to be used to predict the likelihood that currently unidentified heritage assets will be discovered in the future. Kent County Council maintains this record on behalf of the district councils via the KCC website.</p>	<p>The Bearing Fruits Local Plan Policy CP8 sets out the Council's commitment to the preparation of a Heritage Strategy and broad development management principles, plus Policies DM32 to DM35.</p> <p>A Heritage Assets Review was also undertaken to support the plan preparation. The Bearing Fruits Plan (alongside the NPPF) therefore provides a good basis for development management decisions in respect of heritage, which is unlikely to need substantial</p>

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
	Changes to the way the impact of proposed development on the significance of a designated heritage assets is assessed are confirmed and clarified in paragraph 193 which states that 'great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).	revision. The NPPF also looks to local plans to set out a positive strategy for the conservation and enjoyment of the historic environment. A Swale Heritage Strategy and Action Plan is under preparation and this, along with the Heritage Assets evidence base will inform choices on the local plan review as it progresses.
17. Facilitating the sustainable use of minerals	There is little change to this part of the revised NPPF. Minerals are a finite resource and it is essential that there is a sufficient supply to provide for the infrastructure, buildings, energy and goods that the country needs. Planning policies should provide for the extraction of mineral resources and identify and safeguard sites as appropriate. Local planning authorities should not normally permit other development proposals in minerals Safeguarding Areas if it might constrain potential future use for mineral working. This chapter also includes policy on oil, gas and coal exploration and extraction.	Kent County Council is the authority for minerals planning. They are responsible for producing the Minerals and Waste Local Plan for the county and for determining planning applications for mineral extraction. A Supplementary Planning Document has been produced by them on how to address the potential for mineral extraction prior to non minerals development proceeding in a Minerals Safeguarded Area. For Swale Minerals safeguarding areas are clearly identified on the Swale Local Plan Proposals Map – this is in respect of brick earth deposits. This will inform SHLAA appraisal and any land allocation for built development.
Annex 1: Implementation	This NPPF became a material consideration on the day of publication and the new local plan will be assessed against it at examination. It should be noted that the policies in 'Bearing Fruit' are not out of date as they are consistent and compliant with this NPPF. Annex 1: Implementation provides detail on the workings of the Housing Delivery Test that will commence in November 2018.	The Housing Delivery Test (HTD) is intended to highlight where the number of homes being built is below target and provide a mechanism for establishing the reasons why. MHCLG will publish the results of the HDT in November, based on data supplied by local planning authorities. Where delivery has fallen below 85% of

NPPF (2018) Section No.	Key Points	Impact and implications for the adopted local plan and the emerging local plan
		target in the last three years, an Action Plan must be prepared and a 20% buffer applied to the 5 year housing supply calculations. Swale's 2017-18 Housing Land Supply Statement is therefore expected to be published mid – late November.
Annex 2: Glossary	The Glossary has been amended to exclude and include various definitions and refine others. Of note, the definition of 'affordable housing' has been amended to reinstate 'social rent' and include other products such as Discount Market Rate Housing, build-to-rent, self-build and starter homes.	This will be reflected where relevant as the new local plan progresses.

Appendix II:

Bearing Fruits 2031: The Swale Borough Local Plan 2017 – NPPF (2018) Compliance

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
ST1	Strategic Policy - Delivering sustainable development in Swale	Policy ST1 is an overarching general policy that sets out the broad issues development proposals should address in order to demonstrate how they will deliver sustainable development.	The presumption in favour of sustainable development remains at the heart and centre of the NPPF and therefore ST1 is compliant with the revised NPPF. However, the Sustainability Appraisal and other relevant studies and evidence along with consultation feedback from 'Looking Ahead' will help to shape policies in the new local plan as it progresses.
ST2	Strategic Policy - Development targets for jobs and homes 2014-2031	Policy ST2 sets out the Objectively Assessed Needs for housing and employment land.	Strategic Policy which will require review to respond to new NPPF requirements to plan positively for their development needs for the plan period as set out in this Policy. Paragraph 60 of the NPPF states that housing needs should be assessed using the standardised methodology in the national planning guidance. The recently published ELR already identifies the employment land needs for the new local plan period and a retail and leisure needs study is underway.
ST3	Strategic Policy - The Swale	Policy ST3 sets out the settlement	Policy ST3 will need to be reviewed in

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
	settlement strategy	strategy for the Borough which places the focus for development on PDL within defined built up areas and on sites allocated within the Local Plan. The policy also sets out the Borough's settlement hierarchy with Sittingbourne, as the principal town for the Borough, the main focus for development followed by the urban centres of Faversham and Sheerness then the Rural Local Service Centres and other villages with built up confines. The policy sets out the circumstances in which development in the countryside would be permitted.	coming to a view on how best to accommodate new development requirements to 2038. The settlement strategy in the new local plan will be informed by the evidence base; compliance with NPPF; Sustainability Appraisal, and consultation responses. Studies and evidence will shape the new local plan strategy which must, as set out in paragraph 21 of the NPPF, make sufficient provision for the development needs of the area during the plan period. Reasonable alternative strategies will be generated, from which one will need to be worked up as the Council's Preferred Option.
ST4	Strategic Policy - Meeting the Local Plan development targets	Policy ST4 sets out all of the housing and employment development allocations in the local plan.	Will need review and updating to address the new development targets and chosen development strategy.
ST5	Strategic Policy - The Sittingbourne area strategy	Policy ST5 sets out the strategy for development in Sittingbourne. It sets out details that will be expected in development proposals as appropriate, e.g. that proposals will ensure the vitality and viability of the town centre.	Likely to need review and updating to be informed by evidence base; Sustainability Appraisal and consultation feedback. Further consultation will take place next. A similar policy approach to the broad locations for development in the strategy would be appropriate and in line with the NPPF.
ST6	Strategic Policy - The Isle of	Policy ST6 sets out the strategy for	Likely to need review and updating to be

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
	Sheppey area strategy	development within the Isle of Sheppey. It sets out the requirements of development proposals as appropriate, e.g. that it will support tourism, bring forward improvements in the identified regeneration areas and so on.	informed by evidence base; Sustainability Appraisal and consultation feedback. Further consultation will take place next. A similar policy approach to the broad locations for development in the strategy would be appropriate and in line with the NPPF.
ST7	Strategic Policy - The Faversham area and Kent Downs strategy	Policy ST7 sets out the strategy for development in the Faversham and Kent Downs area.	Likely to need review and updating to be informed by evidence base; Sustainability Appraisal and consultation feedback. Further consultation will take place next. A similar policy approach to the broad locations for development in the strategy would be appropriate and in line with the NPPF.
CP1	Strategic Policy - Building a strong competitive economy	Policy CP1 sets out the strategy for building a strong and competitive economy. It sets out the criteria against which development proposals for employment related uses will be assessed.	NPPF, Chapter 6 'Building a strong, competitive economy' supports this policy approach. Studies and evidence along with the Sustainability Appraisal, and consultation feedback will inform the economic vision and strategy for the new local plan.
CP2	Strategic Policy - Promoting sustainable transport	Policy CP2 sets out the criteria against which development proposals will be assessed with regards to its approach to the provision of transport infrastructure.	Will need review and updating. NPPF, Chapter 9 'Promoting sustainable transport' requires local planning authorities to consider transport issues from the earliest stages of plan-making and development proposals. Modelling of reasonable alternative strategies will

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
			inform choices for the way forward and working with highway authorities, public transport providers and other stakeholders to embed sustainable transport proposals in the local plan. It will also inform a supporting local transport strategy to be prepared in collaboration with Kent County Council ; and bidding for public funding for schemes as appropriate.
CP3	Strategic Policy - Delivering a wide choice of high quality homes	Policy CP3 sets out the criteria against which development proposals for new housing will be assessed within the context of delivering a wide choice of high quality homes.	Will need review and updating. As part of the evidence base for the new local plan, there is the need for information on the size, type and tenure of housing needed for different groups in the community and should be reflected in planning policies. This includes local plan policies that will specifically identify and address the affordable housing requirements and other needs such as Travellers and those wishing to undertake self-builds. The NPPF sets out this specific requirement in paragraph 61.
CP4	Strategic Policy - Requiring good design	Policy CP4 sets out the criteria against which development proposals will be assessed in terms of design quality.	Policy is NPPF compliant. Achieving well-designed places remains a key priority for the NPPF. May need minor review and updating
CP5	Strategic Policy - Health and wellbeing	Policy CP5 sets out the criteria against which development	Policy is NPPF compliant. Promoting healthy and safe communities remains a

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		proposals will be assessed in terms of their impact and contribution to health and wellbeing.	key priority for the NPPF and policy would be appropriate in the new local plan. May need minor review and updating.
CP6	Strategic Policy - Community facilities and services to meet local needs	Policy CP6 sets out the criteria against which development proposals will be assessed for their ability to deliver and protect community facilities.	Policy is NPPF compliant. Part of promoting healthy and safe communities includes ensuring there are appropriate community facilities and services to meet local needs and as such this would be an appropriate policy to roll forward to the local plan review. The review will be supported by an updated Implementation and Delivery Schedule; an site specific allocations will indicate necessary supporting infrastructure.
CP7	Strategic Policy - Conserving and enhancing the natural environment – providing for green infrastructure	Policy CP7 sets out the criteria against which development proposals will be assessed for how they will ensure the protection, enhancement and delivery of the conservation and enhancement of the natural environment and the provision for green infrastructure.	Policy is NPPF compliant. Conserving and enhancing the natural environment remains a key priority for the NPPF. A similar policy would be appropriate in the new local plan. May require some updating to policy and Proposals Map.
CP8	Strategic Policy - Conserving and enhancing the historic environment	Policy CP8 sets out the criteria against which development proposals will be assessed for how they will ensure the conservation and enhancement of the historic environment. The policy also sets out the Council's commitment to the	Policy is NPPF compliant. Conserving and enhancing the historic environment remains a key priority for the NPPF. Policy remains appropriate for local plan review and little need for updating anticipated. Plan will be supported by a Heritage Strategy and Action Plan.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		preparation of a Heritage Strategy.	
A1	Allocation - Existing committed employment locations	Policy A1 identifies land allocated for 'B' class employment uses as shown on the proposals map.	NPPF compliant. As this policy seeks to ensure the Borough's employment land needs for the current plan period are being met. Will be updated and included in the local plan review.
A2	Allocation - Land south of Kemsley Mill	Policy A2 identifies land south of Kemsley Mill as shown on the proposals map for employment uses and sets out specific criteria against which development proposals will be assessed.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A3	Allocation- Land at West Minster, Sheerness	Policy A3 identifies land at West Minster, Sheerness for employment uses as shown on the proposals map and sets out the specific criteria against which development proposals will be assessed.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A4	Allocation - Land at Cowstead Corner, Queensborough	Policy A4 identifies land at Cowstead Corner, Queenborough for employment uses as shown on the proposals map and sets out the specific criteria against which development proposals will be assessed.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A5	Allcoation - Land at Selling Road, Faversham	Policy A5 identifies land at Selling Road, Faversham for employment uses as shown on the proposals map and sets out the specific	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		criteria against which development proposals will be assessed.	
A6	Allocation - Land at Graveney Road, east of Faversham	Policy A6 identifies land at Graveney Road, east of Faversham for employment uses as shown on the proposals map and sets out the specific criteria against which development proposals will be assessed.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A7	Allocation - Thistle Hill, Minster	Policy A7 identifies land at Thistle Hill, Minster for housing development as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A8	Allocation - Stones Farm, Canterbury Road, Sittingbourne	Policy A8 identifies land at Stones Farm, Canterbury Road, Sittingbourne for housing development and open space and landscaping as shown on the proposals map. It sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A9	Allocation - Land at Crown Quay Lane, Sittingbourne	Policy A9 identifies land at Crown Quay Lane, Sittingbourne for housing development as shown on the proposals map. It sets out the	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		specific requirements that will need to be met for the development proposals to be acceptable.	
A10	Allocation - Milton Pipes, Mill way, Sittingbourne	Policy A10 identifies land at Milton Pipes, Mill Way, Sittingbourne for housing development as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A11	Allocation - Land at Plover Road, Minster	Policy A11 identifies land at Plover Road, Minster for housing development as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A12	Allocation - Land west of Barton Hill Drive, Minster	Policy A12 identifies land West of Barton Hill Drive, Minster for housing development as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A13	Allocation - Land at Belgrave Road, Halfway	Policy A13 identifies land at Belgrave Road, Halfway for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		development proposals to be acceptable.	
A14	Allocation - Land at the Western Link, Faversham	Policy A14 identifies land at the Western Link, Faversham for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A15	Allocation - Land north of Graveney Road, Faversham	Policy A15 identifies land north of Graveney Road, Faversham for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A16	Allocation - Land at Preston Fields, Faversham	Policy A16 identifies land at Preston Fields, Faversham for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A17	Allocation - Iwade expansion	Policy A17 identifies land at Iwade for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
A18	Allocation - Land north of High Street	Policy A18 identifies land north of High Street, Newington for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A19	Allocation - Land east of Station Road, Teynham	Policy A19 identifies land east of Station Road, Teynham for housing as shown on the proposals map and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A20	Allocations - New allocations on sites within existing settlements	Policy A20 sets out housing allocations within the settlement confines across the Borough as sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
A21	Allocations - Smaller allocations as extensions to settlements	Policy A21 sets out smaller housing allocations that are extensions to settlements and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
MU1	Allocation - Land at north-west Sittingbourne	Policy MU1 identified land at north-west Sittingbourne for mixed use	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	policies such as this to set out more detailed policy for specific areas.
MU2	Allocation -Land at north-east Sittingbourne	Policy MU2 identified land at north-east Sittingbourne for mixed use development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
MU3	Allocation - Land at south-west Sittingbourne	Policy MU3 identified land at south-west Sittingbourne for mixed use development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
MU4	Allocation - Land at Frognal Lane, Teynham	Policy MU4 identified land at Frognal Lane, Teynham for mixed use development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
MU5	Allocation - The Oare gravel workings, Oare Road, Faversham	Policy MU5 identified land at The Oare gravel workings, Oare Road, Faversham for mixed use development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
MU6	Allocation - Land at Lady Dane Farm, east of Love Lane	Policy MU6 identified land at Lady Dane Farm, east of Love Lane, Faversham for mixed use development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
MU7	Allocation - Perry Court Farm, Faversham	Policy MU7 identified land at Perry Court Farm, Faversham for mixed use development and sets out the specific requirements that will need to be met for the development proposals to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas.
Regen1	Central Sittingbourne: Regeneration Area	Policy Regen1 sets out the policy for the regeneration of Central Sittingbourne as shown on the proposals map. It sets out the specific requirements that will need to be met for the development proposals within this area to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out policy for specific areas.
Regen2	Queenborough and Rushenden: Regeneration Area	Policy Regen2 sets out the policy for the regeneration of Queenborough and Rushenden as shown on the proposals map. It sets out the specific requirements that will need to be met for the development proposals within this area to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out policy for specific areas.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
Regen3	The port of Sheerness: Regeneration Area	Policy Regen3 sets out the policy for the regeneration of the Port of Sheerness as shown on the proposals map. It sets out the specific requirements that will need to be met for the development proposals within this area to be acceptable.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out policy for specific areas.
Regen4	Kent Science Park, Sittingbourne: Regeneration Area	Policy Regen4 sets out the policy for the regeneration of Kent Science Park Sittingbourne as shown on the proposals map. It sets out the specific requirements that will need to be met for the development proposals within this area to be acceptable.	NPPF compliant. Depending on strategy chosen for local plan review, may need updating.
NP1	Faversham Creek Neighbourhood Plan	Policy NP1 sets out the Faversham Creek Neighbourhood Plan area as shown on the proposals map and sets out criteria against which development proposals will be assessed.	NPPF compliant Paragraph 29 -30 of the NPPF cover neighbourhood plans. The adopted Neighbourhood Plan will apply in this area, unless its content is superseded by local plan strategic or non strategic policies which may be adopted in future.
AS1	Safeguarded area of search: Sittingbourne Northern Relief Road – The A2 link	Policy AS1 safeguards the area of search for the Sittingbourne Northern Relief Road – The A2 link as identified on the proposals map. Development proposals likely to impact upon the potential route will	NPPF compliant. Depending on strategy chosen for local plan review, may need updating.

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
		not be permitted.	
DM1	Maintaining and enhancing the vitality and viability of town centres and other areas	Policy DM1 sets out the criteria against which proposals for development in town centres will be assessed.	NPPF compliant. Paragraph 85 of the NPPF requires planning policies to define the extent of town centred and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each town centre. Studies, evidence, the Sustainability Appraisal and consultation will help inform and shape any review needed to Policy and Proposals Map.
DM2	Proposals for main town centre uses	Policy DM2 sets out the Council's retail hierarchy and sets out the policy for determining development proposals in the town centres and for appropriate town centre uses.	NPPF compliant. Paragraph 85 of the NPPF requires planning policies to define a network and hierarchy of town centres which this policy has done. Studies, evidence, the Sustainability Appraisal and consultation will inform any review necessary.
DM3	The rural economy	Policy DM3 sets out the criteria against which proposals for development in the countryside/rural areas that relate to the rural economy will be assessed.	NPPF compliant. Paragraph 83 of the NPPF states that planning policies should enable sustainable growth and expansion of all types of business in rural areas; the development and diversification of agricultural and other land-based rural businesses; and, sustain rural tourism and leisure developments which respect the character of the countryside. The retention and development of accessible local services and community facilities is

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
			also supported. Review will be dependent upon evidence; development strategy chosen; Sustainability Appraisal and consultation.
DM4	New holiday parks or extensions to existing parks	Policy DM4 sets out the criteria against which proposals for new/ extensions will be assessed.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas or topics
DM5	The occupancy of holiday parks	Policy DM5 states that planning permission will not be granted for the permanent occupancy of holiday and 10 month occupancy allowed only if certain criteria is met.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy for specific areas or topics.
DM6	Managing transport demand and impact	Policy DM6 sets out the criteria against which proposals will be assessed for their impacts on the road network	NPPF compliant. As required by paragraph 102 of the NPPF, this policy allows for the consideration of transport issues from the earliest stages of development proposals and provides for the provision of detail needed to address potential transport issues in local areas. May need updating to reflect evidence base; new strategy; and approach to Air Quality.
DM7	Vehicle parking	Policy DM7 sets out the Council's parking standards until more up to date SPD is adopted.	NPPF compliant Paragraph 105 of the NPPF supports the use non-strategic policies to set out more detailed policy to address specific concerns. Policy likely to need updating to cross refer to Swale SPD to be prepared on vehicle parking

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
DM8	Affordable housing	DM8 sets out the Council's policy on affordable housing	<p>Policy compliant with NPPF but will require updating to reflect evidence base; local need and new NPPF definitions of affordable housing. Paragraph 63 requires provision to be sought in major developments only (other than in designated rural areas). Paragraph 64 requires major development involving the provision of housing to make at least 10% of the homes available for affordable home ownership.</p> <p>The NPPF also has a revised definition of 'affordable housing' which includes social housing for rent and other products such as discounted market sales housing. Affordable housing policies in the local plan review will need to take into account these revisions in national policy and the amount of affordable housing to be provided will be influenced by whole plan viability and balanced against other development costs.</p> <p>Para 57 of the NPPF also places the emphasis on viability assessment at the plan making stage; and that any developer wishing to diverge from this and adopted policy requirements will need to provide a publicly available viability assessment to support this. More</p>

Policy Ref	Policy Title	Summary of policy objectives	Compliance with NPPF (2018) Objectives – New Local Plan
			robust application of this Bearing Fruits Policy may therefore be possible in determining planning applications as a result of the new NPPF.
DM9	Rural exceptions housing	Policy DM9 sets out the criteria against which proposals for affordable housing to meet local needs in rural areas will be granted.	NPPF Compliant. Paragraph 77 of the NPPF supports rural exception housing policies. For local plan review other rural housing will be dependent upon development strategy and informed by the evidence base.
DM10	Gypsy and Traveller sites	DM10 sets out the criteria against which proposals for Gypsy and Traveller accommodation will be assessed.	NPPF compliant. The Planning Policy for Traveller Sites (August 2015) remains current government policy. A GTAA is underway and will identify the need for pitches (and plots for Travelling Showpersons) that will need to be planned for during the new local plan period.
DM11	Extensions to, and replacement of, dwellings in the rural area	Policy DM11 sets out the parameters within which it will be acceptable to extend or replace dwellings in the rural area.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns.
DM12	Dwellings for rural workers	Policy DM12 sets out the criteria against which proposals for rural worker dwellings will be assessed.	NPPF compliant Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns and para 79a) deals with rural workers' housing. . The content of such

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			policies will still need to be informed by evidence.
DM13	Extending the garden of a dwelling in the rural area	Policy DM13 sets out the criteria against which proposals to extend the garden of a dwelling in the rural area, or to use such land as amenity land, will be assessed against.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns.
DM14	General development criteria	In seeking to achieve high quality design or the conservation and enhancement of the natural and built environment, DM 14 sets criteria against which planning applications can be considered against.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns.
DM15	New shopfronts, signs and advertisements	Policy DM15 sets out the Council's requirement for a high standard of shopfront design and advertisements that both safeguards those features which are of visual and historic interest and provides interest within the town centres.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns. Para 132 has been subject to minor modification in dealing with advertisement control.
DM16	Alterations and extensions	Policy DM16 sets out the criteria for assessing planning applications for alterations and extensions to existing buildings.	NPPF compliant Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns.
DM17	Open space, sports and recreation provision	Policy DM 17 seeks to protect existing open space, playing pitches and sports facilities and seeks,	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more

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		where required as a result of new development, the provision and enhancement of good quality and well-maintained open space, sport and recreation facilities.	detailed policy to address specific concerns. Paras 96-97 specifically support this policy. The local plan review will need to update this policy to respond to updated evidence and the chosen development strategy.
DM18	Local green spaces	Policy DM 18 has no direct influence on the management of Local Green Spaces, however, it will be used to preserve them and proposals for development which would conflict with the purposes of designating the land will not be permitted, other than in very special circumstances.	NPPF compliant. Para 99-101 of the NPPF supports this policy..
DM19	Sustainable design and construction	Policy DM19 deals with sustainable construction techniques to address climate change issues.	NPPF compliant. Local Plan review may need to be updated and informed by evidence if design standards are to be introduced.
DM20	Renewable and low carbon energy	Policy DM 20 deals with renewable and low carbon energy installations.	NPPF compliant. However this section of the NPPF has been revised and no longer refers to energy efficiency or zero carbon policy.. Local plans should however, provide a positive strategy to help increase the use and supply of renewable energy and heat, so this policy will need to be reviewed.
DM21	Water, flooding and drainage	Policy DM21 deals with water drainage and managing flood risk.	NPPF compliant. The NPPF has not changed significantly in its approach to these topics although clarity has been

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			improved.
DM22	The coast	Policy DM 22 deals with development proposals at the coast	NPPF compliant (Paras 166-169). There is little change in the NPPF, although local plan review policy may need to take account of any updated evidence and Marine Policy Statement and marine plans.
DM23	Coastal change management	Policy DM23 Coastal Change Management	NPPF compliant. As per DM22
DM24	Conserving and enhancing values landscapes	Policy DM24 is the policy dealing with protection afforded to the hierarchy of landscape value.	NPPF compliant. The NPPF continues to support designated landscapes (para 11 and 172). Local designations will need to be supported by updated evidence and could potentially be affected by the chosen development strategy.
DM25	The separation of settlements – Important Local Countryside Gaps	Policy DM25 deal with retaining the individual character and setting of settlements as well as recognising the intrinsic beauty of the countryside.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns and para 170 in respect of the intrinsic character and beauty of the countryside. However, this policy may need review in the light of updated evidence and the chosen development strategy.
DM26	Rural lanes	Policy DM26 seeks to safeguard rural lanes and ensure that development proposals have particular regard to their landscape,	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific

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		amenity, biodiversity, and historic or archaeological importance.	concerns. This policy may need review in the light of updated evidence and the chosen development strategy..
DM27	The keeping and grazing of horses	The keeping of horses is a popular activity in Swale. Whilst these activities can bring economic benefits to the rural area, they can, individually, and especially cumulatively, adversely change the rural character of the area. This policy gives design and landscape criteria to ensure future impacts are limited.	NPPF compliant. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns.
DM28	Biodiversity and geological conservation	Policy DM28 aims to ensure that all development proposals will conserve, enhance and extend biodiversity, in accordance with the hierarchy of their importance. It provides for net gains in biodiversity where possible, minimise any adverse impacts and compensate where impacts cannot be mitigated against.	NPPF compliant.. Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns. Paras 174-177 add detail to The extent of such policy on the Proposals Map may need to be informed by any updated evidence on specific sites .
DM29	Woodlands, trees and hedges	Policy DM 29 seeks to safeguard trees, woodlands, old orchard trees, and hedgerows as features, habitats, and areas to ensure that they continue to be an essential part of the environment. It supports the	NPPF compliant. Supported by paras 175 and para 28 which supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns

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		establishment of new sites and addresses trees that may be protected by Tree Preservation Orders.	
DM30	Enabling development for landscape and biodiversity enhancement	Policy DM30 looks to facilitate landscape and biodiversity enhancements more widely in a way that does not undermine Policy ST 3 and targets real and substantial benefits to areas identified as a priority for enhancement. It is only likely to be applicable in a relatively small number of exceptional situations.	NPPF compliant para 175d).
DM31	Agricultural land	Policy DM 31, in recognition of the importance of the agricultural sector to Swale, in terms of its identity and economy, looks to safeguard its most important resource – its soils, and in particular the proportion of best and most versatile land that is present here.	NPPF compliant (para 170) but no moratorium on development of BMV agricultural land.
DM32	Development involving listed buildings	Policy CP 8 provides a general presumption in favour of the preservation of a listed building except where a convincing case can be made for alteration or, exceptionally, demolition. It states that applicants must prepare a	NPPF compliant.

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		heritage statement and a design statement for any proposals for listed building works. In all cases the policy seeks to safeguard the character and setting of listed buildings.	
DM33	Development affecting a conservation area	Policy DM33 sets out what the Council expects of developments within, and adjacent to, a conservation area and aims to preserve or enhance features that contribute positively to the area's special character or appearance.	NPPF compliant..
DM34	Scheduled Monuments and archaeological sites	Policy DM34 sets out the protection given to these sites, together with other nationally important monuments or archaeological sites not scheduled. It sets out the Council's approach to dealing with development proposals that may affect known, or potentially important, archaeological sites and maritime remains.	NPPF compliant
DM35	Historic parks and gardens	Policy DM35 seeks to protect registered Historic Parks and Gardens and protect them from development that would adversely affect the landscape character, layout and features of a Historic	NPPF compliant

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DM36	Area of high townscape value	<p>Park and Garden, or its setting.</p> <p>The Council's objectives here are to encourage a high standard of design of new development, the retention and reinstatement of original features and the preservation of the spaces between buildings, landscaping and parks, alongside the retention and expansion of its street trees, in this area.</p>	<p>NPPF compliant Paragraph 28 of the NPPF supports the use of non-strategic policies such as this to set out more detailed policy to address specific concerns.</p>
IMP1	Implementation and Delivery Plan.	<p>Policy IMP1 sets out how the Council will implement and deliver the vision, objectives and strategy of the Local Plan with delivery partners. Local Plan milestones as per the implementation delivery plan. This document is a snapshot in time and for each pre-app and planning application infrastructure providers are consulted on their updated requirements.</p>	<p>NPPF compliant (para 35 deliverability is a soundness requirement for local plans), but will need to be updated in the local plan review to reflect the new plan period; the chosen development strategy; and new allocations which support it.</p>