



## AGENDA

### CABINET MEETING

Date: Wednesday, 18 March 2020

Time: 7.00 pm

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

Membership:

Councillors Mike Baldock (Vice-Chairman), Monique Bonney, Angela Harrison, Ben J Martin, Richard Palmer, Roger Truelove (Chairman) and Tim Valentine.

Quorum = 3

#### RECORDING NOTICE

Please note: this meeting may be recorded.

At the start of the meeting the Chairman will confirm if all or part of the meeting is being audio recorded. The whole of the meeting will be recorded, except where there are confidential or exempt items.

You should be aware that the Council is a Data Controller under the Data Protection Act. Data collected during this recording will be retained in accordance with the Council's data retention policy.

Therefore by entering the Chamber and speaking at Committee you are consenting to being recorded and to the possible use of those sound recordings for training purposes.

If you have any queries regarding this please contact Democratic Services.

---

1. Emergency Evacuation Procedure

Pages

The Chairman will advise the meeting of the evacuation procedures to follow in the event of an emergency. This is particularly important for visitors and members of the public who will be unfamiliar with the building and procedures.

The Chairman will inform the meeting whether there is a planned evacuation drill due to take place, what the alarm sounds like (i.e. ringing bells), where the closest emergency exit route is, and where the second closest emergency exit route is, in the event that the closest exit or route is blocked.

The Chairman will inform the meeting that:

(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

(b) the lifts must not be used in the event of an evacuation.

Any officers present at the meeting will aid with the evacuation.

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

2. Apologies for Absence

3. Minutes

To approve the [Minutes](#) of the Meeting held on 12 February 2020 (Minute Nos. 511 - 525) 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 Report for recommendation to Council**

5. Corporate Plan 5 - 30

#### **Part B Reports for Decision by Cabinet**

6. Financial Management Report: April - December 2019 31 - 54
7. Swale House 55 - 62
8. Anti-Idling Legislation 63 - 74
9. Swale Heritage Strategy 2020 - 2032 75 - 268
10. Affordable Housing 269 - 276
11. Recommendations from the Swale Joint Transportation Board meeting held on Monday 2 March 2020 - to-follow
12. Recommendations from the Extraordinary Local Plan Panel meeting held on Tuesday 25 February 2020 277 - 278

#### **Issued on Monday, 9 March 2020**

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 Cabinet, please visit [www.swale.go](http://www.swale.go)

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

This page is intentionally left blank



<b>Cabinet</b>	
<b>Meeting Date</b>	18 March 2020
<b>Report Title</b>	<b>Corporate plan 2020-2023</b>
<b>Cabinet Member</b>	Cllr Roger Truelove – Council Leader
<b>SMT Lead</b>	David Clifford
<b>Head of Service</b>	Head of Policy, Communications and Customer Services
<b>Lead Officer</b>	
<b>Key Decision</b>	No
<b>Classification</b>	<b>Open</b>
<b>Recommendations</b>	1. <b>Endorse</b> and <b>propose</b> the corporate plan at appendix I for adoption by council.

## 1 Purpose of Report and Executive Summary

- 1.1 Following the close of the public consultation on the draft corporate plan, this report seeks cabinet’s endorsement of the final version of the plan for recommendation to council.

## 2 Background

- 2.1 The council’s corporate plan establishes the political and managerial priorities on which the organisation will focus over a medium-term period. Without attempting to cover in any detail all of the objectives to be pursued by every department, it sets the tone for future resource allocation, establishing which activities and objectives are priorities and, by implication, which are not.
- 2.2 In an era of constrained and diminishing resources, the plan endeavours to ensure that those resources are marshalled as coherently as possible so that issues which are truly priorities for residents and their representatives on the council are not crowded out by apparently more urgent but ultimately less important pieces of work.
- 2.3 The plan is a key component in the council’s constitutional policy framework, within which the cabinet must exercise its executive decision-making authority. The plan also represents the strategic end of the ‘golden thread’ which runs down through departments’ operational service plans to individual officers’ annual performance appraisals, so in an ideal world it will square the circle of establishing clear priorities while also providing a ‘hook’ for all teams to link their work to the overall ambitions of the council.
- 2.4 It is worth emphasising that the corporate plan is primarily an internal document. Clearly its single most significant influence will be the political ambitions of the

administration, and to some extent it can be seen as the managerial response to those ambitions, but it does also need to factor in the type of general contextual analysis that all organisations, including those less overtly political than a local authority, need to conduct from time to time.

- 2.5 Inclusion within the council's overarching policy framework carries with it in law some constraints which do not apply to policy documents lower down the chain, and these constraints are reflected in the council's constitution. As with the budgetary framework, adoption of the corporate plan is a matter reserved to full council, with cabinet's role being to develop the plan and propose it to council.
- 2.6 The draft plan has been the subject of a public consultation exercise, the results of which are outlined in section 5 below.

### **3 Proposals**

- 3.1 Cabinet is now **recommended** to endorse the final version of the corporate plan at appendix I and propose it for adoption by council.

### **4 Alternative Options**

- 4.1 Although there is a legal requirement for councils to have a definite policy framework, there is no specific requirement for a corporate plan, and a genuine option would therefore be to dispense with the document altogether.
- 4.2 However, a medium-term strategic plan of some kind is a near-universal feature of English councils, with the development process being used to explore, refine and achieve consensus on the meaning of political ambitions, and the final document acting as a guide to both members and officers as to the key areas on which progress must be made over the lifetime of an administration. The absence of a plan is likely to result in a lack of clarity among officers about the organisation's priorities and less coherent decision-making by members, and is therefore not recommended.

### **5 Consultation Undertaken or Proposed**

- 5.1 A public consultation was conducted on the draft version of the corporate plan between mid-January and early March. This was predominantly by means of an online survey, but key stakeholders were written to individually, including all of Swale's parish councils. The consultation was advertised on social media and through channels such as the business bulletin, as well as internally through staff communications.
- 5.2 The consultation generated 15 responses, of which two were from residents, two from parish councils and six from Swale employees. The majority of responses included only general indications of support or the opposite, with relatively few specific suggestions for changes. A couple of the latter have been taken up, resulting in minor amendments to the text at appendix I. Unscientifically

classifying responses as supportive, unsupportive or neutral, seven can be read as supportive (including both of the parish council responses), one as unsupportive and seven as neutral.

### **Policy Development and Review Committee**

5.3 The policy development and review committee has considered the corporate plan twice during its development, initially feeding in its thoughts on an early draft of the priorities and objectives, and more recently reviewing the consultation draft of the plan. The committee showed itself to be generally supportive of the plan and its priorities, and one suggestion for an amendment to the text has been taken up in the final draft at appendix I (this relates to objective 2.5).

## **6 Implications**

<b>Issue</b>	<b>Implications</b>
Corporate Plan	The corporate plan at appendix I will replace the existing plan on adoption by council.
Financial, Resource and Property	The corporate plan to some extent represents the narrative complement to the medium-term financial plan (MTFP), in that it sets out in broad terms what the council aims to achieve given the resources established by the MTFP. Conversely, it is anticipated that the activities required by the plan will generally be funded within the resourcing framework established in the MTFP.
Legal, Statutory and Procurement	The legal status of the corporate plan as a component of the statutory policy framework has been discussed in the body of the report. This derives from the Local Government Act 2000 and regulations subsequently made under it. The relevant constitutional provisions are contained in section 4.3 of the constitution.
Crime and Disorder	The draft plan at appendix I includes some specific points of relevance to crime and disorder, particularly under priority 3.
Environment and Climate/Ecological Emergency	The draft plan at appendix I includes some specific points of relevance to the environment and to the climate and ecological emergencies, particularly under priority 2.
Health and Wellbeing	The draft plan at appendix I includes some specific points of relevance to health and wellbeing, particularly under priority 3.
Risk Management and Health and Safety	Swale's approach to risk management is dependent on an articulation of objectives the achievement of which is endangered by a given set of risks. The corporate plan is therefore an essential component of the risk management framework.
Equality and Diversity	The public sector equality duty requires decision-makers to have due regard to the need to eliminate unlawful discrimination and advance equality of opportunity right throughout the decision-making process. A final equality impact assessment is attached at appendix II. The corporate plan is in general at too high a level of

	abstraction for the aims of the equality duty to be relevant in any concrete way, although they are likely to be much more relevant to many of the pieces of work which will flow from the plan, which will all need to be subject to individual impact assessments. The impact of the plan itself on the aims of the equality duty, without reference to these more detailed pieces of work, is considered to be low, and nothing involving unlawful discrimination or requiring the mitigation of adverse impacts has been identified.
Privacy and Data Protection	No specific implications have been 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: Final corporate plan 2020-2023
- Appendix II: Equality impact assessment

## 8 Background Papers

8.1 There are no background papers.

**Swale Borough Council**

# **Working together for a better borough**

**Corporate Plan 2020-2023**

# Summary of priorities and objectives

## **Priority 1:**

### **Building the right homes in the right places and supporting quality jobs for all**

- 1.1 Use the local plan review to ensure that future housing delivery is more closely aligned to the borough's ability and capacity to provide for genuine sustainable housing needs, in terms of location, type and tenure, and that the impact of housing growth is offset through improved physical, environmental, social and health infrastructure.
- 1.2 Work with registered providers, developers and community-led housing groups to pursue all viable opportunities for increasing the supply of affordable and social housing across the borough, and ensure that standards in the private rented sector are robustly enforced.
- 1.3 Encourage the development and innovation of high-quality sustainable housing on brownfield land in urban centres, with an appropriate range of tenure options, improving the appearance, biodiversity, and economic and environmental sustainability of our towns.
- 1.4 Develop a new economic improvement strategy to encourage the role of a living wage and expand the range of employment opportunities in the borough, including higher-skilled employment.
- 1.5 Support residents and businesses to improve the borough's vocational skill levels, and vigorously pursue all opportunities to enhance the provision and accessibility of further and higher education for Swale residents at all stages of their careers.
- 1.6 Implement the visitor economy framework to increase investment, address new visitor demands and grow the value of the sector to the Swale economy.

## **Priority 2:**

### **Investing in our environment and responding positively to global challenges**

- 2.1 Develop a coherent strategy to address the climate and ecological emergencies, aiming for carbon neutrality in the council's own operations by 2025 and in the whole borough by 2030, and pursue all opportunities to enhance biodiversity across the borough.
- 2.2 Encourage active travel and reduced car use, including through the permeability of new developments, and work with partners to address air quality issues.
- 2.3 Establish a special projects fund to provide much-needed capital investment in the borough's public realm and open spaces.
- 2.4 Recognise and support our local heritage to give people pride in the place they live and boost the local tourism industry.

- 2.5 Work towards a cleaner borough where recycling remains a focus, and ensure that the council acts as an exemplar environmental steward, making space for nature wherever possible.

**Priority 3:**

**Tackling deprivation and creating equal opportunities for everyone**

- 3.1 Undertake targeted interventions to identify our most disadvantaged families and communities, improve our understanding of the issues they face, and develop new ways of working to reduce social exclusion and enhance opportunities and quality of life.
- 3.2 Reduce health inequality by developing more productive relationships with local health partners and making health and wellbeing a central consideration in all relevant council decision-making, recognising especially the link between housing and health.
- 3.3 Develop a communitarian approach to partnership working based on shared objectives with like-minded agencies in the voluntary and community sectors.
- 3.4 Ensure that the council plays a proactive role in reducing crime and antisocial behaviour, including through the modernisation of CCTV provision.
- 3.5 Promote wellbeing and enjoyment of life by signposting and encouraging a wide range of sporting, cultural and other leisure activities appropriate and accessible to each age group.

**Priority 4:**

**Renewing local democracy and making the council fit for the future**

- 4.1 Review the council's constitution to diffuse decision-making power more widely among elected members and improve the transparency, responsiveness and public accountability of that decision-making.
- 4.2 Ensure that all elected members are appropriately supported to lead and improve the council's engagement with its disparate geographic and demographic communities, and encourage especially the participation of underrepresented groups in the democratic process.
- 4.3 Develop a cross-departmental corporate ethos focused on the priorities in this plan, and embed the Swale Manager programme to ensure a consistent understanding of the council's expectations of all managers.
- 4.4 Continue to reduce dependence on government-controlled funding sources and support staff to find innovative ways to ensure other objectives can be met in the context of diminished resources.

# Foreword

[To be added in designed version]

## Introduction

The corporate plan is the overarching statement of the council's strategic priorities for the period April 2020 to March 2023. It consists of 20 medium-term objectives grouped into four broad priorities. Between them, these objectives articulate both local political aspirations for the borough and community of Swale and the council's response to anticipated changes to the policy and fiscal context in which it operates.

The document's primary purpose is to ensure that the organisation's resources are coherently allocated in support of agreed priorities. The objectives established here will therefore be a significant factor in determining the focus of the council's activities over the next few years, but the plan sets out a broad direction of travel rather than a detailed list of actions, and its emphasis is on areas of change and development rather than continuity.

Swale is one of 12 districts (boroughs and cities) which make up the county of Kent. Located on the county's northern coast, the borough sits between Medway, Maidstone and Canterbury, around 60km from central London in one direction and 40km from the Channel tunnel in the other. The borough covers an area of 360km<sup>2</sup>, roughly one-tenth of Kent, and is home to just under 150,000 people, also approximately one-tenth of the county figure.

For such a relatively small area, the borough is a remarkably diverse place, including the historic market town of Faversham, the traditional seaside resort of Sheerness and the more industrial market town of Sittingbourne, which in recent years has been the focus of major council-led redevelopment. These urban centres are connected both physically and culturally by the borough's extensive and important rural areas, accounting for around a quarter of the population, which take in a number of protected wildlife habitats and part of the Kent Downs area of outstanding natural beauty.

Swale's demographic make-up is no less diverse than its geography, including a mix of affluent and less affluent communities, but in general the area is less well-off than is typical for the south-east, and there are some concentrated pockets of severe socioeconomic disadvantage to be found in locations across the borough. While the causes of this are deep-rooted and complex, the outcome is that a proportion of our residents suffer from entrenched inequality and a lack of opportunities which the council needs to do what it can to address.



The indices of multiple deprivation are calculated by government based on a range of measures of poverty and associated disadvantage, and were last published in 2019. Compared to the previous time the figures were calculated in 2015, Swale's overall position on the indices deteriorated relative to other places, with the borough now the 69th most disadvantaged of 317 shire districts in England, and the second most disadvantaged in Kent.

Over recent decades, Swale has seen a successful diversification of its economy, which now has key strengths in manufacturing and distribution, as well as high-skilled activities including cutting-edge technology and life sciences. However, it remains the case that much of the borough's employment, including employment created in the last few years, is at the lower end of the skills spectrum.

The borough council is made up of 47 elected members representing 24 wards and employing around 280 full-time equivalent staff. The all-out election held in May 2019 resulted in the loss by the Conservative group of its longstanding majority and the formation of a five-group coalition administration including the Labour, Swale Independents Alliance, Liberal Democrat, Green and Independent groups. The coalition benefits from a clearly articulated shared programme for its term of office, which forms the basis of the objectives outlined in this plan.

The financial crash of 2008 and the period of austerity which followed it have wrought huge changes to the landscape of local government and the services it provides over the last decade. Swale has not been immune to this, but its successes in expanding the business-rate base enabled it to benefit disproportionately from the move away from formula-based revenue support grant towards local retention of business-rate growth.

With the future parameters of the local government funding regime still very unclear, it is difficult to forecast the extent of likely gaps in the council's revenue budget over the next few years. What is much less uncertain is that financial sustainability will remain a key concern for the organisation over the next few years, with financial constraints representing a significant brake on what the council is able to achieve.

The first three priorities in this plan set out the objectives for the borough and its residents towards which we want to work notwithstanding these constraints, but we must recognise that the constraints are real and will have an impact. The final priority is in part about finding ways to obviate or minimise this impact.

## **Priority 1: Building the right homes in the right places and supporting quality jobs for all**

There is widespread recognition of the fact that the UK's housing market is fundamentally broken, with the dream of home ownership – or even of a tenancy which is secure, decent and affordable – an unattainable one for growing numbers of people. The effects of this crisis are to be felt in the lived experience of families across Swale, whether the high cost of rent is impeding their ability to save for a deposit, or whether they are facing homelessness as a result of a no-fault eviction from a shorthold tenancy.

The government recognises that there is a problem, but its only strategy for solving it is as ineffectual as it is unimaginative and one-dimensional. Simply obliging local councils to grant ever higher numbers of planning consents with insufficient mechanisms to ensure that the housing which is built is what local people actually need and can afford, or that it comes with adequate GPs, school places and transport links, has engendered general public hostility to development and created another unwelcome fissure in our already polarised society.

While the council is bound to follow the law in planning for housing growth, we need to do everything we can within this system to ensure that what is built reflects the needs and preferences of local people and that the adverse effects of development on communities is offset by properly funded infrastructure.

Clearly, the optimal solutions to the crisis cannot only be about building homes for sale, even if there is a need to maximise the proportion of these which cater to genuine community needs and which are sold at 'affordable' prices. We will therefore seek innovative partnership arrangements with housing associations and others to enable us to invest in social housing available for rent as well as shared and affordable ownership. The council will also use the full extent of its legal powers to advance the legitimate expectations of the borough's private-sector tenants in terms of the decency, safety and sustainability of their homes and the security of their tenancies.

Swale has seen some genuine successes in expanding and diversifying its economy in recent years, but there is still a long way to go before the borough is able to offer residents the range and quality of local employment opportunities which are available in a more typical south-eastern district.

The council will adopt a new economic improvement strategy to encourage particularly higher-skilled jobs into the borough, and to promote the economic benefits of a more widespread adoption of a living wage for workers no matter what their skill level. We

will also work with businesses to implement the recently agreed visitor economy framework, increasing the value of the sector to Swale's economy and helping small business owners to innovate and grow their businesses.

In the 2019 indices of multiple deprivation, Swale is ranked the 28th most disadvantaged of England's 317 shire districts on the domain covering education and skills, making it the worst performer in Kent on this measure. The issue of skills and education is a complex one in which the council plays only an indirect role, but the problem is so significant for the borough that it demands our focus. This cannot be solely about addressing the unfairness of the lack of further education provision for Swale's young people, although that is certainly vital, but must also address the need to give people at all stages of their careers opportunities to upskill and retrain.

The six objectives towards which we want to work under this priority are:

- 1.1 Use the local plan review to ensure that future housing delivery is more closely aligned to the borough's ability and capacity to provide for genuine sustainable housing needs, in terms of location, type and tenure, and that the impact of housing growth is offset through improved physical, environmental, social and health infrastructure.
- 1.2 Work with registered providers, developers and community-led housing groups to pursue all viable opportunities for increasing the supply of affordable and social housing across the borough, and ensure that standards in the private rented sector are robustly enforced.
- 1.3 Encourage the development and innovation of high-quality sustainable housing on brownfield land in urban centres, with an appropriate range of tenure options, improving the appearance, biodiversity, and economic and environmental sustainability of our towns.
- 1.4 Develop a new economic improvement strategy to encourage the role of a living wage and expand the range of employment opportunities in the borough, including higher-skilled employment.
- 1.5 Support residents and businesses to improve the borough's vocational skill levels, and vigorously pursue all opportunities to enhance the provision and accessibility of further and higher education for Swale residents at all stages of their careers.
- 1.6 Implement the visitor economy framework to increase investment, address new visitor demands and grow the value of the sector to the Swale economy.

## **Priority 2: Investing in our environment and responding positively to global challenges**

The rate at which humans have been burning fossil fuels since the industrial revolution has already caused irreversible climate change, with global temperatures having increased by one degree Celsius from the preindustrial period. Given the damage which has already occurred, it is inevitable that temperatures will continue to increase, causing floods and extreme weather events, and the race is now on to reduce emissions enough to keep the rise below two degrees. A further consequence of our collective attitude to earth's delicate ecosystems in the last two hundred years is an unprecedented rate of species extinctions, with up to a million species now threatened with extinction within decades.

Together these global problems represent a grave threat to the wellbeing of humanity, and demand urgent and radical action not only from national governments but from local ones as well. Swale has recognised this urgency, declaring a climate and ecological emergency in June 2019 which established the goals of net-zero carbon emissions from our own operations by 2025 and in the borough as a whole by 2030.

While the global situation requires concerted local action over the medium term, there are plenty of local environmental issues which also need to be addressed. Poor air quality – largely a further consequence of burning fossil fuels – is associated with a number of serious health impacts, including cancer and heart disease, and more vulnerable people are typically worse affected than others, including children, older people, those with pre-existing conditions and those living in poorer areas. Swale will work with KCC and other partners to ensure that action plans to improve air quality are developed and implemented wherever they are needed.

For several years the council has consistently underspent on its revenue budget, with the difference between budgeted and actual expenditure being added to reserves, which have almost doubled since 2010. While it would generally not be prudent to use these reserves to mitigate what is likely to be a very tough position in the revenue budget over the life of this plan, there is no reason not to use a proportion of them to support one-off capital investments. Recognising that this is money which belongs to the people of Swale, we will use some of it to begin to rectify many years of underinvestment in the sort of small-scale shared community assets which can go a long way towards making somewhere a good place to live.

Keeping the borough's streets clean and minimising the amount of household waste sent to landfill are two of the council's most elementary and most visible functions. The current waste and cleansing contract has been economically advantageous for Swale,

but the ageing waste collection fleet has recently combined with other issues to render the contract increasingly unreliable. With the waste contract accounting for so high a proportion of both our carbon emissions and our revenue expenditure, the council will need over the life of this plan to give careful consideration to the specification it requires for the service when the current contract expires in 2023.

The five objectives towards which we want to work under this priority are:

- 2.1 Develop a coherent strategy to address the climate and ecological emergencies, aiming for carbon neutrality in the council's own operations by 2025 and in the whole borough by 2030, and pursue all opportunities to enhance biodiversity across the borough.
- 2.2 Encourage active travel and reduced car use, including through the permeability of new developments, and work with partners to address air quality issues.
- 2.3 Establish a special projects fund to provide much-needed capital investment in the borough's public realm and open spaces.
- 2.4 Recognise and support our local heritage to give people pride in the place they live and boost the local tourism industry.
- 2.5 Work towards a cleaner borough where recycling remains a focus, and ensure that the council acts as an exemplar environmental steward, making space for nature wherever possible.

## **Priority 3: Tackling deprivation and creating equal opportunities for everyone**

Poverty is a significant issue for many of Swale's residents and communities, detracting from people's quality of life and holding them back from achieving their potential both for themselves and for their community. In the 2019 indices of multiple deprivation, Swale is ranked the 74th most disadvantaged of England's 317 shire districts on the income domain, making the borough more relatively disadvantaged on this measure than was the case in 2015. Across the whole range of indicators on which the indices are based, almost one-fifth of Swale's statistical neighbourhoods are among the ten percent most disadvantaged in the country, including no fewer than half of the 26 neighbourhoods on Sheppey.

The increasing extremity of both wealth and poverty is clearly a national (and indeed international) issue which would require concerted government action to address comprehensively, but councils can still work with other local agencies to make a real difference. Swale will take a collaborative approach to understanding how disadvantage affects individual families and communities and what the council and our partners in other local agencies can most effectively do to help. Our aim is to cultivate a borough in which residents and communities work together to address the issues that hold them back, and where the council plays an active role in supporting and facilitating a vibrant and engaged voluntary and community sector.

One of the most significant areas in which poverty and associated disadvantage blight people's lives is health and wellbeing, with average life expectancy in Swale's most deprived neighbourhoods being up to eight years lower than in the least deprived. As with disadvantage in general, health – and in particular the promotion of good health rather than the treatment of poor health – is central to the objectives of multiple agencies, but arguably few more so than district councils. While working to strengthen links with local bodies in the health and related sectors, Swale will also ensure that the health implications of the services it offers and the way it offers them are given more prominence when decisions about those services are being made.

The five objectives towards which we want to work under this priority are:

- 3.1 Undertake targeted interventions to identify our most disadvantaged families and communities, improve our understanding of the issues they face, and develop new ways of working to reduce social exclusion and enhance opportunities and quality of life.

- 3.2 Reduce health inequality by developing more productive relationships with local health partners and making health and wellbeing a central consideration in all relevant council decision-making, recognising especially the link between housing and health.
- 3.3 Develop a communitarian approach to partnership working based on shared objectives with like-minded agencies in the voluntary and community sectors.
- 3.4 Ensure that the council plays a proactive role in reducing crime and antisocial behaviour, including through the modernisation of CCTV provision.
- 3.5 Promote wellbeing and enjoyment of life by signposting and encouraging a wide range of sporting, cultural, leisure and development activities appropriate and accessible to each age group.

## **Priority 4: Renewing local democracy and making the council fit for the future**

The last of the priorities in this plan is focused on the council as an organisation, but it is not intended to be inward-looking. The principal purpose of a district council is to further the interests and wellbeing of its local area, and this priority is about the internal changes we need to make in order to sustain and improve our ability to do this effectively.

The economic and political events of the last ten years have combined with new ways for people to exchange news and opinions to create a polarisation of political views and a pervasive lack of trust in public institutions and public servants at all levels. While scepticism and criticism are vital components of a democracy, a widespread lack of belief that political action can or should result in real improvements in people's lives is as unhealthy as it is erroneous.

While this is a national malaise, its effects within Swale have arguably been heightened by the council's constitutional arrangements, which concentrate decision-making power in the hands of a small number of councillors and leave other democratically-elected representatives largely disenfranchised. Going forwards, the council will identify and trial ways to reverse this trend and to help all councillors fulfil their mission of giving voice to their constituents' views and helping those constituents to engage with the decisions which will affect their lives.

Another way in which the events of the last decade have affected communities is austerity, which has resulted in significant year-on-year reductions in government funding to councils since 2010. According to the Local Government Association, over the last eight years councils will have lost 60p out of every £1 the government used to provide in core funding to pay for local services.

Swale has not been immune from these measures, but has been able to use government schemes such as the new homes bonus and – especially – the local retention of business-rate growth to cushion the effects of the loss of core funding. Overall Swale's revenue budget has fallen by almost a fifth since 2010. Looking ahead, the future framework for funding local authorities remains extremely unclear, but whatever formula is eventually adopted in Westminster it is unlikely that Swale will be able to weather the storm as well as it has done in the recent past.

By this stage there is a vast amount of national evidence about the efficacy of councils' efforts both to supplement their income through greater commercialisation and to minimise the impact of funding reductions by increasing efficiency. Swale has already



acquired a good deal of experience in both of these endeavours, but will need to continue to learn lessons from other councils about what can be made to work and what cannot in terms of generating and saving money as government funding continues to diminish.

The overall goal must be to deliver on the objectives of this corporate plan as successfully as possible notwithstanding the straitened financial circumstances, and for this we will be dependent on a motivated and engaged workforce who understand what the council wants to achieve and are empowered to find innovative ways of achieving it at ever lower cost. A core role of the management team will therefore be to create the conditions for every team and every employee to thrive and do their best for the borough and the community we serve.

The four objectives towards which we want to work under this priority are:

- 4.1 Review the council's constitution to diffuse decision-making power more widely among elected members and improve the transparency, responsiveness and public accountability of that decision-making.
- 4.2 Ensure that all elected members are appropriately supported to lead and improve the council's engagement with its disparate geographic and demographic communities, and encourage especially the participation of underrepresented groups in the democratic process.
- 4.3 Develop a cross-departmental corporate ethos focused on the priorities in this plan, and embed the Swale Manager programme to ensure a consistent understanding of the council's expectations of all managers.
- 4.4 Continue to reduce dependence on government-controlled funding sources and support staff to find innovative ways to ensure other objectives can be met in the context of diminished resources.

This page is intentionally left blank

An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in decision-making.

### When to assess

An EIA should be carried out when you are changing, removing or introducing a new service, policy or function. The assessment should be proportionate; a major financial decision will need to be assessed more closely than a minor policy change.

### Public sector equality duty

The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:

- 1) Eliminate discrimination, harassment and victimisation;
- 2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- 3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

These are known as the three aims of the general equality duty.

### Protected characteristics

The Equality Act 2010 sets out nine protected characteristics that apply to the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership\*
- Pregnancy and maternity
- Ethnicity
- Religion or belief
- Gender
- Sexual orientation

\*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

**We also ask you to consider other socially excluded groups**, which could include people who are geographically isolated from services, with low literacy skills or living in poverty or low incomes; this may impact on aspirations, health or other areas of their life which are not protected by the Equality Act, but should be considered when delivering services.

### Due regard

To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.

How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general equality duty to the decision or function in question. The greater the relevance and potential impact, the higher the regard required by the duty. The three aims of the duty may be more relevant to some functions than others; or they may be more relevant to some protected characteristics than others.

## Collecting and using equality information

[The Equalities and Human Rights Commission](#) (EHRC) states that 'Having due regard to the aims of the general equality duty requires public authorities to have an adequate evidence base for their decision making'. We need to make sure that we understand the potential impact of decisions on people with different protected characteristics. This will help us to reduce or remove unhelpful impacts. We need to consider this information before and as decisions are being made.

There are a number of publications and websites that may be useful in understanding the profile of users of a service, or those who may be affected.

- The Office for National Statistics Neighbourhoods website <https://www.ons.gov.uk/>
- Swale in 2016 <https://archive.swale.gov.uk/assets/About-us/Summary-of-Key-Data-for-Swale.pdf>
- Kent County Council Facts and Figures about Kent <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent>
- Health and Social Care data [http://www.kpho.org.uk/search?mode=results&queries\\_exclude\\_query=no&queries\\_excludefromse\\_arch\\_query=yes&queries\\_keyword\\_query=Swale](http://www.kpho.org.uk/search?mode=results&queries_exclude_query=no&queries_excludefromse_arch_query=yes&queries_keyword_query=Swale)

At this stage you may find that you need further information and will need to undertake engagement or consultation. Identify the gaps in your knowledge and take steps to fill these.

## Case law principles

A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- The general equality duty is not a duty to achieve a result, it is a duty to have due regard to the need achieve the aims of the duty.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

<b>Lead officer:</b>	David Clifford – Head of Policy, Communications and Customer Services
<b>Decision maker:</b>	Council
<b>People involved:</b>	David Clifford – Head of Policy, Communications and Customer Services Sarah Porter – Interim Policy Manager
<b>Decision:</b> <ul style="list-style-type: none"> <li>• Policy, project, service, contract</li> <li>• Review, change, new, stop</li> </ul>	This is a high-level strategic plan which is being redrafted following the formation of a new political administration.
<b>Date of decision:</b> The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	Council: May 2020
<b>Summary of the decision:</b> <ul style="list-style-type: none"> <li>• Aims and objectives</li> <li>• Key actions</li> <li>• Expected outcomes</li> <li>• Who will be affected and how?</li> <li>• How many people will be affected?</li> </ul>	<p>The main purpose of the corporate plan is to set the council’s strategic direction over the medium term. It is intended to influence and guide future detailed decision-making about resource allocation and activities, rather than to set out the detail of that decision-making in advance. It is therefore very difficult to foresee equality-related issues at this stage, and separate EIAs will need to be conducted on individual decisions as they arise.</p> <p>Insofar as it provides guidance for the allocation of council resources over the medium term, the corporate plan potentially has an impact on everyone living in, working in or visiting the borough. However, the plan is a strategic document which sets out broad areas of focus rather than proposing concrete pieces of work which could have a definite and measurable equality impact.</p> <p>The plan proposes four overarching priorities for the council to focus on over the period 2020-2023. Beneath each of these priorities sit a number of high-level objectives, as follows:</p> <p><b><i>Priority 1: Building the right homes in the right places and supporting quality jobs for all</i></b></p> <p>1.1 Use the local plan review to ensure that future housing delivery is more closely aligned to the borough’s ability and capacity to provide for genuine sustainable housing needs, in terms of location, type and tenure, and that the impact of housing growth is offset through improved physical, environmental, social and health infrastructure.</p> <p>1.2 Work with registered providers, developers and community-led housing groups to pursue all viable opportunities for increasing the supply of affordable and social housing across the borough, and ensure that standards in the private rented sector are robustly enforced.</p> <p>1.3 Encourage the development and innovation of high-quality sustainable housing on brownfield land in urban centres, with an appropriate range of tenure options, improving the appearance,</p>

biodiversity, and economic and environmental sustainability of our towns.

- 1.4 Develop a new economic improvement strategy to encourage the role of a living wage and expand the range of employment opportunities in the borough, including higher-skilled employment.
- 1.5 Support residents and businesses to improve the borough's vocational skill levels, and vigorously pursue all opportunities to enhance the provision and accessibility of further and higher education for Swale residents at all stages of their careers.
- 1.6 Implement the visitor economy framework to increase investment, address new visitor demands and grow the value of the sector to the Swale economy.

***Priority 2: Investing in our environment and responding positively to global challenges***

- 2.1 Develop a coherent strategy to address the climate and ecological emergencies, aiming for carbon neutrality in the council's own operations by 2025 and in the whole borough by 2030, and pursue all opportunities to enhance biodiversity across the borough.
- 2.2 Encourage active travel and reduced car use, including through the permeability of new developments, and work with partners to address air quality issues.
- 2.3 Establish a special projects fund to provide much-needed capital investment in the borough's public realm and open spaces.
- 2.4 Recognise and support our local heritage to give people pride in the place they live and boost the local tourism industry.
- 2.5 Work towards a cleaner borough where recycling remains a focus, and ensure that the council acts as an exemplar environmental steward, making space for nature wherever possible.

***Priority 3: Tackling deprivation and creating equal opportunities for everyone***

- 3.1 Undertake targeted interventions to identify our most disadvantaged families and communities, improve our understanding of the issues they face, and develop new ways of working to reduce social exclusion and enhance opportunities and quality of life.
- 3.2 Reduce health inequality by developing more productive relationships with local health partners and making health and wellbeing a central consideration in all relevant council decision-making, recognising especially the link between housing and health.
- 3.3 Develop a communitarian approach to partnership working based on shared objectives with like-minded agencies in the voluntary and community sectors.

	<p>3.4 Ensure that the council plays a proactive role in reducing crime and antisocial behaviour, including through the modernisation of CCTV provision.</p> <p>3.5 Promote wellbeing and enjoyment of life by signposting and encouraging a wide range of sporting, cultural and other leisure activities appropriate and accessible to each age group.</p> <p><b>Priority 4: Renewing local democracy and making the council fit for the future</b></p> <p>4.1 Review the council’s constitution to diffuse decision-making power more widely among elected members and improve the transparency, responsiveness and public accountability of that decision-making.</p> <p>4.2 Ensure that all elected members are appropriately supported to lead and improve the council’s engagement with its disparate geographic and demographic communities, and encourage especially the participation of underrepresented groups in the democratic process.</p> <p>4.3 Develop a cross-departmental corporate ethos focused on the priorities in this plan, and embed the Swale Manager programme to ensure a consistent understanding of the council’s expectations of all managers.</p> <p>4.4 Continue to reduce dependence on government-controlled funding sources and support staff to find innovative ways to ensure other objectives can be met in the context of diminished resources.</p>
<p><b>Information and research:</b></p> <ul style="list-style-type: none"> <li>• Outline the information and research that has informed the decision.</li> <li>• Include sources and key findings.</li> <li>• Include information on how the decision will affect people with different protected characteristics.</li> </ul>	<p>The text of the plan contains some contextual demographic information about the borough and its residents. However, the plan is (intentionally) at too abstract a level to have a definite impact on people with particular protected characteristics. More detailed pieces of work which will sit under the objectives in the plan will need to be subject to impact assessments in their own right in due course.</p>
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>• Has there been specific consultation on this decision?</li> <li>• What were the results of the consultation?</li> </ul>	<p>Significant internal consultation has taken place during the development of the plan, and public consultation has taken place on the final draft. The public consultation resulted in 15 responses, none of which raised any equality-related issues.</p>

<ul style="list-style-type: none"> <li>• Did the consultation analysis reveal any difference in views across the protected characteristics?</li> <li>• Can any conclusions be drawn from the analysis on how the decision will affect people with different protected characteristics?</li> </ul>	
---	--

<b>Is the decision relevant to the aims of the equality duty?</b>	
Guidance on the aims can be found in the EHRC's PSED Technical Guidance - <a href="https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance">https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance</a>	
<b>Aim</b>	<b>Yes/No</b>
1) Eliminate discrimination, harassment and victimisation	Yes
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Yes

<b>Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.</b>		
When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.		
<b>Characteristic</b>	<b>Relevance to decision</b> High/Medium/Low/None	<b>Impact of decision</b> Positive/Negative/Neutral
Age	Medium at this stage	Positive at this stage (particularly young people)
Disability	Medium at this stage	Positive at this stage (particularly regarding the high proportion of people with long-term conditions living in deprived areas)
Gender reassignment	Low at this stage	Neutral at this stage
Marriage and civil partnership	Low at this stage	Neutral at this stage
Pregnancy and maternity	Low at this stage	Neutral at this stage
Ethnicity	Low at this stage	Neutral at this stage
Religion or belief	Low at this stage	Neutral at this stage
Gender	Low at this stage	Neutral at this stage
Sexual orientation	Low at this stage	Neutral at this stage
Other socially excluded groups <sup>1</sup>	High at this stage	Positive at this stage (particularly regarding people living in poverty or in deprived or isolated communities)

<p><b>Conclusion:</b></p> <ul style="list-style-type: none"> <li>• Consider how due regard has been had to the equality duty, from start to finish.</li> </ul> <p><sup>1</sup> Other socially excluded groups could include those with literacy issues, people living in poverty or on low incomes or people who are geographically isolated from services.</p>	<p>The corporate plan is in general at too high a level of abstraction for the aims of the equality duty to be relevant in any concrete way, although they are likely to be much more relevant to many of the pieces of work which will flow from it. The impact of the</p>
---	---



<ul style="list-style-type: none"> <li>• There should be no unlawful discrimination arising from the decision (see <a href="#">PSED Technical Guidance</a>).</li> </ul> <p>Advise on the overall equality implications that should be taken into account in the final decision, considering relevance and impact.</p>	<p>plan itself on the aims of the equality duty, without reference to these more detailed pieces of work, is considered to be low, and nothing requiring the mitigation of adverse impacts has been identified. It is believed that the plan involves no unlawful discrimination.</p>
---	---

### Timing

- Having ‘due regard’ is a state of mind. It should be considered at the inception of any decision.
- Due regard should be considered throughout the development of the decision. Notes should be taken on how due regard to the equality duty has been considered through research, meetings, project teams, committees and consultations.
- The completion of the EIA is a way of effectively summarising the due regard shown to the equality duty throughout the development of the decision. The completed EIA must inform the final decision-making process. The decision-maker must be aware of the duty and the completed EIA.

**Full technical guidance on the public sector equality duty can be found at:**

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

**Please send the EIA in draft to Bob Pullen in the Policy and Performance Team**

**([bobpullen@swale.gov.uk](mailto:bobpullen@swale.gov.uk) – 01795 417187) who will refer it on to the EIA Group who will peer review it and let you have any comments or suggested changes.**

**This Equality Impact Assessment should form an appendix to any SMT or committee (e.g. Cabinet or Council) report relating to the decision and a summary should be included in the ‘Equality and Diversity’ section of the standard committee report template under ‘Section 6 – Implications’.**

This page is intentionally left blank

<b>Cabinet</b>	
<b>Meeting Date</b>	18 March 2020
<b>Report Title</b>	Financial Management Report – April to December 2019
<b>Cabinet Member</b>	Cllr Roger Truelove, Leader and Cabinet Member for Finance
<b>SMT Lead</b>	Nick Vickers, Chief Financial Officer
<b>Head of Service</b>	Nick Vickers, Chief Financial Officer
<b>Lead Officer</b>	Phil Wilson, Financial Services Manager and Caroline Frampton, Principal Accountant
<b>Key Decision</b>	Yes
<b>Classification</b>	Open
<b>Forward Plan</b>	Reference number:
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. Note the projected revenue underspend on services of £33,000 (Table 1 refers).</li> <li>2. Note the capital expenditure of £14,918,000 to end of December 2019 (Paragraph 3.19 and Appendix I Table 2 refers).</li> <li>3. To approve the capital variance and its funding as detailed in paragraph 3.21 and Appendix I Table 2.</li> </ol>

## 1. Purpose of Report and Executive Summary

1.1 This report sets out the revenue and capital projected outturn position for 2019/20 as at the end of December 2019. The report is based on service activity up to the end of December 2019 and is collated from monitoring returns from budget managers.

1.2 The headline figures are:

- total revenue underspend of £33,000;
- capital expenditure of £14,918,000.

## 2. Background

2.1 The Council operates a budget monitoring process at Head of Service level, with regular reports to the Leader and Cabinet Member for Finance, the Deputy Cabinet Member for Finance and the Strategic Management Team.

2.2 Financial monitoring reports are presented to Cabinet on a quarterly basis, as well as to Scrutiny Committee.

### 3. Proposals

#### Revenue Outturn

3.1 As at the end of December 2019 the forecast revenue underspend projected to 31 March 2020 is £33,000.

**Table 1: Projected Variance by Service**

Service	Service Manager	Working Budget £	Projected Outturn £	Projected Variance £
Chief Executive	M. Radford	331,280	247,280	(84,000)
Democratic Services	D. Clifford	1,114,370	1,012,370	(102,000)
Policy, Communications & Customer Services	D. Clifford	1,203,400	1,139,400	(64,000)
Director of Regeneration	E. Wiggins	185,460	185,460	0
Commissioning, Environment & Leisure	M. Cassell	5,440,880	5,285,880	(155,000)
Planning	J. Freeman	819,390	947,390	128,000
Housing, Economy & Community	C. Hudson	2,988,380	3,451,380	463,000
Finance	N. Vickers	803,120	793,120	(10,000)
Revenues & Benefits	Z. Kent	(245,200)	(575,200)	(330,000)
Property	A. Adams	343,950	373,950	30,000
Licensing & Resilience	D. Fackrell	47,000	2,000	(45,000)
Environmental Health	T. Beattie	591,070	570,070	(21,000)
Information Technology	C. Woodward	1,202,260	1,186,260	(16,000)
Audit	R. Clarke	176,480	174,480	(2,000)
Human Resources	B. Sandher	437,280	436,280	(1,000)
Legal	P. Narebor	461,590	391,590	(70,000)
Sittingbourne Regeneration	N. Vickers	0	139,000	139,000
STC - Retail Park	N. Vickers	182,000	(45,000)	(227,000)
Contributions to Reserves from services shown above	N. Vickers	0	227,000	227,000
Corporate Items	N. Vickers	2,607,290	2,714,290	107,000
<b>NET REVENUE SERVICE EXPENDITURE</b>		<b>18,690,000</b>	<b>18,657,000</b>	<b>(33,000)</b>
<b>Financed by:</b>				
Revenue Support Grant		(113,000)	(113,000)	0
Business Rates		(8,083,000)	(8,083,000)	0
New Homes Bonus		(1,875,000)	(1,875,000)	0
Council Tax Requirement		(8,258,000)	(8,258,000)	0
<b>TOTAL FINANCING</b>		<b>(18,329,000)</b>	<b>(18,329,000)</b>	<b>0</b>
<b>NET EXPENDITURE (Contribution (to)/ from General Fund</b>		<b>361,000</b>	<b>328,000</b>	<b>(33,000)</b>

The Working Budget shows the service expenditure being more than the income in the year so the General Fund was budgeted to reduce by £361,000. The projected outturn forecasts that the service expenditure will be greater than the income in the year so the General Fund is forecast to decrease by £328,000.

## **Business Rates**

- 3.2 The Council is budgeted to collect £48m of business rates in 2019/20. After the complicated system of levies and tariffs has been accounted for, the Council is forecast to receive £7.8m.
- 3.3 Council has previously agreed to the establishment of a Business Rates Volatility Reserve, in order to assist the Council in managing the anticipated volatility in business rate income resulting from the introduction of business rate localisation from 2013/14. There are a number of causes of this volatility, such as new businesses opening, existing business growing or closing, rating appeals, and collection rates. The balance on the reserve is currently £4.9m.
- 3.4 The Business Rates Collection Fund has set aside £10m for appeals, of which our share is £4m. In July 2019 we were notified of a successful business rate appeal by Morrisons for their major warehouse on the 2010 rating list. The one-off cost charged to the provision for appeals is £2.5m and the ongoing impact is a £400k reduction in business rates income. However, the effect on future years' business rates income has been offset to an extent as a result of a change in the methodology used for calculating the cost of potential appeals for the 2017 rating list.
- 3.5 The Council has benefitted very significantly from the localisation of business rates, but the Morrisons outcome does show how volatile this income stream can be.

## **Use of Reserves**

- 3.6 The administration views the Reserves as being an essential part of funding one off expenditure. This section of the report will update on the initiatives underway.

## **Special Projects Fund**

- 3.7 The Special Projects Fund was set up by Cabinet at its July 2019 meeting. The terms of reference are:
- (1) The fund will be used to deliver tangible projects for the residents of the borough making the public spaces cleaner and better presented;
  - (2) We will seek an equitable allocation of resources across all parts of the borough.
- 3.8 It was agreed at Cabinet on 10 July 2019 (minute 122/07/2019) that £1m per annum will be transferred from Reserves to the Special Projects Fund. This Fund replaces the Regeneration Fund.
- 3.9 Special Project Fund approvals to 31 December 2019 are detailed in Appendix I Table 4.

3.10 At least initially the projects will be focussed on areas within the Environment portfolio. The two main themes will be:

- (1) Improvements to the public realm including high streets, green spaces and seafronts, and
- (2) Projects to support the achievement of the climate change motion agreed by Council.

3.11 If Members wish to make a Special Projects Fund bid then they should approach the relevant Cabinet Member with a project proposal, a rationale and the costings. Sign off of each bid is by the relevant Cabinet Member and Head of Service, and then the Leader and Cabinet Member for Finance and the Chief Financial Officer.

### **Communities Fund**

3.12 Cabinet in December agreed to allocate an additional £500k to the Communities Fund from the General Reserve.

3.13 The commitments against the Communities Fund are summarised in paragraph 3.17 and details of the funds approved in 2019/20 are in Appendix I Table 4.

### **Other Funds**

3.14 The Housing and Commercial Growth Fund is kept to fund affordable housing borrowing costs. This has £1.7m available.

3.15 There is a shared business rate pot with Kent County Council and this has been used in the past to fund a contribution to the Lower Road on Sheppey and towards the Visitor Economy Strategy (both £250k).

3.16 Cabinet in December agreed to allocate a further £250k from the shared business rate pot to fund the Heritage Strategy.

3.17 Table 2 below details the movements on the Funds up to end of December 2019. Further details regarding the funds committed in 2019/20 are detailed in Appendix I Table 4.

**Table 2: Funds**

<b>Funds</b>	<b>Balance as at 1 April 2019</b>	<b>Topping up/ transfer of funds in 2019/20</b>	<b>Funds committed prior to 2019/20</b>	<b>Funds committed (refer to Appendix I Table 4) 2019/20</b>	<b>Funds not yet committed</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Special Projects	0	1,135	0	(860)	275
Performance	494	0	(257)	0	237
Communities	121	500	(44)	(164)	413
Pension & Redundancy	86	0	0	9	95
Regeneration	437	(135)	(248)	(54)	0
Local Loan Fund	175	0	0	0	175
<b>TOTAL</b>	<b>1,313</b>	<b>1,500</b>	<b>(549)</b>	<b>(1,069)</b>	<b>1,195</b>

### **Capital Expenditure**

3.18 Table 2 in Appendix I details the actual capital expenditure and highlights any variations.

3.19 Actual expenditure to end of December 2019 was £14,918,000. This represents 63% of the revised budget.

3.20 The revised budget includes the capital rollovers from 2018/19 approved by the July Cabinet.

3.21 Approval is sought from Cabinet to fund additional expenditure on Sittingbourne Town Centre. This is to be financed from borrowing.

### **Payment of Creditors**

3.22 The outturn for payment of creditors for 2019/20 to date was 96.80% paid within 30 days of receipt of invoice, against the target of 97%.

### **Sundry Debtors**

3.23 Tables 3.1 and 3.2 in Appendix I analyse the sundry debt outstanding.

## 4. Alternative Options

- 4.1 This report meets the requirements of the constitution and the financial regulations to report on the finances of the Council on a quarterly basis. To consider the approval of funding of specified initiatives.

## 5. Consultation Undertaken or Proposed

- 5.1 Heads of Service and Strategic Management Team have been consulted in preparing this report.

## 6. Implications

Issue	Implications
Corporate Plan	Good financial management is key to supporting the emerging Corporate Plan objectives.
Financial, Resource and Property	As detailed in the report.
Legal and Statutory	None identified at this stage.
Crime and Disorder	None identified at this stage.
Environmental Sustainability	None identified at this stage.
Health & Wellbeing	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

## 7. Appendices

- 7.1 The following documents are published with this report and form part of the report:
- Appendix I: Financial Monitoring Report Tables as at the end of December 2019.

## 8. Background Papers

- 8.1 Cabinet Medium Term Financial Plan and Budget 2019/20



**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

<b>Net (under)/overspend / income shortfall for 2019/20 by service</b>		
<b>Service – Cabinet Member (Head of Service)</b>	<b>£'000</b>	<b>Explanation</b>
<b>CHIEF EXECUTIVE – Cllr R Truelove (Mark Radford)</b>		
Chief Executive & Corporate Costs	(84)	(£67k) Underspend – net salaries; (£9k) Net savings – special projects; (£8k) Underspend – external audit fee.
<b>TOTAL</b>	<b>(84)</b>	
<b>DEMOCRATIC SERVICES – Cllr R Truelove (David Clifford)</b>		
Democratic Process	(90)	(£29k) Underspend – net salaries; (£26k) Underspend – members' allowances; (£13k) Underspend – members' travel costs; (£8k) Underspend – training costs; (£14k) Reduced net expenditure.
MKS Shared Service Corporate Costs	(8)	(£8k) Reduced costs.
Elections & Electoral Registration	(4)	(£2k) Reduced costs postage, etc; (£2k) Additional fees and charges income and contributions towards costs.
<b>TOTAL</b>	<b>(102)</b>	
<b>POLICY, COMMUNICATIONS AND CUSTOMER SERVICES – Cllr R Truelove (David Clifford)</b>		
Policy	(11)	(£8k) Underspend – net salaries; (£3k) Net underspend.
Communications	(15)	(£16k) Underspend – net staff costs; £1k Net additional costs.
Customer Services	(28)	(£18k) Underspend – net staff costs; (£3k) Underspend – postage costs; (£7k) Net underspend.
Information Governance	(10)	(£10k) Underspend – net staff costs.
<b>TOTAL</b>	<b>(64)</b>	
<b>REGENERATION – Cllr M Bonney (Emma Wiggins)</b>		
Regeneration	-	Nil variance reported.
<b>TOTAL</b>	<b>-</b>	

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>COMMISSIONING, ENVIRONMENT AND LEISURE – Cllr A Harrison, Cllr T Valentine (Martyn Cassell)</b>		
Commissioning, Contracts and Procurement	(94)	(£87k) Underspend – net salaries; (£8k) Savings equipment purchase and maintenance; £1k Net other costs.
Client & Amenity Services and Technical Services	(22)	(£29k) Net Staff cost savings; £11k Additional agency costs; (£4k) Net savings other supplies & services.
Environmental Response Team	(56)	(£29k) Net savings Fixed Penalty Notices (FPNs); £17k Additional Environmental Initiative Grants paid out (offset by FPN Savings); (£13k) Savings equipment purchase; (£13k) Net additional income licences issued, recovery of fees and pest control contract commission and reduced BT contribution; (£7k) Savings travel/transport costs; (£2k) Staff costs savings; (£9k) Net other savings. <b>N.B. Section 96 of the Clean Neighbourhoods and Environment Act of 2005 advised that income must be spent on “qualifying functions”. A surplus of £25k will be transferred to the ring fenced account at year end.</b>
Leisure & Sports Centres	(2)	£15k loss of income (Sport England Grant reserved since 2016/17 no longer realistic to expect); £9k Net additional costs leisure centres operational agreement (£16k additional contract costs and (£7k) savings energy costs); (£28k) Savings leisure centres maintenance agreement; £2k other additional costs.

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
Sports Pitches & Pavilions, Parks & Open Spaces, Countryside & Country Parks, and Allotments	43	£95k Overspend on premises costs ( <i>incl. £43k necessary H&amp;S repairs to play areas, £20k hire temporary changing rooms Faversham Rec. Gnd. and £7k works to ponds at Milton Country Park</i> ); (£41k) Net additional fees/rent/recovery of costs/grants and other miscellaneous income; (£15k) Savings grants expenditure; (£9k) Net savings equipment purchase/maintenance costs; £5k Additional salary costs; £4k Pest Control additional costs; £4k Additional other costs.
Community Halls & Centres	2	£5k Additional grant Faversham Pools; (£3k) Gas and trade waste savings, King George pavilion, Sittingbourne.
Grounds Maintenance	(15)	(£15k) Net contract savings.
Cemeteries and Closed Churchyards	(19)	(£18k) Additional interment fees; (£1k) Net other income.
Refuse Collection / Street Cleansing / Public Conveniences / Recycling & Waste Minimisation	(168)	(£39k) Net additional income wheeled bins; (£45k) Contract costs savings – performance penalties; (£57k) Additional income – garden waste collection; (£26k) Net additional income Special Collections; (£7k) Savings Public Conveniences premises; £7k Additional Litter Bins maintenance; (£1k) Net other additional income. <i>NB Wheeled bins purchase additional expenditure of £94k to be met from reserves.</i>
Seafront, Harbour & Quays, Coast Protection and Flood Preparation	21	£5k Additional salary costs, Seafront; £4k income unachieved from Southern Water; £6k Additional contractor costs - seafront; £5k Additional travel expenses; (£3k) Additional income memorial benches; £1k Net Reduced income Beach Huts; £3k Net other costs.

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
Multi-Storey Car Park (MSCP)	120	£50k Business Rates; £30k Property Management Costs; £21k Equipment purchase; £11k Building Maintenance; £9k Signage; £8k Electricity; £8k Deep Cleaning; £10k Other Fees & Services; (£27k) Fees income receivable.
Highways	2	£2k Footway Lighting additional contractor costs.
Parking Management	33	£73k Net reduced income – car parks pay and display fees <i>(average monthly income from off-street parking per quarter was £159k at quarter 3, £171k at quarter 2 and £157k at quarter 1);</i> £34k Net additional car park equipment purchase, maintenance costs, licences and other fees; £9k Additional costs – Parking Partnership Maidstone Borough Council; £7k Season Ticket reduced income; (£34k) Additional Income – Residents Parking permits and voucher parking; (£13k) Staff cost savings; (£10k) Saving Cash Security costs; (£7k) Net income on and off-street Penalty Charge Notices (PCN's) incl. cost of new automated customer service; (£7k) Net additional income traffic orders; (£6k) Parking Adjudication Fees; (£2k) Savings car parks Business Rates; (£11k) Net other savings. <b>N.B. A deficit of £12k relating to on-street parking will be transferred to the ring fenced on-street parking account under Section 55 of the Road Traffic Act 1984 at year end.</b>
<b>TOTAL</b>	<b>(155)</b>	
<b>PLANNING – Cllr M Baldock (James Freeman)</b>		
Building Control/ Dangerous Structures	2	£2k Additional expenditure re dangerous structures.

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
Local Land Charges	65	£70k Reduced income from land charges - fewer searches being requested due to slow down in the housing market; (£5k) Reduced costs – Mid Kent Planning Service.
Planning Support	(30)	(£30k) Reduced costs – Mid Kent Planning Service.
Local Planning & Conservation	(28)	(£28k) Reduced costs – Conservation & Design.
Development Control/Services	119	(£110k) Reduced net salary costs;  £235k Reduced income – planning fees. A slowdown in the number of significant major planning applications as existing local plan allocations have come forward for determination;  £30k Reduced income – S106 monitoring fees;  (£70k) Net additional Income – Planning Performance Agreement (PPA) offset by reduced pre-application advice income;  £25k Additional costs – legal fees / planning consultancy advice;  £9k Net additional costs.  <i>Note: £245k estimated for additional consultancy costs for defending two public enquiries on planning applications and extended determination periods for handling major planning applications. Major appeals inquiries start 2020/21. To be funded from reserves. Costs could be higher if the Council has to pay legal costs if appeal unsuccessful.</i>
<b>TOTAL</b>	<b>128</b>	

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>HOUSING, ECONOMY AND COMMUNITY SERVICES – Cllr B Martin, Cllr T Valentine, Cllr R Palmer, Cllr M Bonney, Cllr A Harrison (Charlotte Hudson)</b>		
<b>Economy &amp; Community Services: -</b>		
CCTV	(29)	(£14k) Line rental savings; (£13k) Monitoring service savings; (£2k) Additional contribution income.
Community Safety	(1)	£5k Net staff cost savings; (£5k) Fees & services savings; (£3k) Additional grant income; £2k Additional transport costs.
Learning & Skills	2	£5k Additional agency staff costs; (£3k) Savings fees & services.
Members Grants and Community Services	-	Nil variance reported
Economy & Community Services, Cultural & Economic Development	7	£7k Additional Staff costs; £1k Additional Transport costs; (£1k) Savings Consultancy/Specialist advice.
Tourism & Heritage	(2)	(£1k) Savings staff costs; (£5k) Grant savings; £4k Additional fees & services; £1k Additional Advertising; (£1k) Additional Licences income.
Markets	(5)	(£5k) Net additional rental income.
Sports Development	(9)	(£8k) Net salary savings; (£1k) Net transport costs savings.
Youth	(4)	(£4k) Savings Youth Diversion Project.
<b>Sub-total</b>	<b>(41)</b>	

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>Housing: -</b>		
Homelessness Temporary Accommodation	480	<p>Net additional homelessness costs, being: £831k accommodation costs, (£353k) net housing benefit income, £13k additional storage costs, (£25k) contributions to rent and repaid deposits, £1k net costs Landlord Incentive Scheme and £13k net other costs.</p> <p><i>Note: Rollovers of £190k Ring-Fenced grants (Homelessness Prevention £34k, Flexible Housing Support £77k, New Burdens £38k and Rough Sleeper Initiative £41k) will be requested at year end which have not been reflected in figures above.</i></p> <p>Number of bookings in year to end of December 2019 is 2,170 compared to this time last year of 1,853. In addition, the average cost per booking has increased by £117 (22.9%).</p>
Homelessness Temporary Houses	10	£9k Loss of rental income; £2k Net additional utilities and Council Tax costs; (£1k) Net other savings.
Housing Advice / Options	16	(£39k) Staff costs savings; £56k Additional Agency/Contract staff costs; (£1k) Other savings.
Private Sector Housing	5	£6k Additional salary costs; (£1k) Net miscellaneous costs savings.
Housing Development and Strategy	(7)	(£7k) Salary costs savings.
Stay Put Scheme	0	£13k Disabled Facilities Grant (DFG) Fee income less than budgeted; (£3k) Additional grants, donations and fee income; £213k Premises costs to be funded by DFG; (£213k) DFG grant to fund expenditure; (£10k) A deficit of £10k will be taken from the Stay Put Scheme reserve at year end.
<b>Sub-total</b>	<b>504</b>	
<b>TOTAL</b>	<b>463</b>	

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>FINANCE – Cllr R Truelove (Nick Vickers)</b>		
Financial Services	(10)	(£10k) Net underspend.
<b>TOTAL</b>	<b>(10)</b>	
<b>PROPERTY SERVICES – Cllr M Bonney (Anne Adams)</b>		
Property Services	(13)	(£30k) Underspend net salary costs; £17k Additional expenditure – Printing costs (equipment maintenance, rental and increased paper costs).
Administrative Buildings	30	(£4k) Underspend net salary costs; £32k Additional expenditure on security – Swale House; £2k Reduced rental income and property charges – Central House;
Property Management	13	£7k Reduced income – rental income; £4k Additional expenditure net; £2k Additional expenditure – electric car.
Building Maintenance	-	<b>N.B. Any variance on building maintenance will be transferred at year end to the ring-fenced reserve to be used solely to fund building maintenance expenditure in future years.</b>
<b>TOTAL</b>	<b>30</b>	



**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>REVENUES &amp; BENEFITS – Cllr R Truelove (Nick Vickers)</b>		
		(£140k) Additional income - Department for Works and Pensions Housing Benefit Grant; £32k Reduction in Benefit Admin Subsidy; (£57k) Staff cost savings; <b>N.B. The net saving of (£165k) detailed above will be transferred to reserves at year end.</b>
	(330)	£10k Increased expenditure on net Housing Benefits; (£50k) Additional income – from recovery of over payments of Housing Benefits; (£34k) Additional income – recovery of Council Tax benefit overpaid and recovery of Council Tax costs; (£16k) Additional income – recharge to Collection Fund NNDR; (£14k) Reduced costs Fraud Partnership with Maidstone Borough Council; (£20k) Reduced costs re court costs; (£18k) Reduced costs re postage; (£14k) Reduced external audit fees; (£6k) Additional income MKS Debt Enforcement Partnership share of surplus; (£3k) Net additional savings.
<b>TOTAL</b>	<b>(330)</b>	
<b>ENVIRONMENTAL HEALTH – Cllr T Valentine (Tracey Beattie)</b>		
Environmental Health Mid Kent Service	(23)	(£23k) Variance on shared service with Tunbridge Wells Borough Council as a result of vacant posts.
Environmental Services	2	£2k Net underspend/additional income on client side.
<b>TOTAL</b>	<b>(21)</b>	

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>LICENSING &amp; RESILIENCE PLANNING – Cllr R Palmer (Della Fackrell)</b>		
Resilience Planning	4	£4k Additional expenditure.
Licensing	(49)	£21k Reduced income – Gambling licence fees; (£28k) Additional income – Hackney Carriage licences; (£26k) Additional income – General licence fees; (£8k) Reduced expenditure – salary costs; (£8k) Net reduced costs. <b>N.B. A net underspend of £49k on Hackney Carriage licences and other licences will be transferred to the ring-fenced reserve under the Local Government Act 1976 at year end. This reserve is to be used to fund Licensing related expenditure in future years.</b>
<b>TOTAL</b>	<b>(45)</b>	
<b>IT SERVICES – Cllr R Truelove (Chris Woodward)</b>		
Telecommunications	(24)	(£24k) Reduced expenditure on equipment maintenance and costs of telephones.
IT Maintenance and Software	-	Nil variance on IT maintenance and software. <b>N.B. Any variance will be transferred to the ring-fenced reserve to be used solely to fund IT related expenditure in future years.</b>
Mid Kent ICT	8	£8k GIS Additional expenditure
<b>TOTAL</b>	<b>(16)</b>	
<b>INTERNAL AUDIT – Cllr R Truelove (Rich Clarke)</b>		
Mid Kent Audit Services	-	Nil variance reported.
Risk Management	(2)	(£2k) variance reported.
<b>TOTAL</b>	<b>(2)</b>	
<b>HUMAN RESOURCES – Cllr R Truelove (Bal Sandher)</b>		
Mid Kent Human Resources	-	Nil variance reported on shared service with Maidstone Borough Council.
Organisational Development	(1)	(£1k) variance reported.
<b>TOTAL</b>	<b>(1)</b>	

**Table 1 – Main Variations by Service as at the end of December 2019 by Service**

Net (under)/overspend / income shortfall for 2019/20 by service		
Service – Cabinet Member (Head of Service)	£'000	Explanation
<b>LEGAL – Cllr R Truelove (Patricia Narebor)</b>		
Legal MKLS	(79)	(£2k) Reduced expenditure – salary costs; (£73k) Additional income as a result of Swale's usage of the service being below the budgeted level. Therefore additional income expected from Maidstone Borough Council and Tunbridge Wells Borough Council; (£4k) Net reduced costs.
External Legal Fees	(18)	(£18k) Reduced expenditure.
S106 Income	27	£27k Reduced income.
<b>TOTAL</b>	<b>(70)</b>	
<b>NON-SERVICE BUDGETS</b>		
Sittingbourne Town Centre	139	£11k Additional salary costs; £105k Property Management costs; £40k Operational Management costs; (£17k) Recovery of costs.
STC – Retail Park	(227)	(£246k) Additional income – rental income Princes Street Retail Park (total rental income for year £495k); £19k Property Management costs.
Transfer to Reserves	227	£227k Net contribution to reserves from ring fenced services as detailed below: - Parking Management (£12k) Licences £49k Revenues & Benefits £165k FPN surplus £25k
Corporate	107	£19k Broker fees; £14k Reduction in cash flow offset by an improved return on our investments; £74k Net additional expenditure.
	<b>(33)</b>	<b>Projected Net Expenditure Underspend</b>

Table 2 – Capital Programme 2019/20 Outturn as at end of December 2019

Capital Scheme	Funding SBC/ Partnership (P)	2019/20 Original Budget £	2019/20 Revised Budget £	2019/20 Actual to Date £	2019/20 Projected Variance £	Ref
<b>Housing, Economy &amp; Community Services – C. Hudson</b>						
CCTV - Reserves - Repairs & Renewals	SBC	15,000	30,000	0	0	
CCTV Monitoring Control Centre - Reserves	SBC	0	250,000			
The Mill Project, Sittingbourne Skate Park - S106/Capital Grant	P	15,000	16,350	0	0	
The Mill Project, Sittingbourne Skate Park - Capital Receipts	SBC	150,000	200,000	161,825	0	
Faversham Creek Basin Regeneration Project – Capital Receipts	SBC	200,000	200,000	0	0	
Land plots, Crown Quay Lane incl. CPO's and Creek frontage	SBC	0	0	5,775	0	
Sittingbourne Town Centre – Cinema Complex	SBC	14,212,758	15,250,640	9,879,560	0	
Sittingbourne Town Centre - Other Assets	SBC	0	0	1,714,044	1,480,000	(1)
Sittingbourne Town Centre - Multi Storey Car Park	SBC	0	0	192,626	0	
Disabled Facilities Grants - External Grant	P	2,062,800	3,676,730	1,109,455	0	
Housing Repair Grants Over 60 – from recycled capital receipts	SBC	0	0	2,310	0	
Winter Warmth Grants – from recycled capital receipts	SBC	0	0	10,887	0	
Decent Home Loans Owner Occupier – from recycled capital receipts	SBC	0	0	7,150	0	
<b>Total Housing, Economy &amp; Community Services</b>		<b>16,655,558</b>	<b>19,623,720</b>	<b>13,083,632</b>	<b>0</b>	

Table 2 – Capital Programme 2019/20 Outturn as at end of December 2019

Capital Scheme	Funding SBC/ Partnership (P)	2019/20 Original Budget £	2019/20 Revised Budget £	2019/20 Actual to Date £	2019/20 Projected Variance £	Ref
<b>Commissioning, Environment &amp; Leisure – M. Cassell</b>						
Barton's Point Coastal Park – Replacement Bridge	SBC	0	120,000	0	0	
Faversham Recreation Ground Improvement – External Grant	P	1,103,000	1,103,000	843,220	0	
Faversham Recreation Ground Improvement – Reserves	SBC	0	50,000	0	0	
Faversham Recreation Ground Improvement – S106	P	225,920	225,920	0	0	
Gunpowder Works Oare Faversham -S106	P	0	9,000	0	0	
Leisure Centres – Internal/External Borrowing	SBC	0	1,079,000	756,723	0	
Car Park Improvement/Enhancement: Disabled Bays, Beach Street, Sheerness – Reserves	SBC	0	21,570	0	0	
Milton Creek Country Park Access Road – Reserves	SBC	40,000	40,000	0	0	
New Play Area – Iwade Scheme	P	45,000	45,000		0	
Hugh Price Close Play Area Improvements – External Grant	P	0	30,000	0	0	
Open Spaces Project Play Equipment – S106 Grant	P	226,000	226,000	17,781	0	
Play Improvements Project – Reserves	SBC	150,000	0	0	0	
Rectory Road Playing Field – Reserves	SBC	0	51,510	51,508	0	
Open Spaces Project – Balas Drive – External Grant	P	0	1,000	1,000	0	
Open Spaces Project – Balas Drive – Reserves	SBC	0	10,000	10,070	0	
Open Spaces Project – Diligent Drive – Reserves	SBC	0	18,000	0	0	
Open Spaces Project – Minster Leas – Reserves	SBC	0	22,000	20,247	0	
Open Spaces Project – Minster Leas – External Grant	P	0	9,000	9,000	0	

Table 2 – Capital Programme 2019/20 Outturn as at end of December 2019

Capital Scheme	Funding SBC/ Partner-ship (P)	2019/20 Original Budget £	2019/20 Revised Budget £	2019/20 Actual to Date £	2019/20 Projected Variance £	Ref
Open Spaces Project – Milton Creek Country Park – Reserves	SBC	0	27,200	27,184	0	
Open Spaces Project – Shellness Road – Reserves	SBC	0	30,000	0	0	
Open Spaces Project – Shellness Road – External Grant	P	0	15,000	0	0	
Open Spaces Project – Shellness Road – S106 Grant	P	0	11,750	0	0	
Open Spaces Project – Rectory Play Field – S106 Grant	P	0	20,000	19,999	0	
Public Toilets - Forum Sittingbourne – Capital Receipts	SBC	0	50,000	0	0	
Public Toilets - Central Car Park Faversham – Capital Receipts	SBC	0	40,000	0	0	
Modular Toilet Kiosk - Milton Creek Country Park – Capital Receipts	SBC	0	150,000	0	0	
Public Toilets/Showers – Barton’s Point – Capital Receipts	SBC	0	100,000	0	0	
Public Toilets - Spinney Leysdown – Capital Receipts	SBC	0	40,000	0	0	
Modular Toilet Kiosk - Minster Leas – Capital Receipts	SBC	30,000	80,000	0	0	
Modular Toilet Kiosk - Minster Leas – Reserves	SBC	0	30,000	0	0	
Resurfacing Promenade, The Leas – External Grant	P	84,970	84,970	5,000	0	
Wheeled Bins – Reserves	SBC	0	94,000	0	0	
<b>Total Commissioning, Environment &amp; Leisure</b>		<b>1,904,890</b>	<b>3,833,920</b>	<b>1,761,732</b>	<b>0</b>	

Table 2 – Capital Programme 2019/20 Outturn as at end of December 2019

Capital Scheme	Funding SBC/ Partnership (P)	2019/20 Original Budget £	2019/20 Revised Budget £	2019/20 Actual to Date £	2019/20 Projected Variance £	Ref
<b>Environmental Health – T. Beattie</b>						
Replacement of Air Pollution Monitoring Station	SBC	0	49,050	0	0	
<b>Total Environmental Health</b>		<b>0</b>	<b>49,050</b>	<b>0</b>	<b>0</b>	
<b>Property – A. Adams</b>						
New Folder/Inserter machine in Print Room	SBC	0	20,110	20,106	0	
<b>Total Property Services</b>		<b>0</b>	<b>20,110</b>	<b>20,106</b>	<b>0</b>	
<b>Finance – N. Vickers</b>						
Finance System Upgrade - Reserves	SBC	0	5,210	2,850	0	
<b>Total Finance</b>		<b>0</b>	<b>5,210</b>	<b>2,850</b>	<b>0</b>	
<b>ICT – C. Woodward</b>						
ICT infrastructure – firewall and implementation	SBC	91,200	50,000	49,666	0	
ICT equipment replacement	SBC	0	42,500	0	0	
<b>Total Information Technology</b>		<b>91,200</b>	<b>92,500</b>	<b>49,666</b>	<b>0</b>	
Total Capital Programme Funded by SBC	SBC	<b>14,888,958</b>	<b>18,150,790</b>	<b>12,912,531</b>	<b>0</b>	
Total Capital Programme Funded by Partners	P	<b>3,762,690</b>	<b>5,473,720</b>	<b>2,005,455</b>	<b>0</b>	
<b>Total Capital Programme</b>	<b>SBC &amp; P</b>	<b>18,651,648</b>	<b>23,624,510</b>	<b>14,917,986</b>	<b>0</b>	

Notes :- (1) financed from borrowing.

**Table 3.1: Sundry Debt Outstanding (including not due) by Due Date**

	<b>December 2019</b> <b>£'000</b>	<b>December 2018</b> <b>£'000</b>
Not Due (less than 1 month)	407	221
1-2 Months	89	368
2-6 months	187	48
6-12 months	217	78
1-2 years	15	28
2-3 years	28	17
3-4 years	12	31
4-5 years	13	6
5-6 years	19	3
6 years +	30	34
<b>Total</b>	<b>1,017</b>	<b>834</b>
<b>Total due (over 1 month)</b>	<b>610</b>	<b>613</b>
<b>% Total over 1 month</b>	<b>60%</b>	<b>74%</b>

Notes: -

The December 2019 figures have been adjusted to exclude any large debts that have since been paid.

2-6 months includes £93k relating to a S106 planning agreement and £57k relating to one company;

6-12 months includes £147k Re Sittingbourne Regeneration – Network Rail and £28k relating to one company.

2-3 years includes £6k charges on property.

6 years + includes £21k charges on property. The balance are rent deposit debts which are being paid off via payment plans.

**Table 3.2: Sundry Debt due by Head of Service**

	<b>December 2019</b> <b>£'000</b>	<b>December 2018</b> <b>£'000</b>
Property	201	115
Commissioning, Environment & Leisure	35	364
Housing, Economy & Communities	230	109
Environmental Health	1	1
Planning	14	0
Communications	1	0
Other	128	24
<b>Total</b>	<b>610</b>	<b>613</b>

Notes:

'Other' in December 2019 includes £88k S106 planning agreement.



Table 4

	<b>Allocated to January 2020 £'000</b>
<b>Special Project Fund</b>	
Carbon Management Plan 2019 – 2023	19
Parks Infrastructure Fund	150
Fuel and Water Poverty Outreach Service	48
Project Support Surveyor	45
Playground Improvements	40
Recycling Bins on main bathing beaches	5
Faversham Swimming Pool Boiler Replacement	93
Deep Clean in The Four Air Quality Monitoring Areas	50
Clean Air Action Zone Feasibility Study	50
Eco Stars (Continued Participation)	5
KM Schools Walk to School Project	1
Engaging and Delivering for Our Communities	75
Sheppey Hall Improvements	40
Restoring the Artesian Well at Oare Marshes	10
St. Anne's Footbridge Lighting	10
Traffic Pollution Additional Planting on SBC Land	40
Climate and Ecological Emergency	7
The Mill Skatepark	40
School Trees Planting	20
Survey of Local Haulage and Bus Companies Along the A2 On Vehicle Fleet	10
Upgrade 8 Planned EV Charging Points	32
Newington Play Area	20
Painters Forstal Community Hall	50
<b>Total Special Project Fund Approved as at 31 January 2020</b>	<b>860</b>
<b>Communities Fund</b>	
Volunteer Swale Awards 2019/20	5
Salt Giveaway	4
20's Festival	25
Food Bank	30
Murston Old Church	100
<b>Total Communities Fund Approved as at 31 January 2020</b>	<b>164</b>

	<b>Allocated to January 2020 £'000</b>
<b>Pension &amp; Redundancy Fund</b>	
Pension and Redundancy accrual difference	-9
<b>Total Pension &amp; Redundancy Fund as at 31 January 2020</b>	<b>-9</b>
<b>Regeneration Fund</b>	
Members Grants 2019/20	54
<b>Total Regeneration Fund Approved as at 31 January 2020</b>	<b>54</b>

<b>Cabinet Meeting</b>	
<b>Meeting Date</b>	18 March 2020
<b>Report Title</b>	Swale House
<b>Cabinet Member</b>	Cllr Monique Bonney, Cabinet Member for Economy and Property
<b>SMT Lead</b>	Nick Vickers, Chief Financial Officer
<b>Head of Service</b>	Nick Vickers, Chief Financial Officer
<b>Lead Officer</b>	Nick Vickers, Chief Financial Officer
<b>Key Decision</b>	Yes
<b>Classification</b>	<b>Open</b>
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. To note the report.</li> <li>2. To authorise an initial capital allocation of a <u>maximum</u> of £200,000 for the initial options appraisal, feasibility work and procurement of detailed design to achieve a modern office space which is carbon neutral.</li> </ol>

## 1 Purpose of Report and Executive Summary

- 1.1 This report sets out the options for the Council's main office location, currently Swale House. It is essential to get this early work right for a successful refurbishment project.
- 1.2 The report seeks agreement for preliminary work to build up a business case for a refurbishment of the building. The refurbishment would have the objectives of making the building a modern fit for purpose workspace, to become a beacon carbon neutral workspace in the borough and to create new income streams from commercial and/or public sector tenants.

## 2 Background

### Swale House

- 2.1 Swale House was constructed in the late 1970's/early 1980's. It is a concrete framed building with elevations of brickwork. The building is a part three storey, part four storey building with some undercroft parking at ground floor level. The access to the parking areas is from street level at the North West corner of the building. The building is built around a central open courtyard, which has parking at ground level. The buildings to the North and West sides of the courtyard extend to the higher third floor level with the buildings on the other two sides being one floor lower with the roof at third floor level.

- 2.2 As members will be aware the layout of the main floors for staff offices is very traditional with sub divisions into sectional offices and a large number of offices which have single occupation. The partitions take up a lot of space and are of little purpose for sound proofing. The ground floor is largely used for a large reception space, but also a large print room, post room and strong room for civic regalia and legal files. The third floor has some office accommodation but is also the focus for the civic functions, with the Council Chamber, Committee room and Assembly room as large meeting rooms, and offices for the political groups.
- 2.3 The building has quite a large number of meeting rooms, 9 on the first and second floors and 19 dedicated storage rooms. The usage of the storage space is not efficient. There is a first aid room and server room on the first floor.
- 2.4 Over the last 20 years the Council has significantly contracted its workforce and greater use of technology has increased home and flexible working so its need for space has reduced. However, given the lack of alternative uses the workforce has spread out to use the space. By any measure the Council has significantly more space than it needs.
- 2.5 There are four external clients who pay rent and/or a service charge, the Citizens Advice Service, National Probation Service, Sateda and SFM. Their aggregate rent is £27,200 per annum. Space is also provided free of charge to Apcoa (as part of the parking management contract) and Kent Police and Optivo (within the Community Safety Unit). The tenants are spread across three of the floors which is not helpful.
- 2.6 As will be examined further below the expectation going back some 10 years has been that the Council would move to a different office. Maintenance of the building as a result of this has been largely reactive. The main areas of spend in recent years have been on the boilers, lifts and the toilets.
- 2.7 Resource constraints mean that expenditure on public buildings is always going to be a difficult issue. But there are some real drivers of change. The building is highly inefficient from an energy perspective with combined electricity and gas costs of around £145,000. This issue will be examined further.

### **Spirit of Sittingbourne Development Agreement**

- 2.8 In 2012 the Council entered into a Development Agreement with Spirit of Sittingbourne. The plan was for two phases of development:
- Phase 1- a retail development on a site owned by the Council, a Leisure development again primarily on Council owned sites (Cinema/Travelodge/restaurants) and 212 apartments on three Council owned sites.
  - Phase 2- a new civic building. Part of the building would be leased to Kent County Council for a Gateway and Library.

- 2.9 So effectively under this agreement the Council lost control of the Swale House site. As part of the arrangement for a new Civic Office, Spirit would take ownership of the Swale House site for primarily residential development. So since 2012 effectively this was the solution to the problem of what to do with Swale House.
- 2.10 In late December 2019 following a Cabinet decision the development agreement was terminated. The Council now retains ownership of Swale House and can proceed with alternative arrangements as set out in this report.

### **One Public Estate**

- 2.11 One Public Estate (OPE) is a Government funded initiative where public bodies work together to seek to efficiencies in their use of property assets by working collaboratively. The Council, Kent County Council and Kent Police were successful in bidding for £80,000 in 2018 for a project to “carry out a strategic definition exercise for a number of sites in Sittingbourne to set out different options for delivering the first steps in the design and implementation of the Sittingbourne Civic Quarter”.
- 2.12 It needs to be emphasized that it was felt from the beginning that this was quite speculative in terms of delivering a viable outcome and also it assumed that the Spirit tie up fell. It was entirely free to the Council as it was fully funded from the OPE funding.
- 2.13 The sites taken into consideration were KCC and Kent Police offices in the Avenue of Remembrance, the Swallows, the KCC library, Phoenix House, Swale House, the ex Mormon land and Central Park Stadium.
- 2.14 A detailed report was received in July 2019. Whilst 8 options were initially considered these were reduced down to 4 options which were costed. The cost shortfalls on the options ranged from a minimum of £18.1m to a maximum of £28.3m. The fundamental weakness of all of the options was that none of the options for residential development showed a surplus even without developer’s risk profit and land values being applied.
- 2.15 Once it became apparent that the original brief was not deliverable, the availability of the OPE funding allowed the brief to be revised and further work commissioned. A detailed measured survey of Swale House was then undertaken together with a full structural survey. The latter was undertaken in November 2019 by Gledsdale Associates Consulting Structural Engineers. Gledsdale’s report is caveated, understandably, by the nature of the brief which was to undertake a non-destructive building survey in an occupied building. This was carried out externally from ground level, internally where access was available and externally at roof level again where access was available. Their conclusions were:

- “Generally the buildings are in reasonable condition commensurate with their age and use and appear to have been regularly maintained.
  - There is no evidence of any major structural movement or settlement within the buildings.
  - The concrete frame appears sound and where concrete surfaces are exposed they do not show any evidence of deterioration.
  - There are some local defects in the brickwork to the parapets but these can be repaired with the use of helical reinforcement within the bed joints.
  - The roof coverings require repair or replacement to prevent further water ingress.
  - Other defects noted are none structural and can be addressed as part of the refurbishment of finishes and decorations.”
- 2.16 At this stage the main conclusion for the Council is that no significant defects were identified that would rule out a refurbishment of the building. Unfortunately any refurbishment of an existing building carries the risk of further defects being found after work commences and it is impossible to eliminate all risk. It is good practice to allow a contingency sum within the contract for this purpose.

### **Climate Change and Ecological Emergency**

- 2.17 The Council agreed the Climate Change and Ecological Emergency at full Council on 26 June. It was one of the first actions of the new administration, which is a demonstration of their commitment to the issue. Swale has the most ambitious targets of any council in Kent – to be carbon neutral by 2025 as an organisation and 2030 as a borough.
- 2.18 The work necessary to achieve these objectives is being led by a cross party member and officer group chaired by the Cabinet Member for the Environment. One of the first actions of the group was to commission the Carbon Trust funded from the Special Projects Fund. The core brief was to determine the emissions produced directly by the Council and indirectly in the Borough.
- 2.19 The report was received in late 2019. The report identifies that:
- Electricity- 76% of electricity emissions are from Swale House.
  - Gas- 98% of gas consumption is from Swale House heating and hot water.
- 2.20 All non-domestic property in the UK for sale or rent requires a Non-Domestic Energy Performance Certificate and there are 6 classifications ranging from A (most efficient-our target) to G (least efficient). Swale would be in category D, it is

better than the national average on both electricity and gas, but markedly better on gas.

- 2.21 To put the Swale House position in a wider context, Swale House accounts for 13% of total Council emissions, Transport (our fleet, business travel and staff commuting) 7% and contracts 78%.
- 2.22 A Council wide action plan is being prepared but there will be workstreams within this. The Swale House refurbishment will make a major contribution to reducing our emissions as a Council.

### **Modern Work Spaces**

- 2.23 The changes in the building will require other changes, particularly in relation to the use of ICT and culture.
- 2.24 Through the Mid Kent ICT service there is an ongoing IT refresh programme. It will be essential to ensure that the IT in the building can fully support flexible ways of working.
- 2.25 Given the existing spare capacity within the building there is a large amount of paper storage. Some of this is justified but much of it isn't and we are storing massive amount of unnecessary material. This will have to be addressed for the space allocations to work.
- 2.26 The potential change to a more open plan basis is going to be challenging for many staff who are used to working in small offices. The current approach in many ways helps teams build up their identities but it doesn't help cross team working. So there is a need for culture change and ensuring that staff are actively involved in decision making.

### **Financial Position**

- 2.27 The Council has effectively been putting off the time when it needs to address the future of Swale House. The aspiration to have a new Civic Centre through the Spirit of Sittingbourne arrangement never addressed how it was going to be financially viable. In signing the original Development Agreement the expectation was that Phase 2 would never happen. Given that Phase 1 was only delivered by the Council becoming the owner and funder of the project it made Phase 2 look even less likely.
- 2.28 The refurbishment of Swale House will have to be funded by borrowing. There may be scope for a degree of internal borrowing but some external borrowing will be required. This will mean the Council incurs debt interest costs and will have to make Minimum Revenue Provision to provide for principal repayment.
- 2.29 There seems to be 2 main sources of revenue to fund these borrowing costs:
  - Savings on electricity and gas costs, and

- Rental income from renting out space in the building.
- 2.30 If these sources of funding are not sufficient then the borrowing costs will be a charge on the revenue budget which is already highly constrained.

### **3 Proposals**

- 3.1 At this stage we do not know that a full refurbishment will be financially viable. Therefore, it is recommended that a number of different options are explored and fully costed to allow members to decide on the scope of work to be carried out and the budget to be allocated. The other 3 options are set out in section 4.
- 3.2 The first stage of this project will be a feasibility study to establish that there is a viable project. Under the Royal Institute of British Architects (RIBA) Plan of Work the scope would cover the first three stages; Strategic definition, Preparation and brief and Concept design. It would be accompanied by a detailed costing of the project to give budget estimates for each option. This plan and cost estimates would then be subject to a separate Cabinet decision on which option to proceed with.
- 3.3 To ensure continuity of the project team and to avoid having to carry out a further procurement exercise, it is proposed that the initial procurement of the feasibility work will include the procurement of RIBA Plan of Work Stages 3 – 6 (Developed design through to Handover). These phases would not be commissioned until after Cabinet has received a further report.
- 3.4 As part of the feasibility work it will be necessary to consider document storage and how this can be modernised and the amount of space currently needed reduced. Options such as document imaging and off-site archiving will be explored and costed.
- 3.5 There is no internal capacity to project manage this project. If there is a viable project then there will also be a need to procure a project manager.
- 3.6 The report has focussed on Swale House but there is also a similar issue in relation to the Masters House in Sheerness, which is to be refurbished for community use. As the projects are similar but the size of the project much smaller it is proposed to carry out a joint procurement exercise for Swale House and the Masters House.

### **4 Alternative Options**

- 4.1 Do nothing- the Council will then remain in an office it uses inefficiently and it will not achieve its objectives on reducing carbon emissions. It is likely that maintenance costs will increase but there is a large building maintenance



reserve. It could also be said that the poor condition of the building adversely impacts on staff morale, it has been occupied for 30 years without any significant refurbishment.

- 4.2 Hybrid- until the costings are received we will not know whether the full refurbishment is financially viable. An alternative option is to focus any spend on the energy efficiency of the building and meeting the carbon emissions target.
- 4.3 New build- in undertaking the detailed work set out above the consultants will be asked to make an estimate of the cost of a new building for comparative purposes.

## 5 Consultation Undertaken or Proposed

- 5.1 Communication of the options and the possibility of a refurbishment has been commenced with staff.

## 6 Implications

Issue	Implications
Corporate Plan	The proposal is supportive of emerging Corporate Plan objectives.
Financial, Resource and Property	As set out in the report there is an initial requirement for project feasibility costs of up to £200,000. These will be charged to a capital cost code and initially will be funded by internal borrowing.
Legal, Statutory and Procurement	Officers will seek to contract through an established framework arrangement.
Crime and Disorder	Not applicable.
Environment and Sustainability	The project is heavily driven by the requirement to become carbon neutral.
Health and Wellbeing	Not applicable.
Risk Management and Health and Safety	There are important health and safety issues from occupying a not fit for purpose building. But actually the implications in the medium term are even bigger if we undertake a phased refurbishment and continue to occupy the building during that phase.
Equality and Diversity	Not applicable.
Privacy and Data Protection	New office layouts will need to ensure the secure storage of sensitive information.

**7 Appendices**

None

**8 Background Papers**

None

<b>Cabinet Meeting</b>	
<b>Meeting Date</b>	18 March 2020
<b>Report Title</b>	Adoption and Implementation of Anti-Idling legislation
<b>Cabinet Member</b>	Cllr Tim Valentine, Cabinet Member for Environment
<b>SMT Lead</b>	Nick Vickers, Chief Financial Officer
<b>Head of Service</b>	Tracey Beattie, Mid Kent Environmental Health Manager
<b>Lead Officer</b>	Julie Oates, Environment Protection Team Leader
<b>Key Decision</b>	Non-Key
<b>Classification</b>	<b>Open</b>
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. To approve the implementation and enforcement of provisions relating to anti idling as laid down by the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002</li> <li>2. To delegate authority to the Chief Financial Officer and Head of Commissioning, Environment &amp; Leisure to authorise relevant officers or persons to stop the commission of stationary idling offences and issue fixed penalty notices (FPNs) in respect of such offences, in accordance with Regulation 6(3) of the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002.</li> </ol>

## 1 Purpose of Report and Executive Summary

- 1.1 To seek approval for the implementation of anti-idling legislation as laid down by the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. This would give officers or persons authorised by the Council the power to stop the commission of stationary idling offences and issue a Fixed Penalty Notice (FPN) to drivers allowing their engines to run unnecessarily while the vehicle is stationary, if they fail to comply with a requirement to stop the running of the engine of that vehicle. The FPN in relation to these Regulations is £20, increasing to £40 if not paid within 28 days. There is no discretion to amend this charge.
  
- 1.2 A stationary idling offence under the 2002 Regulations is defined to be a contravention of, or failure to comply with so much of Regulation 98 of the Road Vehicles (Construction and Use) Regulations 1986 (stopping of engine when stationary) as relates to the prevention of exhaust emissions. The Regulation 98 offence, driver failing when the vehicle is stationary to stop the running of the engine of that vehicle, is contrary to Section 42 of the Road Traffic Act 1988 (as substituted by the Road Traffic Act 1991).

- 1.3 It is envisaged that in the main, information relating to the anti-idling legislation will be disseminated by way of awareness campaigns focussed on 'hot spot' locations such as outside schools, railway stations and other areas where vehicles are known to idle for periods of time. The issue of an FPN will generally only be used as a last resort if drivers refuse to co-operate and switch off engines when asked to do so, or regularly flout the Regulations.
- 1.4 The aim of introducing the Regulations into the Swale Borough Council area is to reduce emissions from idling vehicles particularly in locations where pollution levels are high or exceeding the relevant Air Quality Objective (AQO) and where people likely to be exposed to the vehicle emissions. Swale Borough Council has a Strategic Air Quality Action Plan (AQAP) (approved by Defra in September 2019) detailing both strategic and local measures aimed at minimising and reducing pollution levels in the current 5 declared Air Quality Management Areas and also the borough as a whole. In addition, a Climate Change and Ecological Emergency was declared by the Council in June 2019 and an action plan is in the process of being finalised. The introduction of these powers will support both of these strategies and plans.

## **2 Background**

- 2.1 Under the Environment Act 1995 and the Local Air Quality Management framework, Swale Borough Council has a statutory duty to review and assess air quality within its borough and take the necessary actions to improve areas of poor air quality. If Air Quality Objectives (AQO) for key pollutants are exceeded, an Air Quality Management Area (AQMA) must be declared. To date Swale Borough Council has declared five AQMA's for exceedances of the annual average AQO for nitrogen dioxide (NO<sub>2</sub>):

AQMA 1: Newington, (A2/High St)) declared 2009;

AQMA 2: Ospringe Street, Faversham (A2/Ospringe) declared in June 2011 and revised (as AQMA 6) to the Mount in May 2016. AQMA 2 has now been revoked and renamed and consolidated into one as AQMA 6;

AQMA 3: East Street, Sittingbourne (A2/Canterbury Road) declared January 2013;

AQMA 4: St Pauls Street, Milton, Sittingbourne (B2006) declared January 2013;

AQMA 5: Teynham (A2 /London Rd) declared December 2015; and

AQMA 6: See details in AQMA 2 above.

- 2.2 The 2019 Strategic AQAP outlines actions and measures that will be delivered in order to reduce concentrations of air pollution and exposure to air pollution. The implementation of these Regulations is in accordance with the general thrust of the AQAP in reducing air pollution and will directly support the following actions contained within the AQAP including:

- Air Quality & Low Emission Strategy;
- 'Clean Air Corridor' signage and information scheme; and
- Local School & Business Travel Plans

- 2.3 It is widely recognised that emissions from vehicles play a large part in poor air quality which can exacerbate health problems such as heart and lung disease. As well as emitting NO<sub>2</sub> and particulates, vehicle fumes also contain CO<sub>2</sub> which contributes towards climate change. Idling vehicles can emit more pollution than a vehicle moving at 30mph.
- 2.4 We are currently working with schools in the borough via the Clean Air for Schools campaign (CAFS) and vehicles parked outside schools with engines left running is a common problem. The Environmental Protection Team also receives complaints about idling vehicles outside schools and other locations from time to time. The adoption of these Regulations and the ability for FPNs to be served will enable a greater awareness of the issues arising from leaving vehicle engines running, and potentially an improvement in air quality in local areas.
- 2.5 The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 are made under Section 87 of the Environment Act 1995. Under the Regulations powers are given to Local Authorities to issue FPNs to drivers who allow their vehicle engines to run unnecessarily while the vehicle is parked, if they fail to comply with a requirement to stop the running of the engine of that vehicle. The Regulations cover all vehicles including cars, taxis, buses and all commercial vehicles.
- 2.6 Designation from the Secretary of State is not required for the enforcement of stationary idling offences and as such a Local Authority can authorise any officer of its authority, or any other person, to stop the commission of stationary idling offences (in accordance with Regulation 12) and to issue a FPN in respect of such an offence committed in its area.
- 2.7 Guidance issued by the Secretary of State for Transport 2002 – “Guidance on powers to require drivers to switch off engines” advises that FPNs should be used as a deterrent and only issued as a last resort. With this in mind, it is anticipated that FPNs will be issued in limited circumstances where a driver refuses to switch off an engine when asked to do so by an authorised officer/person of the Council. The guidance also recommends that a ‘common sense’ approach is taken by officers when using the powers under the Regulations.
- 2.8 There are exempted circumstances where vehicles are permitted under Regulation 98(2) of the Road Vehicles (Construction and Use) Regulations 1986 and these apply to the 2002 Regulations:
- (a) when the vehicle is stationary owing to the necessities of traffic;
  - (b) so as to prevent the examination or working of the machinery where the examination is necessitated by any failure or derangement of the machinery or where the machinery is required to be worked for a purpose other than driving the vehicle; or

(c) in respect of a vehicle propelled by gas produced in plant carried on the vehicle, to such plant.

- 2.9 The enforcement process under the 2002 Regulations allows for a £20 FPN to be served in relation to stationary idling offences. This increases to £40 if not paid within 28 days. There is no discretion to amend this charge.
- 2.10 Local Authorities can retain the income generated from the FPNs. However, the amount of income is expected to be minimal as FPNs would only be issued as a last resort.
- 2.11 There is no formal appeal route under the Regulations although, it is required the notice contains the person and address to whom any correspondence relating to the FPN may be sent. The guidance recommends that an FPN can be queried through correspondence with the council. The terms of the FPN remain in place even if a query is raised, although it is envisaged that the Council would not expect payment until it had been decided and notified that the representation had been unsuccessful. Alternatively, a person to whom an FPN has been issued may give notice requesting a hearing in respect of the offence to which the FPN relates. A request in writing for a hearing can be made no later than the 28<sup>th</sup> day after the FPN was issued. A hearing is effectively a prosecution in the Magistrates' Court. In this situation, the FPN is suspended once a hearing has been requested.
- 2.12 Where an FPN remains unpaid after the maximum period allowed of 56 days after service, and a request for a Hearing hasn't been made within the specified time the Regulations state that the penalty can be recoverable through the County Court system. As with any contravention of Regulation 98 of the Road Vehicles (Construction and Use) Regulations 1986, a request to use the County Court system as a means of recovering unpaid FPNs would be dealt with electronically by the Traffic Enforcement Centre (Northampton County Court).
- 2.13 If the recommendations are approved by Cabinet, work will need to be undertaken to implement the procedures for the introduction, service and management of the FPNs. In addition, signage wording and locations will need to be agreed with Kent County Council prior to installation. This will mean there will be a necessary delay before the Regulations will be in force in the borough.

### **3 Proposals**

- 3.1 To approve and authorise the implementation and enforcement of provisions relating to anti-idling as laid down by the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002.
- 3.2 To delegate authority to the Chief Financial Officer and Head of Commissioning, Environment & Leisure to authorise relevant officers of the Council including Environmental Enforcement Officers and Environmental Protection Officers, and other appropriate persons as required to exercise the powers within the Regulations.

## 4 Alternative Options

- 4.1 Not to approve the use of these powers and not to authorise officers or appropriate persons to issue FPNs. In this situation, education on anti-idling would still continue within the Clean Air for Schools project; however this is limited to areas around participating schools only. The implementation of this legislation and authorisation of officers would enable a greater awareness of the issues arising from leaving vehicle engines running to be made and potentially an improvement in air quality in local areas. In addition, implementation of the legislation supports the actions within the strategic AQAP and also the Climate and Ecological Emergency declaration.

## 5 Consultation Undertaken or Proposed

- 5.1 Consultation is not a requirement to implement these powers. The Council's Strategic AQAP was subject to a formal and public consultation for a period of approximately six weeks and these powers are linked to measures in the AQAP.

## 6 Implications

Issue	Implications
Corporate Plan	The proposals support Priority 2: Investing in our environment and responding positively to global challenges in the emerging Corporate Plan 2020-2023 'Working together for a better borough'.
Financial, Resource and Property	Some revenue may be received from payment of FPNs however this is not likely to be significant. Implementation will be met by existing staff resources. There may be some costs associated with setting up the FPNs and associated signage. These will be financed by previously agreed S106 monies from developments in relation to air quality mitigation measures.
Legal, Statutory and Procurement	The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 are made under Section 87 of the Environment Act 1995. The Environment Act 1995 sets out the standards relating to air quality and the objectives for particular pollutants. Part IV of the Act requires local authorities to review and assess air quality within their districts and take the necessary actions to improve areas of poor air quality. Under the 2002 Regulations (Regulation 6(3)), a Local Authority is not required to be designated by the Secretary of State to stop the commission of stationary idling offences and to issue FPNs in respect of such an offence committed in its area. As such, a local authority can authorise any officer of its authority, or any other person, to deal with the offences. This matter has been discussed with and agreed by Legal.

Crime and Disorder	None identified
Environment and Sustainability	Implementation of the Regulations supports measures in the Strategic Air Quality Action Plan and also supports the declaration of the Environmental and Ecological Climate Emergency.
Health and Wellbeing	The AQAP measures and any reductions in vehicle emissions are beneficial to the health of residents.
Risk Management and Health and Safety	None identified.
Equality and Diversity	None identified at this time. Equalities Impact Assessment attached at Appendix I
Privacy and Data Protection	None identified

## 7 Appendices

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

- Appendix I: Equality Impact Assessment

## 8 Background Papers

The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 - <http://www.legislation.gov.uk/uksi/2002/1808/contents/made>

Swale Borough Council Strategic Air Quality Action Plan - <https://www.swale.gov.uk/assets/Air-Quality/AQAPSwaleBC2018-final.pdf>



# Equality Impact Assessment

An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in decision-making.

## When to assess

An EIA should be carried out when you are changing, removing or introducing a new service, policy or function. The assessment should be proportionate; a major financial decision will need to be assessed more closely than a minor policy change.

## Public sector equality duty

The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:

- 1) Eliminate discrimination, harassment and victimisation;
- 2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- 3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

These are known as the three aims of the general equality duty.

## Protected characteristics

The Equality Act 2010 sets out nine protected characteristics that apply to the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership\*
- Pregnancy and maternity
- Ethnicity
- Religion or belief
- Gender
- Sexual orientation

\*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

**We also ask you to consider other socially excluded groups,** which could include people who are geographically isolated from services, with low literacy skills or living in poverty or low incomes; this may impact on aspirations, health or other areas of their life which are not protected by the Equality Act, but should be considered when delivering services.

## Due regard

To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.

How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general equality duty to the decision or function in question. The greater the relevance and potential impact, the higher the regard required by the duty. The three aims of the duty may be more relevant to some functions than others; or they may be more relevant to some protected characteristics than others.

## Collecting and using equality information

[The Equalities and Human Rights Commission](#) (EHRC) states that 'Having due regard to the aims of the general equality duty requires public authorities to have an adequate evidence base for their decision making'. We need to make sure that we understand the potential impact of decisions on people with different protected characteristics. This will help us to reduce or remove unhelpful impacts. We need to consider this information before and as decisions are being made.

There are a number of publications and websites that may be useful in understanding the profile of users of a service, or those who may be affected.

- The Office for National Statistics Neighbourhoods website <https://www.ons.gov.uk/>
- Swale in 2016 <https://archive.swale.gov.uk/assets/About-us/Summary-of-Key-Data-for-Swale.pdf>
- Kent County Council Facts and Figures about Kent <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent>
- Health and Social Care data [http://www.kpho.org.uk/search?mode=results&queries\\_exclude\\_query=no&queries\\_excludefromse\\_arch\\_query=yes&queries\\_keyword\\_query=Swale](http://www.kpho.org.uk/search?mode=results&queries_exclude_query=no&queries_excludefromse_arch_query=yes&queries_keyword_query=Swale)

At this stage you may find that you need further information and will need to undertake engagement or consultation. Identify the gaps in your knowledge and take steps to fill these.

## Case law principles

A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- The general equality duty is not a duty to achieve a result, it is a duty to have due regard to the need achieve the aims of the duty.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

<b>Lead officer:</b>	Julie Oates, Environmental Protection Team Leader
<b>Decision maker:</b>	Cabinet
<b>People involved:</b>	Julie Oates
<b>Decision:</b> <ul style="list-style-type: none"> <li>• Policy, project, service, contract</li> <li>• Review, change, new, stop</li> </ul>	<ul style="list-style-type: none"> <li>• Service/policy</li> <li>• New</li> </ul>
<b>Date of decision:</b> The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	Cabinet Meeting 18/03/2020
<b>Summary of the decision:</b> <ul style="list-style-type: none"> <li>• Aims and objectives</li> <li>• Key actions</li> <li>• Expected outcomes</li> <li>• Who will be affected and how?</li> <li>• How many people will be affected?</li> </ul>	<p>The implementation and enforcement of provisions relating to anti idling as laid down by the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 aims to:</p> <ul style="list-style-type: none"> <li>• Increase awareness of the consequences of leaving vehicle engines running</li> <li>• Reduce emissions from idling vehicles in locations where pollution is high and people are being exposed regularly</li> <li>• Support measures in the Council's Strategic Air Quality Action Plan and the support the declared Climate and Ecological Emergency</li> </ul> <p>Key actions include:</p> <ul style="list-style-type: none"> <li>• To delegate authority to the Chief Financial Officer and Head of Commissioning, Environment &amp; Leisure to authorise relevant officers or persons to stop the commission of stationary idling offences and issue fixed penalty notices (FPNs) in respect of such offences, in accordance with Regulation 6(3) of the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002.</li> <li>• Disseminate information by way of awareness campaigns focussed on 'hot spot' locations such as outside schools, railway stations and other areas where vehicles are known to idle for periods of time.</li> <li>• Signage across the district, information on SBC website and leaflets</li> <li>• Service of Fixed Penalty Notices to be issued as a last resort if drivers refuse to co-operate and switch off engines when asked to do so, or regularly flout the Regulations.</li> </ul> <p>Expected outcomes:</p> <ul style="list-style-type: none"> <li>• Reduce emissions from idling vehicles particularly in locations where pollution levels are high or exceeding the relevant Air Quality Objective (AQO) and where people likely to be exposed to the vehicle emissions.</li> </ul> <p>The Regulations will cover the whole of the Swale Borough Council district and as such all areas and wards will be affected. However, it is likely that the main enforcement will be via campaigns directed at areas where it is know that drivers regularly leave vehicle engines running such as outside school, near train station etc.</p>
<b>Information and research:</b> <ul style="list-style-type: none"> <li>• Outline the information and research that has informed the decision.</li> </ul>	<p>Research includes:</p> <ul style="list-style-type: none"> <li>• Investigation and discussion with other LA's who have implemented this legislation</li> <li>• Discussions with Legal, Environmental Response Team and Parking Services</li> </ul>

<ul style="list-style-type: none"> <li>• Include sources and key findings.</li> <li>• Include information on how the decision will affect people with different protected characteristics.</li> </ul>	<ul style="list-style-type: none"> <li>• Research into the Regulation and Guidance Sources and key findings:</li> <li>• Sources include the Regulations and Guidance, other LA's</li> <li>• Key findings are that the service of FPNs are a last resort. Most anti-idling is dealt with and resolved informally. Few FPN's are served. The fine is low (£20)</li> </ul> <p>It is unlikely that this decision will affect people with different characteristics</p>
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>• Has there been specific consultation on this decision?</li> <li>• What were the results of the consultation?</li> <li>• Did the consultation analysis reveal any difference in views across the protected characteristics?</li> <li>• Can any conclusions be drawn from the analysis on how the decision will affect people with different protected characteristics?</li> </ul>	<p>No consultation has been carried out for the EIA. No consultation is required under Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002</p>

<p><b>Is the decision relevant to the aims of the equality duty?</b> Guidance on the aims can be found in the EHRC's PSED Technical Guidance - <a href="https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance">https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance</a></p>	
<b>Aim</b>	<b>Yes/No</b>
1) Eliminate discrimination, harassment and victimisation	No
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	No
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	No

<p><b>Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.</b></p>		
<b>Characteristic</b>	<b>Relevance to decision</b> High/Medium/Low/None	<b>Impact of decision</b> Positive/Negative/Neutral
Age	None	Neutral
Disability	None	Neutral
Gender reassignment	None	Neutral
Marriage and civil partnership	None	Neutral
Pregnancy and maternity	None	Neutral
Ethnicity	Low	Neutral
Religion or belief	None	Neutral
Gender	None	Neutral
Sexual orientation	None	Neutral
Other socially excluded groups <sup>1</sup>	Low	Neutral

<p><b>Conclusion:</b></p> <ul style="list-style-type: none"> <li>• Consider how due regard has been had to the equality</li> </ul> <p><sup>1</sup> Other socially excluded groups could include those with literacy issues, people living in poverty or on low incomes or people who are geographically isolated from services</p>	<p>The introduction of these Regulations is of either no or low relevance to people with different protected characteristics. The impact is</p>
--	---

<p>duty, from start to finish.</p> <ul style="list-style-type: none"> <li>• There should be no unlawful discrimination arising from the decision (see <a href="#">PSED Technical Guidance</a>).</li> </ul> <p>Advise on the overall equality implications that should be taken into account in the final decision, considering relevance and impact.</p>	<p>deemed to be of neutral impact.</p> <p>If any impact is measured after implementation – for example language or cultural barriers to the anti-idling message we will consider these and adjust our communications accordingly.</p>
--	---

### Timing

- Having ‘due regard’ is a state of mind. It should be considered at the inception of any decision.
- Due regard should be considered throughout the development of the decision. Notes should be taken on how due regard to the equality duty has been considered through research, meetings, project teams, committees and consultations.
- The completion of the EIA is a way of effectively summarising the due regard shown to the equality duty throughout the development of the decision. The completed EIA must inform the final decision-making process. The decision-maker must be aware of the duty and the completed EIA.

**Full technical guidance on the public sector equality duty can be found at:**

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

**Please send the EIA in draft to Bob Pullen in the Policy and Performance Team**

**([bobpullen@swale.gov.uk](mailto:bobpullen@swale.gov.uk) – 01795 417187) who will refer it on to the EIA Group who will peer review it and let you have any comments or suggested changes.**

**This Equality Impact Assessment should form an appendix to any SMT or committee (e.g. Cabinet or Council) report relating to the decision and a summary should be included in the ‘Equality and Diversity’ section of the standard committee report template under ‘Section 6 – Implications’.**

This page is intentionally left blank

# Agenda Item 9

Cabinet Meeting		Agenda Item: 9
<b>Meeting Date</b>	18 March 2020	
<b>Report Title</b>	Swale Heritage Strategy and associated Action Plan	
<b>Cabinet Member</b>	Cllr Mike Baldock - Cabinet Member for Planning	
<b>SMT Lead</b>	Emma Wiggins – Regeneration Director	
<b>Head of Service</b>	James Freeman – Head of Planning Charlotte Hudson – Head of Economy and Community Services	
<b>Lead Officer</b>	Simon Algar – Conservation & Design Manager	
<b>Key Decision</b>	Yes	
<b>Classification</b>	Open	
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To note the extent and range of consultation responses received in relation to the public consultation for the Heritage Strategy.</li><li>2. To agree the final version of the Heritage Strategy for adoption and publication. *</li></ol>	

\* *Due to factors including the short lead-in time between the February SMT meeting and the report deadline for Cabinet Meeting reports for the 18<sup>th</sup> March Cabinet meeting, the fully re-drafted version of these documents will not be available for members to review at the Cabinet meeting on the 18<sup>th</sup> March. However, all of the changes to the text are included in the agenda pack related to this report. The fully completed version of each Heritage Strategy document (properly formatted and with all illustrations included) will be circulated to members for information as soon as the remaining photography and desk top publishing work has been completed. It is estimated that this will be towards the end of March or early April due to staff leave commitments and a temporary staff shortage in the Council's Communications Team. The red text shown in the strategy documents in the agenda packs relates to changes made in relation to the significant consultation feedback provided, much of it quite detailed in nature.*

## **1 Purpose of Report and Executive Summary**

1.1 The purpose of this report is to note the extent and range of consultation responses received in relation to the public consultation for the Heritage Strategy and what impact this could have on the final form of the Strategy to be taken forward to adoption.

## **2 Background**

1.2 The consultation draft version of the Swale Heritage Strategy was agreed at the December 2019 Cabinet.

1.3 The Strategy and associated action plan was drafted to ensure that:

1. Projects are prioritised in on heritage at risk or on heritage anticipated to, or already facing major change – such projects will therefore necessarily include all the main towns in the Borough and their respective town centre areas;
  2. New development and regeneration proposals where appropriate will be used to promote 'heritage' improvements;
  3. Partnership working is utilized wherever possible, but in particular, where this would aid in the development of grant funding bids to support project work; and
  4. Solutions will be sought to help maximize the capacity and ability of third parties (including the local community and interest groups) to help deliver projects.
- 1.4 As agreed at the December 2019 Cabinet meeting in accordance with the report recommendation, public consultation commenced on Friday the 20<sup>th</sup> December 2019 and ran for a period of 6 weeks until Friday the 31<sup>st</sup> January 2020. Reminder letter were sent out to consultees in early January given the timing of the consultation beginning just before the Christmas break.
- 1.5 A wide range of parties were consulted on the Strategy ranging from statutory government agencies such as Historic England, the Highways Agency and the Environment Agency, Kent County Council, the national and local amenity societies, adjoining local authorities, Historic Swale and those businesses/individuals, etc. that had previously registered to be consulted in relation to Local Plan documents.
- 1.6 A total of 88 responses were received from 86 different respondents (two submitted an initial response and a follow up response). The make up of responses was as follows:
- Private individuals: 44
- Local amenity groups/societies: 15
- Parish/Town Councils: 9
- Government and other national advisory/regulatory bodies: 4
- Utility companies and other infrastructure providers: 2
- Kent County Council and other local advisory and regulatory bodies, including adjoining local authorities: 4
- Local businesses/landowners, or companies with local business/property interests: 10



2.6 The range of issues raised is wide and many of the responses were long and detailed, in particular from some of the private individuals, amenity groups and the key consultees of Historic England and Kent County Council. However, whilst the broad majority of respondents expressed positive comments about the Strategy in general, and in particular for the high level vision and derived set of 5 priorities, there are 7 key themes which can be picked up from a review of the responses and these are as follows:

1. A particular desire to see the current collection of small museum/heritage study facilities in Sittingbourne re-homed together in a centrally located larger facility with more space for display, research, workshop/learning events, archive storage and ideally a café facility.
2. More officer and financial support to be given to the local groups running heritage sites and museums.
3. A requirement that moveable/portable heritage (\* see below) be referenced in the types of heritage the Strategy priorities relate to.
4. That the development of a 'local list' (i.e. a list of buildings, structures and/or natural/manmade features of local heritage interest) be fully committed in the Strategy and brought forward as an action for the initial 3-year Action Plan.
5. That natural heritage is considered as part of the Heritage Strategy.
6. That planning enforcement around securing the conservation of heritage assets is made more effective; and
7. Concern that the additional resources being put into the implementation of the Strategy will not be adequate to achieve the desired aims, particular over the longer term.

\* Portable/moveable is not specifically defined by the respondents that have referred to this point, but it is clear that it includes archaeological finds, museum items (paintings/ceramics, etc.), archive documents and information and structures/machines that were designed to move, including trains and planes.

2.7 There were also, perhaps not surprisingly a range of comments (principally from private individuals) criticizing the Council's past track record on heritage conservation, some businesses (notably Shepherd Neame) expressing concern regarding the possibility of new or strengthened heritage designations, a wide range of local groups expressing a general willingness to work with the Council in developing heritage projects relevant to them, and some requests to re-consider the priorities of the Strategy and the associated order of items in the initial 3-year Action Plan.

2.8 A total of 181 different points has been noted and set down in the consultation response table forming **Appendix A**. Whilst some of these points overlap to some degree, they are all included as they come from different groups with different emphases. The points set out in relation to private individuals responses represent the collective themes that are drawn from this group. In relation to the other types of respondents, the table clearly shows where different organisations making responses are making the same or a very similar point.

- 2.8 In relation to key response themes 1 and 2, the feedback in this respect has been noted and consideration into how this could be delivered will feed into various separate but related work streams including the Visitor Economy Framework and the Sittingbourne Town Centre Supplementary Planning Document.
- 2.9 In relation to key response theme 3, this is something which the Council already does to some degree and it can be made clear that we will continue to do so as far as possible in a context of very limited resources. The Council can also reference the fact that conservation accredited organisations (such as the Faversham Society) have shown that they can pull in more external funding towards the area because of the greater level of professionalism/expertise that this accreditation signifies. The Council has repeatedly tried to assist other groups in working towards this important accreditation.
- 2.10 In relation to key response theme 4, it was always the intention to produce a local list, particularly given the stated commitment to this in the current Local Plan and following the ministerial announcement on this matter late in 2019, albeit that it was originally considered this would be something to work on during the second 3-year action plan. However, it is clear from the number of responses specifically referencing this matter, that earlier consideration would have a number of benefits, not least of which would be early positive engagement of local groups, societies and residents, etc., along with the opportunity to identify and protect (to some limited degree) what in reality would make up a significant proportion of, if not the bulk of Swale's heritage asset portfolio in overall terms. It is therefore planned to commence work on this in 2020, but to spread this out over the duration of the initial 3-year action plan to take into account the complexities/logistics of putting in place such a list with full support, including that of the majority of affected property/landowners. Adding a further layer of protection above and beyond what can realistically be achieved through a Local Plan policy could, as things stand, only be done through the making of one master, or a series of individual Article 4 Directions, but the making of such Directions would require acceptance from the Secretary of State before it/they could be confirmed. This could be the final element of the action in the initial action plan, or depending on the complexity and anticipated level of support (something to be tested via public consultation), might be an element of the overall work that would need to be carried into the subsequent action plan.
- 2.11 In relation to key response theme 5, this has also already been discussed internally with the Cabinet Member for Planning, and whilst it has been agreed that it would be appropriate to include a themed section on historic landscapes (as well as necessarily strengthening the recognised weaker section on archaeology – with the assistance of KCC's Principal Archaeologist), the wider issue of hedgerow and tree recognition and protection is beyond the remit of the

Strategy and something which is/will be effectively dealt with in other Local Plan documents.

- 2.12 In relation to key response theme 6, this has also already been discussed internally with the Cabinet Member for Planning, and it is anticipated that the Planning Enforcement Team will be strengthened later this year by some additional administrative support. The charter is also due to be reviewed before autumn this year (in relation to auditing of the function) and will be re-drafted to make adequate reference to enforcement of controls around the area of buildings/historic areas in poor/declining condition.
- 2.13 In relation to key response theme 7, the Council is aware that further funding will be needed to support the vision and priorities of the Strategy over the Strategy period, and this will be reviewed over time.
- 2.14 Whilst there are limitations on the funding available for this program, there are many valuable points that have been put forward as a result of the consultation process that can be incorporated into the Heritage Strategy and Action Plan without impacting on the available resource.
- 2.15 In conclusion, it is therefore proposed to take the Strategy forward absorbing much of the constructive feedback provided, which will strengthen the Strategy and add value to it in the widest sense.

## **2 Proposal**

- 3.1 That the extent and range of consultation responses received in relation to the public consultation for the Heritage Strategy be noted.
- 3.2 To agree the final version of the Heritage Strategy documents for adoption and publication based on the background information and conclusion set out above. Note that due to factors including the short lead-in time between the February SMT meeting and the report deadline for Cabinet Meeting reports for the 18<sup>th</sup> March Cabinet meeting, the fully re-drafted version of these documents will not be available for members to review at the Cabinet meeting on the 18<sup>th</sup> March. However, all of the changes to the text are included in the agenda pack related to this report. The fully completed version of each Heritage Strategy document (properly formatted and with all illustrations included) will be circulated to members for information as soon as the remaining photography and desk top publishing work has been completed. It is estimated that this will be towards the end of March or early April due to staff leave commitments and a temporary staff shortage in the Council's Communications Team. The red text shown in the strategy documents in the agenda packs relates to changes made in relation to the significant consultation feedback provided, much of it quite detailed in nature.

## 4 Alternative Options

- 4.1 There are a whole range of possible alternative options taking into account the wide range of asks of the Council submitted via the consultation exercise. However this can sensibly be whittled down to two main alternative options:
1. Leave the Strategy and Action Plan as it stands without any further changes. This would not be unacceptable given the generally positive feedback provided, and in particular the comment from Historic England that the draft Swale Heritage Strategy is viewed by it as ‘...a relatively good document of its kind and compares well with other Kentish examples, currently existing or in production’. However, in spite of the significant extra officer time that would be required to re-draft the Strategy documents to take on board the cost-neutral constructive feedback, it is considered on balance that this would in the longer term represent time well spent, particularly if it assists in strengthening important professional relationships with stakeholders and supporting future bids for funding from heritage bodies including Historic England and the Heritage Lottery Fund.
  2. Taking on board all of the key asks set out in 2.6 above. This would result in the Council essentially making commitments to work that would require extra resources, and carrying out additional work for the Heritage Strategy, already partly actioned under other work streams, and planned for other work streams in the future.

## 5 Consultation Undertaken or Proposed

- 5.1 This is as set out in section 2 of this report with the resultant feedback set out in the consultation response table at **Appendix A**.

## 6 Implications

Issue	Implications
Corporate Plan	Protecting and improving the built environment are priorities in the emerging Corporate Plan.
Financial, Resource and Property	<p>The proposed initial (3 year) Action Plan to support the Draft Heritage Strategy has been drafted on the basis of utilising the existing resources available within the Council and the additional £250,00 injection agreed by members. Therefore, it is not proposed that any growth bids be made. This remains unchanged as a result of the public consultation.</p> <p>However, should the Council wish to display a similar level of ambition and thus take forward a similar level of actions for the 2<sup>nd</sup> and subsequent action plans, additional resource will be required.</p>

Legal and Statutory	There is a statutory obligation on LPA's to consider the preservation and enhancement of conservation areas, listed buildings and designated heritage assets in determining development proposals
Crime and Disorder	The Borough Council is a founding member of Heritage Watch, which is an affiliation of heritage focussed organisations set up in liaison with the police force to tackle and reduce the growing problem of heritage crime (e.g. theft of priceless artefacts and lead roof sheeting from churches). The Kent Branch of Heritage Watch (where the key mover behind this initiative is based) is interested in the possibilities that the Swale Heritage Strategy has for improving effectiveness in both deterring/preventing and tackling heritage crime when it happens. This issue is covered in the strategy document and public consultation on the strategy involved liaison with the Kent Police and other members of Kent Heritage Watch.
Environmental Sustainability	One of the three dimensions of sustainable development is its environmental role: contributing to protecting and enhancing our natural, built and historic environment. The other two dimensions are a strong economy and a healthy and socially vibrant community
Health and Wellbeing	The health and wellbeing aspects of interaction with heritage assets and heritage related projects are referenced in the Heritage Strategy.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

## 7 Appendices

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

- Appendix A: Consultation Response Table (also including full copies of responses from key consultees, Historic England and Kent County Council)
- Appendix B: Draft re-worked version of the Swale Heritage Strategy \*
- Appendix C: Draft re-worked version of the Swale Heritage Strategy Initial Action Plan \*
- Appendix D: Draft re-worked version of the Swale Heritage Strategy Baseline 2020 Local Heritage at Risk Register \*

- \* Please note: due to factors including the short lead-in time between the February SMT meeting and the report deadline for Cabinet Meeting reports for the 18<sup>th</sup> March Cabinet meeting, the fully re-drafted version of these documents will not be available for members to review at the Cabinet meeting on the 18<sup>th</sup> March. However, all of the changes to the text are included in the agenda pack related to this report. The fully completed version of each Heritage Strategy document (properly formatted and with all illustrations included) will be circulated to members for information as soon as the remaining photography and desk top publishing work has been completed. It is estimated that this will be towards the end of March or early April due to staff leave commitments and a temporary staff shortage in the Council's Communications Team. The red text shown in the strategy documents in the agenda packs relates to changes made in relation to the significant consultation feedback provided, much of it quite detailed in nature.

## **8 Background Papers**

None.

**APPENDIX A** (for Cabinet Report, March, 2020)

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



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



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

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

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

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

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



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

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

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



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

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

Consultation Response Type	the history of areas such as Painters Forstal. Water extraction has made a big difference to this part of the landscape e.g. there was once a grand boating lake at Lorenden Park.	Summary of SBC Response
<p data-bbox="172 338 507 495"><b>Local businesses/landowners, or companies with local business/property interests</b></p>	<p data-bbox="507 306 1605 432">164. Medway &amp; Swale Estuary Partnership: Minor corrections pointed out for 2 different sections of the Strategy. Mention is also made to the reference in the Strategy concerning the question of whether Tonge can be considered a notable location in relation to the epic Old English Poem, Beowulf.</p> <p data-bbox="884 621 1228 653" style="text-align: center;"><b>Summary of issues raised</b></p> <p data-bbox="507 747 1605 873"><b>Respondents in this category number 10 and consist of: D.S. Smith Paper Division (Kemsley), Duchy of Cornwall, Fenrose Ltd, Frogna Farmhouse, G.H. Dean &amp; Co. Ltd, Green Cube CIC, Nixox Ltd, Peel Ports Group, Shepherd Neame Ltd and Swan Quay LLP.</b></p> <p data-bbox="507 905 1605 1125">165. D.S. Smith: Some inaccuracies highlighted concerning the history of Kemsley Mill and its founders. The paper mill is starting to work in its centenary and we are continuing to gather in as much evidence about the mill and village as possible, which can be scanned at high resolution. We now have the two WWII plaques removed from what is now the Appleyard mounted next to our Visitors Centre. Kemsley village should be included in reference to important C20 buildings. We have much information on the village and the social welfare approach used by Frank Lloyd.</p> <p data-bbox="507 1157 1605 1472">166. Duchy of Cornwall: The Duchy owns land southeast of Faversham and is engaging with SBC through a Planning Performance Agreement to develop proposals for part of the land in question between the M2 and A2 for a mixed use sustainable urban extension, for which an Enquiry by Design and a conceptual masterplan has been provided. The Enquiry process identified Faversham's history as a key feature of the town's identity, greatly valued by local people. The emerging design proposal therefore aims to positively manage the effects of growth on the town's identity and function, as referenced in the Strategy and through the Enquiry. Specifically, heritage assets within and near to the proposed development area (including the Faversham-next-Preston Conservation Area) have informed the conceptual masterplan.</p> <p data-bbox="507 1503 1605 1692">167. Duchy of Cornwall: The draft Strategy's principles are consistent with the Duchy's approach to building new communities, most notably the role of heritage in enhancing local distinctiveness and place making, and there are considered to be significant opportunities in this respect. The SE Faversham Draft Housing Manual produced by the Duchy following the Enquiry provides a baseline for ensuring that the proposal displays an appropriate level of contextual sensitivity.</p> <p data-bbox="507 1724 1605 1911">168. Duchy of Cornwall: The Faversham-next-Preston CA is relatively close to the proposed SE Faversham mixed use development area, and it is noted that the Strategy references the review of this conservation area in the initial Action Plan. The Duchy requests that this conservation area should not be extended further east along the A2. Such a larger area was not considered to be warranted when it was designated, and nothing appears to have changed materially. Any possible extension of the existing CA</p>	<p data-bbox="1605 464 2778 527">165. Corrections to relevant Strategy section actioned. Other points noted for future reference in relation to planned/anticipated action plan items.</p> <p data-bbox="1605 716 1991 747">166. Noted and acknowledged.</p> <p data-bbox="1605 1062 1991 1094">167. Noted and acknowledged.</p> <p data-bbox="1605 1283 2778 1503">168. Noted and acknowledged. As acknowledged in relation to the Faversham Society response, the review of the Faversham Conservation Areas will be brought forward to help inform the neighbourhood plan work for the town already under way. SBC will necessarily review the boundaries of both conservation areas as a key part of this work. Based on current knowledge of the Faversham-next-Preston Conservation Area, it is not anticipated that the boundary will be materially changed, but notwithstanding the point made, this cannot of course be ruled out.</p> <p data-bbox="1605 1598 2778 1850">169. Noted and acknowledged. SBC appreciates the point made concerning the monitoring process, but considers that a more wide-ranging triennial Action Plan report combined with an annual update to the (publicly available) Local Heritage at Risk Register is sufficient, particularly bearing in mind the limited staff resources it has to carry out the wide range of ongoing and planned heritage related work. Annual updating of the at-risk register will serve to inform if any additional resources need to be obtained, and SBC is also committed to exploring the use of existing software packages to help relevant staff more easily monitor and record changes to, and the condition of all the Borough's statutory listed buildings and structures.</p>

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

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

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

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

This page is intentionally left blank



# A Heritage Strategy for Swale

2020 – 2032

**Adopted March 2020**





# **Swale Borough-Wide Heritage Strategy 2020-2032**

**ADOPTED MARCH 2020**

# CONTENTS

Foreword .....	6
Executive Summary .....	7
List of Figures (maps and tables) .....	9
<b>1. Introduction: A Heritage Strategy for Swale .....</b>	<b>9</b>
1.1: Why a heritage strategy? .....	9
1.2: <b>Scope of the heritage strategy .....</b>	<b>XX</b>
1.3: A unique strategy for our unique Borough .....	10
1.4: Community involvement with heritage projects.....	11
1.5: <b>The Swale Local Plan and heritage .....</b>	<b>11</b>
1.6: Neighbourhood Plans and heritage .....	13
1.7: Other key complementary plans, strategies and frameworks .....	14
1.8: <b>Our big heritage issues, and possible solutions.....</b>	<b>15</b>
<b>2. Our Vision, Priorities and Strategy Strands .....</b>	<b>17</b>
2.1: Our Vision .....	17
2.2: Our Priorities and Strategy Strands .....	17
2.3: <b>How will this translate into actions? .....</b>	<b>XX</b>
<b>3. Our Heritage: it's significance .....</b>	<b>18</b>
<b><i>Heritage Strategy Strand A: Understanding &amp; Designation</i></b>	
3.1: Heritage Strategy Priority Alignment(s) with <b>Strategy Strand A</b> .....	18
3.2: The story of our borough: Setting the scene.....	19
3.3: <b>An introduction to heritage designations .....</b>	<b>XX</b>
3.4: <b>An introduction to the key heritage themes of the Borough.....</b>	<b>XX</b>
3.5: Aviation & defence heritage .....	27
3.6: Industrial heritage .....	30
3.7: Maritime and transport heritage .....	35
3.8: Agricultural, horticultural and rural heritage .....	41
3.9: <b>Towns and high streets .....</b>	<b>43</b>
3.10 Villages and hamlets.....	XX
3.11 Temples, churches, chapels and memorials.....	XX
3.12 Historic landscapes.....	XX
3.13 Archaeology.....	XX
3.14 Museums, collections & archives (digital/traditional).....	XX
3.15 Portable/moveable heritage.....	XX
3.16 Snapshot of our designated heritage.....	XX
3.17 Identifying locally important heritage.....	XX

<b>4. Our Heritage: strengths, weaknesses, opportunities and threats.....</b>	<b>51</b>
<b><i>Heritage Strategy Strand B: Positive Management and Intervention</i></b>	
4:1 Heritage Strategy Priority Alignment(s) with <b>Strategy Strand B</b> .....	51
4.2: Our strengths.....	XX
4.3: Our weaknesses.....	XX
4.4: Our opportunities.....	XX
4.5: Our threats.....	XX
4.6: Heritage assets: appraisal & positive management.....	XX
4.7: Heritage assets: positive intervention	
<b>5. Our Heritage: valuing it and fulfilling its potential .....</b>	<b>61</b>
<b><i>Heritage Strategy Strand C: Capitalizing &amp; Championing</i></b>	
5.1: Heritage Strategy Priority Alignment(s) with <b>Strategy Strand C</b> .....	61
5.2: Economic, cultural and other benefits.....	61
5.3: Raising awareness and building a positive legacy.....	63
<b>6. Resourcing and Delivering the Heritage Strategy .....</b>	<b>64</b>
6.1: Swale Borough Council’s Functions, Role and Resources .....	64
6.2: External resources (national and local).....	65
6.3: Partnerships (working together).....	67
<b>7. Conclusions &amp; Way Forward.....</b>	<b>68</b>
<b>8. Implementation, Monitoring and Review .....</b>	<b>69</b>
8.1 Heritage Strategy Action Plans (Triennial rolling plans over the lifetime of the strategy).....	69
8.2 Monitoring Framework & Strategy Review.....	69
<b>Acknowledgements.....</b>	<b>XX</b>
<b>Appendices .....</b>	<b>71</b>

I Action Plan 1 (2020 – 2023)

li Baseline 2020 Swale Heritage at Risk Register

## Foreword



Swale's heritage is a major asset, not just in terms of our cultural offer and our visitor economy, but also regarding the area's ability to attract investment and employment. Key factors in making an area attractive as a place to live, **learn**, work, invest and visit include jobs, quality of environment and social and cultural infrastructure. Swale's heritage is essential to all of these.

Swale's historic buildings and areas deliver a wide range of economic, social and environmental benefits and support a wide range of economic activity. This includes accommodation for businesses, recreational facilities, community facilities and residential accommodation. Heritage-led regeneration can help to achieve significant economic and physical transformations in Swale, as this strategy demonstrates.

A well-maintained historic environment helps to create a sustainable environment, with a sense of place and positive

image. This helps create a sense of civic pride in the places where we live, and the environment around us.

Heritage must form an integral part of Swale Borough's cultural, economic development, regeneration and tourism strategies if the area is to finally realise its potential. This document puts forward a positive strategy for Swale's heritage, to maximise the chances of it helping the Borough to meet that overall potential.

A handwritten signature in black ink that reads "Mike Baldock".

Councillor Mike Baldock,  
Cabinet Member for Planning and Swale Borough Council Heritage Champion



# Executive Summary

## SCOPE:

This strategy provides a framework for the designation, conservation, management and physical and economic regeneration of Swale's Historic Buildings and Areas, including designated historic parks and gardens. From analysis of evidence on Swale's heritage and some early engagement with local stakeholders, a high level vision and set of five associated priorities have been identified. These are set out below and were agreed in the context of the difficult challenges outlined in summary here.

## CHALLENGES:

Working in partnership with others towards achieving the effective and sustainable protection and enhancement of Swale's heritage in the difficult economic and political climate we face at the time of writing presents a considerable challenge, both for the Council, and for those it seeks to work with. The challenge as far as the Council is concerned, is made all the more difficult, but all the more pressing to meet in the context of much, including some of its most significant heritage, being at risk of substantial irreversible harm or in the worst cases, even total loss. Running parallel with this problem, which is a particular issue for Swale Borough, are the significant development pressures and growing climate change considerations, which Swale in common with many other local authorities face. As such, this strategy has been drafted demonstrating the understanding, ambition, commitment and necessary resourcing to start working towards making the vision set out below a reality at the conclusion of the strategy period, if not sooner.

## VISION:

*A vibrant and widely-known heritage which is valued for its own sake and for the long term benefits it provides to the people, economy and environment of the Borough of Swale*

## PRIORITIES:

1. To conserve, and where possible enhance Swale's heritage buildings, structures and areas and **moveable/portable heritage** as a cultural, economic, community and environmental asset to the area, in particular by positively managing the Council's own heritage assets, and by establishing a programme for the review and appraisal of Swale's conservation areas;
2. To make use of the borough's heritage to help achieve and promote sustainable and inclusive growth and regeneration, social and economic wellbeing, and civic pride, in particular **by actions to tackle and specifically reduce** Swale's heritage at risk **across the full range of nationally and locally designated heritage assets**;
3. To recognise and promote the role of Swale's heritage in creating or enhancing local distinctiveness and a positive image for the area as a place to live, **learn, work and visit, in particular by the Council continuing to work in an enabling role to develop and support projects and initiatives by local groups, societies and businesses that would bring about significant public benefit.**
4. To ensure Swale's heritage forms an integral part of local strategies and initiatives to promote tourism and the visitor economy, including through the conservation and subsequent positive management of the Borough's internationally significant maritime **heritage (at Sheerness Dockyard)** and aviation heritage **(at Eastchurch)** on the Isle of Sheppey;
5. Raising the historic environment **(and the important social history associated with it)** up the agenda by promoting awareness and understanding of Swale's heritage

among local residents, businesses and visitors to the area, in particular to help realise the cultural, educational and associated health benefits it can offer.

The five priorities will be considered and addressed through the following **Strategy Strands**:

**A: Understanding and Designation** (Our heritage: its significance);

**B: Positive Management and Intervention** (Our heritage: strengths, weaknesses, opportunities and threats – SWOT); and

**C: Capitalising and Championing** (Our heritage: valuing it and fulfilling its potential).

The series of Action Plans deriving from this Heritage Strategy will show how the proposed actions are linked to the priorities and underlying strategy **strands**, and that the highest priority in the early years of the strategy plan period **will be given principally to** tackling and reducing the major issue of heritage at risk facing the Borough.

## **RESOURCES FOR DELIVERING THE STRATEGY:**

The Council has dedicated, albeit modest existing in-house staffing resources available to support and where appropriate, initiate this important work. These are principally spread between the Council's Planning Service and Economy & Community Service teams, although this being a corporate strategy, officers from across the whole range of Service areas and teams are anticipated to provide input as needed. It was however recognized in the development of this strategy that further resource will be needed to support the significant challenges that lie ahead and to this end, the Council is therefore publicly committed to supporting the first 3 year action plan of this 12 year heritage strategy with an injection of £250,000, to help provide additional heritage specialist capacity and in some cases, limited physical works.

The Council is fully aware of the need to properly resource the priorities of the heritage strategy beyond the initial 3 years so that it can have a continual, and potentially momentum building positive effect on heritage conservation in the Borough. It also recognizes that its own limited resources (both staffing and financial) will only stretch so far, and as such it will, wherever possible, work with other agencies, developers and stakeholders to maximize the scope and benefits of this investment and the associated work to be undertaken. In particular, the Council will seek out and where feasible, apply for any match-funding opportunities and capacity building grants that exist.



## List of figures (maps and tables)

Fig. 1:	Map of Swale’s listed buildings .....	20
Fig. 2:	Table of Swale’s conservation areas (alphabetical order).....	21
Fig. 3:	Map of Swale’s conservation areas .....	22
Fig. 4:	Table of Swale’s Registered Historic Parks and Gardens.....	23
Fig. 5:	Map of Swale’s Registered Historic Parks and Gardens .....	23
Fig. 6:	Table of Swale’s scheduled monuments (parish order) .....	24
Fig. 7:	Map of Swale’s scheduled monuments .....	25
Fig. 8:	Map of Swale’s area of high townscape value.....	26
Fig. 9:	Map 5.7.1 from the Swale Borough Local Plan, showing the indicative location of main heritage assets in Swale .....	46
Fig.10:	Faversham Urban Archaeological Zone map .....	47
Fig. 11:	Milton Regis Urban Archeological Zone map .....	47
Fig. 12:	Queenborough Urban Archaeological Zone map .....	48
Fig. 13:	Sheerness Urban Archaeological Zone map.....	48
Fig. 14:	Sittingbourne Urban Archaeological Zone map.....	49
Fig. 15:	Table of Historic Swale group members .....	50

# 1. Introduction: A Heritage Strategy for Swale

## 1.1: Why a heritage strategy?

A heritage strategy is needed to help the Borough Council, key stakeholders and other interested parties protect and manage the historic environment in Swale Borough in a sustainable and **informed way that gets the best benefit and use of the Borough's heritage and realizes the opportunities that it offers. This vital work** includes setting an appropriate overall vision for the heritage in our Borough, and setting out a vision and set of priorities that, as far as possible, align with the plans and aspirations of local communities such that this is a strategy that can be as inclusive and widely supported as possible.

There is no specific legal requirement for a local authority to publish a heritage strategy, but in the context of the planning system for England and Wales, which is essentially a plan-led system for the management of development, the key central government document which sets out the framework for local planning policy through local plans (the National Planning Policy Framework, Edition 2, **Feb. 2019**) sets out in paragraph 185, that *'Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats...'*

**It is important to recognize at the outset that this heritage strategy is provided not as a restraint on change, but one which seeks to ensure that change insofar as it affects our heritage is accommodated sensitively such that the benefits our heritage provide are not eroded at the expense of the wider public benefit it typically provides.**

**The term heritage asset is one that is necessarily much used in this Heritage Strategy. It is defined by the government as 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)'. The Council recognizes however, that there are types of heritage that exist outside the remit and control of the planning system, and hence the scope of this Heritage Strategy is not just limited to the types of heritage considered within the planning system. More on this below, and for more information on designated heritage assets, please refer to sections 3.3 and 3.16 of this document.**

## 1.2 : Scope of the heritage strategy

This heritage strategy is therefore first and foremost a planning system based strategy designed to support and reinforce the core and development management policies set out in Bearing Fruits 2031: The Swale Borough Local Plan (adopted July 2017). Critically however, it is also designed to function as a necessary evidence base for ongoing work on the replacement local plan, and furthermore, it links to wider corporate strategies in order to help deliver wider priorities of the Council.

The Swale Heritage Strategy builds on work completed as an evidence base for the current adopted local plan, namely the Swale Heritage Asset Review document (June 2015), produced by Urban Vision CIC on behalf of the Council. The Heritage Asset Review document is too large to include as an appendix to this Heritage Strategy document, but can be viewed via this link: <https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/LP-Examination-documents/Swale-Heritage-Asset-Review-June-2015.pdf>

The Strategy is appropriately focused on the historic environment, and whilst consideration is given to historic landscapes (see Chapter 3, Section 3.12) the wider topic of natural heritage is not included here. This is, or will be covered in some detail in other Local Plan evidence base documents including the existing Swale Biodiversity Action Plan (2016) and the planned Blue & Green Infrastructure Strategy or Supplementary Planning Document, the work on which will commence later this year. Importantly however the Borough contains a wealth of heritage in the shape of archives, artefacts/archaeological finds and large moveable machines (such as steam trains) at its various museums and heritage attractions. As this Strategy is not just an evidence base/supporting document for the Local Plan, but also sets out the Council's wider, corporate position to the subject of heritage in the wider sense, it has therefore been designed to incorporate consideration of what might be conveniently termed, portable/moveable heritage.

The Strategy has been also purposely been designed to describe the rich heritage of the Borough in an accessible way with signposting to further information given that there is only so much information a document of this nature can sensibly contain. It is anticipated that the Strategy can be used by a wide range of individuals, groups and organisations, etc., to better appreciate the heritage around them, and to help communities and groups in developing their own projects and initiatives. The Strategy can also be used as an educational tool and in conjunction with other projects/initiatives (e.g. heritage-related volunteer options) to promote health and wellbeing.

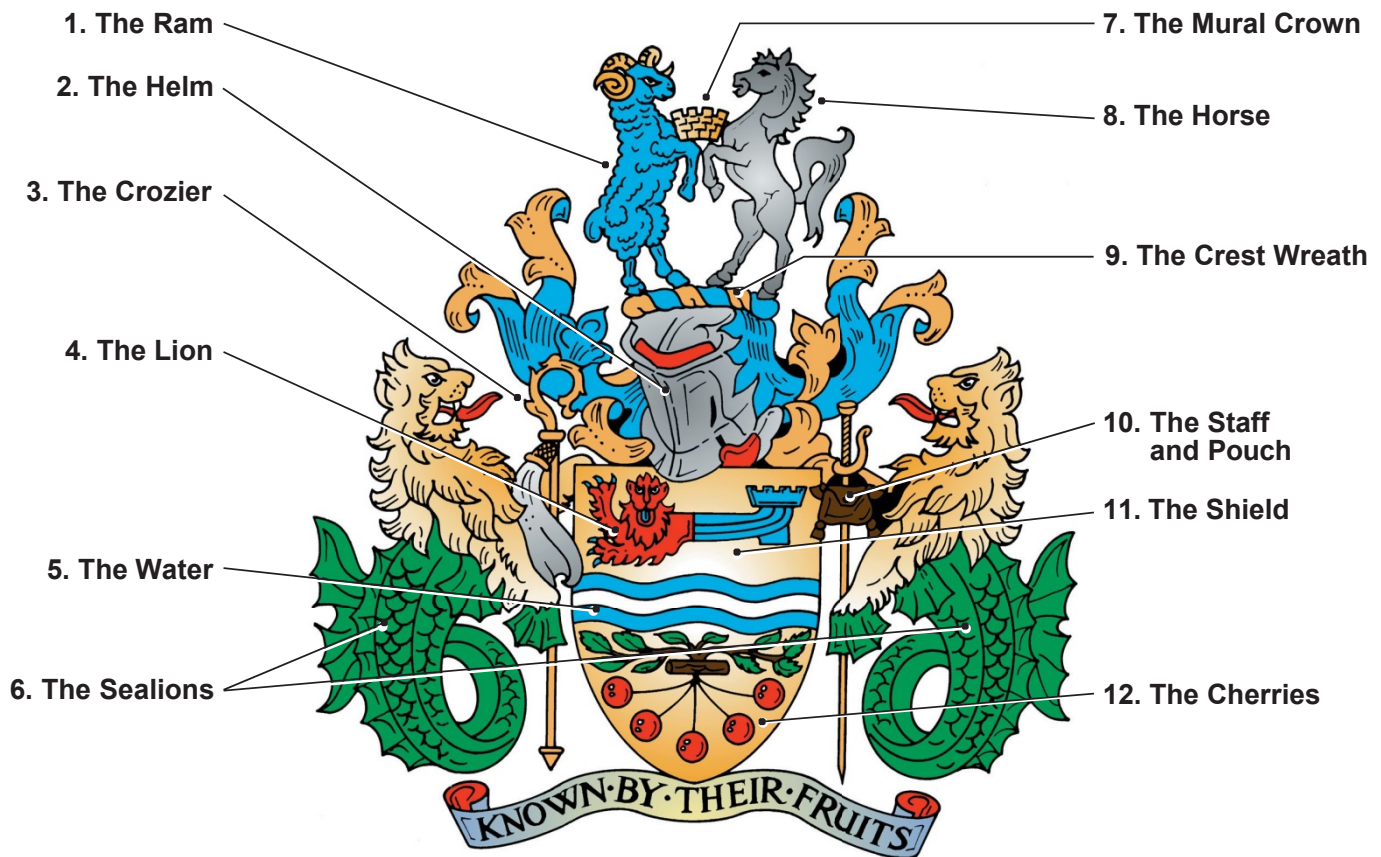


*Image of the new Sheppey Crossing, with the Kings Ferry Transporter Bridge in the foreground: two pieces of key 20th and 21st century transport infrastructure linking the island and mainland parts of Swale Borough.*

## 1.3: A unique strategy for our unique Borough

The Borough of Swale is unique in many ways, and as such, whilst there will be some heritage issues and opportunities in Swale also facing other local authority areas, a *copy and paste* exercise will not be truly effective. This is not just because of the range of heritage assets we have in the Borough (a number of which are of international significance), but also because of the rather special geography of the Borough, and the wide range of communities contained within. Many of these are represented by well established and knowledgeable amenity societies and other groups that have a strong interest in understanding, protecting and maintaining the heritage which helps to define and characterize their local surroundings, and in many cases provide a sense of place and pride in their local area. **This is a real strength.**

The Borough Council therefore wishes this to be a strategy which is as much for the residents and business in the Borough, as it is for the Council, and it is hoped that through the process of public consultation, a Heritage Strategy can be produced which all of those with a positive, publicly minded interest in the Borough can feel is partly shaped by them and can therefore be wholeheartedly supported.



### Swale's Armorial Bearings

An explanation of the details of this Civic Crest can be found at  
[www.swale.gov.uk/armorial-bearings-of-swale](http://www.swale.gov.uk/armorial-bearings-of-swale)





*Visitors at an archaeological site at Newington*

## **1.4 : Community involvement with heritage projects**

The Council wants to engage with the local communities in developing, implementing and completing projects to ensure that the end product or outcomes are ones that are supported beyond just the Council itself and **key** third party organisations such as Kent County Council and Historic England. **It fully recognizes that a real strength of the Borough's heritage are the highly active and knowledgeable heritage stakeholder groups that are found in several areas of Swale and that can and should help to deliver the Strategy.**

It will also look to enable/facilitate community groups that wish to deliver heritage projects through staff support where possible, and/or through grants (including through its current scheme of heritage, culture and members grants). **This role is important given the pressures on public spending, and giving guidance and support to the local community to deliver heritage actions not only provides better value on financial investment, but also empowers and inspires the local community to engage more fully with their heritage.**

## **1.5 : The Swale Local Plan and heritage**

The Local Plan 'Bearing Fruits 2031: The Swale Borough Local Plan', was adopted 26th July 2017, and includes the following vision.

'It is 2031 and Swale is known by the fruits of its endeavors.

We have harnessed our assets – a strategic location, diverse communities and an outstanding natural environment – and are a sustainable, flourishing place in which to enjoy life and do business, with:

- 1.5.1 Sittingbourne transformed into an attractive, competitive and prosperous town, with a thriving centre that residents across the Borough are proud to use;

- 1.5.2 Sheerness and Queenborough as beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey;
- 1.5.3 Faversham, a thriving market town and heritage destination that has grown organically; and
- 1.5.4 Successful rural communities across the downs, farmed plains and coast as places of innovation; nurturing enterprise, local produce and greater self-reliance’.

The plan includes 12 core objectives, most of which are relevant to heritage, with objective 4 specifically focused on heritage, and shown in bold text for clarity:

1. Adapt to climate change with innovation, reduced use of resources, managed risk to our communities and opportunities for biodiversity to thrive.
2. Use our coastal assets to support a strong economy and a sustainably managed environment.
3. Support economic success and improve community wellbeing with a network of maintained, protected and improved natural assets in town and country.
4. **Conserve and enhance our historic and natural assets as the means to drive regeneration, tourism, and environmental quality and to reverse declines in their condition.**
5. Strive for high quality design to bring a better quality of life, opportunities for healthy living and self-confidence to our communities.
6. Be flexible, provide choice and support sectors that can build on our strengths, diversify our economy, promote investment in skills, and develop our distinct opportunities in pursuit of greener and pioneering technologies.
7. Bring economic growth, regeneration and community development, especially to our most deprived communities.
8. Support our farming and food sectors so that they are at the forefront of increasing food security, reducing food miles and increasing local food consumption.
9. Provide the right housing to support demographic change and housing needs to regenerate and build stronger, greener communities.
10. Develop tourism and culture to support regeneration, employment growth, communities and environmental management.
11. Improve prosperity and environmental quality with efficient and sustainable transport networks.
12. Ensure timely delivery of the services and infrastructure to support strong communities.

In addition, there are four place-based objectives, again, all relevant to heritage:

1. Re-establish Sittingbourne as the principal town with investment in retail, leisure, culture and community services and further education, within new and improved green spaces and streets.
2. Reinforce Sheppey’s uniqueness by ensuring change: supports Sheerness as its commercial and service focus; strengthens and integrates communities at Rushenden and Queenborough and Minster and Halfway;

manages coastal and heritage assets; modernises leisure and tourism industries; and supports isolated communities.

3. Sustain Faversham's role and character as an historic market town serving residents, visitors and a wider area with a range of businesses and services that increase diversity and interest.
4. Address identified needs in our rural communities so that they are sustained in ways that also respect their scale and character.

The strategic aims and associated strategic policies of the Local Plan recognise the importance of heritage and Strategic Policy 1 (Policy ST1) states at section 12 that (the Borough Council will seek to) '*Conserve and enhance the historic environment by applying national and local planning policy through the identification, assessment, and integration of development with the importance, form and character of heritage assets (including historic landscapes)*'.

The core policies in the Local Plan are intended to build detail on the strategic aim policies and to ensure joined-up consideration across the themes covered, to matters of critical importance to the success of the Local Plan. They apply to all development proposals, and Core Policy 8 (Policy CP 8) deals specifically with 'Conserving and enhancing the historic environment', making specific reference and commitment to the production of a borough-wide heritage strategy:

To support the Borough's heritage assets, the Council will prepare a Heritage Strategy. Development will sustain and enhance the significance of designated and non-designated heritage assets to sustain the historic environment whilst creating for all areas a sense of place and special identity. Development proposals will, as appropriate:

- Accord with national planning policy in respect of heritage matters, together with any heritage strategy adopted by the Council;
- Sustain and enhance the significance of Swale's designated and non-designated heritage assets and their settings in a manner appropriate to their significance and, where appropriate, in accordance with Policies DM30-DM34;
- Respond to the integrity, form and character of settlements and historic landscapes;
- Bring heritage assets into sensitive and sustainable use within allocations, neighbourhood plans, regeneration areas and town centres, especially for assets identified as being at risk on national or local registers;
- Respond positively to the conservation area appraisals and management strategies prepared by the Council;
- Respect the integrity of heritage assets, whilst meeting the challenges of a low carbon future; and
- Promote the enjoyment of heritage assets through education, accessibility, interpretation and improved access.

Policies for development management within the 2017 Local Plan have wide relevance for heritage. Policies specific to heritage protection include:

- Policy DM 32 Development involving listed buildings;
- Policy DM 33 Development affecting a conservation area;
- Policy DM 34 Scheduled Monuments and archaeological sites;
- Policy DM 35 Historic parks and gardens; and

The Council is already working towards the replacement of the current adopted Local Plan (Bearing Fruits 2031) and the provision of this strategy will serve to underpin and inform the core and development management policies related to heritage conservation in the forthcoming replacement Local Plan. It will also help to influence the direction of travel for planned new housing and other types of growth to help ensure that such growth would not come at the expense of avoidable harm to the Borough's precious and irreplaceable heritage.

## 1.6: Neighbourhood Plans and heritage

### Faversham Creek Neighbourhood Plan

The Faversham Creek Neighbourhood Plan was made on 24<sup>th</sup> June 2017, following a successful referendum outcome. The 16 objectives of the plan include:

12. Protect and enhance the Creek's rich and outstanding maritime, industrial and landscape heritage for educational and economic purposes.
13. Create living and working environments that respond to the Creek's rich and outstanding maritime heritage, the demands for high-performing standards of sustainable development, whilst supporting existing businesses and their aspirations.

These objectives are addressed by a range of development management policies.



*Part of Faversham Creek, adjacent to Standard Quay: one of the many character areas in the Faversham Conservation Area*



## Boughton & Dunkirk Neighbourhood Plan

This neighbourhood plan is in the process of being finalized, and is anticipated to be taken to public consultation and a subsequent referendum in the near future. The emerging Swale Heritage Strategy has already supported the development of, and evidence base for this neighbourhood plan through the review and recent adoption (for development management purposes) of character appraisal & management strategies for the 3 conservation areas within these two adjoining parishes.

### Other neighbourhood plans

A number of these are expected to be made in the next few years, and it is anticipated that the actions arising from this Heritage Strategy will in many instances, support the development of these plans in directing new development in a sensitive and sustainable manner, which where possible will result in enhancement of the historic built and natural environment. Work has already commenced on a further neighbourhood plan for Faversham and the timing of the planned review work for the Faversham and Faversham-next-Preston Conservation Areas in the initial 3-year Action Plan has been brought forward to help inform this.

## 1.7 : Other key complementary plans, strategies and frameworks

### Swale Borough Corporate Plan

At the time of writing (March 2020), the new Corporate Plan 2020-2023 has just been through public consultation and it is anticipated to be adopted in May 2020. As it stands, the Corporate Plan contains 4 priorities, and the benefits that Swale's heritage brings to the Borough is very much recognized in Priority 2, which is focused on 'Investing in our environment and responding positively to global challenges'. One of the five objectives under this priority is 2.4: [To] 'Recognise and support our local heritage to give people pride in the place they live and boost the local tourism industry'

### Swale Visitor Economy Framework

Swale Borough Council recently prepared 'Swale - Your destinations of choice - A Visitor Economy Framework for Sittingbourne, Faversham and the Isle of Sheppey 2018 – 2023'. This includes six priorities:

1. Identity, marketing and promotion;
2. Infrastructure and connectivity;
3. Public realm improvements;
4. Sector support – Open for Business;
5. Developing the cultural offer; and
6. Market segmentation and information management.

Specific actions under these priorities include:

- To deliver improvements to the public realm in our town centres and strategic gateways to create a more visitor-friendly environment (car parks, lighting, street furniture, signing);
- To encourage and promote quality assessment to meet resident and visitor

- expectations of accommodation and visitor attractions;
- To develop a range of new and unique and distinctive experiences to include food and drink, sport and leisure, festivals and events, arts and culture, history and heritage and outdoor activities in coastal and rural destinations;
- To deliver enhancements to the Borough's physical environment that benefit residents and visitors...

This heritage strategy can make a significant contribution to achieving the priorities and actions of the Visitor Economy Framework, **and visitor data has already shown that the Borough's heritage plays a significant role in attracting visitors to the area. However, it is considered that more can be achieved in this respect, for example, through the development of the Borough's key heritage themes, such as Aviation & Defence heritage. These can provide packages that raise the profile of the heritage, bringing together different types of assets (designated and undesignated) with the stories of the Borough. Heritage packages can help to encourage overnight stays which further support the visitor economy.**

### **A Strategy and Service Charter for Planning Enforcement (Oct. 2017)**

This sets out the Council's approach to tackling breaches of planning control and categorises them into the priority order of Major, Medium or Low. Heritage assets are given some consideration in the framing of these priorities e.g. Demolition of a listed building, breaches of an Article 4 Direction, and works that are irreversible or irreplaceable and constitute a serious breach are all placed within the Major Priority category. **The Strategy and Charter are due to be reviewed by the autumn of 2020 and when this takes place, they will be revised to ensure that fuller and adequate consideration is given to the significant issues of dealing with owners that fail to properly maintain their heritage building, land or structure, along with associated issues of heritage at risk. The review will also look at whether any further delegation of powers should be provided to officers of the Council to allow for necessarily rapid interventions in cases of urgent threats to heritage assets. Further future reviews of and potential revisions to the Strategy and Service Charter for Planning Enforcement will also take into account the need to deal with the aforementioned heritage issues during the plan life of this Strategy.**

## **1.8: Our big heritage issues, and possible solutions**

The big **heritage** issues for the Borough of Swale as far as heritage is concerned can all be neatly filed under the principal headings of Heritage at Risk and Untapped Potential, although there are multiple strands of issues sitting under each of those, and there is also overlap of the issues between those two main headings.

The issue of heritage at risk is considered in more detail elsewhere in this heritage strategy (principally at Chapter 4) but in outline the principal **issues and the Council's related responses** are as follows:

- **Issue 1:** An already significant number of conservation areas, listed buildings and other heritage assets in a poor and declining condition, such that the heritage significance of these special areas, buildings and structures is reduced, and in some cases may not be fully retrievable (heritage assets are finite resources and once they have been lost, or

**Response:** An early focus on and review of the conservation areas, listed buildings and other heritage assets most affected. In the case of conservation areas, the provision of an up-to-date character appraisal and management plan will be provided to enable more sensitive and effective management of these areas moving forward, with additional controls (in the shape of Article 4 Directions and Areas of Special Advertisement Control) and associated guidance additionally being introduced where necessary to better manage change in these areas. In all cases, the Council will initially seek to work cooperatively with property and landowners in addressing issues of neglect and breaches of planning control, whether deliberate or unintended. This will be carried out in the context of helping property and landowners to understand what is significant in heritage terms about their asset, and how that significance can be managed effectively. Where cooperation is not provided, the Council will use the full range of enforcement powers (provided through national legislation) at its disposal to address the issues and remedy the harm. The range of powers available to this and all other Council's in the UK is referenced in some detail at Chapter 4 of this Strategy. However, for more information on the powers available to Council's to address issues of building neglect and deterioration, readers may find it helpful to view the Historic England guidance on this set out in its publication called Stopping The Rot. See: <https://historicengland.org.uk/images-books/publications/stoppingtherot/>

- **Issue 2:** An increasing number of problem owners which, or who display little interest in properly maintaining their property in an appropriately sensitive manner to help protect and conserve the special interest of the building(s)/structure(s) in question, and/or the character and appearance of the wider Conservation Area. The owners in this respect range from individual people and small local companies to significant landowners and multinational companies.

**Response:** See above. Additionally, in the worst case scenarios, the Council will (where the public interest case justifies it) seriously consider the use of the compulsory purchase powers available to it and may take on temporary or even permanent ownership of, heritage land, buildings and/or structures which current owners are allowing (deliberately or otherwise) to be harmfully altered and/or fall into decay. Any such compulsory purchase would it is anticipated, be carried out in partnership with a development partner (e.g. a building preservation trust or developer), but the Council will consider taking such action in isolation, if necessary.

- **Issue 3:** Limited Council resources, and in some cases, controls, to effectively tackle the inappropriate actions of such owners. As a general rule of thumb, there is no such thing as a problem building or structure – it is almost always the actions or inaction of owners or other parties with an interest in a building/structure (e.g. leaseholders and tenants) that result in problems developing for any particular building/structure.

**Response:** See above. Additionally, the Council is committed to strengthening its planning enforcement function and the associated Planning Enforcement Strategy and Charter to ensure that fuller and adequate consideration is given to the significant issues of dealing with owners that fail to properly maintain their heritage building, land or structure, along with associated issues of heritage at risk. Furthermore, the Council will continue to explore the possibility of recruiting a dedicated Heritage at Risk Officer – who would be able to focus in effectively on this significant problem – via a capacity building grant.

- **Issue 4:** An unbalanced mechanism for working with property owners to help conserve heritage significance: Previously, the Council was able to offer conservation grants to help the owners of listed buildings maintain their properties in an appropriately sensitive way, this being appropriate given the premium that typically has to be paid for the types of construction materials, construction detailing and level of skill/craftsmanship needed in this respect. Significant ongoing cuts to local government grants over a period of years has meant that the grant scheme has had to be abandoned, and as such, only positive advice can be offered by the Council in relation to repairs and alterations, and in certain cases intervention when it is clear that changes taking place are not appropriate. The previous ‘carrot and stick’ approach that was possible has thus given way to a largely ‘stick’ only approach which is unfortunate, as it is recognized that some listed building owners struggle to afford to be able to upkeep their homes, or other types of buildings in an appropriately sensitive manner.

**Response:** There are no obvious solutions to this problem in the context of central government’s significant ongoing funding cuts to local authorities in the last decade or so, and no prospect of this trend being significantly reversed within the lifetime of this strategy. However, the Council can (at the time of writing) offer very limited heritage grants for projects that would offer a clear public benefit, and the grants that the Council can offer will be reviewed from time to time in the context of what the Council can realistically afford to provide, and the type and level of grants available from other sources. The Council will continue to help to signpost those in need of financial assistance (to carry out essential repairs/maintenance or clear, sensitive improvements to heritage assets) to other possible sources and will also continue to provide free specialist advice, where requested to owners of heritage assets wishing to undertake repairs.

- **Issue 5:** Exacerbating the above stated issue is the fact that the VAT system in this country in terms of rate reductions, is biased towards new works and alterations over repairs, which as well as making repair work more expensive than it need be, also arguably leads to a tendency for some owners to wait for elements of their buildings to fall apart and then having to replace them. In the process, the special interest of the building/structure can therefore **sometimes** be diminished.

**Response:** Again, there is no obvious solution to this problem, following the government’s decision to introduce VAT to approved works on listed buildings for the first time ever in 2012. The Swale Borough based, but nationally operating Listed Property Owners Club with the strong backing of the multiple local and national heritage focused organisations making up the Heritage Alliance are leading the way in terms of seeking to persuade the government to replace the current VAT regime with one which would encourage and allow for the improved conservation of the nation’s listed buildings. The Council will consider the options it has to best help influence the government’s thinking on this matter.

**Issue 6:** Development proposals impacting on the Borough’s settlement and landscape patterns and features, and on its archaeological and built heritage assets.

**Response:** The Council cannot set the amount of new housing it is required to provide but it can and will use the various tools and controls available to it at both the site allocation and planning application assessment stage to limit and mitigate,

and where possible avoid any harm in this respect. Ongoing and planned work around the historical development of settlements, landscape types in the Borough (including historic landscapes) and the development of a Local List, which will identify important local heritage (including built and landscape feature heritage assets), will help to make the Council more alert to potential impacts in this respect and this will in turn inform the discussions and negotiations that take place with developers. With particular reference to archaeology, The Borough Council would normally consult the county's archaeologists on development that falls within mapped *Areas of Archaeological Potential* as well as on larger scale of development in other areas. The mapping has limitations in that it is not up to date and is based on where archaeological remains have been identified from previous investigation and survey and concentrates around the northern part of the Borough. In reality the archaeological potential of the borough is more widespread, and so to address the shortcomings of the consultation system, revised mapping is being prepared by the County Council. Relabeled as *Archaeological Notification Areas* to reflect their purpose the new maps will recognise the widespread potential in the borough and guide consultation in a scaled approach. The mapping will also be supported by improved guidance to developers.

**Issue 7:** Coastal erosion, flooding and climate change impacting on heritage.

**Response:** The Council is not the responsible body for flood protection, but it will work with the Environment Agency (which is), along with other relevant parties in seeking to find feasible and sustainable solutions to this growing issue. The Council will seek to ensure that new development is either not at risk of flooding or designed to cope with limited flooding. In particular, it will seek to ensure that the provision of new development does not generate knock-on flood risk issues for existing areas and that sustainable urban drainage systems are put in place for new development that are designed to cope with the increased probability of flooding. In respect of heritage assets, the Council will look to work constructively with the owners of such assets to allow for the development of mitigation measures where necessary, in doing so carefully weighing up the possible harm to a heritage asset through the introduction of such measures against the benefits of the longer-term conservation of the asset. The re-use of disused historic buildings will be generally encouraged and there are sustainability benefits in doing so over new build which will, repeated as a cumulative practice on a national and international basis, help to limit the carbon footprint of growth thus helping to limit climate change.

**Issue 8:** Harmful agricultural operations and leisure activities impacting on heritage.

**Response:** The Council has limited control over many agricultural operations as many are allowed under the range of permitted development rights allowed for this by government. In some instances, there may be the scope for the Council to work with the landowner/farmer to agree a safeguarding measure, or where this is not possible, in some cases the Council may be able to introduce additional planning controls to protect a feature of heritage interest, and if the feature is deemed significant enough, consideration could be given to formal designation at a national level which would provide protection from potentially harmful operations. Archaeological heritage is particularly vulnerable in this respect and a large part of the solution to this particular issue is in having or



developing awareness of archaeological heritage that may be harmed by such operations, and looking to put in controls to prevent this, where feasible. The additional mapping work which the County Council is preparing may help to identify where some interventions may be necessary. In terms of impact from leisure activities impacting on heritage assets, the key will be working with the landowners to agree safeguarding measures, which in part may involve making activity users aware of the heritage interest they may unwittingly be harming through interpretation and e.g. if necessary to protect particularly vulnerable/sensitive heritage features, some form of barrier control.

**Issue 9:** Vandalism affecting many heritage assets throughout the Borough. In some cases, this has been severe and resulted in buildings being burnt to the ground by arsonists.

**Response:** This is principally a matter for the Kent Police to try and tackle. It is unlikely that this problem could ever be completely eradicated, but there are measures that can be taken to reduce the risks of vandalism taking place, and in some cases, limit the extent of harm that would arise where vandalism does arise. The Council will aim to support the owners of heritage assets affected by this type of problem and where appropriate, will liaise with the owner(s) and Kent Police to eliminate or mitigate this problem as far as possible. Whilst the Council will seek to ensure that the special significance of a heritage asset is not unduly compromised in the possible introduction of measures to address this issue, a pragmatic view will be taken, particularly in relation to properties or areas of land that have been subjected to repeated acts of vandalism, and which have been formally recorded by the police. Furthermore, the Council is committed to working with the Kent Police and relevant owners to prosecute offenders that have been caught and ensure that the impact of their crimes (notably to the heritage significance of affected properties or land) is properly taken into account by the courts. To this end the Council is committed to following the steps already taken by Canterbury City Council and Dover District Council (and a number of other local authorities elsewhere in England) in signing up to the Memorandum of Understanding as a proposed further local authority member of the Alliance to Reduce Crime against Heritage (ARCH). For more information on this initiative, please visit the website hosted by Historic England:

<https://historicengland.org.uk/advice/caring-for-heritage/heritage-crime/>

**Issue 10:** An increasing problem of historic buildings being targeted for their construction materials (principally lead, but sometimes other types of material which can be sold on through the reclaimed materials market), and in the case of buildings which are not permanently occupied (typically churches and church halls), break-ins to steal the contents of these buildings. As well as the loss of sometimes very valuable artifacts, this can also result in damage to important historic fabric such as doors and/or windows used as the route into and out of the building by thieves.

**Response:** Measures have already been taken at a national level to reduce this problem (e.g. by the firmer regulation of the scrap metal market), but the problems still persist both of metal theft, and for other types of heritage crime. As per the above, the Council will work with property owners and Kent Police to eliminate or reduce this problem as much as possible, and a pragmatic and proportionate view will be taken by the Council in relation to proposals (requiring listed building consent

and/or planning permission) to introduce security measures such as CCTV and/or alarm systems where advice from the police or independent security consultants indicate such measures would likely be effective in deterring or limiting harm to the historic fabric of heritage assets.

**Issue 11:** The continued growth pressure in the London and southeast regions over many years has resulted in more vehicles on our roads, resulting in heavy traffic levels and associated air pollution affecting conservation areas and other historic areas on principal roads, notably Newington High Street Conservation Area, and Ospringe Conservation Area on the A2 trunk road.

**Response:** The Intergovernmental Panel on Climate Change (IPCC) provides comprehensive and balanced assessment on the present and predicted global warming impact, including mitigation and adaption measures. The IPCC will hopefully influence future legislation and government action with regards to targets, plans and policies for improving the natural environment and the protection of it. Swale Borough Council has declared a climate emergency and action plan in response to recommendations from the IPCC.

A strategic Air Quality Action Plan (AQAP) (2018 – 2022) is in place, which was approved by Defra in September 2019. At present in Swale there are 5 Air Quality Management Areas (AQMA's) declared for the exceedance of the annual Air Quality Objective for NO<sub>2</sub>. The key priorities are to target reductions in emissions from vehicle fleets, smooth traffic flows, reduce congestions and protect local communities. The AQAP aims to deliver compliance of air quality objectives through a combination of strategic (e.g. Clean Air Zone along the A2) and local focused AQMA (e.g. ECO stars freight recognition) measures.

The Council is not the Highway Authority, therefore various measures and resources needed within the AQAP are highly dependent on Kent County Council (KCC) involvement. An integrated approach with both internal and external partners is required. For example; aligning the Transport Strategy and Swale Freight Management Plan (2016) with the AQAP measures is essential. In addition, the new Local Plan will include an air quality policy.

It will be difficult for the Council to be able to materially influence the number of vehicles using the road network in the Borough and surrounding area until there is a change in government policy. However, the Council can work to try and achieve this in partnership with KCC (as the Highway Authority) by focusing on measures such as improved infrastructure for electric vehicles, alternative modes of transport to support modal shift, and introducing vehicle weight limits to move large, more polluting vehicles away from sensitive areas.



Boat Store at Sheerness Port – Heritage at Risk Grade I listed building

**Issue 12:** The vulnerability of heritage in the Borough that is currently either unrecognized or not formally designated.

**Response:** The scope for harm to occur in this respect will be limited by the proposed actions of the Borough Council and County Council moving forward (see responses in relation to issues 6 and 8. Gaining an early and deep understanding of the heritage significance of any given heritage asset will be critical to developing measures to manage the long term conservation of it.

**Issue 12:** The untapped potential of the Borough’s heritage to provide a wide range of benefits.

**Response:** This is something that is touched on in the Council’s Swale Visitor Economy Framework but it is also very clear from a quick look at the wide range of heritage that the Borough has to offer, that much of it is little recognized by a wider audience, and partly as a result of this, it is undervalued and inadequately understood. A key example of this is the group of listed buildings and structures at Sheerness Port, a number of which are graded at the higher grade I and II\* level (i.e. a notch above the lower and more typical grade II listing status). The grade I listed Boat Store is considered to be of international heritage significance principally because of the pioneering form of its iron-framed construction which helped pave the way for the skyscraper buildings of the late 19<sup>th</sup> and early 20<sup>th</sup> Century, and yet even within the Borough itself, many people are unaware of its existence.

As part of its public commitment to protecting the Borough’s precious and irreplaceable heritage, the Council will therefore seek to work with a wide range of local and national groups in **raising awareness of**, and championing the special qualities of its wide ranging heritage assets from the most modest structure, such as



*Artists illustration of repaired and re-purposed Sheerness Dockyard Church – Heritage at Risk Grade II\* listed building. Image provided courtesy of*

*Hugh Broughton Architects with Martin Ashley Architects*

the grade II listed boundary marker stone at Faversham Recreation Ground, to the special townscapes and landscapes of places such as the former Royal Naval Dockyard at Sheerness Port, the historic core of Faversham, Sittingbourne High Street, Syndale’s parkland landscape, and the Kent downland landscape around conservation villages such as Thowley Forstal. Chapter 5 (section 5.2) of this Heritage Strategy sets out the role that heritage can play in providing a wide range of benefits including economic and social regeneration, providing/restoring a sense of place and civic pride, community activity and celebration, boosting the strength of the local economy, providing opportunities for learning and improved health and well-being.



## 2. Our vision, priorities and strategy strands A, B and C

### 2.1 Our Vision

The Council's vision and priorities for the positive management of the Borough's heritage **were** in part identified through some early engagement with local stakeholders in the development of the first draft version of the heritage strategy. However, given that this strategy **is intended to be** as much for the residents and businesses in the Borough, as it is for the Council itself, views on the overarching framework for the heritage strategy, were actively sought during the public consultation period. **The vision as set out below was widely supported so has been retained unchanged. Whilst the 5 priorities proposed in the public consultation draft were generally well supported, there were constructive suggestions received for some changes to each one, and so these have been incorporated into the set of priorities shown below.**

**OUR VISION:** *A vibrant and widely-known heritage which is valued for its own sake and for the long term benefits it provides to the people, economy and environment of the Borough of Swale.*

### 2.2 OUR PRIORITIES AND STRATEGY STRANDS

#### OUR PRIORITIES:

1. To conserve, and where possible enhance Swale's heritage buildings, structures and areas and **moveable/portable heritage** as a cultural, economic, community and environmental asset to the area, in particular by positively managing the Council's own heritage assets, and by establishing a programme for the review and appraisal of Swale's conservation areas;
2. To make use of the borough's heritage to help achieve and promote sustainable and inclusive growth and regeneration, social and economic wellbeing, and civic pride, in particular **by actions to tackle and specifically reduce** Swale's heritage at risk **across the full range of nationally and locally designated heritage assets**;
3. To recognise and promote the role of Swale's heritage in creating or enhancing local distinctiveness and a positive image for the area as a place to live, **learn**, work and visit, **in particular by the Council continuing to work in an enabling role to develop and support projects and initiatives by local groups, societies and businesses that would bring about significant public benefit.**
4. To ensure Swale's heritage forms an integral part of local strategies and initiatives to promote tourism and the visitor economy, including through the conservation and subsequent positive management of the Borough's internationally significant maritime **heritage (at Sheerness Dockyard)** and aviation heritage **(at Eastchurch)** on the Isle of Sheppey;

5. Raising the historic environment (and the important social history associated with it) up the agenda by promoting awareness and understanding of Swale’s heritage among local residents, businesses and visitors to the area, in particular to help realise the cultural, educational and associated health benefits it can offer.

The five priorities will be considered and addressed through the following **strategy strands**:

**A: Understanding and Designation** (Our heritage: its significance);

**B: Positive Management and Intervention** (Our heritage: strengths, weaknesses, opportunities and threats); and

**C: Capitalising and Championing** (Our heritage: valuing it and fulfilling its potential).

## 2.3 How will this translate into actions?

The Action Plans deriving from this Heritage Strategy **indicate** how the proposed actions, **set out therein**, are linked to the priorities and underlying strategy **strands in this Heritage Strategy document**. The initial **3-year** Action Plan for 2020 – 2023 is provided as **Appendix i**. The actions, which collectively comprise a mixture of appraisal, research, planning and physical works will be carried out by the Council and/or its project/initiative partner(s) (or their appointed consultants or contractors) to meet the objective(s) set out in outline in the relevant Action Plan entry and in accordance with a more detailed brief agreed at the inception of the individual project/initiative. The timeframe for the carrying out of the relevant work will as far as possible be broadly in line with the timeframe indicator shown in the relevant Action Plan document.



*Partially rebuilt Belcote – part of a grade II listed building at the Council’s Bell Road Cemetery  
The Council invested significant sums of money to repair and stabilize the belcote stonework to the cemetery chapel so that this well-loved characterful historic building could continue to provide an important community facility for the residents of the Sittingbourne area. The chapel at the Bell Road Cemetery is back in use again and further improvements to the building are planned as and when resources permit.*

## 3. Our Heritage: its Significance (Heritage Strategy Strand A: Understanding & Designation)

### 3.1 Heritage Strategy Priorities Aligning with Strategy Strand A

The Heritage Strategy Priorities which principally align with this **Strategy strand** are:

**Priority 1:** To conserve, and where possible enhance Swale's heritage buildings, structures and areas and **moveable/portable heritage** as a cultural, economic, community and environmental asset to the area, in particular by positively managing the Council's own heritage assets, and by establishing a programme for the review and appraisal of Swale's conservation areas;

**Priority 5:** Raising the historic environment (**and the important social history associated with it**) up the agenda by promoting awareness and understanding of Swale's heritage among local residents, businesses and visitors to the area, in particular to help realise the cultural, educational and associated health benefits it can offer.

### 3.2 The story of our borough: Setting the scene

The borough is named after the narrow **navigation** channel called The Swale. This separates the mainland of Kent from the Isle of Sheppey, and it occupies the central part of the borough.

The borough was formed in 1974 under the Local Government Act 1972, from the Borough of Faversham; the Borough of Queenborough-in-Sheppey (which covered the whole of the Isle of Sheppey), the Sittingbourne and Milton Urban District, and Swale Rural District.

The ancient trackway route of Watling Street, passes through the area, and the modern A2 main road, largely overlies this route which was paved by the Romans. The historic settlements that developed along the length of Watling Street, including Boughton-under-Blean, Faversham, Newington and Sittingbourne, are now by-passed by the M2 Motorway, which was constructed in the early 1960s.

Apart from the urban concentrations around Sheerness and Minster in the northwestern part of the Isle of Sheppey, and those focused on the two mainland towns of Faversham and Sittingbourne, it is a predominantly rural borough, containing a high proportion of the UK's apple, pear, cherry and plum orchards within an area of the county known as the North Kent Fruit Belt, and also containing many of Kent's remaining hop gardens.

**Whilst the Borough is home to many businesses, some of regional and even national stature (Sittingbourne and the Isle of Sheppey forms the southeastern most parts of the Thames Gateway growth area, set up in the early years of Tony Blair's Labour government), the perception of the Swale area to many visitors today is of a lightly industrialised area heavily dominated by agricultural and horticultural activity. However, this belies the significant industrial activity that has**

taken place in the area over several hundred years, and has shaped the form and development of settlements in the area, along with the key factors of the area's direct access to the Thames Estuary, and the coming of the railway in 1859.

Telltale signs of these former industrial and some other types of activity can still be seen in the landscape along with remnant structures and buildings at some locations in the Borough and we will build on this background in the heritage theme sections of this chapter, starting at section 3.5.

In landscape terms, most of the southern half of the borough lies within the Kent Downs AONB (i.e. rolling, hilly landscape, heavily wooded in places), although the largest concentration of woodland lies at the eastern edge of the borough, where the large ancient woodland of The Blean provides one of most ecologically and archaeologically rich areas of the borough. Whilst much of the northern edge of the mainland and the southern edge of Sheppey consists of marshland, much of it still undrained and largely still natural in form. On the mainland, the wide band of land lying between the Kent Downs and the marshes is generally relatively flat, well drained and fertile as is the case for much of the land north of the Sheppey Marshes, and this to a large degree broadly distinguishes the different landscape characters of the Borough and the different types of countryside activities we still see taking place within them today.

The combination of Swale's industrial past interlocking with its farming and coastal fringe landscapes is arguably one of, if not the major factor that makes Swales heritage unusual and special.

**(Insert image of The Blean, nr  
Dunkirk)**

## 3.3 An introduction to heritage designations

Some of the physical heritage that we see around us, such as buildings, structures, or groups of buildings and spaces, is formally recognized as being special in some way by the process of designation. Such designation takes place at either the national level or at the local level and the following table sets out the different types of designations for the different types of heritage, and which body is responsible for making the designation. It should be noted that this table does not include the different types of natural heritage designations (such as Areas of Outstanding Natural Beauty) and it also includes some types of designation that are not found within Swale Borough. The table is laid out showing the designations in the order of importance from a national planning policy perspective, but the Council, along with Historic England and Kent County Council recognizes that it is sometimes heritage which is not formally recognized at all, or only recognized at a local level which can be the most precious to particular individuals, groups and communities, etc.

Designation Type	Example	Designating Body	Designation Grade (if applicable) <sup>1</sup>	List Entry ID No. (if applicable) <sup>2</sup>
1. World Heritage Site <sup>3</sup>	Canterbury Cathedral...	UNESCO <sup>4</sup>	N/A	1000093
2. Scheduled Monument <sup>5</sup>	Queenborough Castle earthwork mound ( <b>Swale</b> )	Secretary of State for Department of Culture Media & Sport (on recommendation of Historic England)	N/A	1007465
3. Listed Building <sup>5</sup>	Lynsted Court ( <b>Swale</b> )	(as above)	Grade I	1069274
4. Registered Park & Garden <sup>5</sup>	Doddington Place ( <b>Swale</b> )	(as above)	Grade II	1000398
5. Registered Battlefield <sup>5</sup>	Battle of Hastings 1066	(as above)	N/A	1000026
6. Protected Wreck Site <sup>5</sup>	Bronze Age Ship at Langdon Bay, off Dover	(as above)	N/A	1000059
7. Conservation Area <sup>6</sup>	Boughton Street ( <b>Swale</b> )	Any Local Planning Authority	N/A	N/A
8. Local List <sup>7</sup>	N/A (at present)	Any Local Planning Authority	N/A	N/A (at present)
9. Area of High Townscape Value (AHTC) <sup>8</sup>	Sittingbourne AHTC	Swale Borough Council	N/A	N/A

### Explanatory Notes/Further Information:

1. Listing and **Listed Building** designation marks and celebrates a building or structure's special architectural and historic interest, and also brings it under the consideration of the planning system, so that it can be protected for future generations. The older a building is, and the fewer the surviving examples of its kind, the more likely it is to be listed. The '**Register of Parks and Gardens of Special Historic Interest in England**' is focused on gardens, grounds and other planned open spaces (such as town squares). The emphasis is on designed landscapes rather than on planting or botanical importance. Designation takes place because historic parks and gardens are a fragile and finite resource. They can easily be damaged beyond repair or lost forever, so there is a need to protect



them through the planning system. Listed buildings and Registered Parks & Gardens have gradings to indicate the level of heritage importance attributed to them. There are 3 levels: grade I (heritage assets of exceptional interest); grade II\* (heritage assets of more than special interest); and grade II (heritage assets of special interest). Grade I and II\* list entries (see below) make up less than 10% of the total list amount of these types of heritage assets. For more information, please visit the relevant web page on the Historic England website. See:

<https://historicengland.org.uk/listing/what-is-designation/listed-buildings/> and  
<https://historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/>  
For information on curtilage listed buildings, please see section 3.16 of this document.

2. The List Entry ID No. relates to heritage assets listed on the National Heritage List for England (NHLE) which is provided by Historic England. The first six types of heritage asset on the table above are all included on the NHLE, and if you know the List Entry ID No, you can find the list entry information about any particular heritage asset simply by typing the ID No. into the search box on Historic England's Search the NHLE web page. You can also use this search facility to e.g. view all the heritage types in a particular local authority area and/or of a particular listing grade by using the advanced search feature. See: <https://historicengland.org.uk/listing/the-list/>

3 & 4. **World Heritage** is the designation for places on Earth that are of outstanding universal value to humanity and as such, have been inscribed on the World Heritage List to be protected for future generations to appreciate and enjoy. Places as diverse and unique as the Pyramids of Egypt, the Great Barrier Reef in Australia, Galápagos Islands in Ecuador, the Taj Mahal in India, the Grand Canyon in the USA, or the Acropolis in Greece are examples of the 1007 natural and cultural places inscribed on the World Heritage List to date. World Heritage Sites are designated by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). You can find out more about UNESCO and this type of designation (including a list of all the world heritage sites) by visiting the UNESCO website. See: <https://whc.unesco.org/en/about/>

5. Heritage asset types 2 – 6 from the table are all designated by the Secretary of State for the Department of Culture, Media and Sport on the recommendation of Historic England, which is the government agency responsible for advising the government on all matters relating to heritage, excepting the content of museums and moveable/portable heritage such as historic planes, boats and trains. **Scheduling** represents the highest form of heritage designation and related protection and proposals to alter **scheduled monuments** are therefore determined by the aforementioned Secretary of State on the recommendation of Historic England. Scheduling is a designation applied only to sites of national importance, and is only applied to deliberately created structures, features and remains. Scheduled monuments are not always ancient, or visible above ground, and they range from pre-historic standing stones and burial mounds, through to many types of medieval sites (castles, monasteries, abandoned farmsteads and villages), to the more recent result of human activity such as collieries and military defence structures. **Registered Battlefields** and **Protected Wreck Sites** are not found within or off the coast of Swale Borough, although there are examples of these types of heritage asset not far away, as per the examples cited in the table. For more information on all these heritage types (2 – 6), (including selection criteria and how to apply for a heritage asset to be considered for listing or scheduling) please see the following web pages from the Historic England website:

<https://historicengland.org.uk/listing/apply-for-listing/>  
<https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/>  
<https://historicengland.org.uk/listing/what-is-designation/listed-buildings/>  
<https://historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/>  
<https://historicengland.org.uk/listing/what-is-designation/registered-battlefields/>  
<https://historicengland.org.uk/listing/what-is-designation/protected-wreck-sites/>

6. Conservation Areas are designated by Local Planning Authorities such as Swale Council, but using guidance on appraisal, designation and subsequent management provided by Historic England. See: <https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>  
Conservation areas exist to manage and protect the special architectural and historic interest of a

place - in other words, the features that make it unique. Conservation Areas vary hugely in size, character and form, but typically include groups of buildings of a special and readily notable character along with the spaces (formal and/or informal e.g. parks, squares, avenues, private gardens and alleyways, etc) that contribute to the overall special character of the defined area. Every local authority in England has at least one conservation area and there are now over 10,000 in England. At the time of writing, Swale Borough has 50 Conservation Areas and you can find out more about them by visiting the Conservation Areas web pages of the Borough Council and Historic England. See:

<https://www.swale.gov.uk/conservation-areas/>

<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>

7. The Council does not current have a Local List (of buildings, structures, sites or features of local heritage interest), but this is something which it is giving priority to developing as an early action in the initial Heritage Strategy Action Plan. The current coverage of such lists across England is (at the time of writing) quite patchy, and whilst there are some good examples of this type of local designation, there are also some in place that are either dated, limited in their coverage (e.g. not district/borough-wide) and of limited value for one reason or another e.g. lack of any supporting Local Plan policy and/or community support. The Council is therefore determined to ensure that the Local List it develops in partnership with the town and parish councils, local amenity groups/societies and the relevant property/landowners is robust and easily accessible in form, widely supported, and regularly reviewed to ensure it would maintain its value in assisting with the conservation of the Borough's heritage. The Council will make use of the guidance provided by Historic England in developing its own Borough-wide Local List. See: <https://historicengland.org.uk/listing/what-is-designation/local/local-designations/>

8. The Area of High Townscape Value designation is specific to Swale Borough, although some other Local Planning Authorities have a similar type, and in some cases similarly named designation. Unlike Conservation Areas, Swale's Area of High Townscape Value imposes no additional planning controls, but it is supported by a policy in the current adopted Local Plan (Policy DM36), to help ensure that any new development requiring planning permission would be designed in such a way as to maintain or even improve the special townscape qualities that the area displays. There is currently only one such designated area in Swale Borough that consists primarily of Edwardian and Victorian buildings and parks cemeteries trees and open spaces marking an important period in the town's post industrial expansion. The area in question is located to the south of Sittingbourne High Street. However, further designations of this type may be considered in the future. More information on this designation, including a map of the only current designated area and illustration of it can be seen in Section 3.16 of this chapter.

Section 3.16 of this chapter sets out what Swale Borough contains in respect of the different designated heritage types reference above, excepting the types of heritage that could be included on a Local List. Locally important heritage in a Swale Borough context is considered in the following Section, 3.17, and it should be noted from the outset that the bulk of heritage in the Borough while undesignated, can nevertheless in some cases contain a level of significance that matches that of designated heritage. As an example of this, the First World War defences on the Chatham Land Front and on the Isle of Sheppey are likely of regional and national importance. Even where not at that level of significance, the undesignated heritage provides a lot of the distinctive character of the Borough's places and it is recognized by the Council that this is highly valued by many local groups and communities.

**(insert photo of gun emplacement at Barton Point)**

## 3.4 An introduction to the key heritage themes of the Borough

The following 11 sections of this chapter (sections 3.5 to 3.15 inclusive) set out what the Council considers to be the types of heritage in the Borough which are not only special in their own right but very much serve to lend the Borough its unique character and contribute to its overall heritage appeal through the way they have shaped townscapes, landscapes and the local communities and traditions over time, generating many fascinating stories along the way, some of which are documented, but some of which only survive as memories and oral histories. In line with the concluding remarks of the previous section (3.3), much of the heritage referenced in the following part of this chapter is undesignated, but the chapter sections in question do not set out to distinguish between designated and undesignated heritage assets, but rather to provide a series of snapshots of the overall heritage picture for the Borough by focusing in on 11 broad key heritage themes.

There are so many different types of heritage in this within the Borough that the Council considered it was necessary to effectively divide them under these 11 broader grouped headings to make navigating this important element of the Heritage Strategy a little easier. It is accepted that there is overlapping of the heritage types between the themes, but this is inevitable to some degree, and the Council has sought to be as logical and clear as possible in the way it has set out this part of the Heritage Strategy.

The heritage themes (as set out below) are not intended to provide a detailed analysis of each theme area including important considerations such as range and extent of relevant asset types, condition, distribution and vulnerability etc. The time needed to carry out the research to provide this level of detail has not been a realistically possible in the context of the Council's existing limited resource levels, and as such, each of the following heritage theme sections seeks to provide the essential flavour of each theme and will serve as the basis for a more detailed heritage theme topic paper, one of which is planned to be produced for all but the last year of this 12 year Heritage Strategy such that by the end of the Strategy plan period, the Council and other stakeholders should have a much clearer understanding and appreciation of the entire range of heritage within the Borough. Due to the particular vulnerability and typically poor level of understanding of this particular heritage type, the Council will be starting off this heritage theme topic paper series in 2020 with a paper on archaeology.

<b>Heritage Theme</b>	<b>Chapter 3 Section</b>
Aviation & defence heritage	3.5
Industrial heritage	3.6
Maritime and defence heritage	3.7
Agricultural, horticultural and rural heritage	3.8
Towns and high streets	3.9
Villages and hamlets	3.10
Churches, chapels and memorials	3.11
Historic landscapes	3.12
Archaeology	3.13
Museums, collections & archives (digital/traditional)	3.14
Portable/moveable heritage	3.15



### 3.5 Aviation and defence heritage

Given the location of Swale Borough in England's county closest to mainland Europe and with a stretch of coastline overlooking the sea approach to Great Britain's capital, London, it's perhaps not surprising that the modern area of Swale Borough has played an important role in the defence of the realm for hundreds of years. It came to the fore in this respect during the **18<sup>th</sup> Century**, when a naval dockyard and associated defence structures were constructed on the Isle of Sheppey at Sheerness **to provide protection against potential attack and/or invasion by a foreign power**. The Royal Naval Dockyard at Sheerness continued to develop in the 19<sup>th</sup> Century and the early part of the 20<sup>th</sup> Century before its Royal Naval function ceased in **1960**, and it began to transform into a commercial port, **known as Sheerness Port**. **The site today is not only characterised by the surviving Royal Naval Dockyard buildings and structures (many of which were designed by the notable early Victorian civil engineer, John Rennie), but also by the defences such as the fort at Garrison point, the Sheerness Defences, Fort Townshend (now gone but part recently found in archaeological remains) and the eventual long canal structure across the peninsula, the Queenborough Lines (see image below).**



Most of the surviving buildings and structure are protected by scheduled monument, listed building and/or conservation area designation

*Queenborough Lines (a scheduled monument).*

The Sheerness Dockyard Preservation Trust was set up following the combined efforts of the Council, the Spitalfields Trust and many individuals to save some of the historic buildings within the former Royal Naval Dockyard from a sad demise, most notable of these being the (twice fire-damaged) grade II\* listed Dockyard Church. The Trust's focus today is on the repair and imaginative re-use of the classically inspired Georgian church, but as part of the plans for the re-use of the building, it is intended to be able to display section of John Rennie's large scale model of the Royal Naval Dockyard (covering 1600 ft<sup>2</sup>) is currently temporarily housed by English Heritage in Portsmouth. You can read more about the Trust's project and the dockyard model by visiting the Trust's website. See: <https://sdpt.org.uk>

The Defence of Swale Project (a collaboration between Kent County Council, community volunteers and defence experts) has been instrumental in identifying and cataloging 20<sup>th</sup> Century defence heritage, in order to provide an overview of Swale's defence heritage in the wider context of the strategic role that Kent historically played in the defence of the nation. Please visit The Defence of Swale Project website for more information: [www.khdarchaeology.org.uk/2014/06/the-defence-of-Swale-project](http://www.khdarchaeology.org.uk/2014/06/the-defence-of-Swale-project).

Whilst the Swale defences were one of many anti-invasion defence systems built around the east coast of England, what makes the defences in Swale special is the detailed record of them that survives. The National Archives has a collection of around 40 detailed maps of World War I sites and structures prepared by the Royal Engineers, in many cases including photographs and construction details.



The defences, forming part of the Chatham Land front, were designed to prevent a landing in the first instance, and then to counter the advance of any invading enemy troops towards the strategically important naval dockyards at Chatham and Sheerness. Key sites include communication trenches, batteries and artillery positions, pill boxes, and observation posts.

*Pill box set in wall of the Ship Inn, Ospringe (part of the grade II listed building). Image provided courtesy of Simon Mason.*



The Swale area played an important role in helping to defend Great Britain through the course of both world wars, and in respect of World War II, a series of chain home radar stations built across the east coast of England and Scotland played a vital role in giving the nation early warning of invading enemy aircraft. One such station is the one that can still be seen today at Dunkirk near the eastern edge of the borough. Dunkirk is one of only five radar station sites to have retained any of their original towers, and the tower at Dunkirk (now used as part of the emergency services communications network, and by mobile phone operators) is one of the best preserved in-situ examples in England. The tower in question played a particularly significant role during the Battle of Britain.

*Dunkirk Radar Tower (a grade II listed building and scheduled monument).*

Perhaps more surprising is the important role that the Swale area played in the early, pioneering development of aviation.



*Royal Aero Club buildings at Eastchurch (some of these hangars still survive and are now grade II listed buildings).*

The training aerodrome at Eastchurch on the Isle of Sheppey, is one of just two sites in Britain where structures built in association with the early pioneers of powered flight have survived. In early 1909, brothers Hugh and Horace Short identified land between Leysdown and Shellness point on the Isle of Sheppey, as a suitable location for a flying base. Flying thereafter began at Eastchurch in July 1909, when C.R. Rolls used Standford Hill for tests of his glider, designed and built by the Short brothers at their nearby Leysdown works.

In 1910, encouraged by the owner of the site, Francis McClean, the brothers moved their operations to Eastchurch and built workshops, sheds for aeroplanes, and bungalows for the workforce. Rapid progress was made and Eastchurch became a fashionable centre for aviation pioneers.

Its military role began in 1910, when the Royal Aero Club began to give flying instruction to the Admiralty, and in 1912, Eastchurch was established as the Royal Flying Corps' Naval Wing HQ.

In addition to its key role in training naval pilots, the Eastchurch base responsible for the air defence of the naval dockyards at Chatham and Sheerness. By the end of World War I, the Eastchurch base covered a 600 acres area and had a diverse range of 29 hangars.

During World War II, the base was used to mount raids on German occupied ports, until a series of severe targeted raids put the airfield largely out of action. This however didn't prevent it from becoming an unofficial landing ground for battle-damaged USAAF aircraft during 1943-44. After 1950, the airfield returned to its original agricultural use, whilst the buildings were converted into an open prison, which still operates today and is known as HMP Standford Hill.



A group of 4 steel framed aircraft hangars at the prison site still survive today, and these were given listed building status in 2005 **but are in poor condition and in need of urgent attention.** Other structures and buildings associated with aviation at this location still survive, whilst within the centre of Eastchurch village, a stone memorial to the aviation pioneers was unveiled in 1955, and is now also listed. The Eastchurch Aviation Museum plays an important role today in explaining and celebrating the important role of the Isle of Sheppey in the development of aviation, **and the Council is committed to working with the museum to develop the internationally significant aviation history of Sheppey, and in particular to secure the conservation of the aircraft hangars. For more information on this, please visit the museum, and/or it's website. See: <https://eastchurchaviationmuseum.org.uk>**



*Aviators Memorial at Eastchurch (a grade II listed building). Image provided courtesy of Simon Mason.*

## 3.6 Industrial heritage

The Swale area has a long history of industrial activity stretching back hundreds of years. The Swale area today is still recognized today for its brickmaking, papermaking and brewing industries, although it now only has one brickmaking plant, one papermaking plant, and one major brewery left. Another historically important industry in the area was gunpowder manufacturing.

### Brickmaking

The sole, surviving brickmaking plant in Swale, is located at Sittingbourne. This continues to produce the popular Smeed Dean yellow stock bricks that have been used throughout London and across much of the southeast region of England for over 150 years. Other brickmaking plants were scattered across the northern mainland part of the borough area in areas with large and readily accessible pockets of brickearth. These were typically close to the coastline (e.g. Lower Halstow) or to the Roman road, Watling Street, and later, during the mid-Victorian era, to the Dover to Chatham railway line (e.g. Ospringe), to allow for quick transportation of the bricks to building sites across the region. The principal brickmaking areas were centred around Faversham and Sittingbourne with their respective Faversham and Milton Creeks where barges heavily laden with bricks leaving for London would have been a regular sight. The barges rarely returned empty and often their return loads consisted of construction waste that today can be seen in the sea defences of the Borough.

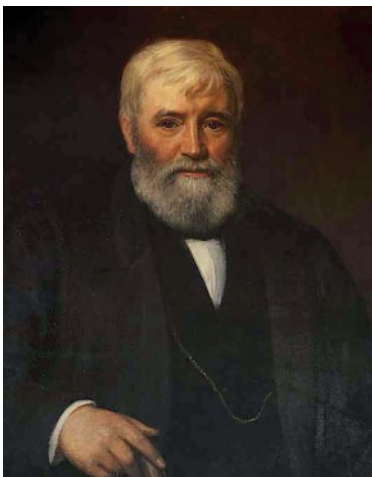
Faversham was for many years (in the late 19th and early 20th centuries) almost completely encircled by brickmaking plants, the last of which to cease operations, was the Cremer & Whiting plant at Ospringe which made both red and yellow stock bricks. The separate yellow and red stock brickmaking areas are in the process of being developed for housing, and once the scheme has been completed, you will be able to see the kiln chimney and clay wash plant retained and



maintained as heritage features of the former redbrick making plant.

*Left: Brickmaking kiln chimney at Ospringe brickworks site.*

*Below left: George Smeed – oil painting in Swale Borough Council Chamber.*



The brickmaking plant at Sittingbourne was named after its original owner, George Smeed and his son in law George Hambrook Dean, who joined the business in 1875. In 1877, the plan produced over 60 million bricks and was the largest brick manufacturer in Great Britain. When Smeed died in 1881, he operated the largest brickmaking works in the world. His obituary in the Western Press hailed him as “the making of Sittingbourne”. He left a

personal estate of £160,000 and Dean succeeded him as head of the company. There are no remains of the early brickmaking plant left

at the Sittingbourne plant today, as it was modernized in the 1920s. It is now owned by Wienerberger, but the many buildings in the borough built with bricks from the Sittingbourne, Faversham and other brickmaking plants in the Swale area stand as testament today to the hugely important role this industry once had. Furthermore, the quarrying of the brickearth deposits was so extensive, that it has left its mark on the Borough's landscape and also on its early archaeological record where numerous discoveries were made including Palaeolithic finds, and Roman and Saxon sites within or on the brickearth.



## Gunpowder manufacturing

Gunpowder works was historically another very significant industry in the Swale area with no less than 3 sites developed in and around Faversham. All 3 ceased manufacturing in 1934, but important surviving elements of the buildings and structures that supported this industry survive at all 3 locations, namely Home, Marsh and Oare, **as well as at Faversham Creek.**

The first gunpowder factories were small, near the town, and alongside the stream, between the London to Dover road (now the A2) and the head of the creek. By the early 18<sup>th</sup> Century, these had coalesced into a single plant, subsequently known as the Home Works, as it was the town's first.

At this time the British government was buying its supplies from the private sector, but the quality was often poor, and in 1759 it decided it needed its own plant. Rather than build a new one, it effectively nationalised the Home Works, upgrading all the machinery in the process. From this phase dates the Chart Gunpowder Mill, the oldest of its kind in the world. This was thankfully rescued from the demolition, and then restored by the Faversham Society in 1966. It is now open to the public.



*The Proof House at Marsh Gunpowder Works awaiting repairs and restoration summer 2019 ( a grade II listed building).*

Nearby is Stonebridge Pond, today something of a picturesque beauty spot at the head of the Faversham Creek.

Historically however, It served to power some of the works' watermills, slender remains of which survive. The pond still features a network of narrow-gauge canals along which powder was punted from process to process.

In the 1680s a second factory was started by Huguenot asylum-seekers alongside another stream about two kilometres west of the town. It had its own access to the sea via Oare Creek and so became known as the Oare Works. It became a leading supplier to the British East India Company.

The third and last gunpowder factory to open was the Marsh Works, built by the British government 1 kilometre northwest of the town to augment output at its Home Works; it opened in 1787.

In the wake of the Napoleonic Wars, the government leased its Faversham works back to the private sector - the Home Works in 1816 and the Marsh Works in 1834 - later selling them on in 1825 and 1854 respectively.

Explosives manufacture continued unabated at both sites under private ownership up to and beyond the Great War, but it should be noted that gunpowder from Faversham was not just used in warfare. It played a key part in the Industrial Revolution, e.g., by enabling routes to be blasted for canals and railways.

All three gunpowder factories shut in 1934. Imperial Chemical Industries (ICI), the then owners, sensed that war might break out again with Germany, and realised that Faversham would then become vulnerable to air attack or possibly invasion. They took the decision to transfer production, together with key staff and machinery, to the more remote Ardeer in Ayrshire, Scotland.

The site of the Marsh Gunpowder works transformed into a sand & gravel quarry following the plant's closure. Quarrying at the remaining operational part of the site only ceased in 2018 and this area is now beginning to be transformed into a new area of housing for Faversham, and one which will benefit from the Lakeland park area formed from previously worked areas. To the north of the planned area

Master Plan Proposed Use:

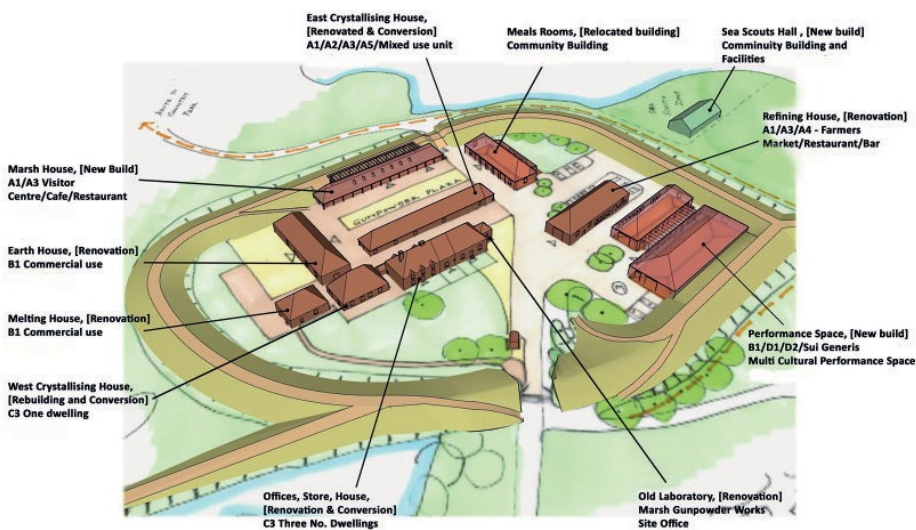


Illustration of proposed heritage and cultural hub. Image provided courtesy of Anthony Swaine Architecture Ltd.

of new housing stands a cluster of buildings originally erected to form part of the gunpowder manufacturing process. All but two of these buildings (namely the Charge House and the Old Meals Room) are individually listed (along with the Gate House and Proof House) at the eastern entrance to the site. The Council is now working with the developer for the site (Anderson Group), their heritage and architectural advisers (Anthony Swaine Architecture Ltd) and other

parties to transform this group of buildings into a heritage hub, and a real asset to the development and wider area.

It is important to note that the story of this industry does not finish with the closure of the 3 aforementioned gunpowder factories in 1934, but continues with later explosives works at Uplees and again at Faversham.



## Papermaking

This industrial activity within the Swale area was concentrated in and around Sittingbourne. Paper manufacture started in Sittingbourne in 1708, when Peter Archer was first recorded as a paper-maker. Sittingbourne Paper Mill existed from circa 1769, but by 1820 had grown and was owned by Edward Smith. After newspaper editor turned publisher Edward Lloyd bought the factory in 1863, it burnt down later that same year!

Covering paper production from his London sites with longer shift production, Lloyd had the Sittingbourne paper mill rebuilt from 1863, but closer to the new railway to enable easier shipping of



*Working locomotive on the Sittingbourne and Kemsley Light Railway.*

product to his newspaper presses in Bow, east London. After purchasing the Daily Chronicle in 1876, Lloyd installed new machinery capable of producing 1,300 square feet (120 m<sup>2</sup>) of paper per minute, and handed over management of the site to his youngest son, Frederick. By 1882, the transfer of paper-making from London to Sittingbourne was complete, enabled by using esparto grass imported from Algeria and southern Spain via the creek port as a replacement for expensive cotton rag. The site then supplied all the newsprint to his presses in London.

The site's production capability was expanded by converting the mill to steam power, and, after the death of his father in 1889, eldest son Frank introduced a horse-drawn tramway to carry materials from a new wharf

at Milton Creek to the mill. As the mill expanded and silt built up in Milton Creek in the early 20<sup>th</sup> Century, the tramway was converted into a narrow gauge railway, to allow both ships and barges to offload pulp product at Ridham dock, for onward transport to the mill. On what is now known as the Sittingbourne & Kemsley Light Railway, and open to the public as a heritage attraction with leisure rides along the part of the rail line, the first of three steam locomotives came into operation in 1906.

In 1910, United Newspapers was created to buy out Lloyd's newspapers, thenceforward separating



it from the paper-making side which continued as Edward Lloyd Ltd. By 1912, the resultant investment made the Sittingbourne Paper Mill the largest producer of newsprint in the world, with 1200 employees using 17 machines to make over 2000 tonnes per week and supply the demands of Fleet Street.

Following a shortage of pulp in the early 1920s, from 1924 Frank Lloyd developed a new mill

at Kemsley, together with a model village for its employees - this became the present-day Kemsley village. After his death in 1927, the mill was sold to the Berry Brothers (of Allied Newspapers). In 1936, they then sold the mill to Eric Bowater to form the Bowater-Lloyd Group,

*The Kemsley Arms Public House (prior to its closure and deterioration – see baseline HAR register at Appendix II).*

After both plants were acquired by Finnish based paper company Metsa Serla in 1998, the decision was made to close the Sittingbourne Mill in October 2006, with the last reel being produced on 23 January 2007. The Sittingbourne Paper Mill was subsequently demolished in 2010 and its site redeveloped as a retail park and housing. Nothing now remains of the mill **but archaeological investigations at the site have recorded remains of the early paper industry and the workers houses that were cleared from the area in the 1950s. This area of Sittingbourne was once occupied by extensive workers housing, but little of it remains today. Even the Lion Inn which provided refreshment for the mill workers for many years no longer functions as a public house, and its conversion into full residential use along with the loss of the majestically scaled mill marked the end of an era for many folk in the town, such that today, memories of this once intrinsic element of Sittingbourne are a particular focus on the town's social media groups and attract considerable public interest. Assets such as the social club and some of the older recreational facilities in the town also derive from this industry.**

Happily, the later Kemsley Paper Mill still remains and continues to function to this day. In the 1920s, its 4 paper making machines were the largest in the world. These days, the mill has an annual production capacity of around 820,000 tonnes and is the second biggest recovered fibre-based paper operation in Europe. In 2008, DS Smith invested over £100m to purchase and rebuild Paper Mill No. 6 to make lightweight corrugated case material. Kemsley Mill also now produces Light Medium; the first recycled lightweight paper manufactured in the UK.



*1920s mill buildings at Kemsley Paper Mill. Image provided courtesy of D. S. Smith Kemsley paper Mill.*

The original paper mill buildings at the Kemsley site are still used today and their striking brickwork form (principally made up of the locally made Smeed Dean yellow stock bricks) is readily noticeable amongst the later 20<sup>th</sup> and 21<sup>st</sup> Century buildings primarily built using modern cladding materials.



## Brewing

The final key industrial activity which has historically taken place in the Swale area, and continues to do so to this day, is brewing. This is centred in Faversham, which is undoubtedly the most significant site in Kent in terms of the number of surviving brewery structures, with the extensive former Rigden's site to the east of Court Street and the still-operational Shepherd Neame Brewery almost opposite on the west side. The Shepherd Neame Brewery was founded in 1698, although it is known that brewing has been carried out on the site since at least 1570 and possibly as early as 1520.

Although many of the buildings are modern, much of the 19th century structure remains. As date stones attest, the Shepherd Neame brewhouse was built in 1864, when the firm was known as Shepherd & Mares. The central clock tower was built during the 1890s. The Millennium Brewhouse, an extension of the 1864 brewhouse that opened in 2000, includes two stained glass windows with beer and brewing motifs by Keith and Judy Hill of Staplehurst in Kent. The ornate office building on Court Street displays hop motif decoration on its facade. Its northern section, including the doorway, was built in 1869; it was extended in 1900 by altering the building immediately to the south in matching style. The entire combined building is listed grade II. The brewery still interestingly retains some old equipment, including two traditional oak and gunmetal mash tuns dating from 1914 and 1916, which are still in regular use; two steam engines also survive in working order, but are no longer used in the brewing process.

Rigden's Brewery in Faversham was acquired by Fremlin's in 1948, later passed to Whitbread's, and eventually closed in 1990. The whole site is listed in nine sections, all grade II apart from the grade II\* listed offices, a 16th century house. Remaining buildings include the former maltings (which was converted to a Tesco supermarket in 1996) and the brewhouse. The previous version of the Swale Borough Council Local Plan (from 2008) envisaged a mixed-use development of the entire Rigden's site with conversion of the buildings for new uses including housing and retail. Much of this has since taken place.

The Shepherd Neame brewery continues to play an important role in Faversham and the wider local economy. It is the largest employer in the town and its extensive pub arm employs a further significant number of people. The brewery used to own large tracts of land across Swale Borough used for hop growing but in recent years, has sold many of these off, and now largely buys in the raw materials it needs to make its own beers, and the beers it produces for some other major beer brands.

These days, the two brewery complexes still continue to form impressive architectural compositions in the heart of Faversham, and are very much key features of the town's extensive conservation



area – the largest urban conservation area in the Borough. Furthermore the activity and distinctive, largely pleasant smells created by the brewing process form a key part of this historic town's intrinsic character.

*Shepherd Neame brewery*

*complex – Image provided  
courtesy of Shepherd  
Neame.*

## 3.7 Maritime and transport heritage

Maritime and transport heritage in Swale overlaps to some degree with industrial, and aviation and defence heritage in rather the same way that elements of Swale's industrial heritage links to its, agricultural, horticultural and rural heritage, notably in respect of its brewing industry.

### Barge traffic and boatbuilding

Much of Swale's maritime heritage is linked to the area's proximity to London and the significant trade that moved along the Thames Estuary by boat. Historically, the distinctive Thames Barges were used to carry a wide range of goods along the river, most notably bricks and paper from the Swale area, but also coal from the coalmines along the east coast of Kent.

The formerly separate settlement of Milton Regis (now a suburb of Sittingbourne) developed from a Saxon royal estate at the head of the creek leading into Swale, and because of the extent of shipping trade it was able to engage in, it was larger and more important than Sittingbourne (a stopping point in the journey by road to the channel ports) until the creek started silting up, the Dover to Chatham Railway line arrived, and fortunes effectively reversed.

Some of the quays and wharfs which serviced this river trade still survive today, along with some of the warehouse, office and maltings buildings that enabled their effective operation. Most of these buildings have now been converted into other uses, and the quays now mostly provide moorings for small numbers of leisure craft and a quiet spot for local anglers, but the former working character of some of these quays and wharfs can still be appreciated to some degree, perhaps most notably at Standard Quay and Iron Wharf in Faversham, where the quayside form remains little altered, and the grouping of quayside buildings (warehouses and the home of a nearby shipyard owner and possible former mayor of the town) have been retained, and have, or are in the process of being sensitively converted into new uses.

At the Milton Regis Creek (known as Milton Creek), an important heritage feature on the edge of the Milton Country Park (created and operated by the Council in the area of the Church Marshes – historically used for boatbuilding and gravel extraction for brickmaking) is the Dolphin Barge Museum. The sailing vessel being restored at this site is the Thames Sailing Barge, Raybel, originally made and launched at Milton Creek in 1920. Raybel Charters is working to return her to cargo delivery operation under sail; and to manage this barge as a newly revitalised heritage asset for community benefit.

Boatbuilding was historically an important industry in the Swale area for hundreds of years, not just at Milton Regis (where the principal focus was on barges), but also at Faversham, Oare, Queenborough and Sheerness, and fortunately there is still a good degree of surviving evidence for this: the quays at Milton Creek, Faversham and Lower Halstow; working barges and repair of barges; and the wealth of old hulks that can be seen in the creeks and marshlands of Swale. Furthermore, the importance of the creeks for transport and the links to the main London to coast road from Roman times is well evidenced in the rich archaeological record of Swale. There is sadly little of substance now left of this once important local industry except for some limited restoration work on existing craft, including that referred to above.

### Cinque Port

It should not be forgotten that Faversham was historically a 'limb town' of Dover – one of the five Cinque Ports in Kent and Sussex. The Confederation of Cinque Ports is a historic series of coastal towns in Kent, Sussex and Essex. It was originally formed for military and trade purposes, but is now entirely ceremonial. The ports lie at the eastern end of the English Channel because this is, where the crossing to the continent is narrowest.

The origins of the Cinque Ports can be traced back to Anglo-Saxon times, when certain southeastern ports were granted the local profits of justice in return for providing ships. By 1100, the term Cinque Ports had come into use; and in 1155 a Royal Charter established the ports to maintain ships ready for The Crown in case of need. The chief obligation laid upon the ports, as a corporate duty, was to provide 57 ships for 15 days' service to the king annually, each port

fulfilling a proportion of the whole duty. In return the towns received the following privileges:

*Exemption from tax and tolls; self-government; permission to levy tolls, punishment of those who shed blood or flee justice, punishment of minor offences, detention and execution of criminals both inside and outside the port's jurisdiction, and punishment of breaches of the peace; and possession of lost goods that remain unclaimed after a year, goods thrown overboard, and floating wreckage.*

Faversham was added as a 'limb port' to Dover in the 15<sup>th</sup> Century, but by the reign of Queen Elizabeth I (1558 to 1603), the Cinque Ports had ceased to be of any real significance and were absorbed into the general administration of the Realm.

Around the coat of arms on the Faversham Common Seal is the Latin inscription *Regis ut arma rege libera portus ego*, meaning since I (Faversham) bear arms for the King without charge, I am a free port. This is a reference to the town's corporate membership of the Confederation of Cinque Ports



*The Faversham Common Seal*

## Bridges and ferries

The Isle of Sheppey is one of the parts of Swale Borough that helps to make it very distinct in geographical terms, and its name is derived from the Old English work *Sceapig*, meaning

Sheep Island. Historically it was in fact three islands (Sheppey itself, Harty to the southeast, and Elmley to the southwest), but the water channels between the islands silted up many years ago to make one continuous island, named after the largest previously separate landmass.

Sheppey was separated from mainland Kent until 1860 when the first of the island's bridges (the Kingsferry Bridge) was built, taking both road and rail. This earliest (static form) bridge was replaced in 1906 with one having a rolling lift design, initially operated by hand, and later by electricity. This in turn was replaced in 1959 by the current Kingsferry Bridge with its distinctive



*The 1959 Kingsferry bridge with transporter platform raised. (a non-designated heritage asset)*

paired set of reinforced concrete towers, which unlike the second bridge, allows it to lift both the road and the railway line to allow clearance for shipping heading to/ from the commercial docks at Ridham (used for the transport of the area's important brickmaking and papermaking industries).

The current Kingsferry Bridge only carries a single carriageway of road traffic in each direction, and so with the need for the island to



help cater for housing and employment growth towards the end of the 20<sup>th</sup> Century and into the 21<sup>st</sup> Century, the decision was made to build a second bridge crossing. The Sheppey Crossing (as it was named) is a four-lane road bridge carrying the dualled A249 road, providing the island with a fast road link to Sittingbourne and further south to the M2 Motorway and the county town of Maidstone.

The Kingsferry Bridge, a combined road and rail vertical lift bridge (sometimes referred to as the transporter bridge) is not listed, but is a good example of 20<sup>th</sup> Century heritage yet to be fully appreciated.

Prior to the arrival of the first bridge, four separate ferries connected the island to mainland Kent: (1) the King's Ferry to Iwade, (2) the Harty Ferry to Faversham, (3) the Elmley Ferry, and (4) a passenger ferry connecting the island to the Port Victoria railway terminus on Kent's Grain Peninsula. The most recently active of these was the Harty Ferry, although this ceased to operate at the start of the First World War. These were by nature small scale operations and physical reminders of these ferry services are limited. However, the ferryman's house at Harty (which evolved into an inn) still stands and this grade II listed building with its impressive views over the Swale is now a popular location for weddings and leisure craft sailors who make use of inn's jetty.

The other surviving reminder of the island's former ferry services is the pier toll house at Sheerness for the ferry service to Grain. The associated pier (with its octagonal form waiting room at the pier



end) was demolished when the commercial port at Sheerness was extended out westwards into the River Medway, but the little toll house survives along with the iron railings and cobbled street surfacing at the entrance to the former ferry pier. This modest little building is not currently listed and may not be of sufficient architectural or historic interest to warrant future listing by Historic England, but is certainly of significant local heritage interest.

*The Ferryman's Inn at Harty, Isle of Sheppey (a grade II listed building)*

## Roads and pilgrims

The road network in the Swale area is an important contributor to the overall degree of heritage interest that Swale has to offer. This is primarily derived from the fact that the route of an ancient trackway cut across the heart of the area in a roughly east-west



*Pier Toll House, Sheerness (a non-designated heritage asset)*

alignment. Watling Street as it became known from the Roman period linked London with the channel ports of Dover and Richborough. The Romans paved the route and it continued to be an important transport corridor for subsequent activity, with many sites established alongside it in Roman, Saxon, medieval and later periods, Archaeological evidence illustrates that. Some of these remains cannot be seen, **but** it is anticipated that there are further remains still to be discovered, **and** this will be considered more fully at section **3.13**. **check if applicable**

Watling Street is likely to have always been a busy route from the when it was first constructed, but in the medieval period, its degree of use, if it had ever in fact started to decline, increased again following the infamous murder of Thomas Becket at Canterbury Cathedral in 1170. The subsequent pilgrimage that

developed in memory of Becket resulted in the increased development of inns along the Watling Street route

(which passed through Canterbury on its way to Dover) and other developments including pilgrim hospitals.

The pilgrimage route from Southwark in London, to Canterbury was of course famously captured in the collection of stories known as The Canterbury Tales, written by the medieval poet and author, Geoffrey Chaucer, between 1387 and 1400, and published from the 15<sup>th</sup> Century onwards. **Sittingbourne and Boughton are the only Swale places mentioned in the Tales, and an illustrated map in the lych gate of Boughton Church quotes the relevant text (in Old English).** At the tiny settlement of Tonge in Swale Borough is a small stream that feeds the mill pond just to the north of Watling Street. Following Thomas Becket's death in 1170, this stream became known as Becket's Stream and for many years, it was believed to have healing powers. As such a medieval hospital was developed alongside the stream, and it is understood that the stream become a popular stopping point for pilgrims on their way to Canterbury. The stream, mill pond and (some of) the mill buildings can still be seen, but the site of the former hospital has long since been cleared, and it is no longer clear exactly where it stood, so this requires some investigation. The stream, mill pond and surviving mill buildings (all of which are listed) are nevertheless recognized for their heritage value and together make up the Tonge Conservation Area. **It should be noted that the mill buildings at Tonge were not associated with the pilgrimage to Canterbury.** The Council plans to review this small conservation area early in 2020 as part of a series of events happening in 2020 to mark the passing of 850 years since the infamous murder of Thomas Becket. The intention is to provide some interpretation measures to help provide an understanding of the link between this area and Becket's shrine in Canterbury. The Council is also committed to exploring the ancient history of this site and the possibility of extending the area of the new country park at this location (on the eastern edge of the recently started Stones Farm housing development) to allow public access to the head of the stream.

Various historians and history information sources have suggested that the former Tonge Castle was the site at which the ancient King of the Britons – Vortigern (c. 425), made a pact with the Saxon leaders Hengist and Horsa to protect his kingdom against the Picts and the Scots, rewarding them for their services with a grant of land. Subsequently the Britons made war on the Saxon newcomers (first established in Kent) and four battles were fought, the last of which led to Vortigern's son Vortemir (the Saxon's leading opponent) being slain.

According to some specialist historians, there are a number of locations within the modern Swale Borough area that feature in the epic Old English Poem, *Beowulf*, notably Tonge and parts of the Isle of Sheppey.

There were historically inns at all the settlements in the Swale area along the route of Watling Street, and many of these still exist today, although typically in a much enlarged and altered



*The Red Lion Inn, Sittingbourne (a grade II listed building)*

form. Many of these had stables and coach houses to cater for the horse drawn coaches that plied the route, although little in the way of this service infrastructure survives today, with most having been either demolished, or converted into additional accommodation space.

Many of the inns still survive and function as either inns or public houses, and the finest surviving example is without doubt the Red Lion Inn at the High Street in Sittingbourne. This listed building, located right in the middle of the Sittingbourne High Street Conservation Area, was the principal hotel of Sittingbourne until it was superseded by the (since demolished) Rose Inn. The current inn at the site now only operates from the east side of the carriage arch which leads you through to a rear courtyard, and a long low timber framed building that may previously have functioned as a stable range. It is known that there has been an inn at this site for over 600 years. In 1415, King Henry V was known to have been entertained here on his return from the Battle of Agincourt. Other famous customers include Cardinal Wolsey, King Henry VII, King Henry VIII and Emperor Charles V (ruler of both the Spanish Empire from 1516, and the Holy Roman Empire from 1519).



Finally, no overview of the Swale area's marine and transport related heritage would be complete without consideration of the significant role that railways have played in the transformation of the area from the mid Victorian period.

## Railways and growth of the area

The development of railways in Great Britain first started in the 1830s, with all the majority of lines that were built by the different railway companies having a major terminus station in London. The Swale area was connected to the capital by The London, Chatham and Dover

Railway, which began life as the East Kent Railway, and operated from 1859 until 1923, when it united with other companies in south east England, to form the Southern Railway. The Kent Past website has suggested that the coming of the railways turned fields into towns, whilst the absence of a railway connection to existing towns led to them remaining small and viewed as villages compared to many of the places which developed rapidly from the second half of the

19<sup>th</sup> Century well into the latter reaches of the 20<sup>th</sup> Century. It is certainly the case that the arrival of the railway in the Swale area at the dawn of the 1860s profoundly affected the manner in which the area evolved and certain settlements grew at the expense of others.

The London, Chatham and Dover Railway initially provided the Swale area with five stations, which from west to east were: (1) Newington, (2) Sittingbourne, (3) Teynham, (4) Faversham, and (5) Selling. A branch link between Sittingbourne and the Isle of Sheppey (with further stations being added at Queenborough and Sheerness was added in 1860, with the construction of the Kingsferry Bridge, which allowed a rail line to be carried over The Swale. The branch line between Sittingbourne and Sheerness was operated for a while by the nominally independent Sittingbourne and Sheerness Railway before being fully absorbed the London, Chatham and Dover Railway in 1876. The smaller stations of Kemsley and Swale were later added to this branch line in the 1920s, largely to serve the Kemsley Garden Village, built to provide dedicated



*Queenborough Railway Station (a non-designated heritage asset).*

homes for the second paper mill at Sittingbourne (in Kelmsley), as referenced in Section 3.5.

In 1876, Queenborough became a junction station with the opening of a short spur to Queenborough Pier to serve steam ship services. A second line was added on 1 August 1901 with the opening of the Sheppey Light Railway, an 8.75 miles (14.08 kilometres) line across the Isle of Sheppey to Leysdown. There was no direct connection with the Sheerness Line and trains for Leysdown departed from the outer face of a newly constructed island platform at Queenborough. An iron footbridge was erected at the southern end of

the platforms to facilitate passengers changing between main line and branch services. Services on the Sheppey Light Railway ceased from the 4 December 1950. There does not appear to be any trace of the infrastructure for the former Sheppey Light Railway, nor the pier serving the steam ship service at Queenborough left, although this needs further investigation.

Of the stations within the mainland part of Swale, the station at Faversham is by some way the most impressive in architectural terms, and this has been recognized by its designation as a listed building. Faversham Station, like Sittingbourne, also serves as a junction station with the line through the town splitting east of the station to head northeast (leading on to Sandwich



*Tiled underpass feature at Faversham Station (a grade II heritage at risk listed building).*

and Ramsgate) and southeast (leading beyond Swale's easternmost station of Selling), on towards Dover. The Council has recently supported the Faversham Society and the local MP in putting pressure on the rail service operator to initiate some overdue repair and restoration works. Further improvements are still needed, and the Council will continue to work with partners to push for these, as appropriate.

The railway infrastructure at Faversham has changed significantly over the years, and this has resulted in two further listed railway buildings (referred to as the engine shed and carriage shed) effectively becoming separated from the remaining sidings at Faversham Station, and falling into disuse and decay. This heritage at risk scenario, and other heritage at risk scenarios for different types of buildings/structures is considered in section 4.2 of this heritage strategy.

It can be seen that both Sittingbourne and Faversham (both of which were already home to significant industries) grew exponentially throughout the late



*The engine shed at Faversham (a grade II heritage at risk listed building)*

Victorian period, through the Edwardian period and up to the beginning of the Second World War. The areas of Victorian and Edwardian housing that now partially surround the historic core of each town contribute substantially to their character, and this is recognized by Area of High Townscape Value and Conservation Area designation respectively.

The arrival of the railway resulted in the rapid expansion of Sittingbourne at the expense of Milton Regis, with the latter

*housing at Newington.*



*The modern replacement station and adjacent Victorian*



eventually becoming subsumed into the urban expansion of Sittingbourne as a northern suburb.

The villages of Newington and Teynham also expanded rapidly at the expense of coastal settlements including Upchurch, Lower Halstow and Conyer. The largely ribbon forms of Victorian housing stretching away from Newington and Teynham stations both form part of conservation areas at these two large villages today.

### 3.8 Agricultural, horticultural and rural heritage

Co-existing alongside some of the Swale area's early industries has been the long tradition in the area of fruit and hop growing. This is a strong tradition that continues to this day, although some of the areas historically used for fruit or hop growing have since been given over to the growing of vegetable or cereal crops, or developed for housing or employment use.

The north Kent Fruit Belt forms a distinctive landscape character within Swale Borough and it straddles the old Watling Street route through large parts of the borough.

Many of the traditional farm buildings associated with fruit or hop growing have been demolished following modernization of the fruit growing processes in the 20<sup>th</sup> Century, but enough still remain to help us understand how the early fruit and hop farms operated, and how important this type of activity has been in the Swale area for hundreds of years.



*Provender Oast near Lewson Street – one of many converted oast houses in Swale (this one a non-designated heritage asset).*

The most easily recognizable buildings in this respect are **easily** the oast houses (aka hop kilns) with their typical distinctive conical or pyramidal shaped roofs, topped by a movable cowl.

These buildings were designed for the kilning (drying) of hops as part of the brewing process, but with the mechanization of the hop-picking process, many oasts fell into disuse. Of those surviving subsequent demolition, many were converted into dwellings, with most of these conversions managing to retain some of the original building's character.

In the Swale area, there are many examples of converted oast houses, a significant number of which are listed.

Still functioning oast houses in Swale are now very rare, and consideration might need to be given to preserving and maintaining one in functional form to help retain a local understanding and appreciation of this key part of the area's agricultural heritage.

Closely associated with the oasts were the hop pickers huts, and there is a long history of the communities (many from parts of London) that flooded into the Swale area and used these huts to live in and work from, on a seasonal basis. There are plenty of cultural memories in this respect, some surviving through the typically vulnerable pickers huts that still survive, a number of which are located within Swale Borough. A good example of such pickers huts are those found at South Street, near Boughton-under-Blean. These have not been used for their original purpose for some time, but form an important and distinctive feature of the Boughton Church Conservation Area. Plans were approved in 2019 to convert them into holiday accommodation, essentially retaining much of their character.

**(insert image of hop pickers huts at Boughton Church CA)**

Apples, cherries, pears and plums are the principal fruit crops grown in the Swale area and the heritage of this, and that of fruit growing more widely in Great Britain is celebrated by the



National Fruit Collection at Brogdale Farm, just south of Faversham. This site is important not only because of the story it tells about fruit growing in Kent and across Great Britain as a whole but also because it consists of a traditional grouping of Kentish farm buildings dating from the 18<sup>th</sup> Century, including the grade II listed Brogdale Farmhouse – a good example of a Kentish farmhouse in the fruit growing belt, from that period.

*Brogdale farm and fruit collections*





*Marshland landscape at Emley National Nature Reserve, Isle of Sheppey.*

The landscape character to the northern edge of the Swale area's mainland, and on the Isle of Sheppey is mostly dominated by low-lying marshland, and so where not drained and used as arable land, it is mostly left in its natural form and provides a significant wildlife habitat, particularly for birds and small mammals, including bats. The grazing of sheep and cattle in these low-lying marshy areas is common too, and as noted in 3.6, it was the prevalence of sheep grazing which gave the Isle of Sheppey its name.

To the south of the fruit belt area and south of the M2 Motorway the landscape form of the Swale area changes from a mostly gentle undulating topography to a more visually dramatic downland landscape. This is the northern edge of the range of low hills known as the Kent Downs, and its very special landscape character is recognized and protected by an Area of Outstanding Natural Beauty (AONB) designation that has been in place since 1969. Almost of the land area in Swale Borough south of the M2 Motorway forms part of the Kent Downs AONB, and the distinctive landscape form of the downs has given rise to a string of villages and hamlets in the Swale area that have a different feel to the settlements within, and north of the fruit belt.

Many of Swale's downland villages and hamlets have conservation areas which contain listed buildings, and typically many of those listed buildings consist of farmhouses or farm buildings, as is the case at Throwley Forstal, where the listed South Forstal Farmhouse and its barns form an intrinsic part of the village scene which forms the conservation area there.

The Kent Downs AONB (as with all other AONB's in England and Wales) has its own special organisation to help protect and promote the special qualities of the area and help ensure that the local authorities and others responsible for development in the AONB's manage this in a sensitive way. The Kent Downs AONB Unit has produced a range of guidance to help manage the area appropriately, and notable amongst this is the Kent Farmsteads Guidance, which was produced in 2014 in collaboration with Historic England (then English Heritage), Kent County Council and the High Weald AONB Unit.



*farmhouse and barn are both grade II listed buildings)*

*South Forstal farm – a key feature of Throwley Forstal (the*  
**Page 176**  
 51

Traditional farmsteads and their buildings make a significant contribution to local character and distinctiveness in the Swale area, and beyond, through variations in their scale, layout, buildings and materials. In Swale, this can be readily appreciated by viewing some of the traditional Kentish farmsteads in the Swale area both within the downland and fruit belt areas of the borough.

The aforementioned guidance **is supported by a catalogue of historic farmsteads that has been entered into the Kent Historic Environment Record and together, they help** to enable a greater appreciation and understanding of the different types of farmsteads, and the types and forms of building which contribute to their distinctive characters.

## 3.9 Town and high streets



Queenborough Harbour

**Insert photo of Blue Town High Street**

The historical reasons for the development of Faversham and Sittingbourne have already been discussed at 3.6 and 3.7. This also references how the once important and separate settlement of Milton Regis became subsumed by Sittingbourne.

Swale Borough's other major town of Sheerness developed around the Royal Naval Dockyard and in part as a Victorian and Edwardian seaside resort, complete with the traditional leisure pier. Blue Town is a particularly fascinating part of Sheerness and is the area that was occupied by the dockyard workers and their families from the early 18<sup>th</sup> Century until the dockyard closed in 1960. It is also where the town was established (around the historic dockyard) before it expanded across the moated Sheerness defences to the newer areas of Mile Town and Marine Town, **much of which was built under the direction of the prominent Victorian building and public works contractor, Sir Edward Banks in his business partnership with William Joliffe., . Blue Town is named as such, as this was the colour of the blue-grey naval paint used to paint the timber cabins the workers lived in. None of the cabins remain now and many of the other buildings forming the High Street of Blue Town outside the tall brick dockyard wall (constructed in 1827) had to be pulled down due to decay, but many fine buildings remain, a number of which are listed, and together they form a highly distinctive townscape cluster full of historic interest.**

The smaller town of Queenborough initially developed as a planned medieval town alongside the castle built by King Edward III and this is still evident in the town plan today. The

castle itself is long gone, but its mound forms a significant area of open space in the town and by virtue of its age and associated heritage interest, it is protected as a Scheduled Monument, and along with the town's Victorian era railway station, forms a key and distinctive feature at the eastern end of the town's conservation area. Activities in the settlement, (which was granted royal borough status in 1338) focused heavily on fishing, boatbuilding, wool-trading and some

heavy industrial activity including glue and chemical production, and the harbour and associated creek that supported these activities is still very much the principal feature of the town at the heart of the Queenborough Conservation Area.

The town centres of each of the four Swale Borough Towns are all quite different in layout, scale and the variety/form of buildings and associated spaces to be found. However, a common

**(also insert photo of Milton High Street)**



feature to be found in all four towns is the traditional High Street, lined with the principal grouping of shops, public houses, inns, and in some cases municipal buildings. Faversham is the odd one out here in that its de-facto High Street is not actually named High Street, but is instead called Preston Street.

All of Swale's town centres contain high quality townscape and as such are all protected by conservation area status. Furthermore, many of the buildings in each town centre are of significant architectural or historic interest, and as such are listed. There is a particularly high concentration of listed buildings in the town centre area of Faversham.

Away from the high streets, each town has areas of townscape and/or landscape of appeal and varying degrees of heritage interest. Of particular note are the remains of the medieval streetscape at Abbey Road and Abbey Street in Faversham. Adjacent the standing remains of the medieval Royal Abbey of St, Savior (founded in 1147) can be seen the major and minor



barns, stables and farmhouse that served as the farmstead to the Abbey, whilst in Abbey Street at Arden's House the remnants of the old gateway to the Abbey can be seen. All of this highly significant heritage is protected by a combination of scheduling, high grade listing and

conservation area status.  
**Insert photo of Abbey barns**

### 3.10 Villages and hamlets

Away from the Borough's 3 principal towns of Sittingbourne, Faversham and Sheerness and the smaller town of Queenborough, there are multiple villages of varying size and form, and many hamlets, with each parish in the borough typically containing a village and a number of associated hamlets. The larger villages in the Borough (namely Boughton, Eastchurch, Iwade, Leysdown, Newington and Teynham) function as Rural Local Service Centres in planning policy terms and as such are planned for some limited housing growth to help support the retention and where possible expansion/improvement of local facilities. Irrespective of size however, many of the villages in the Borough and their associated hamlets are of some heritage interest and this is principally recognized through conservation area status, although it should be recognized that the lack of a conservation area does not imply that any given area has/retains no heritage interest.

A good example of a village and series of smaller hamlets with heritage interest can be found within the parish of Borden (immediately southwest of Sittingbourne). At Borden Parish, the village of Borden itself has a quite extensive conservation area, whilst its associated hamlets of Chestnut Street, Harman's Corner and Hearts Delight each have their own smaller conservation area.

**Insert photo of Borden Conservation Area**

It is worth noting that many of the historic captains of industry made their homes within or close to some of the villages in Swale. Edward Banks (construction contractor giant of the Victorian era – see section 3.6) built his country home just outside the then hamlet of Halfway Houses on Sheppey, whilst George Smeed (of the Smeed Dean brickwork plant at Sittingbourne) built his mansion at what is now King George's Park in Tunstall – where he is also buried in style at the parish church.

Villages and hamlets with heritage interest can be found in all parts of the borough, **although** as referenced in 3.8, there is a higher concentration of villages with conservation area status in the downland landscape part of the borough, south of the M2 Motorway, where the bulk of the area is also designated as an AONB.



*Boughton Parish Church with its attractive rolling landscape setting.*

It is very much the case that the special landscape quality of this area contributes to the setting and associated character of many of these downland area conservation areas, and that in turn the notably special groupings of buildings and spaces (recognized through conservation area status) contribute positively to the overall landscape character and associated quality. However, this is not to say that the rural conservation areas outside the AONB do not benefit from a setting of strong landscape character, and in turn contribute to it, and it can be seen that this same mutual benefit applies in many cases, a good example of this being the Boughton Church Conservation Area.

### 3.11 Temples, churches, chapels and memorials

In many cases, the temples, churches and chapels represent some of the oldest buildings to be found in the Borough. They survive typically because of their robust masonry form (typically a mix of stone, stone & flint or brick & stone) and the high standard of construction skills and materials lavished on them as the focal point for worship, and many of them display different phases of development. The ranges in this respect vary considerably, but the churches and chapels in the Borough collectively display phasing that ranges from before the Roman occupation period through to the 21<sup>st</sup> Century. The vast majority are listed in their own right, or in the case of temple remains, scheduled, because of the highly significant architectural and/or historic interest they display. A large number of these buildings are also further protected and recognized for their heritage interest through their location within conservation areas. The small number of such buildings which are not protected by these designations are nevertheless of some heritage interest at a local level.

The earliest buildings of this type are now just standing remains, such as the Romano-Celtic temple at Boxted in Upchurch Parish, which is today protected as a scheduled monument.

**(insert image of Boxted temple)**

The earliest church still in use for worship in the Borough is believed to be the medieval Church of St. Thomas The Apostle, at Harty Ferry Road on the Isle of Sheppey. The nave of this small, low grade II\* listed church dates from the 11<sup>th</sup> or early 12<sup>th</sup> Century, and it displays phases of development in the late 14<sup>th</sup>/early 15<sup>th</sup> Century as well as the 19<sup>th</sup> and 20<sup>th</sup> Centuries. It is now very isolated and was listed in part because it represents one of the last vestiges of the medieval settlement of Harty, which as referenced in section 3.7 (under Bridges & Ferries) was once a small island in its own right.

**(insert image of Harty Church)**

Although other faith groups exist in the Borough, the buildings of heritage interest are at present limited to the Christian faith. The majority of these are now in the Anglican denomination, although some started out as Catholic churches and were effectively turned into Anglican churches following the reformation in the 16<sup>th</sup> Century, such as the grade I listed medieval parish church of Faversham, St. Mary of Charity, with its distinctive Corona spire.

**(insert image of spire to St. Mary of Charity, Faversham)**

Other Christian denominations with churches in the Borough that are of heritage interest include the Baptist, Methodist and United Reform Churches, with the different forms of worship used by the different Christian faith groups together with questions of scale often influencing whether the place of worship is referred to as a church or a chapel.

In the Borough's principal towns and in many of its villages, churches were for many years the heart of the community – a place where folks marked the different stages of life from birth through to death, as well as the changing of the seasons in chime with the Christian calendar.

**(insert image of Weleyan Methodist Chapel off Sittingbourne H.St)**

Although many church congregations are dwindling in an age where consumerism, social media and the cult of the personality appear to be the new religions, churches in the Borough and elsewhere continue to serve an important community function and adaptations to churches to serve a wider range of functions (both faith-based and secular) and provide better facilities have in the main helped in this process without harming heritage interest. This is important as the heritage interest of churches can frequently lie as much if not more with the internal features, as it does with the exterior form. Examples of important internal features will vary depending on the type and scale of the church or chapel but will commonly include the nave and the altar. Many also have fine organs, rood screens and choir stalls. Churches are of course often noted for their fine stained glass windows, which are both an external and internal feature though normally designed to be best appreciated from the interior. Swale churches have many good examples in this respect, some of great antiquity, but many more dating from the Victorian period (when re-modelling of churches was common) and later, one of particular interest being the 1955 stained glass window in All Saints Church at Eastchurch. This was dedicated to Charles Rolls and Cecil Grace – early pioneers of flight that flew their prototype planes from an airfield at Eastchurch.

It is important to recognize that alterations to churches still in use for worship (i.e. consecrated) fall outside of the scope of the secular planning controls operated by local planning authorities. Proposals in this respect (e.g. partial removal of pews and/or provision of kitchen/washroom facilities – which are perhaps the most typical) are dealt with by the relevant Diocese through something called the faculty process, with this division of control set in place many years ago, and today regulated by the Ecclesiastical Exemption Order 2010. More information on this and the heritage theme of churches, etc, more generally will be provided in a detailed topic paper to follow during the plan period of this strategy.

**(insert image of Eastchurch Church's stained glass)**

**windows of Rolls & Grace)**

The majority of churches and chapels have churchyards attached to them, which in many cases forms a strong and distinctive setting for the church building itself. Particularly in the rural areas where such churchyards are typically quite extensive and frequently enclosed by historic walls, these together with the grave stones, typical tree planting – Yew trees in particular – and monuments, form an attractive, open and peaceful place with a real patina of age, which are enjoyed by many for the peaceful enjoyment they provide. Unfortunately however, many of these churchyards (now closed to further burials) have suffered from a lack of adequate or appropriate maintenance over many years and the special qualities that they display are under threat, as is the actual fabric of the church buildings in some cases too. The Council is all too aware of this issue as many closed churchyards are allowed by law to be transferred from the relevant Diocese to the relevant local authority to manage/maintain, and Swale Borough Council has effectively inherited a lot of the closed churchyards in its area, which it is estimated come with a repairs bill of around £1.25 million.

**(insert image of churchyard to St. Michael, Sittingbourne – showing frontage wall in poor condition)**

When we think of memorials, most of us typically think of the various types of memorial structures erected across the country to remember and honour those who gave their lives in the two world wars. In Swale Borough as in most other districts, this represents the majority of memorials that we see, with many of these being located within, or just outside churchyards. However the wide variety of forms and material used together with the poignancy and often local social history that these structures display is what lends them appeal and heritage interest, even to those of us with no particular personal connection to any given memorial. The strong feelings that many folks have for such memorials and the memories associated with them were illustrated in recent years by the changes made to the setting of the grade II listed stone cross memorial (to the fallen soldiers of both world wars) in Faversham. The completed enhancement works have left the listed stone cross untouched, but created a stone wall of names of the fallen soldiers from the town together with new hard and soft landscaping features and new benches to enjoy the peaceful garden area by the cross. At the time, there was much vocal and written opposition to the planned changes as well much support. Now that the works are complete and starting to weather a little, it is hoped that the majority of local residents and regular visitors to the site will be pleased with the end result.

**(insert image of Faversham Stone Cross memorial and remodeled garden area)**

There are two memorials which help to tell the history of the area, which are of particular note, and both of which are listed in their own right. These are the Aviator Memorial at Eastchuch (see illustration and summary information about this on [page XX](#) of this strategy document) and the mass grave memorial to the workers at the Faversham munitions factory which were killed during an explosion at the factory in 1916. As the listing text states in relation to the reasons for designation, *'The grave is the final resting place of the majority of the victims of the worst accident in the 450-year history of the British explosives industry'*. The grade II\* memorial can be found in the municipal cemetery at Love Lane in Faversham and forms a particularly poignant part of the concluding chapter in the long history of gunpowder and munitions manufacturing in and around the town.

**(insert image of Faversham Munitions  
Explosion Victims memorial)**

### 3.12 Historic landscapes

As referenced elsewhere in this strategy document, the landscape we see in the Borough can tell us much about and past activities and events at various points in time that have taken place, as well as of course indicating the current range of (principally rural and farming related) activities that we see today.

Some of these past activities or processes are industrial in nature such as the extraction of brick earth and the associated construction of kiln buildings and drying/storage sheds. Where the kilns (with their tall brick chimneys) and other processing/storage can no longer be seen in the landscape, the tell tale signs in the landscape are the reduced ground levels where the brick earth has been extracted, and this intervention to the landscape form can be seen in many parts of the Borough, but perhaps most notably around the edges of Faversham (see illustration and summary information about this on [page XX](#) of this strategy document). Faversham would look entirely different to the way it does now if it hadn't been for the brickfields and the brickmaking that went with it. There are of course other types of extraction works that have taken place within the Swale area and of some extraction continues to this day to help meet the needs of the construction industry. Historically, chalk was an important material needed for a number of process, but notably in the production of lime, used for mortar. Many old hollows in the landscape can still be seen, and at the Finch Drive area of the 1980s housing estate at Preston-next-Faversham, the housing has been quite well integrated into the excavated area of land formerly used for chalk extraction and associated lime manufacture.



In terms of other historic landscapes created by former industrial activities and processes, we can look at the creeks where it is easy to find abandoned and sometimes crumbling wharf structures, together with the remains of the barges and other types of vessels that historically moored up at these wharfs. We can also see cuttings in the landscape where railway lines were laid and later abandoned, such as on Sheppey where the bed of the old Sheppey Light Railway can now be walked from Power Station Road to Scapsgate Road as a result of a successful claim to it to be added to the Definitive Map as a public footpath (ZS 55).

**(insert image of Oare creek)**

Perhaps the most striking historic landscape created by past industrial processes is the series of waterways at Stonebridge Pond in Faversham. The reservoir of water here was not only used to work the gunpowder mills, but the associated network of waterways that were created also provided the means of moving unfinished powder by punt safely between the various processes of corning, pressing, dusting and packing.

**(insert image of Stonebridge pond (and the associated remaining waterways, at Faversham))**

It is safe to say that Swale Borough today represents a beautiful and remarkable example of a post-industrial landscape that has recovered to a very great extent from the ravages wrought on it during the 19<sup>th</sup> and early 20<sup>th</sup> centuries by the various industries that were active there. However, many still recognizable historic landscapes are pre-industrial and stem from the medieval period or even earlier. Reference has already been made (in section 3.9) to the remnants of the medieval streetscape on the northern fringes of Faversham at Abbey Farm, and to the remains of the medieval settlement at Harty on the Isle of Sheppey. Adjacent the medieval church of St . Thomas the Apostle at Harty, you can also interestingly see the remains of the medieval moat around Sayes Court, which is scheduled for its significant heritage interest and which in its heyday would have been an impressive feature within the medieval settlement, likely designed to display wealth and prestige rather than to perform any serious defensive role.

**(insert image of Sayes Court – including the moat)**



Away from the settlements, the rural landscape displays the remains of farmsteads, enclosures and field ditches, woodland management features and the routes and trackways that have shaped the settlement pattern in the Borough we see today. This is particularly notable in the area of The Blean Ancient Woodland to the east of the Borough. Areas of Ancient Woodland have, by definition, remained undisturbed since at least 1600AD. It therefore follows that this area is also rich in archeological remains because of the limited impact that activities have had on the ground levels. The Battle of Bossenden Woods (an area within The Blean) is said to be the last battle which took place on English soil, and the scene of this event can be accessed by permissible footpaths, although there is at present no sign or memorial to mark the site.

Other early features that can be seen in the Swale (and in many other parts of the country) creating historic landscapes are burial mounds, castle mounds and salterns.

Whilst the castle no longer exists, the castle mound at Queenborough is a distinct feature in the otherwise largely flat and marshy landscape and this scheduled monument serves to provide a vivid reminder of the medieval origins of this settlement.

**(insert image of Queenborough Castle Mound)**

At Graveney marshes, in the northeast part of the Borough and on the edge of the Seasalter Level can be found a series of six salterns. These structures were used for the production of salt from sea water and the hummocky area of mounds you can see today (rising to a height of approximately 6 metres above surrounding ground levels) are the (since grown over) heaps of marsh clay waste discarded after brine extraction. This historic feature is today protected by scheduling.

**(insert image of medieval salterns at Graveney Marsh)**

Finally, no overview of historic landscapes in the Borough would be complete without some mention of the significant semi-natural landscapes created to

serve the grand homes of the landed gentry and big industrial business proprietors. The landscapes around four such grand houses (namely Lees Court, Belmont House, Doddington Place and Mount Ephraim) are of such significance because of the striking nature of aspects of their designed landscapes, that Historic England has chosen to add them to its Register of Parks & Gardens of Historic Interest. Each of these properties displays a range of landscaping ranging from the highly ornate to the more naturalistic in style in the vein of the most famous English landscape gardener, Lancelot ‘Capability’ Brown. The illustration bellows shows an example of the more ornate style of landscape design based around the Italian sunken garden theme with formal planted beds and terracing around a central pond feature.

**(insert image of Doddington Place Sunken Garden)**

The more informal style of landscape design in the style of Capability Brown is perhaps more easily and readily appreciated at Syndale just to the southwest of Faversham, where a Palladian mansion erected on the summit of the hill there enjoyed a commanding view over the surrounding landscape. The mansion was largely destroyed by fire in 1961, but as referenced in the character appraisal for the conservation area there, the area is still dominated by a fine landscaped parkland that matured around the site of the former grand country house. This designed landscape combines in a naturalistic way with the network of woodlands and shaws that grow on the steep and less easily farmed sloped of the Newnham Valley – one of a series of dry chalk valleys that emerge from the crest of the Kent Downs and cut through the landscape northwards. This fine combination of landscape elements is further enhanced by a range of Victorian buildings including the Syndale Estate dairy and gatehouse which in combination serve to create a distinctive historic landscape little changed in visual terms in a period of around 200 years.

**(insert image of Syndale parkland landscape,  
including the estate gatehouse)**

## 3.13 Archaeology

### **Introduction**

Swale has an incredibly rich and varied archaeological resource. This richness is a legacy of its strategic location at the mouth of the Thames and Medway rivers, it lying astride the principle conduit of people and trade between the continent and London, together with its varied geography including coast, marshland and chalk downs which have been exploited by peoples since ancient times.

Archaeological assets are part of all the themes that are discussed in this Heritage Strategy and provide the physical evidence of Swale's past. They cover the entire period of human habitation from the traces of the hunter-gatherer peoples of the Palaeolithic to the remains of defence industry, farming and settlement of the 20<sup>th</sup> century.

The archaeological record of the Borough comes in many shapes and forms. It includes remains buried beneath Swale's towns, villages, fields and marshlands, it includes buildings and other structures, earthworks, ditches and landscape features and it includes the sediments and environmental evidence that help us understand the ancient topography, processes and environments that influenced human habitation and use of the landscape.

Swale's archaeology is not confined to the land but also includes former land that now lies submerged together with a wealth of wrecks in our coastal waters. Archaeological assets range from individual finds and features to extensive sites and evidence of archaeological and historic landscapes.

### **Designation and protection of archaeological remains**

There is statutory protection for nationally important archaeological remains through the Ancient Monuments and Archaeological Areas Act 1979 where they are designated as Scheduled Monuments (formerly Scheduled Ancient Monuments). However, not all nationally important archaeological remains are Scheduled and protected in this way. There are cases of known nationally important remains which have not been protected and areas where they have only been partially Scheduled principally for land use and management reasons. There are many more cases where important archaeological remains lie buried and where their full importance has not been sufficiently identified to allow Scheduling and many, many more nationally important remains, or even internationally important remains, will lie hidden awaiting discovery. Archaeological remains also contribute to and are protected by other forms of historic environment designation such as Listed Buildings, Conservation Areas, Registered Parks and Gardens, Registered Battlefields, Protected Wrecks and Military Crash Sites. While the greatest emphasis is on the protection and preservation of nationally important remains, there are numerous remains that are significant at a regional and local level which merit protection.

The Kent Historic Environment Record (HER), maintained by Kent County Council is the principal inventory of archaeological assets in the county. The HER is not a complete inventory; it is an evolving record with many new assets recognised and added to it every day both by dedicated Historic Environment Record officers and by volunteers under their guidance. Thematic studies such as the Defence of Swale Survey or the Rapid Coastal Zone Assessment have and will identify large numbers of new sites for inclusion and generally increase the records in detail within particular themes or for particular locations. On occasion the HER will import records from separate databases maintained by other organisations such as Historic England.

The Kent HER is linked to a geographical information system (GIS) which allows the mapping of the records against the counties topography, geology, modern and historic maps, aerial photographs and other geographical information. The HER is available in a shortened version online through the Exploring Kent's Past web pages: [www.kent.gov.uk/exploringkentspast](http://www.kent.gov.uk/exploringkentspast) though this is not as up to date or as detailed as the offline version and should not be relied upon for planning purposes.

### **Archaeological Discovery**

There has been a long history of antiquarian interest and archaeological discovery in the borough. Early antiquarians certainly visited the area and drew and described the various monuments and buildings. The 19<sup>th</sup> century arrival of the railway and the expansion of the borough's towns brought with it many chance discoveries by those building. The archaeological record for the area is full of entries relating to the findings of prehistoric axes, Roman and Saxon cremations and burials with their grave goods. Such sites tended to dominate the record of the period with objects being readily identified, bought and locally collected. A significant example of the early findings is that of the Kings Field Anglo-Saxon cemetery first found by railway navies in 1858 and later through the next seventy years during quarrying works in the area.

By the middle of the 19<sup>th</sup> century the early antiquarianism was starting to give way to a more professional discipline, a better appreciation of the extent of human history and prehistoric chronology. National and local organisations were formed with institutions carrying out research which was published in their journals and discussed at their conferences. The Kent Archaeological Society has published many articles on Swale's archaeology in its annual journal, *Archaeologia Cantiana* since it was formed in 1857.

Following the second world war there came a rise in local archaeological groups and societies excavating sites in their localities as part of their own research and in response to discoveries during development. In the 1960s and 1970s in response to the need for a more concerted approach to rescue archaeology in advance of development saw the rise of units with a core of professional staff such as the Kent Archaeological Rescue Unit and the Canterbury Archaeology Trust to work on key sites and discoveries threatened by development. Perhaps one of the more notable sites excavated in this period was that of the Royal Abbey at Faversham that was excavated by the Kent Archaeological Rescue Unit in 1965. In 1989 Kent followed the example of other counties and appointed its first County Archaeologist to advise planning authorities and maintain a Sites and Monuments Record. The publication of Planning Policy Guidance Note 16 in 1990 provided a much firmer basis for the conservation and investigation of archaeological sites affected by development. With increasing development pressure and such a richness of archaeology, Swale has since seen an explosion in the amount of work undertaken in advance of development in most areas of the borough. Most of the work, funded by developers has been undertaken by professional archaeological units both from Kent and further afield. Many sites have been discovered which have provided a major contribution to our understanding of the borough's ancient history. These include such sites as the substantial Neolithic camps, Bronze Age and Iron Age enclosures discovered in advance of housing development at Kingsborough Manor in Eastchurch; numerous sites that illustrate the rich later prehistoric and Romano-British landscapes around Sittingbourne and Faversham and extending along the A2 corridor and into newly developed areas around Iwade and Kemsley; Rich Anglo-Saxon burial sites at the Meads in Bobbing, clustered around a number of Neolithic and Bronze Age monuments; Sites within the historic towns and settlements that are shedding light on their early development; and on sites of the early industrial, defensive and maritime heritage of the borough for example at Oare's gunpowder sites, Sheerness' dockyard and defences and Sittingbourne's paper mill. Of particular note is the recent remarkable discovery of a Roman road, industrial area and temple on a new housing site in Newington.

Alongside development led archaeology have been projects to map or gather information on various heritage themes, for example the Defence of Swale project which identified and mapped the remarkable First World War defences of the Chatham Land Front between Detling and Iwade.

The borough is also the subject of a number of archaeological projects undertaken by local archaeological societies such as the Faversham Society Archaeological Research Group, the Historical Research Group of Sittingbourne and groups in Newington, Newnham and on Sheppey that have all been actively involved in archaeological survey and investigation. Much work has also been done in discovering and investigating new sites in the area between Sittingbourne and Faversham by the Kent Archaeological Field School. In response to all this archaeological work a unique initiative was developed in the Forum at Sittingbourne with the establishment of CSI Sittingbourne, an archaeological conservation laboratory where local volunteers could gain hands on experience conserving archaeological finds from local excavations.

### ***The Archaeology of Swale***

The archaeology of Swale is a vast resource of outstanding significance that covers the long period of human history from the Palaeolithic to the present day. It is varied and complex. The Borough's archaeology can be found in its settlements where in places it will be deeply buried under consecutive layers of deposits representing periods of that place's history. It may be found in the fields and rural places of the Borough where it may be more shallow buried but extensive. The marshlands on the north coastline and the Isle of Sheppey may contain remains that are deeply buried, well preserved organics in peat deposits or may survive as features associated with the marshland reclamation. Earthworks may survive in woodland, protected from plough erosion for centuries and longer. Artefacts and ancient faunal remains may be found within the brickearth and gravel deposits that have been extracted within the borough. Wrecks and hulks lie along the borough's coastline and offshore; the remains of Swale's historic buildings, structures, defences and industry all include archaeological evidence.

Recent archaeological work has provided growing evidence of the prehistory of Swale. These range from Palaeolithic flint axes in the borough's gravel and brickearth deposits; through camps, ritual and burial monuments of the Neolithic and Early Bronze Age; to extensive buried landscapes of settlement, farming and industry of the Bronze and Iron Ages. The earthwork remains of the ramparts of a small hilltop enclosure at Perry Wood in Selling also date to the Iron Age.

The borough's Roman landscape is particularly special. The main Roman road from the Kent coastal ports to London ran through the borough along the present A2 corridor. Alongside this can be found the remains of roadside settlements, significantly at Ospringe / Syndale, the reputed site of *Durolevum* mentioned in the Antonine Itinerary, at Newington and at Radfield. The richness of the Roman occupation of this area is well evidenced from the large number of Roman villa sites in Swale, the remains of pottery manufacture and saltworking in the marshlands, trackways and burial sites.

Saxon evidence is mainly the rich assemblages of grave goods recovered from cemeteries. Notable amongst these are those from the Kings Field, Faversham found by workmen in the 19<sup>th</sup> century; and the more recently excavated cemeteries at the Meads in Bobbing. Many of the borough's historic towns and villages have origins that extend back to the medieval and earlier. Faversham and Milton developed as important port towns from Saxon times, Queenborough was established as a planned medieval town built by Edward III from 1361 to accompany his royal castle there and named for his wife Phillipa of Hainault. Sittingbourne had lesser prominence though developed as an important coaching stop for travellers along the main road to Canterbury and the coast. Other villages grew along this

important road to serve the travellers and pilgrims. Tradition places an important pilgrimage stop at St Thomas a Becket's Well in Bapchild and a hospital, the Maison Dieu at Ospringe. Other notable medieval sites include ecclesiastical sites such as the parish churches, Minster Abbey and the Royal Abbey at Faversham. Swale includes a number of castles including Queenborough Castle, the Norman motte at Tonge and another possible motte at Syndale. Moated sites include the scheduled examples at Castle Rough in Milton, and at Sayers Court near Harty, Sheppey.

Following the medieval period, we see the further development and expansion of the earlier settlements. At Sheerness a naval port is established followed by the development of Blue Town and Mile Town to serve the dockyard. To defend the dockyard a series of fortifications were built. The 18<sup>th</sup> century earthwork fort, Fort Townshend, recently investigated during the redevelopment of the steelworks, was replaced by a moat, rampart and bastions of the Sheerness Lines separating the dockyard area from the rest of Sheppey. Later, towards the end of the 19<sup>th</sup> century a the Queenborough Lines was built across the island to provide an outer defence for Sheerness. Other defences, designed to command the sea approaches to the Thames and Medway included Garrison Point Fort and a series of batteries along the northern coastline of Sheppey.

The defence heritage of the borough is particularly significant given its strategic location. Recent studies and survey work has discovered a remarkable landscape of First World War anti-invasion defences that extend from Detling through to Iwade and Grovehurst. Together with defences on the Isle of Sheppey these provide one of the best examples of anti-invasion precautions in the country with the physical remains complimented by detailed mapping, photography and emergency planning arrangements in the archives.

Swale is particularly noted for its role in aviation history. Leysdown and later Eastchurch was home to the pioneers of aviation, saw the establishment of the first Royal Naval Air Service base and its continuation as an important airfield of the Second World War. Remains of this aviation history survive as structures and buried archaeology within the present-day prison complex and the Shellness area. The remains of another fighter airfield of the First World War also survives at Throwley.

Industrial archaeological remains are also found throughout Swale. Around Faversham can be found the remains of the important gunpowder and explosives industry and its associated infrastructure. Several assets amongst these have been recognised as nationally important and designated. Around Sittingbourne can be found heritage assets associated with paper making. Across much of the northern part of the borough the remains of the extensive brickmaking industry can be found. These include former industrial buildings, a landscape of former quarries and the remains of the barges and barge building.

The rural areas of the borough contain a wealth of remains associated with the development of the landscape and its exploitation for farming and other uses. Archaeology in these areas includes the remains of farmsteads, enclosures and field ditches, woodland management features and the routes and trackways that provide the settlement pattern we see today. Finally, the foreshore and sea around the coastline is rich in archaeology. Sea level rise has submerged large parts of the landscape. The islands off Swale's coast contain a wealth of early archaeological remains as well as more recent remains. At Dead Man's Island close to Queenborough, the graves of 19<sup>th</sup> century seamen buried from hulks in the nearby creeks are regularly exposed by the tides. Elsewhere the remains of hulks, mostly barges can be seen on the marshlands, while a number at Minster represent the remains of a boom that once extended across to the Essex shore. Offshore can be found the remains of wrecks, most notably that of the Richard Montgomery, a munitions ship that foundered in the Second World War. Notably at Graveney Marsh the unique remains of a Saxon boat were found during ditch excavations in 1970. The Graveney Boat, which dates from the late 9<sup>th</sup> to the mid-10<sup>th</sup> century

is presently at the National Maritime Museum although there are ambitions to return it for display in Faversham.

**IMAGES TO GO IN THIS SECTION:**

**Newington Roman Temple Excavated**

**Newington Temple Reconstruction**

**Defences at Sheerness**

**Recording of Palaeolithic deposits at Bapchild**

**Saxon Finds from Meads**

**Barge hulks in Milton Creek or on the foreshore**

**Perry Wood earthwork**

**Paper Mill excavation**

**Perry Court excavations Faversham**

**Remains of Fort Townshend barrack block at Thamesteel**

**Cropmark on an aerial photograph**



### 3.14 Museums, collections & archives (digital/traditional)



The museums, collections & archives in Swale Borough make a valuable contribution to the overall heritage offer that the borough has to offer, and a number of the museums and/or associated heritage related attractions contribute positively to local tourist and visitor economy.

The group of museums, collections & archives and heritage related attractions are represented by the collective organisation called Historic Swale. This replaced an earlier affiliation called the Swale Museums Group. The Council supported the original affiliation and was instrumental in helping to set up the Historic Swale organisation. This is effectively an umbrella charity, which as it's website clearly states (see: [https:// historicswale.org.uk](https://historicswale.org.uk)) supports its member attractions and organisations in the 3 areas which make up Swale district (Faversham, Isle of Sheppey and Sittingbourne) to collectively showcase the diverse and fascinating heritage which the borough offers.

At the time of writing, the members of Historic Swale are those that are set out in the table overleaf, as Figure 15.

*Faversham's Fleur de Lis Museum.*

Faversham	Isle of Sheppey	Sittingbourne
Chart Gunpowder Mills	Blue Town Heritage Centre and Criterion Music Hall	Milton Regis Court Hall
Faversham Heritage Hub	Eastchurch Aviation Museum	Sittingbourne and Kemsley Light Railway
Fleur De Lis Heritage Centre	Minster Abbey Gatehouse Museum	Sittingbourne Heritage Museum
Kent Police Museum (not yet open)	Queenborough Guildhall Museum	The Heritage Hub – Historical Research Group of Sittingbourne HRGS
The Faversham Society	Rose St Cottage of Curiosities	Raybel Charters (New)
The Maison Dieu		Dolphin Barge Museum (not yet open)

**Fig. 15: Table of Historic Swale group members**

for more details visit <https://historicswale.org.uk/>

It is anticipated that further heritage-related sites/organisations will become members of Historic Swale, and whilst the Council is no longer directly involved with Historic Swale, it is nevertheless committed to continuing to support this important umbrella organisation and its individual members as far as its resources allow. This may include the provision of grants to support the development projects of member groups which the Council consider to be of particular public benefit.

Increasing awareness of the group and its members activities is clearly important, and the Council is committed to doing this through its own website and any other appropriate means that may arise.

The Council is very aware that centres such as the Sheerness Blue Town Heritage Centre, and organisations such as the Faversham Society and Sittingbourne Society contain a wealth of useful local heritage knowledge, and in some cases, expertise. Previously the Council has tended to carry out heritage related project work with only limited liaison with parties, but as a firm principle of this heritage strategy (see section 1.3 of this strategy document), the Council is committed to working, where possible, in a more collaborative manner, and this for example might result in the production



*Murston Old Church – a Scheduled Monument with the project to repair and re-use the church supported by the Council.*

of Conservation Area Review and Character Appraisal and Management Plans being jointly produced, with the appropriate acknowledgment given to all project partners. In other cases, the Council will be willing to support heritage related work or projects led by others, and as part of its commitment to producing a series of action plans on work in which the Council will act independently or as the lead partner in a partnership approach, the Council will include on such action plans, summary details of heritage- related projects in Swale being led by other organisations, in order to increase awareness of, and to help promote them.

The range of artefacts, historic documents, and archival information kept by the local museums and/or local amenity groups and societies is invaluable to gaining an understanding of the history and associated heritage of the Borough. In many cases such local information is supplemented by archive information viewable via national sources such as the national archives at Kew, the Historic England archive at Swindon, and the British Library in London.

The Council is aware of the issues that many of the museums face in archiving heritage collections and in particular, the way in which the archaeological finds of the Borough can be adequately stored and made accessible for the future. This is a matter which it is committed to exploring in liaison with Historic Swale and Kent County Council.

### 3.15 Portable/moveable heritage

This type of heritage refers to transportation vehicles in the form of trains and trams, boats, planes and road/terrain/military vehicles, and associated items such as the carriages and wagons for locomotives.

In this respect, Swale is currently limited to trains and boats, although it is possible that the range of portable/moveable heritage will expand to also encompass trams, planes and road/terrain/military vehicles at some point in the future.

In respect of trains, we know that the Swale area was rich in industrial railways, with the Davington Light Railway being used to carry workers in the Faversham area to the armament factories there. On the Isle of Sheppey, the steelworks and Royal Naval Dockyard at Sheerness were served by a railway, whilst at Highsted, the quarries were linked using a railway. However, the only industrial railway left operating in Swale is the Sittingbourne & Kemsley Light Railway's two mile remnant of the former Bowater Railway serving the papermaking industry in Sittingbourne from 1906. We are fortunate that the Sittingbourne & Kemsley Light Railway (SKLR) preserves not just this remaining track and associated infrastructure (including workshop buildings and the Milton Regis viaduct – which are of at least local heritage interest in their own right), but also 8 locomotives that worked with the papermills all of their working life. The locomotives at the site date from the beginning of the 20<sup>th</sup> Century, those initially used being 0-4-2 Brazil type tank engines, sourced from the Stoke-based locomotive manufacturers, Kerr Stuart & Co. All the locos today are in various states of condition, some in good condition and in operation, and others in need of some repair or a major overhaul – a similar scenario also applying to the rolling stock which the SKLR owns. The SKLR opened as a tourist railway in 1970 and since then has operated nearly 900,000 passenger journeys, and today it stands as a vivid reminder of the strong industrial roots of Sittingbourne and in particular its papermaking heritage. For more information on the history and development of the SKLR, including details about its locomotives and rolling stock, please visit the railway and/or its website:

<http://www.sklr.net>

**(insert image of SKLR loco crossing the Milton Regis viaduct, if obtainable via SKLR)**

In respect of boats, readers will have noted (see section 3.7) that the Swale coastline was historically the scene of much boatbuilding and barge traffic. This is no longer the case although its creeks and the Swale channel they feed into are still used by recreational boaters and some limited boatbuilding and boat repair work still takes place in the Borough.

Milton Creek at Sittingbourne was historically used for boatbuilding and gravel extraction for brickmaking. At the creek today can be found the recently constructed Dolphin Barge Museum. The sailing vessel being restored at this site is the Thames Sailing Barge, Raybel, originally made and launched at Milton Creek in 1920. Raybel Charters is working to return this 90ft originally powerful coastal sailing vessel (which operated between London and the east coast ports as well as the near continent) to full cargo delivery operation under sail; and to manage this barge as a newly revitalised heritage asset for community benefit. For more information on the history and restoration of the Raybel, please visit the Dolphin Barge Museum site and/or visit the Raybel Charters website: <https://raybelcharters.com>

**(insert image of Raybel under restoration at Milton Creek)**



### 3.16 A snapshot of our designated heritage

The renowned Buildings of England series of books recognises that Kent has an exceptionally rich architectural heritage. The most recent national data available from Historic England indicates that Kent has over 17,800 entries in the national list of buildings of special architectural or historic importance. This is more than any other county in the South East, and comparable to the whole of London (over 18,800 listed building entries).

Swale is one of 13 local authority districts in Kent and contributes significantly to the high level of heritage interest that can be found in the county. At the time of writing, Swale contains over 1430 listed building, 50 conservation areas, 4 Historic Parks & Gardens and 22 Scheduled Monuments. Kent districts ranking comparison data on the extent of heritage assets which each district has is available to view via the Council's 2015 Heritage Asset Review, see : [https:// archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/LP-Examination-documents/Swale-Heritage-Asset-Review-June-2015.pdf](https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/LP-Examination-documents/Swale-Heritage-Asset-Review-June-2015.pdf), although it should be noted that some of the data in this document may now be incorrect by small margins.

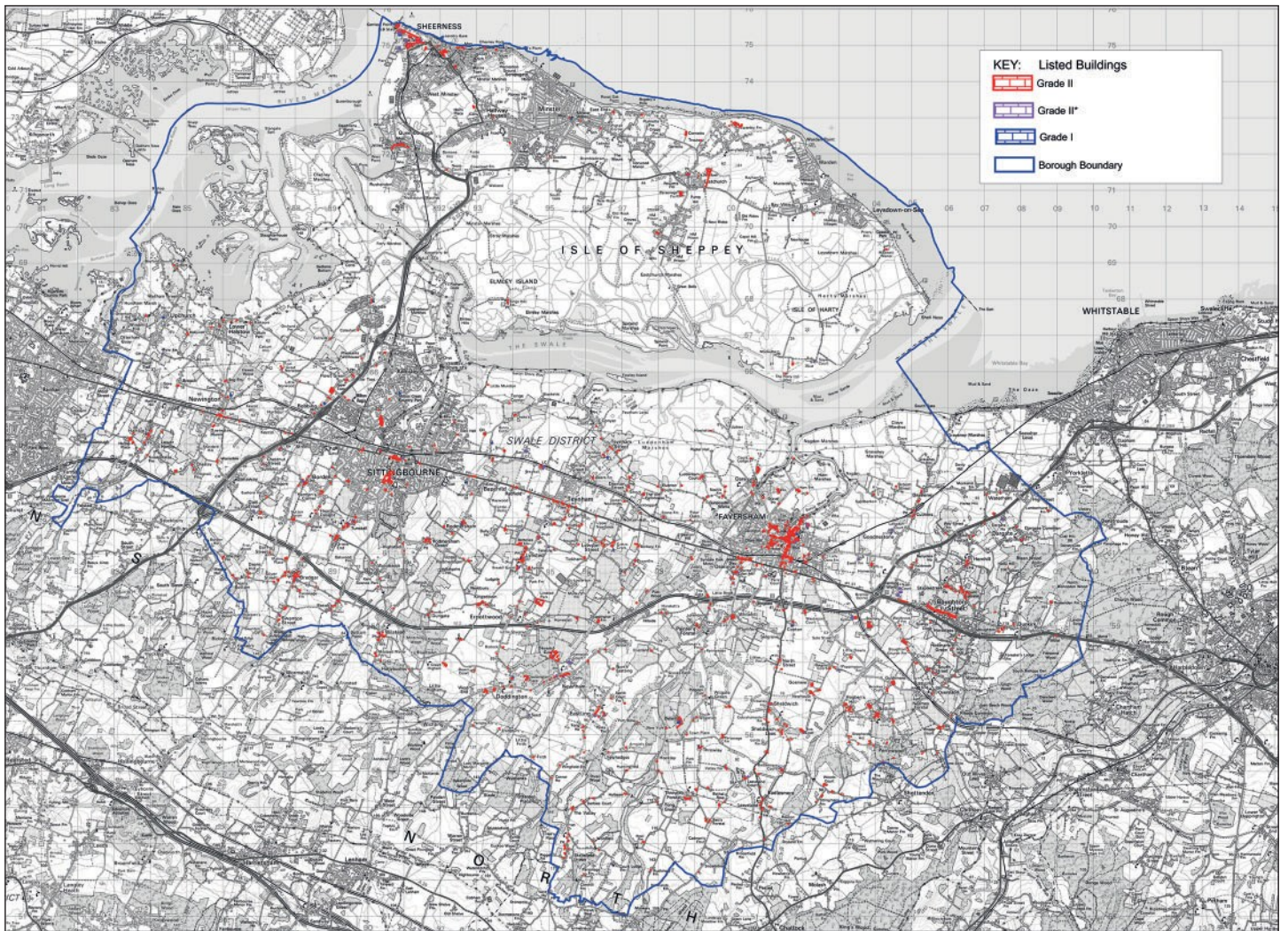
#### Listed Buildings

The distribution of Swale Borough's listed buildings can be seen on Figure 1 overleaf. It can be seen from this that there is a wide distribution of listed buildings/structures across the Borough, but also that there are key areas with high concentrations of listed buildings, most notably within the historic core of Faversham, and around the historic slipway structures within Sheerness Port.



*The former Adult Education Centre in Sittingbourne – one of Swale's many listed buildings*





**Fig 1: Map showing Swale's listed buildings**

General information about the importance of, and the protection applicable to listed buildings is available from Historic England (see [www.historicengland.org.uk/listings/what-is-designation/listed-buildings](http://www.historicengland.org.uk/listings/what-is-designation/listed-buildings)).

The term listed buildings can be a little misleading, as listing **can also apply** to structures which are clearly not buildings e.g. milestone markers, **walls and gates**.

When a building or structure is listed, the protection and controls that come with this apply to the whole building or structure both external and internal, unless explicitly stated otherwise. In some cases, listing is applied only to a particular part of a building or structure, such as a shopfront, but this is not common. Because many buildings and/or structures are attached to others, either in individual form, or as part of a designed terrace, some list entries provide protection and associated planning controls for more than one building/structure. There are many examples of this type of list entry both in Swale Borough and elsewhere. As such, whilst Swale has over 1430 listed building entries, it is estimated that the total number of buildings/structures this represents may be closer to 2000, although some research is needed in this respect.

Swale Borough has a wide variety of listed buildings/structures that vary significantly in size, overall form and age – the latter ranging from the 11th century through to the second half of the 20th century. **An example of one of Swale's listed buildings is shown on the previous page.**



The entire range of listed buildings/structures in Swale Borough can be viewed via web link on the Council's web page on listed buildings (see: [www.swale.gov.uk/listed-buildings](http://www.swale.gov.uk/listed-buildings)).

## Curtilage Listed Buildings

Curtilage listing is not a formal designation in its own right, but is a protection/control factor that derives directly from the process of a building or structure being designated as a listed building by the Secretary of State. This means in summary that buildings/structures directly related to the building/structure being listed can also be subjected to the same planning controls if they are deemed to fall within its curtilage. Curtilage is defined as the Oxford English Dictionary as *an areas of land attached to a house and forming one enclosure with it* but the extent of land, particularly in the case of a sprawling country estate or farmstead and what constitutes 'enclosure' are often matters up for debate, in spite of guidance produced by Historic England in 2018 which has sought to provide some guidance and associated clarity in this respect (See: <https://historicengland.org.uk/images-books/publications/listed-buildings-and-curtilage-advice-note-10/>)

A good example of a curtilage listed building/structure in Swale is the walled kitchen garden at Radfield House, London Road, Teynham.

Whilst the forecourt cast iron railings to this 16<sup>th</sup> Century grade II listed house are specifically referenced in the list description, the walls to the former kitchen garden are not, yet they clearly date from the mid Victorian period (or possibly earlier) and are visually and functionally linked with the house and as such would be treated as a curtilage listed structure

**(insert image of Radfield House Walled Kitchen Garden).**

Such protections and associated controls will only apply in certain scenarios but a fundamental criterion is that the related building or structure must date from before the 1<sup>st</sup> July, 1948. It is a matter for each Local Planning Authority, including Swale Borough Council to determine which buildings/structures within their respective areas should be treated as curtilage listed buildings and thereby apply the necessary planning controls to them when necessary.

The full extent and range of curtilage listed buildings and structures in Swale is currently unknown, and following recent changes to the way in which local land charge searches on properties are carried out (typically in relation to being sold on and subsequently bought), all Local Planning Authorities will be required to accurately capture this information. At the time of writing, all Kent Local Planning authorities are in broadly the same position as Swale so the intention moving forward is to jointly work out the most appropriate way or ways of working through this potentially laborious and time-consuming task through a working party group formed of the Kent Conservation Officers Group liaising as necessary with other parties including the relevant local authority Land Charges and Geographical Information Service (GIS) teams.

## Conservation Areas

Swale's 50 conservation areas are similarly quite well distributed across the Borough area, although there are only 4 located on the Isle of Sheppey, and these are all concentrated in the northwestern quadrant of the island. Each of Swale's towns (Faversham, Queenborough, Sheerness and Sittingbourne) has at least 1 conservation area, the largest urban one being that of Faversham. The size and character of the conservation areas within Swale varies considerably, some overlap with other heritage designations (historic parks & gardens, and scheduled monuments), and many are to be found within the southern half of the Borough, contributing significantly to the special landscape quality of the North Kent Downs Area of Outstanding Natural Beauty (AONB). They are listed below in Figure 2, in alphabetical order, and the maps (and appraisals, where these exist) for these areas can be viewed via the Council's website page for its conservation areas (see: [www.swale.gov.uk/conservation-areas](http://www.swale.gov.uk/conservation-areas)). Figure 3 (on page 22) **check still correct** shows the location of Swale's 50 conservation areas.

Badlesmere	Lynsted - Bogle
Borden - Chestnut Street	Lynsted - The Street
Borden - The Street	Milstead
Borden - Harman's	Milton Regis - High
Corner Borden - Hearts	Street Newington
Delight	Church Newington -
Boughton - Boughton Church	High Street
Boughton - Boughton Street	Newington - Newington
Boughton - South Street	Manor Painter's Forstal
Bredgar	Queenborough
Cellar Hill and Greenstreet	Rodmersham
Doddington and Newnham	Green Selling
Eastling	Selling - Shepherd's Hill
Faversham - Faversham	Sheerness: Royal Naval
Town Faversham - Ospringe	Dockyard and Bluetown
Faversham - Preston Next	Sheerness: Marine Town
Goodnestone	Sheerness: Mile Town
Graveney - Graveney Church	Sheldwich
Graveney - Graveney Bridge	Sittingbourne - High
Hartlip	Street Stalisfield Green
Hernhill	Staplestreet
Hernhill -	Syndale
Dargate Hernhill	Throwley
- Fostall	Forstal Tonge
Kingsdown	Tunstall
Lewson Street	Upchurch
Lower Halstow	Whitehill

**Fig 2: Table of Swale conservation areas (date of designation to be added to each entry)**

For more details, visit: [www.swale.gov.uk/conservation-areas](http://www.swale.gov.uk/conservation-areas)





**Fig 3: Map showing Swale’s conservation areas**

## Registered Parks and Gardens



Swale has four areas of designed landscape that are included in Historic England’s Register of Parks and Gardens of Special Interest. There are as set out in the table overleaf at Figure 4. (Figure 5 shows the location of Swale’s Registered Parks and Gardens), all of which are located in the eastern half of the borough.

*Part of the striking topiary display at Mount Ephraim (grade II registered park & garden)*



## Registered Historic Parks and Gardens

Belmont Park Grade II Registered 1986

Doddington Place Grade II Registered 1988

Lees Court Grade II Registered 1989

Mount Ephraim Grade II Registered 1988

**Fig 4. Table of Swale's Registered Historic Parks and Gardens**

For more details, visit: [www.swale.gov.uk/registered-parks-and-gardens](http://www.swale.gov.uk/registered-parks-and-gardens)



**Fig 5. Map showing Swale's Registered Historic Parks and Gardens**

Swale is rich in archaeological interest with evidence of Neolithic, Bronze Age and Iron Age settlements in the area, as well as the military Roman road, Watling Street, connecting the earliest Roman coastal settlements with London. **The Borough is also endowed with 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> Century defence related heritage, including the 18<sup>th</sup> Century inner and 19<sup>th</sup> Century outer moated defence structures at Sheerness known as the Sheerness Defences and Queenborough Lines, and the 20<sup>th</sup> Century World War II Heavy Anti-Aircraft Gun sites at Iwade and Upchurch. Tucked away in an unassuming residential area of Faversham that developed many years after the closure of the site are the 18<sup>th</sup> to early 20<sup>th</sup> Century remains of the gunpowder factory which formed part of the Home Works site, established at this location around 1560.**

The Borough contains 22 Scheduled Monuments which include a Romano-British mausoleum at Stone-by-Faversham, and a Romano-British villa and Roman-Celtic temple at Boxted. There are also important medieval sites including salterns, fortification, and ecclesiastical buildings.

At the time of writing, consideration is being given to the application for scheduling of a further archaeologically significant structure in the southeast of the borough.

Swale's 22 Scheduled Monuments are listed alphabetically below by parish in **Figure 6**, whilst their location within the Borough is shown overleaf in **Figure 7**.

Parish	List Entry Title (summary)
Dunkirk	Dunkirk WWII Chain Home Radar Station
Eastchurch	Shurland House & remains
Faversham	The Maison Dieu
Faversham	St. Saviour's Abbey
Faversham	Oare Gunpowder Works
Faversham	Chart Gunpowder Mills
Hernhill	Medieval saltern on Seasalter Level (1 of 6)
Hernhill	Medieval saltern on Seasalter Level (2 of 6)
Hernhill	Medieval saltern on Seasalter Level (3 of 6)
Hernhill	Medieval saltern on Seasalter Level (4 of 6)
Iwade	WWII Heavy Anti-Aircraft Gunsite (TS2) E. of Chetney Cottages
Leysdown	Medieval moated site at Sayes Court
Minster-on-Sea	Nunnery at Minster Abbey
Norton, Buckland & Stone	Romano-British mausoleum at Stone-by-Faversham
Queenborough	Queenborough Castle
Sheerness	Sheerness Defences
Sheerness	Queenborough Lines
Sittingbourne	Murston Old Church
Sittingbourne	'Castle Rough' medieval moated site
Upchurch	WWII Heavy Anti-Aircraft Gunsite (TS3) at Wetham Green
Upchurch	Romano-British villa at Boxted
Upchurch	Romano-Celtic temple at Boxted



**Fig. 6: Table of Swale’s Scheduled Monuments**

For more details, visit: [www.swale.gov.uk/scheduled-monuments](http://www.swale.gov.uk/scheduled-monuments)



**Fig 7: Map showing Swale’s scheduled monuments**

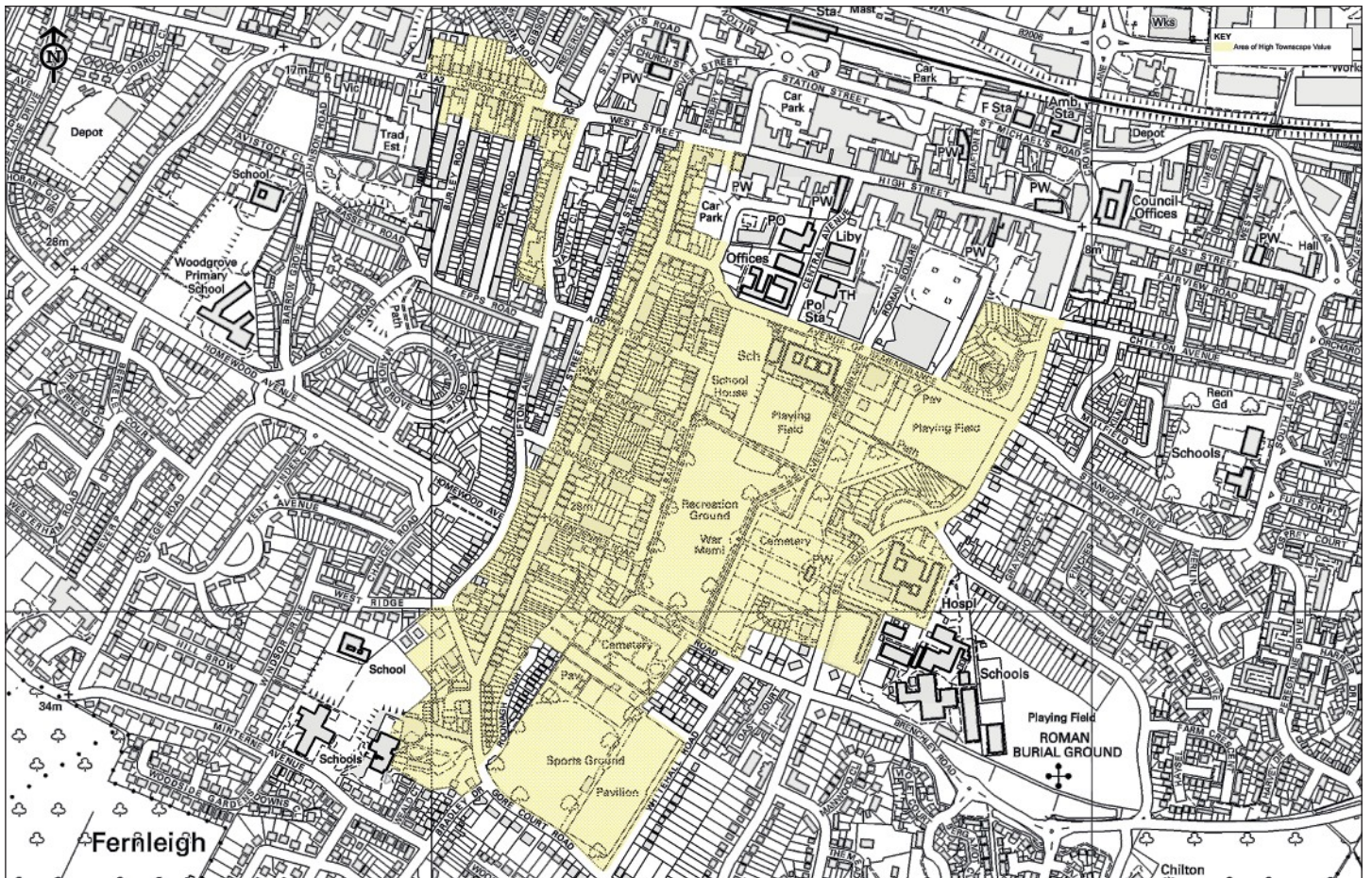
*Streetscene view from Sittingbourne’s Area of High Townscape Value.*



**Areas of High Townscape Value** Outside of Swale’s existing designated conservation areas, parts of the Borough may become of sufficient architectural, historic and/or artistic interest in the future to warrant consideration for conservation area designation. Within the Borough’s towns, such areas may, in the meantime, be subject to development pressures and other change. A key example of this are the areas of Victorian and Edwardian housing, parks and cemeteries, trees and open spaces, south of Sittingbourne town centre, which mark an important period in the town’s post industrial expansion. These characteristics are recognized by its identification and formal local designation as an Area of High Townscape Value. *It is noteworthy that the tree-lined Avenue of Remembrance within this Area of High Townscape Value is only 1 of 5 such named thoroughfares in the world specifically named in this way. Furthermore, Sittingbourne’s Avenue of Remembrance is the only one dedicated to World War I with trees and plaques commemorating fallen soldiers. It very much provides a poignant reminder of the town’s marking*

of The Great War, and as it will 100 years since it was given its name in 2023 and some of the trees and plaques are either in a poor condition, or in some cases, missing, the Council is working with local community groups and societies to make the necessary improvements to this important local heritage feature, if possible, in time for its centenary year. This therefore forms one of the initiatives in the initial 3-year Action Plan. A map showing the location of the Area of High Townscape Value in Sittingbourne is shown in Figure 8.





**Fig 8: Map showing area of high townscape value**

### 3.17 Identifying locally important heritage

It is likely that currently unidentified heritage assets, particularly sites of archaeological interest will be discovered in the future, although it is difficult to predict the questions of what, when and where with any degree of precision.

Such future discoveries may however fall within the patterns of distribution of known heritage assets (e.g. the Roman road, Watling Street) or they may occur within the clusters and concentrations of existing heritage assets, such as the historic towns. Other kinds of heritage assets, as yet undiscovered, may be associated with a geographical distribution (e.g. along Swale's coastline) or within the extent of a particular activity, such as hop/fruit growing or brickmaking.

Often, heritage that may be considered of some significance (but not necessarily of such significance to merit consideration for scheduling, listing or registration by the Secretary of State) is encountered by chance, sometimes as a result of considering a planning application for development for the heritage asset in question or to something else nearby. In such circumstances, the Council will consider whether an application should be made for designation to Historic England following initial discussions with its Designation Team. In more urgent cases where the heritage being considered is believed to be particularly significant and may be under threat of total demolition/loss or significant harm through alteration, then the Council will consider serving a Building Preservation Notice, which has the effect of treating the building or structure in question as a listed building until such time as it has been assessed by Historic England in response to a necessary parallel listing application.

More often than not, it is likely that previously unknown heritage that is subsequently discovered, will not be significant enough to warrant an application to Historic England for listing, registering or scheduling, or the serving of a Building Preservation Notice, but this does not mean any interest in its heritage significance stops there.

The Council records in its reports on applications for planning permission when it considers buildings/structures directly or indirectly affected by a development proposal should be treated as an undesignated heritage asset for the purposes of decision making, as this can rightly have a bearing on the outcome of such an application. Moving forward from the beginning of the Heritage Strategy plan period, the Council will keep a database of all such undesignated heritage assets, not only so that they can be recorded on its applications database and GIS/constraint notification systems to help ensure consistent decision making into the future, but also that the undesignated heritage assets on the list (placed as such by the specialist knowledge of the Council's Heritage Team – in consultation with external heritage specialist where necessary) may be considered for candidature in relation to the Council's planned Local List.

The Council **is committed** to developing a list of buildings, structures, landscape features, archaeological sites and parks and gardens of local heritage interest in partnership with Kent County Council, the Borough's local amenity societies and any other interested parties or relevant parties such as **the Kent Gardens Trust** (See: <https://www.kentgardenstrust.org.uk>). In respect of the 4 parks and gardens in Swale not already registered by Historic England, and which could be suitable candidates for the Local List, a good place to start would be an examination of the existing Kent Gardens Compendium, compiled by the Trust. The Council recognize that in developing such a list, a clearly defined set of criteria for selection and inclusion will be required, and also that there would be real benefit in providing supporting information on significance to assist with ongoing/future conservation management

**In addition to the above**, the Council will also commit to positively considering suggestions for possible new conservation areas and areas of high townscape value, although priority will be given within the lifespan of this heritage strategy to ensuring the existing heritage we already know about, or that is recognized through the development of the planned local list, is properly understood, protected and managed.

**(insert image of non-designated heritage asset which could also be a candidate for the planned Local List, e.g. Sittingbourne Rail Station)**



## 4. Our Heritage: strengths, weaknesses, opportunities and threats

### (Heritage Strategy Strand B: Positive Management)

#### 4.1 Heritage Strategy Priorities Aligning with Strategy Strand B

The Heritage Strategy **Priorities** which principally aligns with this **strategy strand** are:

Priority 2: To make use of the borough's heritage to help achieve and promote sustainable and inclusive growth and regeneration, social and economic wellbeing, and civic pride, in particular by actions to tackle and specifically reduce Swale's heritage at risk across the full range of nationally and locally designated heritage assets

Priority 5: Raising the historic environment (and the important social history associated with it) up the agenda by promoting awareness and understanding of Swale's heritage among local residents, businesses and visitors to the area, in particular to help realise the cultural, educational and associated health benefits it can offer

#### 4.2 Our Strengths

Swale Borough contains a wealth of heritage, some of it highly significant in terms of national heritage designations and associated status, but all of it significant in one way or another at a local level. Allied to this is a good range of different local groups and societies with a strong, and long commitment to conserving and promoting understanding of the heritage. As referenced elsewhere in the document, many of these groups hold detailed knowledge about many of the different types of heritage in the Borough and have the knowledge and expertise to develop their own heritage projects in partnership with the Council and/or other parties. This combination of factors will be a real strength in taking this Heritage Strategy forward and delivering on the projects set out in the series of Action Plans. Furthermore, it can also be seen that the historic environment in Swale is a significant contributor to local distinctiveness and has, and will continue to play a role in positive place making for the foreseeable future. It performs this role not only by being protected, conserved and positively managed as an important element of our cultural heritage, but also in some instances by providing a strong focal point and contextual reference for the form and design of new development.

A good recent example of this is the approved housing development scheme approved in relation to the grade II listed Sheppey Court at Halfway, on the Isle of Sheppey. Here, it is proposed that the former grand home of the historically important developer (Sir Edward Banks: 1770-1835) is shorn of its ugly institutional extensions from the 1960s, restored and brought back into use as six generously proportioned private flats, and providing the focal point and architectural inspiration for a further 33 homes, within a heavily treed setting set against the open marshland landscape, north and west of the local centre of Halfway.



*Artists impression by Clague Architects of Sheppey Court housing scheme, Halfway.*

The Council does not believe there is a need for a Swale Design Guide. It is considered that such a document would overlap significantly with existing guidance and provide only limited additional benefit.

Instead, the Council considers that in relation to the borough's historic environment, up-to-date assessments of each individual or area-based heritage asset should be in place to help inform the character and form of new development and ensure that they display a distinctive character to complement their context. That is why a priority for this heritage strategy moving forward is **to work towards** the review and appraisal of all the borough's conservation areas.

### 4.3 Our weaknesses

At the time of writing, Swale Borough has the unenviable record of having the largest number of recorded heritage assets of all the Kent local authorities on the national Heritage at Risk Register updated annually by Historic England on a regional basis, with input from all the English local authorities. **The statistics in this respect are not helped by the economic conditions affecting parts of the Borough, notably Sittingbourne and many parts of Sheppey including Sheerness. This means that the objective of tackling heritage at risk issues can be sometimes be threatened by or impacted heavily by development viability issues which in some cases means it can be difficult to find a solution.**

Historically, some local authorities have been reluctant to add items to the register including their area, as they have felt this reflected poorly on their management of their historic environment. To some degree, this is indeed still the case but hiding the true scale of the problem is not helpful for a number of reasons, and it is not a course of action that this Council has, or would choose to take.

A problem that Swale Borough Council does share with many other local authorities however, is establishing a clear and accurate picture of the true extent of heritage at risk. This in part has been due in recent years to a lack of resource at the Council to consistently monitor the situation, but there are also other factors at play here, including owners of buildings/structures known or believed to be at risk failing to liaise and/or otherwise adequately cooperate with the Council's efforts to establish the situation, and in some cases, local neighbours and/or business not reporting what they may believe to be serious breaches of planning control and/or the early signs of neglect.

The Council may not always be able to act as quickly as it, or concerned parties would like in scenarios where it discovers, or is made aware of breaches of planning control or clear evidence of neglect which has, or could threaten the heritage significance of a heritage asset. However, if the Council is at least aware of the issue, and can properly record it in a clear and systematic way, then the problem will not be overlooked and the Council can seek to intervene as soon as staff and/or other necessary resources permits.

### 4.4 Our opportunities

The Council is unable to commit to the regular surveying of all its listed buildings because of the sheer number of them (over 1430 at the time of writing this heritage strategy). However it is now committed to more systematically monitoring its conservation areas, historic parks & gardens and scheduled monuments, and will do so on an annual basis from 2020 onwards.

The Council will need an additional resource to put in place this consistent and ongoing heritage monitoring system without impacting on its existing heritage-focused work, including assessing the possible impacts on heritage of new development proposals, which is effectively a full time role for one Council officer. As such, the Council is committed to exploring the possibility of creating a dedicated Heritage at Risk Officer with the possible support of other interested parties, including Historic England, Kent County Council, the borough's town and parish councils, and local amenity groups and organisations, in particular those which are member organisations of Historic Swale.

An additional resource of this nature will also be needed if the Council is to have the ability to give priority to positive intervention in relation to the heritage at risk data identified through its planned monitoring of Swale's historic environment.



Another important commitment from the Council in this respect is that of the early review of its current Planning Enforcement Strategy (last updated in 2017). Whilst the current version of this strategy appropriately prioritises the early investigation (and where appropriate, action) of breaches of planning control relating to listed buildings, it is silent on the subject of the matter of the neglect of heritage assets (deliberate or otherwise) which can threaten heritage significance to an even great degree in some instances.

The review and potential redrafting of the Planning Enforcement Strategy to properly consider the matter of heritage at risk through neglect will be an early action of the Council and this is expected to have been carried out by autumn 2020.



89-91 High Street, Milton Regis (a grade II listed building).

Unauthorised window replacement work is successfully being tackled by the Council

Planning Enforcement Action is undertaken by the Council's Planning Enforcement Team, and so the Council will commit to carrying out an internal review to ensure it has the staffing resources it needs to properly support this additional area of work. As with the Council's Heritage Team, it is recognised that the Planning Enforcement Team needs to be more than a Cinderella service if it is to function effectively, and with the confidence and support of the wider community.

The Council **has compiled** an up-to-date heritage at risk register to act as a baseline from the adoption of this heritage strategy. This will help the Council and other interested parties to establish a clearer picture of the nature and extent of the problem, and will also help it to determine how much additional resource the Council may need to bring on board to tackle the problem, and what the priorities should be for initial intervention.

A copy of the **2020 Baseline** Swale Heritage at Risk Register (which includes non-designated heritage assets as well as designated heritage assets such as conservation areas and listed buildings) is attached as Appendix **ii** to this heritage strategy.



Radfield House, Teynham – at risk grade II listed building

The Council is already aware of certain individual, or groups of buildings that are likely to need prioritization from a heritage at risk perspective, and this would include some of the listed buildings within the Sheerness Port operational area, notably the grade I listed boat store, a building of international importance, named by the Victorian Society as being one of the country's top ten most at risk.



Where possible, the Council will work closely with key partners, including Historic England and current or prospective owners to ensure that the issues that have led to a heritage at risk status being recorded or threatened, are dealt with as effectively and expeditiously as possible.

The Council **is committed** to making the Swale Heritage at Risk Register freely available to view on its website from 2020 onwards, as well as continuing to provide local feedback to Historic England to inform the regionally formatted National Heritage at Risk Register. It is very aware of the significant role that the community stakeholder groups can play in helping to monitor and enhance the information that goes into this important document. Moving forward, and with the range of heritage assets that it is anticipated will be added to the planned Local List, it is also anticipated that a wider range of heritage asset types will feature in the Swale Heritage at Risk Register. Notable in this respect is archeological heritage, and the Council will liaise with Kent County Council and local amenity groups/societies with specialist knowledge in this area to develop the register in this respect, where necessary. Furthermore, the Council will explore the use of additional software packages that may assist in the recording and monitoring of information/data concerning listed buildings, in particular for those on its local Heritage at Risk Register.

## 4.5 Our threats

Climate change and the increasing problem of flooding represent a growing threat for significant amounts of the heritage in the Borough, principally along its coastal fringes but also in some other location. However, for the foreseeable future, the biggest threat to heritage in the Borough comes in the form of the significant development pressure the Borough faces, and in particular the extent of housing growth it is expected to accommodate. Aside from the potential harm this can cause to archaeological heritage and the setting and associated character of historic areas and individual buildings/structures or small groups of such (an issue also referenced at section 1.8), there will likely continue to be pressure placed on the Council from major house builders and other significant developers to utilise standard designs and/or corporate templates/preferences in putting forward major development schemes which can have an impact on the character of individual areas, and indeed how Swale Borough is perceived as a whole. In some less visually sensitive locations this standardize approach may be acceptable to some degree. However, the Council will seek to ensure through the development management process that all new development displays a sufficient level of design quality and distinctiveness, in accordance with national planning policy guidance, and that where proposed new development has the potential to materially affect the historic environment, that more attention is paid to this objective. Where appropriate, the Council will use the mechanisms of development briefs and/or design codes to ensure that development proposals display an appropriate level of contextual sensitivity and associated design quality.

The following list identifies areas where particular care is required to consider the impact of development on heritage assets and their setting:

**Conservation Areas:** Conservation areas need to be considered on an area-by-area basis **in terms of factors including sensitivity and capacity to accommodate change without harm arising**. Many conservation areas can accommodate high levels of change. **The Council recognizes that change created the character of many areas, notably in and around town centres.**

**Listed Buildings:** Like conservation areas, listed buildings need to be considered on an individual basis, with some being able to take considerable change, whilst others are more

sensitive to change. This must be based on an assessment of the special architectural or historic interest of the building and consideration of its setting.

**Scheduled Monuments:** Development would not normally be appropriate within the boundary of, or directly adjacent Scheduled Monuments, which are protected under non-planning legislation, and administered at the national level by Historic England. Limited development may be possible, where it relates to the revealing, conservation and/or interpretation of the monument in question, but this would need to be discussed and agreed with Historic England. **Application for scheduled monument consent are made to Historic England, which in turn makes a recommendation to the Secretary of State for the Department of Culture Media and Sport.** Applications for planning permission directly or indirectly affecting scheduled monuments are determined by the local planning authority.

**Registered Historic Parks and Gardens:** Protection of historic parks and gardens is often provided by conservation area or listed building status. Inclusion on the register is a material consideration in planning decisions. Generally, new buildings should not be allowed in landscaped areas, albeit there is sometimes a need for new operational buildings or other development to support diversification. However, a very high standard of architectural design and careful siting are necessary, so as not to compromise the special landscape character.

**Nationally Significant Maritime and Aviation Heritage:** This includes Scheduled Monuments, listed buildings, and conservation area, so would be treated as above. However, there is also undesignated heritage. Particular care is required to avoid harm to undesignated heritage, where possible, as collectively this adds to the national heritage significance of the area. This is recognised in Paragraph 197 of the National Planning Policy Framework.

**Archaeological areas:** The **Urban Archaeological Zones** **check if this ref should be retained?** and Historic Environment Record previously mentioned should be considered and may have implications for planning conditions (for example on archaeological investigation and recording). In particular, there may be situations where development should be designed to specifically avoid overlaying known or anticipated archaeological remains if its significance warrants it. Preservation of archaeological heritage should be the first consideration where the significance warrants it.

**Undesignated heritage:** Proposals for new development will often flag up potential impacts for designated heritage, but undesignated heritage is often overlooked. The significance and value of such heritage is often not properly understood and so the opportunities that such heritage can bring in creating development with a wider range of benefits can be missed. Historic England's annual Heritage Counts research survey works and finding help to highlight the various benefits that can be gained, and the Council will bear in mind some of the key findings from this ongoing research in taking decisions on development affecting heritage assets designated or undesignated. For more information on the Heritage Counts series, see: <https://historicengland.org.uk/research/heritage-counts/>

## 4.6 Heritage assets: appraisal & positive management

Detailed appraisal of heritage assets (of all different types) provides the best platform for positive management, as this helps to identify the elements that make the area, building or structure worthy of designation in the first instance, as well as clarifying parts of the area or building/ structure that contribute little to the level of interest, and as such could be deemed less sensitive to change, providing that change is positive.

### Conservation Areas and Article 4 Directions

The Council is responsible for the matter of designating, reviewing and positively managing conservation areas, although the positive management aspect is something that is difficult to

achieve without the support of third parties, including property owners and Kent County Council as the Highway Authority. To be suitable for designation, an area must be an 'area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.

Swale Borough currently has 50 conservation areas, and the majority of these have either no appraisal, or dated and inadequate appraisals to function effectively for the task of positive management – a role that also includes ensuring through the development management process, that any new development that takes place within a conservation area, or within its setting does not cause harm, and where possible, has an enhancing effect. **It is therefore vitally important that all of the Borough's conservation areas have an up-to-date and effective character appraisal and management plan in place, as it is only through such documents that the special interest of each one can be identified, expressed and properly taken into account in managing development in such areas and considering possible improvement/enhancement works.**

Priority 1 of this heritage strategy is **to therefore work towards** the systematic review of all the borough's conservation areas. The Council does not have the resources available to undertake this work all at once. It will need to be carried out over a period of years, and the Council will seek to work with the borough's town and parish councils and local amenity groups/ societies to undertake this important review and appraisal work.

It will be seen in the first 3-year action plan of this heritage strategy that almost all the actions relate to conservation area appraisal work. This is because 8 of Swale's conservation areas are considered to be at risk (suffering from harmful change) and/or their special character is threatened to some degree by significant new development **and/or a lack of effective management**. It can be seen that the conservation areas proposed to be reviewed in the first (3 year) action plan, all fall within one of these two categories, with the main focus being on seeking to fully identify, understand and address heritage at risk issues through this process.



The parish Church of Eastchurch, at the heart of the village.

As indicated earlier in this heritage strategy, the Council cannot currently search out possible new conservation areas when the 50 it already has are not being monitored and positively managed as they ought, so effectively getting the 'house in order' is considered to be the higher priority. However, the Council will consider and carry out some initial basic research in relation to suggestions from the community about possible future designations. Feedback to date has suggested the possibility of new conservation areas at Eastchurch and Kemsley, and the Council will consider these for possible designation as soon as resources allow.

Returning to the issue of addressing conservation areas at risk, it is very much the case that whilst conservation area designation alone provides broad protection, it still allows a level of potentially harmful alteration through the system of permitted development rights (i.e. work that can be carried out without the need for planning permission) allowed under the planning system. In this light, it was therefore perhaps unsurprising that Historic England's historic environment survey of 2018 identified a wide

problem of incremental harm



arising from alterations, including neon signs, uPVC doors and windows, loss of traditional frontages and other changes. Town centres in particular were highlighted as suffering from unsympathetic alterations.

To address this issue, Article 4 Directions (which can be used to limit permitted development rights and require planning permission to be gained) would need to be prepared for the conservation areas where harm is occurring. These vary for different conservation areas, according to the specific character, but changes observed include the replacement or alteration of traditional doors, windows and shopfronts. As part of its approach to tackling the issues adversely affecting some of the borough's conservation areas, the Council will also investigate the possibility of using an additional planning control called an Area of Special Advertisement Control. This would provide the Council with greater level of control over shop signs and associated advertising, as the poor quality of many shop signs and the amount of signage

and associated advertising allowed under the planning regulations (without the need for advertisement consent) is already an issue in some areas of the borough, and is anticipated to spread to other areas without some positive management.

## Listed Buildings

These are designated by the Secretary of State on the recommendation of Historic England, and the decision to designate is typically taken in the light of planned thematic surveys looking at areas of topical interest, such as public buildings.

Past listing reviews in Swale have expanded the number of listed buildings, recognising later period and industrial heritage. This includes some key defence, maritime and aviation buildings and structures. However, it is now apparent that aviation and defence heritage is under-represented and in some cases, possibly undervalued on the statutory lists.

The Borough Council will work closely with Historic England and Kent Country Council to ensure that buildings of high heritage value that are not currently on the national list of buildings of special architectural and historic interest are considered. In particular this will include:

- War structures;
- 20th century buildings;
- Aviation buildings and structures;
- Maritime buildings and structures.

Suggestions raised through the 2018 stakeholder survey carried out in relation to this heritage strategy include:

- Aviation history at Eastchurch and Garrison (surviving hangars already listed)
- Buildings at the Dockyard in Sheerness (some already listed);
- The Harps Inn, outstanding art deco building;
- Minster Old School, original school building;
- Kingsferry Bridge due to its unusual form and landmark function; and
- Buildings and structures at Swan Quay in Faversham.

Assuming sufficient evidence to support this can be compiled (by working in partnership with Kent County Council, Eastchurch Aviation Museum and other local community organisations) the Council will make a formal request to Historic England that it undertakes a listing review in respect of aviation and defence structures in Swale at the earliest opportunity.

Management of listed buildings is the responsibility of the owner but the Council is able to offer free advice on repairs and maintenance, as well as a fee paying pre-application service

in

relation to proposals for alterations, extensions and new development (e.g. outbuildings, such as garages). The Listed Property Owners Club (which is based in Swale, but operates nationally)

is another good source of advice for the owners of listed properties and the Council would encourage all listed property owners to consider joining this this very worthwhile club (see: <https://www.lpoc.co.uk>).

Regular and appropriate maintenance is key to the good stewardship of listed and other historically or architecturally important building, in particular those that are of traditional timber framed or masonry (brick and/or stone) construction. The Institute of Historic Building Conservation (IHBC) which promotes and helps to regulate best practice in the historic environment field produces a guide called A Stitch in Time which property owners may find helpful in working out an appropriate maintenance regime (see: <https://www.ihbc.org.uk/stitch/Stitch%20in%20Time.pdf>).

For larger and/or more significant listed buildings the production of a conservation management plan can be a worthwhile investment. Amongst other things, this can help to identify key areas of repairs that need to be undertaken, a regime for necessary ongoing maintenance (to limit the need for future repair) and planned improvements which could be undertaken to enhance the amenity of the building, without compromising its heritage significance. Note that such improvements might necessitate listed building consent and/or planning permission so any such element of a conservation management plan would need to be discussed with the Council's Heritage Team.



## Curtilage Listed Buildings

Curtilage listing is not a formal designation in its own right, but is a protection/control factor that derives directly from the process of a building or structure being designated as a listed building by the Secretary of State. This means in summary that buildings/structures directly related to the building/structure being listed can also be subjected to the same planning controls if they are deemed to fall within its curtilage.

The full extent and range of curtilage listed buildings and structures in Swale is currently unknown, so one of the actions in the initial 3-year Action Plan will be capture and make publicly available this information via the Council's website. This information will be needed to support changes currently being brought in to the way that land charge searches are handled.

In some cases the process of determining the extent of curtilage listed buildings is relatively straightforward, but in others it can be quite complex. It is clearly important therefore for Swale Borough Council and other Local Planning Authorities to take the necessary time and care in reaching decisions in this respect, particularly as there is no formal appeal process for property owners that may consider that an incorrect decision has been made. As it stands at the time of writing, the only feasible mechanisms for testing a decision in this respect (where the Local Planning Authority and property owner and/or interested party disagree on the question of curtilage listing controls applying) is

- (a) for an application for listed building consent to alter or demolish a deemed curtilage listed building/structure, that has been refused by a Local Planning Authority to be tested on appeal by the national independent Planning Inspectorate, or
- (b) for works carried out to such a building/structure without prior consent and subsequently subject to a Listed Building Enforcement Notice, for that enforcement notice to be tested on appeal by the national independent Planning Inspectorate.

In some instances, curtilage listed buildings or structures can be highly significant in heritage terms in their own right, and there may be some cases where such building or structures will need to be considered for listing on their own merits. However, where neither of the above scenarios apply, it is still typically the case that many curtilage listed buildings/structures are important in the role they play of providing a historically and contextually authentic and appropriate setting to the related listed building. A good example in this respect is a listed church and its non-separately listed lych gate (providing the lych gate dates from before the 1<sup>st</sup> July, 1948).

Listed building controls for curtilage listed buildings/structures apply both internally and externally as they do for listed buildings/structures. As such, listed property owners that know or think they may have curtilage listed buildings/structures in their ownership and care, are directed, and expected to treat them with an equal degree of sensitivity and should assume that any works planned to alter them may required listed building consent. Although it may take some time in some instances to provide such information/feedback, the Council's Heritage Team will be able to confirm whether or not curtilage listing applies, as well as providing guidance to help owners understand the heritage significance of such affected (or non-affected) buildings/structures.

## Registered Historic Parks & Gardens

Swale has four sites identified on the national Register of Historic Parks and Gardens. These are:

- Lees Court Park, near Sheldwich;
- Doddington Place;
- Mount Ephraim, near Broughton under Blean; and
- Belmont Park.

Inclusion on the register is a material planning consideration, but offers little other protection, unless accompanied by a statutory designation. Swale's historic parks and gardens are fortunately protected to some degree by a combination of conservation area designations and listed building designations. Where they do not already exist, the Council will encourage the owners of these properties to develop Conservation Management Plans, as these can also equally be applied to special landscapes.

## Scheduled Monuments

Scheduled Monuments are administered nationally, including procedures for gaining consents



to undertake works to monuments. Scheduling brings with it, the highest level of protection under the British planning system.

Swale has 22 Scheduled Monuments. These include a Romano-British mausoleum at Stone-by- Faversham, a Romano-British villa and a Romano- Celtic temple at Boxted, important medieval sites, the Oare Gunpowder Works, Chart Gunpowder Mills, and military and civil defence structures.

As with listed buildings, the management of scheduled monuments on a day-to-day basis is the responsibility of the owner.

*The scheduled Romano-British Stone Chapel off the old Watling Street route, near Faversham.*

## Other Archaeology

Two kinds of archaeological zones/areas have been identified by Kent County Council. These are:

**Urban Archaeological Zones:** These relate to medieval town layouts and archaeology. They guide response to development proposals through the planning process. The zones were identified some time ago and Kent County Council does intend to update them (see Figures 10 - 14 at 3.9). This will include expansion to include industrial sites.

**Areas of archaeological potential:** These are areas where notification of planning application is necessary. It is proposed to rename them as archaeological notification areas. The boundaries are proposed to be reviewed. The Historic Environment Record recognises other non- designated archeology. This is dispersed across the Borough, and inclusion on the Historic Environment Record is a material consideration in making decision in relation to development proposals.

Swale Borough Council will liaise with Kent County Council over the ongoing process of reviewing defence heritage, including the expansion of ‘Urban Archaeological Zones’ and review of ‘Areas of Archaeological Potential’ to ensure that the aviation and defence heritage of the Isle of Sheppey is fully recognised. This will build on the work already carried out by Kent County Council’s Heritage Team for the Defence of Swale project.

Furthermore, if the evidence supports it, the Council in liaison with Kent County Council and local community organisations will approach Historic England to discuss the potential for a book on Swale’s aviation and defence heritage. This could help to underpin wider statutory protections, as well as helping to make this aspect of Swale’s historic environment more widely known and appreciated.

At section 4.3 in relation to the borough’s heritage at risk, it has been recognised that an area approach will typically be needed to address the problems resulting in harm to heritage assets, and it is anticipated that the management plans of individual conservation areas will be key in this respect.

However, whether tackling issues of this nature on an area or site specific basis, the issue of viability does need to be given some consideration. In this respect, it is recognised that the poor condition of some heritage assets is a factor of marginal economic viability in some parts of the borough.

This is at the time of writing principally a problem affecting Sheerness, Queenborough & Rushenden, and Sittingbourne, although degradation of the built environment is a serious problem with smaller centres too. This can include poor quality alterations, poor maintenance and vacancy/disuse. A primary example of this is the situation to be found in Newington, where market failure is apparent in the number of closed business, vacant properties and poor maintenance. Factors contributing to such failure appear to include highway congestion, associated poor air quality and a degraded built environment.



*Degraded buildings in Sittingbourne High Street Conservation Area*

The Council will commit to tackling issues of poor quality alterations and deterioration in a systematic way wherever possible (e.g. seeking to tackle all the issues on one High Street at a time systematically – in some cases as part of a management plan action) as in so doing, early successful interventions may eliminate the need to tackle all the identified buildings in such an area. The Council will utilise all the powers at its disposal to help improve condition and vitality to areas compromised and struggling with negative change, but it must be recognised that some factors (notably air quality and viability) are only likely to be tackled effectively with more strategic level intervention at government or regional level.

## Locally important heritage

Swale does not at present have a local list, but will work towards this as identified at Section 3.17. **Buildings, structures, landscape features, archaeological sites and parks and gardens of local heritage interest** are not automatically protected against demolition or harmful, as is

the case (to varying degrees) with heritage assets protected by national level designations alteration.

However, Article 4 Directions can be used to put in place protection from demolition (where applicable) and also from insensitive change that could arise through the use of permitted development rights.

Inclusion on a local list is nevertheless a material planning consideration where works/development is proposed to the heritage asset itself or on adjacent land that would affect the character and significance of the asset through change to its setting. . This is already reflected in the text of the adopted Local Plan (Bearing Fruits 2031 - see page 294, paragraph 7.8.7), which explicitly recognises that some non-listed buildings may be of some heritage value. However, a specific local list policy will be included in the next version of the Swale Local Plan to give stronger protection to the conservation of local list heritage assets. However, it must be recognized that such a policy would only effectively come into play in relation to works or development that require planning permission.



With or without the application of any additional control to provide some degree of protection to local list heritage assets, the support of owners will critically important in developing a local list. Helping owners to understand the value of local listing beyond their own immediate interests



will be key here as without the majority of owners effectively buying-in to this initiative, the project may not get off the ground, or its long-term value will likely be quite limited. Consultation would need to take place with the owners of buildings/structures proposed to be added to a Swale Local List, and the Council is aware that it might need to give consideration to providing a guide for the owners of such buildings/ structures to assist them with advice on the matter of maintenance, repairs and alterations, etc.

*Possible candidate building for a future Local List – Sittingbourne's New Century Cinema, in the High Street Conservation Area.*

There is no set mechanism for the development of a local list, so the Council would look to investigate the types of models used elsewhere and thereafter seek to apply an approach that fits best for Swale. This would, as indicated above, be in partnership with the borough's local amenity societies and any other interested parties.

## 4.7 Positive intervention

The Council has had some successes in tackling problems affecting the Borough's heritage assets, including those identified as being at risk. Most notable of these in recent years was the action it took in 2016 to secure the future of the former military hospital in Sheerness which was close to being demolished by the new owners of the site, which took it on following the closure of the steelworks. The Council stepped prevented the demolition of this historically important building by serving a Building Preservation Notice, which ultimately led to the building being listed grade II. The Council is now looking at options to repair and bring the building back into use to secure its long term conservation in ongoing discussions with its owner.

Going back to 2012, the Council took action to secure the future of the grade II\* listed Dockyard Church in Sheerness. In this instance, the Council was obliged to utilize its compulsory purchase powers in partnership with the Spitalfields Trust to wrest ownership and control of the building from an irresponsible and neglectful owner. The Council will use this very significant power of last resort again if needed, but in order to protect its financial position and the community that relies on it for a wide range of public services, it will look to use the underwriting systems now offered by Historic England.

In other situations, third parties have helpfully stepped in to take on the ownership of heritage at risk buildings and structures, and have invested heavily in them (under the guidance and/or control of the Council) to save them from likely eventual collapse or demolition, and to bring them back into use. A good recent example of this in recent years is the acquisition and investment made by Paul Townson and Mark Breedon, in respect of Frognaal Farmhouse (a grade II\* listed building), at Lower Road in Teynham.

- The Heritage at Risk data shows that the number of conservation areas at risk in Swale has risen from 0 to 8 since 2012. Thus, whilst some progress is being made for buildings and places of worship, conservation areas present a growing problem. This is not necessarily indicative of rapid deterioration, but that longer-term problems are being recognised. The nature of the problem is not

just about condition and maintenance, but also of harmful alterations. This raises issues around enforcement, but also around designations, including Article 4 Directions. The issues around designation and subsequent management are discussed in more detail later in this strategy (see section 4.4). An area approach is therefore required to address some of the heritage at risk issues in Swale, in addition to targeted work on individual buildings and structures, or small groups of these. This is reflected in the series of proposed actions for the first action plan of this heritage strategy.

- Finally, in relation to the nationwide issue of heritage crime, it should be noted that the Council is a member of the Kent Heritage Watch group, which sits under the umbrella of the national Heritage Watch scheme. The Council's staff, across different teams, work with the Kent Police and property owners to try and reduce the



scope for heritage related crime to occur, and where such crime has occurred, to manage the impact of this as sensitively and effectively as possible, including actions to deter the possibility of further theft and/or damage. The Council is committed to becoming a member of the Alliance to Reduce Heritage Crime (ARCH) and will work with Historic England and other alliance partners to reduce the scope for heritage crime where possible, and where it has occurred, to assist the Kent Police in the prosecution of identified offenders, in particular by providing them with information regarding the harm that has been inflicted on the heritage asset in question – harm that in some instances may be very significant and irreversible.

The Council has over the years, either used or threatened to use all the different powers available to it to address issues of heritage asset neglect/deterioration and breaches of planning control, including unauthorised alterations to, and development within the setting of a listed building.

The principal range of powers available to address issues of heritage at risk are usefully set out in the Historic England publication, Stopping The Rot (See: <https://historicengland.org.uk/images-books/publications/stoppingtherot/>) and the Council will continue to employ the powers set out therein, along with Planning Enforcement and Listed Building Enforcement Notices to protect the Borough's precious heritage and secure its enjoyment for future generations.

**(Insert before & after image of Specsavers building in Faversham re unauthorised alterations to the roof, and intervention to reverse this)**

## 5. Our Heritage: valuing it and fulfilling its potential

### (Heritage Strategy Strand C: Capitalising and Championing)

#### 5.1 Heritage Strategy Priorities Aligning with Strategy Strand C

The Heritage Strategy Priorities which align with this **Strategy strand** are:

**Priority 3:** To recognise and promote the role of Swale’s heritage in creating or enhancing local distinctiveness and a positive image for the area as a place to live, learn, work and visit, in particular by the Council continuing to work in an enabling role to develop and support projects and initiatives by local groups, societies and businesses that would bring about significant public benefit.

**Priority 4:** To ensure Swale’s heritage forms an integral part of local strategies and initiatives to promote tourism and the visitor economy, including through the conservation and subsequent positive management of the Borough’s internationally significant maritime heritage (at Sheerness Dockyard) and aviation heritage (at Eastchurch) on the Isle of Sheppey

#### 5.2 Economic, cultural and other benefits

The economic value of heritage has been recognised at national and local level, including within the Swale Local Plan. Whilst the emphasis with heritage to date has largely been on how it can be used to increase tourism and visitors, the heritage evidence base for the Local Plan, early engagement with stakeholders in 2018 in relation to the development of this heritage strategy and information and data from Historic England’s Heritage Counts annual heritage research series (See: <https://historicengland.org.uk/research/heritage-counts/>) identified a wider set of benefits. These include:

**Utility Value:** Most of Swale’s historic buildings are in productive use. They are part of the infrastructure of the local economy and community. Such uses include housing, offices, transport infrastructure, pubs, shops, community facilities and a range of other uses.

**Business and Enterprise:** Older areas, especially in more peripheral locations like Blue Town in Sheerness, provide affordable and flexible accommodation, essential for supporting new micro and small businesses, social enterprises, creative industries, innovation and knowledge-based employment. The Dockyard Church project in Sheerness is focused on supporting young people and developing business and enterprise skills, helping to raise aspirations.

**Attracting Investment and Economic Development:** There is a direct relationship between the quality of built environment and economic development potential. It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the borough. A well maintained historic environment helps to project a positive image, create investor confidence, attract high value jobs and improve competitiveness. Swale’s historic buildings and places are an asset in terms of delivering sustainable and inclusive economic development.

**Town Centre Competitiveness:** Historic town centres like Faversham attract shoppers and visitors. Historic buildings and areas often accommodate independent retailers and

other businesses, and this is apparent in all of Swale's towns. This helps to support choice and diversity, avoiding the creation of tedious 'clone towns'.

**Heritage and Culture-Led Regeneration:** Heritage and culture can help to deliver dramatic physical and economic transformations and regeneration. Swale has much unrealised potential, for example in the nationally and internationally significant heritage on the Isle of Sheppey.

Heritage can also attract involvement by third sector organisations, for example through asset transfer, which is useful for achieving growth in areas where there are issues with development viability. The initiatives set out in Chapter 7 of this strategy consist of, or are led by community organisations. The transformational potential of some of these initiatives to Swale's economy should not be underestimated.

**Rural Regeneration:** Historic buildings and places have helped to accommodate new uses, facilitate economic diversification and form a basis for new, small industries, tourism and the visitor economy in Swale's rural areas and small settlements. In particular, this can be seen in Swale's farmsteads, barns and registered historic parks and gardens.

**Tourism:** Swale's heritage already supports a visitor economy, with a range of heritage visitor and nature attractions. There is considerable potential for further growth in the visitor economy. Some of the projects referred to in this heritage strategy have the potential to build on this and put Swale on the map as a destination with national and possibly even wider appeal.

**Education:** The heritage of the Borough offers some very real opportunities for school children and other groups to learn about the history of the Borough, and the contributions made by ordinary working people as well as those with wealth and influence in shaping the Borough we see today. Story telling by older residents about particular workplaces and types of work in the Borough combined with study tours and research could help to bring alive the evolution of the Borough through the key heritage themes outlined in this Strategy.

**Workforce development and Local Trade:** Repairing and restoring historic and traditional buildings places a greater emphasis on skilled, typically local labour and less emphasis on the use of physical resources, which is more significant in new-build development. Repair and restoration work within the historic built environment can therefore generate higher levels of pay and investment in the local economy. **It can also offer school leavers in the Borough that wish to work in a trade, a long-term career in which they would learn to understand and appreciate the historic built environment and the special sets of skills and construction materials needed then and now to create and maintain it. There is currently a shortage of skilled heritage construction workers with many of the skilled workers still in this field close to retirement, so there is a real need and benefit in bringing in a new wave of young trainees to this sector of the construction industry so that vital skills are not lost forever.**

**Creating and/or improving Civic Pride:** An area's heritage can give its local residents and businesses a sense of place and a pride in their surroundings. This can particularly be the case where heritage assets feature as local landmarks, or as places that have historically provided work or another important focus for previous generations of people.

**Health benefits:** There is increasing recognition of the health benefits that active involvement with heritage assets can bring to people, and whilst more research needs to be carried out in



*The grade II\* listed Naval Terrace and Dockyard Church, Sheerness.*

this area, it is already known from anecdotal evidence that regular visits to larger heritage assets such as Historic Parks and Gardens or getting involved as a volunteer on a project to repair, restore or enhance a heritage asset can be hugely rewarding and bring with it a sense of wellbeing. Such interaction with heritage assets can help to maintain or improve both mental and physical health

**Achieving Sustainable Development:**

The conservation and refurbishment of historic buildings and areas is an intrinsically sustainable form of development, avoiding the use and waste of scarce resources associated with demolition and redevelopment, and helping to achieve sustainable growth. Swale's historic places and towns are in many ways, ideal for a low-carbon economy in terms of movement and activity patterns, usually having urban design characteristics based on the needs of pedestrians, with rear of pavement active frontages, permeable layouts, a fine grain of mixed uses, a concentration of community facilities and high densities through the use of terraced forms and party wall construction.



## 5.3 Raising awareness and building a positive legacy

Swale's heritage offer as a whole is a strong one and this should not be forgotten in the promotion of individual areas or attractions. Joined up thinking is needed to capitalize of the benefits that Swale's heritage can bring to the borough as a whole.

The borough's heritage offer includes existing well known assets, such as the historic market town of Faversham and Minster Abbey, as well as the new projects described in this strategy. It is clear that the development of local heritage assets and their interpretation represents a major opportunity. In particular, Swale's medieval, aviation, maritime, defence and other histories all offer significant scope to further culturally enrich the borough and boost its local economy in a number of ways. Likewise, the current and historical roles of the town centres can help to create a distinctive identity and basis for promotion, working closely with Visit Kent, Swale Tourism, Faversham and Sheerness Town Councils, plus other local organisations and web sites.

As the local offer improves and expands, wider promotion will be needed by the public sector (the Council and others), including promotional materials, signage and development of digital and social media.

However, the creation of visitor attractions is being led in many instances by community-led organisations. Faversham is currently the main base for tourist information and this is largely community led. Successful coordinated initiatives by the community and public sectors should help to create confidence in the private sector to create new facilities (or improve existing ones) including hotels, restaurants and bars.

The Council will support the proportionate promotion of Swale's heritage attractions, working closely with Visit Kent, Swale Tourism, the borough's town councils and other local organisations and web sites.

The Council's Heritage Team and Heritage Champion are committed to raising awareness of the historic environment in Swale Borough up the agenda, both within the Council itself and in wider circles, and will gladly work in partnership with other parties in order to do so. The production of this heritage strategy is a positive first step in this regard, but it is accepted that there is much more that could be done. Further steps to be taken need to be carefully considered, but could for example include some heritage training for Swale Borough councillors and for the members of the town and parish councils in Swale.

**More generally, the Council will look to support projects that help to provide access to heritage information, understanding and guidance.**



*The T.S. Hazard building, Faversham.*

Finally, the Council itself is a significant owner of heritage assets (including two grade II\* listed buildings: T.S. Hazard in Faversham, and Court Hall in Milton Regis). As such, as well as working to ensure that other owners play their part in maintaining and where possible enhancing the borough's heritage offer, the Council will as far as its resources allow, seek to set a good example in terms of its stewardship of historic buildings and structures.

## 6. Resourcing the Heritage Strategy

### 6.1: Swale Borough Council's Functions, Role and Resources

Swale Borough Council as the local planning authority has a range of statutory functions for heritage. These include:

- **Reviewing and** undertaking local designations, such as conservation areas and Article 4 Directions;
- Consulting statutory heritage bodies;
- Preparation of the Local Plan for Swale, including heritage policies;
- Statutory duties in relation to the process for neighbourhood plans;
- Planning enforcement, including to address unauthorised development and action to secure the preservation of heritage at risk;
- Providing a development management service to deal with development proposals affecting heritage assets, through planning applications and listed building consent applications;
- Supporting neighbourhood planning and ensuring that qualifying bodies have a good level of understanding of the economic potential of heritage; and
- Compulsory Purchase Powers, for example to address buildings at

risk.

Non-statutory functions could include:

- Creating and maintaining a publicly accessible heritage at risk register;
- Ensuring that heritage consideration is embedded into all local regeneration, economic development, investment and tourism strategies;
- Ensuring that there is a progressive policy and approach to asset transfer, so that community organisations have the opportunity to acquire or lease heritage assets or to work in partnership with the Council to deliver projects involving heritage assets;
- Providing support and/or training to third sector organisations, for example in signposting funding opportunities, project development, advising on funding applications, help with business planning, etc;
- Promoting awareness to heritage-focused and non-heritage-focused bodies of the economic potential of heritage;
- Undertaking training and capacity building with Council officers and elected members to ensure good awareness of the economic and social potential of heritage, not just to tourism, but in supporting enterprise, innovation, civic pride and well-being;
- Ensuring Council owned heritage assets are well managed, well-maintained and in productive use;
- **Making information about the historic environment (gathered as part of policy making or development management work) publicly accessible;**
- Highlighting the area's distinctive heritage in tourist and visitor marketing and materials; and
- Compiling a list of locally valued buildings/structures of architectural, historic and/or artistic interest, in partnership with local amenity societies.

Many of these roles could also apply to other public sector bodies, especially those that own heritage assets, such as Kent County Council.



The 2012 National Planning Policy Framework (NPPF) was (at the time of writing) most recently updated in February 2019. As well as strengthening the requirement for development sustainability, it appropriately continues to recognize the value of heritage assets from sites and buildings of local importance right up to those of national and international importance, and furthermore, continues to set out clear guidance for how they should be treated in planning terms. It is acknowledged by the local community and the Council that every effort should be made to ensure that any new development proposals are not only as sustainable as possible, but are also designed in a manner sympathetic to enabling the protection and management of the borough's rich built and natural heritage. A more proactive approach is also needed where possible, to ensure that Swale's heritage assets can be enjoyed for their contribution to the quality of life of both current and future residents.



*Member training*

The Council has dedicated, albeit modest existing in-house staffing resources available to support and where appropriate, initiate this important work. It was however recognized in the development of this strategy that further resource will be needed to support the significant challenges that lie ahead and to this end, the Council is therefore publicly committed to supporting the first 3 year action plan of this 12 year heritage strategy with an injection of £250,000, to help provide additional heritage specialist capacity and in some cases, limited physical works. The additional

investment in this respect will be focused on the heritage assets in the Borough that are most at risk through change, neglect and/or development pressure. Furthermore, the Borough Council **is aware of the need to properly resource the priorities of the heritage strategy beyond the initial 3 years so that it can have a continual, and potentially momentum building positive effect on heritage conservation in the Borough.** It will, wherever possible, work with other agencies, developers and stakeholders to maximize the scope and benefits of this investment and the associated work to be undertaken. In particular, the Council will seek out and where feasible, apply for any match-funding opportunities and capacity building grants that exist.

## 6.2: External resources (national and local)

### THE PRIVATE SECTOR

#### Owners and Occupiers

Most heritage assets are privately owned or occupied and used by private sector organisations or by individuals, couples and families. Whilst the heritage status is a factor for some, the prime motivation for many in taking on heritage assets is their utility value and/or investment value. Close working and engagement with building owners will therefore be essential to delivering the aims of this strategy. In this respect, the Council recognizes that large areas of the Swale countryside and coastal fringe land is included in major land holdings owned by various companies, estates and other organisations, and that working with such companies, estates and/or organisations to develop heritage management plans may be a way of helping to ensure the care and enhancement for some of the Borough's heritage.

#### Development

The development of Swale's historic buildings, towns and areas is undertaken by a range of private building owners, businesses and/or developers. The future of Swale's heritage is therefore dependent to a large extent on private investment decisions. The private sector is often the means to delivering heritage aims, but can also harm heritage if there is not a good level of awareness of the value of heritage and robust quality assurance provided through the planning system.

### THE PUBLIC SECTOR (excluding Swale Borough Council and Kent County Council – already referenced)

#### Historic England

As the independent adviser to central government on the protection, management and promotion of the historic environment, and the organisation that is now effectively responsible for the designation of key heritage assets including listed buildings and scheduled monuments, Historic England plays a vital role in helping to frame the manner in which all local authorities should seek to manage the historic environment within their respective areas. It provides a significant degree of guidance and research literature to assist local authorities and other parties (including the general public and property owners) and it also provides input to local authorities on development proposals and other matters affecting the most important heritage assets. Historic England also run a variety of training and grant schemes which local authorities and other bodies/groups can tap into to assist with the positive management of the historic environment. The range of grant schemes that Historic England offers varies over time, but the latest information in this respect can be viewed by visiting the Historic England website (see: <https://historicengland.org.uk/services-skills/grants/>).

#### The National Lottery Heritage Fund

The National Lottery Heritage Fund, (formerly the Heritage Lottery Fund), distributes a

share of National Lottery funding, supporting a wide range of heritage projects across the United Kingdom. Since it was set up in 1994, under the National Lottery Act, it has awarded over

£7.1 billion to more than 40,000 projects, large and small, helping people across the UK explore, enjoy and protect their heritage.

### **Town and Parish Councils**

Faversham, Queenborough and Sheerness have town councils. There are also numerous parish councils across Swale. Town and parish councils have tax raising powers and can lead on initiatives to in their areas to create better services and facilities. Town and parish councils also have statutory planning powers as the qualifying bodies for preparing neighbourhood plans.

## **THE COMMUNITY (AKA THIRD) SECTOR**

### **Community Organisations in Swale**

The Community or Third sector includes voluntary, not-for-profit, social enterprise and other community-led bodies. This includes heritage-focused bodies, like local societies and building preservation trusts, as mentioned in this document. However, there is also potential in Swale for new community land trusts or community development trusts, which could use heritage assets as a basis for their projects.

Community organisations operate independently, but can also work as part of wider partnerships with public and/or private sector bodies, **including schools**.

Swale is fortunate in having a range of very active, entrepreneurial and ambitious community bodies.

Some of the key regeneration projects and a range of educational initiatives in Swale are led by community organisations. Many heritage sites are similarly managed by community organisations.

The recently formed 'Historic Swale' body clearly has the potential to become a key player in the area, depending on its scope of activity.

## Heritage Activities by Community Organisations

Community-led organisations are tackling heritage asset issues and opportunities in various ways:

- developing regeneration projects;
- developing solutions where heritage-assets are not viable for the private sector;
- gaining access to funding, some of which is not be available to private-sector;
- providing local and specialist knowledge and expertise, including on business, tourism and archaeology;
- providing a platform for local volunteering;
- running education initiatives;
- contributing to or leading research on the area's heritage; and
- managing key heritage sites.

### 6.3: Partnerships (working together)

Partnerships are likely to be required for more complex heritage projects, for example the potential creation of a heritage quarter within the operational part of Sheerness Port, which would have less restricted access.

Partnership working already takes place, for example, in relation to the Dockyard Church in Sheerness, where the Council and Historic England have, and continue to support the Sheerness Dockyard Preservation Trust in its important work to breathe new life and energy back into this severely fire-damaged grade II\* listed building.

Third sector involvement in projects can be an effective way of addressing viability challenges, especially in taking on buildings and structures requiring considerable capital investment. Third sector bodies can access funding for some kinds of capital works not available to local authorities or the private sector.

At the same time, working with developers can sometimes bring valuable development experience and infrastructure to a project.

Complex projects like the regeneration and associated conservation of the historically important dock area at Sheerness Port would likely necessitate a public/private/community sector partnership to be delivered.

Part of the role of the Council in recent years has been to provide support in developing local partnerships, and this will be a role that will continue into the future and is anticipated to become more important.

## 7. Conclusions and way forward

The focus of this heritage strategy is on having in place a strong framework for, and displaying a solid commitment to the appropriate designation, conservation and positive management of the borough's heritage, and capitalizing on the physical and economic regeneration this can bring. However, part of realising the potential of the area's heritage is in raising awareness, including through interpretation and education. Such actions support the visitor economy, but are also an important benefit for the local community, including for school age children.

Early stakeholder engagement and evidence gathering in relation to the development of this heritage strategy has highlighted a range of initiatives already taking place, these being mostly community and volunteer led. Areas for future new work or increased emphasis were also highlighted, including Swale's:

- Medieval and Roman heritage;
- Industrial heritage, including boat building, gunpowder production, paper-making, brickmaking, and fruit growing;
- Maritime, aviation and defence heritage.

Examples of existing community-led facilities that address understanding, interpretation and education are:

**Blue Town Heritage Centre:** Heritage centre with unusual displays. Various shows and films hosted at the Criterion Theatre, which is part of the heritage centre. The centre includes activities for the elderly and local schools.

**The Rose Street Cottage of Curiosities, Sheerness:** The only surviving former Royal Naval Dockyard worker cottages conserved and now used to help bring the heritage of the area to life through the Promenade charity in association with Big Fish Arts, and with a particular focus on promoting heritage learning, understanding and appreciation through the medium of art, history and culture, with a regular programme of events.

**Eastchurch Aviation Museum:** Small museum with planned expansion that works with schools and offenders from the adjacent open prison and provides volunteering opportunities.

**Faversham Society:** Annual lecture series plus volunteering opportunities at a range of site, and in a range of roles. Runs the Fleur de Lis Heritage centre, which includes a museum, gallery space, book shop and tourist information.

**Faversham Town Council:** FTC has now taken over from Swale BC in running the local engagement forum, which can cover a whole range of topics, including heritage management. It also runs faversham.org, which provides tourism and heritage information.

**Historical Research Group, Sittingbourne:** Operates the Sittingbourne Heritage Hub. Annual lecture series, plus volunteering opportunities. They also provide resources (e.g. fact sheets) for schools.

**CSI Sittingbourne:** A project run by the Canterbury Archaeological Trust aimed at giving members of the public an opportunity to learn the basic skills of archaeological conservation from the Trust's team of experts, initially through the investigation of the Anglo-Saxon burial site excavated at The Meads, in Sittingbourne.

**Kent Police Museum, Faversham:** This has yet to open, but will be located in the old Victorian Police Station and is anticipated to open soon. The website advises that they will run a learning programme, and will also provide volunteering opportunities.

**Milton Regis Court Hall Museum:** Exhibition and volunteering opportunities.

**Minster Gatehouse Museum:** Recently upgraded exhibition space plus annual lecture



series and volunteering opportunities (museum run by volunteers from the Sheppey Local History Society).

As well as supporting and deriving from the heritage related policies and objectives in the adopted Swale Borough Local Plan and helping to ensure that the next version of the Local Plan has every chance of being found sound when that next plan reaches Local Plan Inquiry stage, this heritage strategy has very much been developed to display the Council's commitment to supporting existing local groups and initiatives that seek to promote, protect and/or enhance the historic environment in Swale Borough and in particular improve understanding. It is anticipated that the set of actions proposed in this heritage strategy's first action plan will complement the work of many of the aforementioned heritage focused local groups and initiatives and will go some way to ensuring that the historic environment in Swale receives the recognition, protection and positive management it deserves, given the benefits it brings to Swale Borough.



It can be seen from the actions set out in the first 3-year Action Plan, and will be seen in the following Action Plans, that the 5 priorities of the Council derived from the 3 strategy strands in this Heritage Strategy will all work towards the high level vision of achieving *'A vibrant and widely-known heritage which is valued for its own sake and for the long term benefits it provides to the people, economy and environment of the Borough of Swale'*.

The Council recognizes that the Borough has particular strengths in a number of the key heritage themes outlined in this strategy document, and that coordination of activities and initiatives on these can reap better rewards for the Borough, so this will be a key driver for consideration of Council-led project/initiatives and those of local groups/societies that the Council chooses to support.

To maximize the range of potential benefits from heritage related projects and initiatives, partnership working will be utilized wherever possible, but in particular, where this would aid in the development of grant funding bids to support project work. Furthermore, wherever possible, ways will be sought to help maximize the capacity and ability of third parties (including the local community and interest groups) to help deliver projects.

A necessary first step in all of this was seeking and taking on board constructive feedback in the development of this Heritage Strategy and initial 3-year Action Plan. This has been done and in terms of balancing all the new requests for projects and initiatives and suggestions for the re-ordering the priorities of those items proposed in the draft Action Plan, the Council believes that it has gone as far as it can in seeking to match the plans and aspirations of the various communities that make up the Borough.

The Council will initially move forward with those projects/initiatives set out in Action Plan 1 and in developing the future action plans, it will continue to bear in mind the correlation between the key heritage themes in this



document and the activities /stakeholders that are concerned with them, as these may assist the Council in identifying opportunities to coordinate and ensure the greatest benefits can be achieved.

*Minster Abbey Gatehouse Museum*

## 8. Implementation, Monitoring and Review

### 8.1 Heritage Strategy Action Plans (Triennial rolling plans over the lifetime of the strategy)

Without a planned set of actions and a clear commitment and resource to implement such actions, this heritage strategy, although setting out an arguably laudable high level vision and set of associated objectives and priorities would nevertheless amount in practice, to little more than words. Particularly in this day and age, the need for positive action is understood, and as such, to help translate this heritage strategy into reality, a set of three-year action plans will be produced and implemented over the 12 year life span of the strategy, between 2020 and 2032.

The first triennial action plan is attached as Appendix I to this strategy. It is not however set in stone and the Council is including it as part of the public consultation on this strategy to establish whether the proposed actions set out in this first action plan are those that match the priorities and concerns of the local community as a whole.

It is intended that subsequent action plans 2, 3 and 4, will be produced in the final year of the preceding action plan and consultation will take place to again ensure that those actions being put forward are ones which are supported by the local community as a whole.

### 8.2 Monitoring Framework & Strategy Review

To ensure that the Council and its project partners (where applicable) learn valuable lessons in the types of actions/interventions and initiatives which are successful, or not as the case may sometimes be, the Council will produce a monitoring report at the end of each three-year action plan period. These monitoring reports will necessarily be kept concise and will be made **publically** available to view as a link on the Council's Heritage Strategy web page.

It is planned that the monitoring report will be produced by the Council's Heritage Team, although contributions from partner organisation (where applicable) will be sought, and whilst these reports will not be subject to public consultation, any constructive comments received by the Council in relation to a heritage strategy action will be given careful consideration and may be used to help shape the content of the report.

It is planned that the monitoring reports would be produced in advance of consultation on the next action plan, as it is believed that having such information available may help to establish the next set of actions on a more informed basis. However, due to resourcing levels and workload levels for the Council's Heritage Team, this may not always be possible.

Finally, the life of this heritage strategy is necessarily finite. It is **planned** to have a life of 12 years (spanning between 2020 and 2032) and that it will be fully reviewed and updated during the implementation of the final three-year action plan (Action Plan 4). However, it is accepted that fundamental shifts in different areas (e.g. government policy, local policy and resources) may effectively force the Council to fully review this heritage strategy sooner than planned. Minor changes to external factors will unlikely need to result in the strategy itself being amended, but may well result in changes to the series of action plans.

# Acknowledgements

This Heritage Strategy was written by the Council's Heritage Team with the support of officers from other teams within the organisation, and with the much appreciated input of the following key individuals, local groups and societies, local businesses and organisations:

D.S. Smith (Kemsley) Ltd

Faversham Society

Friends of Court Hall

Sittingbourne Society

Etc

Etc

# Appendices

## Appendix I

### Heritage Strategy Action Plan 1 (2020 – 2023)

To view visit: [www.swale.gov.uk/heritage-strategy](http://www.swale.gov.uk/heritage-strategy) or view separate document.

## Appendix II

### Swale Heritage at Risk Baseline (2020) Register

To view visit: [www.swale.gov.uk/heritage-strategy](http://www.swale.gov.uk/heritage-strategy), [www.swale.gov.uk/heritage-at-risk](http://www.swale.gov.uk/heritage-at-risk) or view separate document.

## Contacting Swale Borough Council

The Customer Service Centre deals with all enquiries across the Council; it should be your first stop when contacting us.

Call 01795 417850.

Copies of this strategy are available on the council website: [www.swale.gov.uk/heritage-strategy](http://www.swale.gov.uk/heritage-strategy)

This page is intentionally left blank



# A Heritage Strategy for Swale

Appendix I, Action Plan **1**

1 April 2020 to 31 March 2023





## **An introduction to this, and subsequent Swale Heritage Strategy Action Plans**

This document should be read in conjunction with the Swale Heritage Strategy 2020 – 2032 which sets out the background to this document and the basis for the list of projects and initiatives set out on the following pages.

This document is the first of four 3-year actions plans spanning over the 12 year plan period of the Swale Heritage Strategy.

The Council will seek to work with community groups and local societies as well as key organisations such as Kent County Council and Historic England in carrying out the projects or initiatives listed in the following pages. It will aim to carry these out within the approximate timetable indicated for each item.

Towards the end of this 3 year action plan, a review of the actions carried out by then will be provided (in the form of a monitoring report) outlining key achievements and lessons learned along the way. This will be recorded in a monitoring report which will be made available to view on the Council's Heritage Strategy web page.

The monitoring report will be used to help inform the projects and initiatives to go into the next Action Plan, the content of which will be the subject of public consultation prior to adoption.

## Applicable Heritage Strategy Priorities 1 – 5

(see list of these at **end** of schedule)

### Applicable Heritage Strategy **Strands**

A: Understanding & Designation; B: Positive Management & Intervention;

C: Capitalising & Championing

### Explanatory Notes

HAR = Heritage at Risk      CA = Conservation Area

Project/Initiative No./Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframes
1. <b>Faversham Recreation Ground</b> HLF Enhancement Project	3,4 & 5	B & C	To enhance the heritage and amenity value of this important recreation facility in Faversham	National Lottery Heritage Fund, Historic England	2019/21
2. <b>T.S. Hazard, Faversham:</b> Repair, enhance and re-purpose project	3,4 & 5	B & C	To repair, enhance and bring to life the special heritage qualities of this SBC-owned grade II* listed medieval building for a wider audience	Anthony Swaine Architecture, Canterbury Archaeological Trust, Faversham Town Council, Faversham Society, Historic England and Kent County Council	2019-23
3. <b>Periwinkle Watermill wheel</b> Enhancement Project	5	B	To increase the heritage and amenity value of the feature, and place it on a sounder footing for its long term conservation and management	Sittingbourne Society and Friends of Court Hall	2019-21
4. <b>Sittingbourne 1920s Festival</b>	3,4 & 5	B & C	To celebrate the spirit and style of the roaring twenties in a street festival at the lower end of the High Street, and subsequent greater recognition of the <b>Art Deco</b> architectural qualities of the cinema as a key element of the festival and important community facility (through more positive recognition in revised C.A. appraisal & management plan)	Historic England and Kent County Council	2019-21

Project/Initiative No./Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframe
<p><b>5.</b> <b>Avenue of Remembrance, Sittingbourne</b></p> <p>Enhancement Project</p>	1&5	A,B,& C	To improve understanding of this local heritage feature and develop a scheme for its enhancement in time for its centenary in 2023	Kent County Council and local amenity groups/societies including the Royal British Legion, the Sittingbourne Society and the Historical Research Group of Sittingbourne	2020/23
<p><b>6.</b> <b>INFO/DATA CAPTURE PROJECT</b></p> <p><b>Swale Borough Local List</b></p> <p>Development of a list of buildings, structures &amp; features of local heritage interest</p>	1-5 incl.	A,B,& C	To recognize and help protect the non-nationally designated heritage in the Borough, which contributes to the overall heritage offer	Historic England, Kent County Council, Parish Councils, local amenity societies and affected land/property owners	2020/23
<p><b>7.</b> <b>INFO/DATA CAPTURE PROJECT</b></p> <p><b>Development of a Swale Borough List of Curtilage Listed Buildings</b></p>	1-5 incl.	A,B,& C	To provide the data required by the Land Registry and to ensure that owners and/or prospective owners are aware of their relevant heritage responsibilities	Historic England, Kent County Council and individual land and property owners	2020/23
<p><b>8.</b> <b>APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b></p> <p>Production of character appraisal &amp; management plan for Tonge CA</p>	1-5 incl.	A, B & C	Production of full up-to-date character appraisal & management plan for this CA in time to mark the 850th anniversary of the murder of Thomas Becket in Canterbury Cathedral (Becket Spring/Pilgrims connection)	Historic England, Kent County Council, Bapchild/Tonge Parish Council, local landowners and amenity societies, plus Becket 2020 Initiative	2020/21

Project/Initiative No/Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframe
<p><b>9. APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b></p> <p>Production of character appraisal &amp; management plan for the 4 Borden Parish CA's (Borden, Chestnut Street, Harman's Corner and Hearts Delight)</p>	1-5 incl.	A,B,& C	Production of full up-to-date character appraisal & management plan for these conservation areas, all of which face pressures from planned housing growth around Sittingbourne. Management plan work to include consideration of possible traffic calming measures.	Borden Parish Council, Historic England, Kent County Council and local amenity societies	2020/21
<p><b>10. APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b></p> <p>Production of character appraisal &amp; management plan for Milton Regis CA</p>	1,2 & 5	A&B HAR CA	Production of full up-to-date character appraisal & management plan for this at-risk C.A.	Historic England, Kent County Council, Friends of Court Hall, Sittingbourne Society	2020/21
<p><b>11. SHEERNESS PORT HERITAGE BUILDINGS AT RISK PROJECT</b></p> <p>Production of jointly produced action plan for scheme to achieve repair and re-use of the disused and deteriorating listed buildings within the Sheerness Port operational area (including grade I listed Boat Store)</p>	3,4 & 5	B&C HAR CA	Production of a detailed and timetabled plan of action to realise the repair and re-use of the grouping of highly significant listed buildings within the Sheerness Port operational area. Plan to fully address current difficult access issues and identify and timetable a series repairs to each of the buildings based both on condition and identified future use(s) and any associated non-character compromising alterations that may be needed.	Historic England, Kent County Council, Sheerness Town Council, Peel Ports Group, Sheerness Dockyard Preservation Trust, Naval Dockyard Society and Blue Town Heritage Centre	2020/23

Project/Initiative No/Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframe
<p><b>12.</b> <b>INFO/DATA CAPTURE PROJECT</b></p> <p><b>Archaeology:</b> Production of the 1st of an on-going series of annual heritage theme evidence base documents to be produced</p>	1 & 5	B	To build on the summary heritage theme information provided in the Heritage Strategy to help inform clearer understanding and future conservation management actions. The archaeology paper will also aid the imminent review of the heritage policies in the Swale Local Plan.	Kent County Council, Historic England and local amenity groups/societies with a specific local knowledge/expertise in the field of archaeology	2020/21
<p><b>13.</b> <b>APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b> Production of character appraisal &amp; management plan for Sittingbourne High Street CA</p>	3,4 & 5	B&C HAR CA	Production of full up-to-date character appraisal & management plan for this at-risk CA (management plan to put in place scheme of targeted action for neglected/deteriorating buildings and introduce Area of Special Advertisement Control	Historic England, Kent County Council, Sittingbourne Society	2020/21
<p><b>14.</b> <b>APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b> Production of character appraisal &amp; management plan for the 3 Newington CA's</p>	1-5 incl.	A, B & C (HAR CA)	Production of full up-to-date character appraisal & management plan for these CAs, which includes the at-risk Newington High Street C.A.	Newington Parish Council, Historic England, Kent County Council and local amenity societies	2020/21

Project/Initiative No./Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframe
<p><b>15. APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b></p> <p>Production of character appraisal &amp; management plan for the 2 Faversham CA's (Faversham &amp; Faversham- next- Preston)</p>	3,4 & 5	B & C	<p>Production of full up-to-date character appraisal &amp; management plan for these conservation areas, all of which face significant change and associated issues. Management plan work to include review and of Article 4 Direction and possible introduction of Area of Special Advertisement Control</p>	<p>Historic England, Kent County Council, Faversham Town Council, and Faversham Society</p>	2020/22
<p><b>16. EASTCHURCH AVIATION HERITAGE BUILDINGS AT RISK PROJECT</b></p> <p>Working in partnership to assist the museum to develop a scheme to achieve the repair and re-use of the listed WWI aircraft hangars as part of the Eastchurch Aviation Museum</p>	1-5 incl.	B & C	<p>Working closely with the Eastchurch Aviation and other key external partners/stakeholders to develop a detailed plan for the long-term sustainable conservation of the aircraft hangars which will help to raise the profile and attraction of the museum and the aviation heritage of the Isle of Sheppey more generally.</p>	<p>Eastchurch Aviation Museum, Historic England, Kent County Council, Eastchurch Parish Council, Sheppey History Group</p>	2020/23



Project/Initiative No./Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframe
<p><b>17. INFO/DATA CAPTURE PROJECT</b></p> <p><b>Aviation &amp; Defence Heritage:</b></p> <p>Production of the 2nd of an on-going series of annual heritage theme evidence base documents to be produced</p>	1 & 5	B	<p>To build on the summary heritage theme information provided in the Heritage Strategy to help inform clearer understanding and future conservation management actions. The aviation &amp; defence heritage paper will also aid the development of related projects re these types of heritage.</p>	Kent County Council, Historic England and local amenity groups/societies with a specific local knowledge/expertise of these types of heritage	2021/22
<p><b>18. DATA CAPTURE PROJECT</b></p> <p><b>Heritage at Risk:</b></p> <p>Production of the 2nd of an on-going series of annual updates to be made publicly available via the SBC web site</p>	1 & 5	B	<p>To maintain a clear picture of Heritage at Risk in Swale Borough and identify the resources needed to tackle the extent and range of problems/ issues identified</p>	Historic England, Kent County Council, Parish and Town Councils, local amenity societies, listed/scheduled property owners	2021/22
<p><b>19. APPRAISAL PROJECT CA Review Programme:</b></p> <p>Production of character appraisal &amp; management plan for Sheerness Marine and Mile Town CA's</p>	1 & 2	A, B & C (HAR CA)	<p>Sheerness Town Council, Historic England, Kent County Council and local amenity societies</p>	<p>Sheerness Town Council, Historic England, Kent County Council and local amenity societies</p>	2021/22

Project/Initiative No/Title/Summary	Heritage Strategy Priority(s)	Heritage Strategy Strand(s)	Objectives	External Partners/ Stakeholders	Approximate Timeframe
<p><b>20.</b> <b>INFO/DATA CAPTURE PROJECT</b></p> <p><b>Industrial Heritage:</b></p> <p>Production of the 3rd of an on-going series of annual heritage theme evidence base documents to be produced</p>	1 & 5	B	<p>To build on the summary heritage theme information provided in the Heritage Strategy to help inform clearer understanding and future conservation management actions. The industrial heritage paper will also aid the development of any related projects re these types of heritage.</p>	<p>Kent County Council, Historic England and local amenity groups/societies with a specific local knowledge/expertise of this type of heritage</p>	2022/23
<p><b>21.</b> <b>APPRAISAL PROJECT</b></p> <p><b>CA Review Programme:</b></p> <p>Production of character appraisal &amp; management plan for Cellar Hill &amp; Green Street CA</p>	1-5 incl.	A, B & C  HAR CA	<p>Production of full up-to-date character appraisal &amp; management plan for this at-risk C.A.</p>	<p>Historic England, Kent County Council, Lynsted &amp; Kingsdown and Teynham Parish Councils, and local amenity societies</p>	2022/23
<p><b>22.</b> <b>DATA CAPTURE PROJECT</b></p> <p><b>Heritage at Risk:</b></p> <p>Production of the 3rd annual update</p>	1 & 5	B	<p>To maintain a clear picture of Heritage at Risk in Swale Borough and identify the resources needed to tackle the extent and range of problems/ issues identified</p>	<p>Historic England, Kent County Council, Parish and Town Councils, local amenity societies, listed/scheduled property owners</p>	2022/23
<p><b>23.</b> <b>HERITAGE STRATEGY CONTINUITY PROJECT:</b></p> <p>Production of Action Plan 2 (for 2023 to 2026) + Report on outcomes from completion of Action Plan 1</p>	1-5 incl.	A, B & C	<p>Provision of a further set of actions, to build on the actions carried out in initial Action Plan (dependent on further additional funding, and to be prioritised as appropriate)</p>	<p>All interested parties to be consulted on, and invited to comment on the proposed actions and priorities for Action Plan 2</p>	2022/23

## Heritage Strategy Priorities

1. To conserve, and where possible enhance Swale's heritage buildings, structures and areas and **moveable/portable heritage** as a cultural, economic, community and environmental asset to the area, in particular by positively managing the Council's own heritage assets, and by establishing a programme for the review and appraisal of Swale's conservation areas;
2. To make use of the borough's heritage to help achieve and promote sustainable and inclusive growth and regeneration, social and economic wellbeing, and civic pride, in particular **by actions to tackle and specifically reduce** Swale's heritage at risk **across the full range of nationally and locally designated heritage assets**;
3. To recognise and promote the role of Swale's heritage in creating or enhancing local distinctiveness and a positive image for the area as a place to live, **learn, work and visit, in particular by the Council continuing to work in an enabling role to develop and support projects and initiatives by local groups, societies and businesses that would bring about significant public benefit**;
4. To ensure Swale's heritage forms an integral part of local strategies and initiatives to promote tourism and the visitor economy, including through the conservation and subsequent positive management of the Borough's internationally significant maritime **heritage (at Sheerness Dockyard)** and aviation heritage **(at Eastchurch)** on the Isle of Sheppey; and
5. Raising the historic environment **(and the important social history associated with it)** up the agenda by promoting awareness and understanding of Swale's heritage among local residents, businesses and visitors to the area, in particular to help realise the cultural, educational and associated health benefits it can offer.

## Contacting Swale Borough Council

The Customer Service Centre deals with all enquiries across the Council; it should be your first stop when contacting us.

Call 01795 417850.

Copies of this appendix are available on the council website: [www.swale.gov.uk/heritage-strategy](http://www.swale.gov.uk/heritage-strategy)

Front cover: Swale Borough Council's grade II listed Faversham Recreation Ground Lodge: A key focus of the National Lottery Heritage Fund scheme to enhance the facilities and historic character of the Faversham Recreation Ground.

This page is intentionally left blank



# A Heritage Strategy for Swale

Appendix II, Swale Heritage at Risk Register  
Baseline version – April 2020





## **An introduction to the Swale Heritage at Risk Register**

This document should be read in conjunction with the Swale Heritage Strategy 2020 – 2032 which sets out the background to the provision of this document and subsequent versions of it that will be provided in future years.

This Heritage at Risk Register has been designed to capture, and set out in a clear schedule, all the different types of heritage in the Borough that are at risk through decay, unauthorised alterations, loss of important features or even total loss through possible collapse and subsequent clearance.

The information set out in this Register will be formally updated annually with each new version made available to view via the Council's Heritage at Risk and Heritage Strategy web pages.

The information updated in this Swale Heritage at Risk Register will be used to provide the Council's annual update to Historic England for its National Heritage at Risk Register, which is separated into regional registers and lists the following types of heritage which are considered by Historic England and/or the relevant Local Planning Authority to be at risk for one reason or another:

- Scheduled Monuments
- Grade I and II\* Listed Building and Registered Parks & Gardens of Historic Interest
- Protected Wreck Sites<sup>1</sup>
- Registered Battlefields<sup>1</sup>
- Conservation Areas

(<sup>1</sup> There are currently none of these types of national heritage designations within Swale Borough, or off its coastline, although there are some shipwrecks and battlefield sites of local heritage interest applicable to Swale Borough, and these are referenced in the Swale Heritage Strategy 2020 – 2032)

The Swale Borough data on the National Heritage at Risk Register is contained within the South East Region Register, which in turn is separated into the county areas. You can view the latest version of the Regional Heritage at Risk Register here: <https://historicengland.org.uk/images-books/publications/har-2019-registers>

The Council has set out the schedule on entries on the following pages to provide easy correlation with the entries set out for Swale in the National Heritage at Risk Register by adding the Historic England logo to show all the entries in its own local register that also feature in the national register. The Council has chosen to set out the (currently applicable) entries in its register (also applicable to the national register) in the following order:

- Joint Scheduled Monuments and Listed Buildings
- Scheduled Monuments
- Grade I Listed Building
- Grade II\* Listed Buildings
- Conservation Areas (separate page at back of document before list of former entries removed from the register)

Please note that there are some remaining discrepancies in the data displayed between the local and national heritage at risk registers which the Council will seek to eliminate through ongoing dialogue with Historic England in the coming months. Discussion will also take place around presenting the relevant entries on both registers in the same order for future ease of cross-reference.

Readers of this document will be able to see by looking at the pages at the back of this short document that there have been many successes in removing buildings and/or structures from at-risk status, although as can be seen from the following pages, there is no room for complacency, and the scale of the task ahead in tackling the remaining extent of heritage at risk is to coin a term 'local ongoing'.

The scale of the task ahead is also anticipated to expand at a greater rate than the Council and its partners can work to reduce it, as greater awareness develops of currently unknown or currently non-designated heritage that comes to its attention through ongoing and planned research work, and the development of its Local List. Some of this heritage is anticipated to be at-risk for one reason or another, and as such will added to the Swale Heritage at Risk Register if deemed necessary.

The heritage at risk on the following pages that the Council is committed to tackling through specific projects in the initial 3-year Action Plan for the Swale Heritage Strategy are indicated through the use of bold, italic text with the additional text 'AP1 Target' being used in the Priority column (Area column for Conservation Areas)..

This is not to say that time will not be devoted where possible to other entries in the register, but any such additional targeting of heritage at risk issues may only be possible if the Council is able to secure additional resource, such as the recruitment of a dedicated Heritage at Risk Officer, as referenced in the Swale Heritage Strategy as something it would seek to achieve if possible via capacity grant funding.

In working to eliminate or sufficiently reduce the issues which have resulted in placement in the Swale Heritage at Risk Register for any given heritage asset, the Council will seek to work constructively with the owners and where appropriate, Historic England in order to secure the conservation of the asset and its removal from the register. carrying out the projects or initiatives listed in the following pages. It will aim to carry these out within the approximate timetable indicated for each item.

Whilst the Council's Heritage Team will monitor the situation regarding heritage at risk in the Borough as much as it can, the team is small and can only do so much in this respect, so ongoing feedback which can help to ensure the register is kept up-to-date will always be welcomed

Any information you may wish to report in this respect should be provided as follows:

By Email to: [HeritageAtRisk@Swale.gov.uk](mailto:HeritageAtRisk@Swale.gov.uk)

By Post to: Heritage at Risk Information, Planning Services, Swale Borough Council, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Towards the end of this 3 year action plan, a review of the actions carried out by then will be provided (in the form of a monitoring report) outlining key achievements and lessons learned along the way. This will be recorded in a monitoring report which will be made available to view on the Council's Heritage Strategy web page.

The monitoring report will be used to help inform the projects and initiatives to go into the next Action Plan, the content of which will be the subject of public consultation prior to adoption.

## **Additional entries to be included in document:**

**Aircraft hangars, Eastchurch (AP1 Target)**

**Pett Dane, Eastling**





Priority category (for buildings and structures – including places of worship) is graded as follows:











- A Immediate risk of rapid deterioration or loss of fabric; no solution agreed.
- B Immediate risk of further rapid deterioration or loss of fabric; solution agreed but not yet implemented.
- C Slow decay; no solution agreed.
- D Slow decay; solution agreed but not yet implemented.
- E Under repair or in fair to good repair, but no user identified; or under threat of vacancy with no obvious new user (applicable only to buildings capable of beneficial use).
- F Repair scheme in progress and (where applicable) end use or user identified; functionally redundant buildings with new use agreed but not yet implemented.





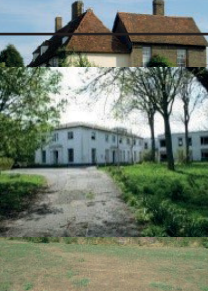



Heritage at Risk: South East Region Register 2019




**SM** (Scheduled Monument)

Item	Building Address	List Grade	Priority	Update	Photo
1	Medieval Stables at Abbey Farm, Abbey Fields	II*	B	Some repair works undertaken but check needed to see if these are sufficient to address HAR concerns	
2	Standard House, Standard Quay	II	F	Consent granted in 2018 for repair, extension & re-use of building. Repairs largely complete and anticipated that building will be brought back into use in 2020	
3	Engine Shed at Faversham Station	II	A	Site suffers from access issues but is in very poor condition. Urgent action needed to prevent total loss	
4	Carriage Shed at Faversham Station	II	A	(as above)	






Item	Building Address	List Grade	Priority	Update	Photo
5	Former WW2 radar station, Daines Road, Dunkirk	SM	C	Conservation management plan including agreed scheme of repairs needed	
6	Barn, 15m northeast of Green Farmhouse, Stalisfield Road, Stalisfield	II	F	Undergoing conversion works to residential use in Summer 2018. Check needed to see if works complete and building now occupied	 
7	Frognal Farm Barn, Lower Road, Teynham	II	A	None available at time of writing	
8	Building 26, Former Working Mast House, Sheerness Dockyard	II*	C AP1 Target	None available at time of writing	 
9	Building 78, The Boat Store, Sheerness Dockyard	I	C AP1 Target	None available at time of writing	 
10	Building 84, Former North Saw Pits, Sheerness Dockyard	II*	C AP1 Target	None available at time of writing	
11	Building 86, Sheerness Dockyard	II	C AP1 Target	None available at time of writing	
11	Building 105-107, Former Saw Mill etc., Sheerness Dockyard	II	F AP1 Target	Repair works to roof carried out and building now in partial use, but further essential repairs still needed	



Item	Building Address	List Grade	Priority	Update	Photo
12	Former Royal Dockyard Church,	II*	D	Consent granted in 2018 for repair, partial remodelling and re-use scheme, but not yet implemented as further fundraising needed. Urgent repairs carried out in 2018	
13	Sheerness Dockyard South boundary wall	II	C AP1 Target	None available at time of writing	
14	Sheerness Dockyard North boundary wall	II	C AP1 Target	None available at time of writing	Image Req'd.
15	Sheerness Defences (Garrison Point), Sheerness Dockyard	SM and II	C AP1 Target	None available at time of writing	
16	Water Tower, Trinity Road, Sheerness	Non-designated Heritage Asset	A	Permission granted for conversion and associated new build scheme in 2017, but not implemented	
17	Sheppey Court, Halfway Road, Halfway, Isle of Sheppey	II	D	Permission granted for conversion and associated new build scheme in 2018, but not implemented	
18	Yaugher Barn, Queendown Warren, Hartlip	Curtilage listed	B	Permission granted in 2017 for conversion to residential use, but not yet implemented	



Item	Building Address	List Grade	Priority	Update	Photo
19	East Hall Farmhouse, East Hall Lane, Murston	II	F	Permission granted for conversion into 2 dwellings. Works underway but not completed	Image Reqd.
20	East Hall Farm outbuildings, East Hall Lane, Murston,	II	B	Permission granted for residential use	Image Reqd.
21	Meres Court Farm Barn, Hugh Price Close, Murston	Curtilage listed	A	Barn advised as being roofless in Summer 2018. Further update needed	Image Reqd.
22	Murston Old Church, Stadium Way, Murston	SM	D	Fundraising in progress to fund proposed art-focused scheme	
23	Gate House, Former Marsh Gunpowder Works, Oare	II	D		Image Reqd.
24	Proof House 10m S.W. of Gate House, Former Marsh Gunpowder Works, Oare	II	D	Permission for repair scheme expected to be granted early 2020 and works to commence shortly thereafter	
25	Refining House (Building 19), Former Marsh Gunpowder Works, Oare	II	C	Discussion ongoing re repair, re-modelling and re-use of building with formal application anticipated in early 2020	
26	Office, Stores & House	II	C	(as above)	
27	East Crystallising House	II	C	(as above)	



Item	Building Address	List Grade	Priority	Update	Photo
28	West Crystallising House	II	A	As above, although the building largely collapsed in October 2019	Image Req'd.
29	Earth House (Building 5) Workshop Area, Former Marsh Gunpowder Works, Oare	II	C	Discussion ongoing re repair, re-modelling and re-use of building with formal application anticipated in early 2020	
30	Melting House (Building 20) Workshop Area, Former Marsh Gunpowder Works, Oare	II	C	Discussion ongoing re repair, re-modelling and re-use of building with formal application anticipated in early 2020	
31	Charge House, Former Marsh Gunpowder Works, Oare	Curtilage Listed	C	(as above)	
32	Garden Hotel, 167-169 The Street, Boughton-under-Blean	II	B	Permission granted in 2013 for conversion of building into flats with associated extension, but scheme not implemented	
33	Radfield House, London Road, Tonge	II	C	Repairs to roof carried out in 2017, but windows, doors and interior of building in very poor condition and in need of urgent attention	

Item	Building Address	List Grade	Priority	Update	Photo
34	Kemsley Arms, The Square, Kemsley	Non- designated Heritage Asset	B	Permission for extension and conversion of building into flats agreed in principle subject to signing of S106 agreement	
35	Former Military Hospital, Brielle Way, Sheerness	II	C	Discussions with building owner ongoing to find new use for building – vacant since closure of associated steel works	

**Note:** In 2010 Sheerness Dockyard was added to the World Monuments Fund’s international Watch List as one of the most endangered historic sites around the world. Nominations are all judged on the significance of the site, the urgency of its threat and the viability of a solution. For more information on this, see: <http://wmf.org.uk/Projects/sheerness-dockyard/>

## Swale Borough Conservation Areas at Risk

Item	Area	Condition	Vulnerability	Trend
1	Cellar Hill and Green Street, Teynham AP1 Target	Poor	Low	Deteriorating
2	Milton Regis High Street AP1 Target	Poor	Medium	Deteriorating
3	Newington High Street	Poor	High	Deteriorating
4	Sheerness: Royal Naval Dockyard & Blue Town	Very bad	Low	Deteriorating
5	Sheerness: Marine Town AP1 Target	Fair	Medium	Deteriorating
6	Sheerness: Mile Town AP1 Target	Poor	Low	Deteriorating
7	Sittingbourne High Street AP1 Target	Very bad	Low	Deteriorating
8	Upchurch	Poor	Medium	Deteriorating

## Buildings removed from the register since 2009

Item	Building Address	List Grade	Photo
1	1-15 Regency Close, Sheerness Dockyard – July 2013	II*	
2	Dockyard House, Sheerness Dockyard – July 2013	II*	
3	Coach Houses, Naval Terrace, Sheerness Dockyard – July 2011	II*	
4	Former Working Men's Club, Broadway, Sheerness – July 2013	Not listed	
5	The ruins of Shurland Hall, Eastchurch – July 2013	II* SAM	
6	Barn to the north of All Saints, Iwade – 2012	II	
7	The Former Oast, Tunstall Road, Tunstall – 2012	II	
8	51, High Street, Sittingbourne – 2010	II*	
9	Provender, Provender Lane, Norton – 2012	II*	
10	Scuttington Manor Oast, Dully Road, Tonge	Not listed	
11	Buckland Farm Barn, Buckland (destroyed by fire)	II	

Item	Building Address	List Grade	Photo
12	Railway Goods Station, Whitstable Road Faversham	II	
13	Copton Manor Stables, Sheldwich Road, Sheldwich	Curtilage Listed	Image Reqd.
14	Copton Manor Barn, Sheldwich Road, Sheldwich	II	Image Reqd.
15	Scocles Court, Scocles Road, Minster	II	
16	Stables approx. 30m southeast of Abbey Farmhouse, Abbey Fields	II	
17	Middletune House, 63 High Street, Milton Regis	II	
18	Oasthouse and oasts, 30 yards southwest of Batteries, Claxfield Road, Lynsted	II	
19	Granary, 10m south of Nash's Farmhouse, Luddenham	II	
20	Claxfield House, London Road Teynham	II	Image Reqd.
21	Meres Court Farmhouse, Murston	II	Image Reqd.
22	Bredgar House, The Street, Bredgar	II	Image Reqd.
23	Church of St Giles, Church Road, Tonge	I	Image Reqd. 
24	Church of All Saints, Seasalter Road, Graveney with Goodnestone	I	 





## Contacting Swale Borough Council

The Customer Service Centre deals with all enquiries across the Council; it should be your first stop when contacting us.

Call 01795 417850.

Copies of this appendix are available on the council website: [www.swale.gov.uk/heritage-strategy](http://www.swale.gov.uk/heritage-strategy)

Front cover: Murston Old Church, Stadium Way, Muston.  
A scheduled monument. Entry No. 22 on this Baseline 2019 HAR Register

<b>Cabinet Meeting</b>	
<b>Meeting Date</b>	18 <sup>th</sup> March 2020
<b>Report Title</b>	Delivering Affordable Housing in Swale
<b>Cabinet Member</b>	Cllr Ben Martin, Cabinet Member for Housing
<b>SMT Lead</b>	Charlotte Hudson, Head of Housing, Economy and Community Services
<b>Head of Service</b>	Charlotte Hudson, Head of Housing, Economy and Community Services
<b>Lead Officer</b>	Charlotte Hudson, Head of Housing, Economy and Community Services
<b>Key Decision</b>	Yes/No
<b>Classification</b>	<b>Open</b>
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. For the Council to pursue the mix of development options set out within the report for delivering affordable housing within the Borough.</li> <li>2. To carry out a procurement exercise on the identified land holdings in Sittingbourne, for proposals on developments that deliver (but not limited to) affordable homes.</li> <li>3. That the Council begins to establish a Council owned housing company to deliver housing. (LHC)</li> <li>4. That Cabinet approve the drawdown of up to £250k of the capital budget provision to fund the due diligence and business planning work for the LHC and any necessary work on the identified Sittingbourne landholdings in order to carry out the procurement exercise.</li> </ol>

## 1 Purpose of Report and Executive Summary

- 1.1 This report details options for increasing delivery of affordable housing in the borough and seeks approval for the establishment of a Local Authority Housing Company (LHC).
- 1.2 The proposals outlined in this report provide the framework for the Council to deliver affordable housing that can be scalable should land or funding become available.

## 2 Background

- 2.1 Affordable housing availability in England has worsened over the years with more and more people unable to buy or rent in areas where they live or work. New supply continues to fall short of demand and this provides an increasing shortage for those on low and medium incomes.

- 2.2 Social rents are linked to local incomes to keep rents more affordable and changes to rents are controlled by central government, rather than the provider. Social rents are lower than 'affordable' rents which are set at up to 80% of the market rate. In Swale the Local Housing Allowance on a 3-bedroom property currently provides a shortfall of £28.42 in Sheerness to £91.40 in Faversham per week against a private rented sector property.
- 2.3 Social housing is allocated on a basis of need and is covered through the Housing Allocations Policy and nomination rights with Registered Providers (RP). Currently there are 1,363 households on the Housing Register in Swale, between April to December 2019 there were 237 properties let through the register. The Housing Allocations Policy is currently being reviewed and this could also increase the numbers on the register.

### Planning Delivery

- 2.4 Delivery of affordable homes historically has been a planning led approach with the reliance on s.106 to deliver affordable homes in Swale. The policy requirement of affordable homes on a development varies depending on location and ranges from 40% in rural areas to 0% on the Isle of Sheppey. The table below shows delivery over the past 5 years and current year to Q3.

Table 1 - Affordable Housing delivery 2014 – 2019

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20 (Q1 - Q3)
<b>Affordable Rent Tenure</b>	109	24	90	72	11	45
<b>Shared Ownership</b>	47	36	54	60	57	40
<b>TOTAL</b>	<b>156</b>	<b>60</b>	<b>144</b>	<b>132</b>	<b>68</b>	<b>85</b>

- 2.5 The adopted Local Plan Policy DM8 covers developments of eleven or more dwellings and the table below sets out the percentage sought. However, due to viability these percentages are not always achieved.

Table 2- Affordable housing percentage sought

Area	Affordable Housing Percentage Sought
Isle of Sheppey	0% affordable housing
Sittingbourne town, urban extensions and Iwade	10% affordable housing
Faversham town and urban extensions	35% affordable housing
All other rural areas	40% affordable housing

- 2.6 Planning permission has already been granted for a number of sites and the table below provides a summary of the pipeline delivery for the next 3 – 5 years of s.106 affordable homes plus additional affordable homes secured outside of s.106 requirements.

Table 3 - Approved planning application sites: Pipeline delivery over the next 3-5 years

	<b>Number of Affordable homes</b>	<b>Affordable Rent Tenure</b>	<b>Shared Ownership</b>	<b>Of which are wheelchair adapted homes</b>
<b>Sittingbourne</b>	448	298	150	15
<b>Faversham</b>	340	217	123	9
<b>Isle of Sheppey</b>	87	45	42	0
<b>Swale</b>	<b>875</b>	<b>560</b>	<b>315</b>	<b>24</b>

- 2.7 In addition to the s.106 homes planned the Council also currently holds £323,550 in commuted sums.
- 2.8 In-line with the administrations ambitions for affordable housing, planning committee has also been more robust in its requirements for delivery of affordable homes through the planning process and will challenge the evidence that is presented against the Local Plan policy.
- 2.9 A Housing Supplementary Planning Document (SPD) is being prepared in tandem with the local plan review. The SPD will expand upon the housing policies in the local plan review. It will comprise a number of individual chapters relating to affordable housing, housing mix for market housing, housing for older people and those in need of care. It will also include detailed policy on alternative housing products such as park homes and modular housing and self-build and custom housebuilding.

### **Homes England Funding**

- 2.10 Homes England provide grant funding to enable the delivery of affordable homes which Councils and RPs can access as well as using their own funds or recycled grant money. Homes England recently introduced the Strategic Partnership Fund (HESP) which allows certain RPs, including Hyde and Optivo, access to higher levels of grant with the aim of delivering additional affordable homes. Hyde have secured £95.4m and need to deliver 1,623 affordable starts by March 2022. Hyde have already brought forward the Stones Farm development utilising the HESP funding and are actively exploring other sites. Optivo have secured £44.9m and need to deliver 1,000 affordable starts by March 2022

## **Increasing delivery**

- 2.11 In May 2019 the administration committed to deliver more affordable homes in Swale, this was further confirmed with the adoption of the Housing, Homelessness and Rough Sleeping Strategy in July 2019. The key objective within the strategy relating to affordable homes is to “develop a borough wide approach to invest in and deliver affordable homes, with a particular focus on social rent”.
- 2.12 The administration has also backed their commitment with the identification of capital funding to enable delivery. In the February 2020 budget report Council agreed that an additional £10 million could be borrowed to fund housing projects. Borrowing to fund capital expenditure on affordable housing will require long-term borrowing. The Council will need to find revenue funding for the debt charge costs and for minimum revenue provision. Unless projects can fully cover these costs there will be a further pressure on the revenue budget. This level of funding will only enable limited delivery of affordable housing.
- 2.13 The Leader, Cabinet Members and senior officers have met with the main RPs who operate in the borough to discuss opportunities that may be available, and a series of research has been conducted to identify where resources in Swale should be targeted. The highest need remains for affordable rented housing but there is also need for intermediate housing products for aspiring homeowners. It is therefore important that the council considers this in its delivery approach.

## **Council owned Land**

- 2.14 Although the Council has limited land holdings, exploration of using these sites to maximise affordable housing is imperative. The following sites have been identified as suitable for housing development in Sittingbourne, the Council has limited suitable landholdings in Faversham and the Isle of Sheppey.
- Old Bus Depot (East Street);
  - Cockleshell Walk Carpark; and
  - Fountain Street.

## **Delivery Vehicle**

- 2.15 Set out below are three options for the Council to pursue in utilising its land and capital to further this ambition in increasing affordable housing. The main difference between the options would be the level of control the Council has in the development and on-going management balanced against risk and return of the investment. This report is only discussing the delivery vehicle and a full appraisal on a site by site basis will be brought forward in due course. A mix of options may be suitable in some scenarios.

## **Option 1 – Sale of Land for Affordable Homes**

- 2.16 This option would be for us to market the land for sale to RPs to develop out schemes that incorporated affordable housing. The Council can dispose of land under s.123 of the Local Government Act 1972, with the development of affordable housing the land receipt is likely to be at an undervalue and therefore the use of the General Disposal Consent 2003 where an undervalue that does not exceed £2m can be agreed providing the wellbeing criteria is met.
- 2.17 In addition, the Social Housing Act 2010 (as amended) provides consent to local authorities to dispose of land to registered providers at less than market value for the development of housing, other than housing for outright sale.
- 2.18 The benefits of this approach are that this would be quick and relatively simple to deliver and would take limited Council Officer resource and limited financial risk to the Council. There would be no need for a procurement exercise or set-up of a delivery vehicle such as Local Authority Housing Company or Joint Venture. Although apart from the designation of the use of affordable housing we would have no further control on the development outside of our separate powers as the Local Planning Authority and holding the Housing Register. With this option the funding is likely to be through grant already held by the RP and therefore this would just divert from other potential schemes (albeit these might not be in Swale) and therefore in real terms do not increase affordable housing delivery. Consideration also needs to be given to the location of these sites as they are paramount to the regeneration ambitions for the town centre.

## **Option 2 – Development partner/ Joint Venture (JV)**

- 2.19 This option would be to undertake a procurement exercise to identify a development partner to jointly deliver affordable housing. It would most likely be a RP but could be a combination of Developer and RP. A development agreement/joint venture can be structured in various ways based upon the composition and proposals that come forward. This option would provide us with more control than Option 1 and bring about additional resource and skills from the partners. Funding could be provided either through grant money available to the partners or private finance in addition to any funding the Council provided. Without undertaking the procurement exercise, it is difficult to determine the exact structure and proposals that would be achieved and the risk liability for the Council. The process of selecting the development partner and drawing up the development agreement can be lengthy and could potentially delay delivery of affordable homes.

## **Option 3 – Create a Local Authority Housing Company (LHC)**

- 2.20 A LHC is an independent arms-length organisation wholly or partly owned by councils. It can develop, buy and manage properties within and outside of a



local authority area and offers the ability to intervene long-term in the market and address the range of housing needs in our borough. The homes a LHC provide sit outside of the local government housing finance system (Housing Revenue Account) and are not subject to the Housing Act. The benefits of a LHC are greater control and influence, greater freedoms and flexibilities (esp. over rents, borrowing and Right to Buy), greater stewardship role in place-shaping through developing mixed tenure developments and a financial return which would generate capital and revenue returns to fund future projects. The downside is that the Council would still need to acquire the relevant skills for development and management, although these can be bought in via consultancy or property management outsourced. Financing would be through the Council mechanisms, private finance or accessing Homes England funding directly. Within the LHC there would also be an opportunity to partner on individual sites should this be appropriate. However, the risk would sit wholly with the Council.

- 2.21 All options detailed will provide the council with a mechanism to make an impact and assist with the delivery of affordable housing. Having reviewed these delivery models against the objectives of the Council, it is proposed that establishing a LHC would provide the Council with the most effective mechanism to provide additional units of social housing, yet still maintain a level of control of the delivery. However, the other options remain viable and legitimate routes should this maximise the best outcome in delivery of affordable housing.
- 2.22 Setting up a LHC is fairly straight forward, a small board of directors would need to be appointed, articles of association and a business plan adopted. It is recommended that the Company structure is a company limited by shares wholly owned by the Council. There are standard model articles of association that can be considered and if appropriate can be used with or without modification as required. The Council will nominate directors to the Company board and care should be taken in avoiding conflict of interest for the nominees due to their position in the Council and their role as furthering the interests of the Company. The model articles allow for five directors. The recommended structure will allow the company to trade for profit and thus pay a dividend to its shareholder.
- 2.23 The company will require a business plan to be adopted and it is recommended to appoint a consultant to prepare the business plan for adoption.

### **3. Proposals**

- 3.1 For the Council to pursue the mix of development options set out within the report for delivering affordable housing within the Borough.

- 3.2 To carry out a procurement exercise on the identified land holdings in Sittingbourne, for proposals on developments that deliver (but not limited to) affordable homes.
- 3.3 That the Council begins to establish a Council owned housing company to deliver housing.
- 3.4 That Cabinet approve the drawdown of up to £250k of the capital budget provision to fund the due diligence and business planning work for the LHC and any necessary work on the identified Sittingbourne landholdings in order to carry out the procurement exercise.

## 4 Alternative Options

- 4.1 Alternative options are considered in the main body of the report.

## 5 Consultation Undertaken or Proposed

- 5.1 Advice has been sought from Legal, Procurement, Property.

## 6 Implications

Issue	Implications
Corporate Plan	The increase of affordable housing in the borough supports priorities within the emerging local plan.
Financial, Resource and Property	Capital funding has been identified, which is detailed in the main body of the report. The business plan development will consider all financial and tax implications. Land identified for use for affordable housing delivery will be brought forward on a site by site basis and be accompanied by the appropriate valuation.
Legal, Statutory and Procurement	Localism Act General Power of Competence provides the legislative framework for the Council to create a LHA.
Crime and Disorder	None identified at this stage.
Environment and Sustainability	None identified at this stage.
Health and Wellbeing	None identified at this stage.
Risk Management and Health and Safety	Risk implications are discussed within the body of the report. A risk plan will form part of the business plan development.

Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

## **7 Appendices**

7.1 None

## **8 Background Papers**

None

Cabinet 18 March 2020

## **Recommendation for approval**

**Extraordinary Local Plan Panel – 25 February 2020**

**Minute No. 546 – Local Development Scheme**

### ***Recommended:***

***(1) That the Local Development Scheme at Appendix I of the report be adopted as the current programme for the Swale Borough Local Plan Review.***

This page is intentionally left blank