

Agenda

Council Meeting

Date: Wednesday, 29 January 2025

Time 7.00 pm

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

Pages

Recording and Privacy Notice

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1. Emergency Evacuation Procedure

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- (a) The fire alarm is a continuous loud ringing. In the event that a fire drill is planned during the meeting, the Chair will advise of this.
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- (d) Anyone unable to use the stairs should make themselves known during this agenda item.

2. Apologies for Absence

3. Minutes

To approve the [Minutes](#) of the meeting held on 6 December 2024 (Minute Nos. 451 – 467) 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, their families or friends.

The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPIs) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

5. Mayor's Announcements

6. Questions submitted by the Public

To consider any questions submitted by the public. (The deadline for questions is 4.30 pm on the Wednesday before the meeting – please contact Democratic Services by e-mailing democraticservices@swale.gov.uk or call 01795 417330).

7. Questions submitted by Members

To consider any questions submitted by Members. (The deadline for questions is 4.30 pm on the Monday the week before the meeting – please contact Democratic Services by e-mailing democraticservices@swale.gov.uk or call 01795 417330).

8. Leader's Statement

9. Motion - Highsted Park planning applications

5 - 6

Proposed by: Councillor Bowen
Seconded by: Councillor Speed

- | | | |
|-----|--|--------------|
| 10. | Motion - Support for a More Democratic Process for Kent | 7 - 8 |
| | Proposer: Councillor Rich Lehmann
Seconder: Councillor Alastair Gould | |
| 11. | Annual Climate and Ecological Emergency Progress report | 9 - 64 |
| 12. | Housing Historic Delivery & Local Plan Review Housing Target | 65 - 162 |
| 13. | Local Government Boundary Review - Council size submission | 163 -
192 |
| 14. | Review of Polling Districts and Places | 193 -
204 |
| 15. | Political Balance - Allocation of Committee Seats | 205 -
212 |
| 16. | Recommendations for Approval | |

Council is asked to note the recommendations from the following meeting:

[Environment and Climate Change Committee \(Link to meeting: \[Agenda for Environment and Climate Change Committee on Wednesday, 15 January 2025, 7.00 pm\]\(#\)\)](#)

Recommendations:

- (1) That the content of the Waste and Street Cleansing Scrutiny Review report be noted.***
- (2) That the conclusions and recommendations proposed by the Waste and Street Cleansing Scrutiny Review Member Panel as set out in Appendix I, subject to the amendment to recommendation (13) as minuted.***
- (3) That a waste contract update report will be considered twice a year by the Environment and Climate Change Committee with the first one in July 2025.***
- (4) That the Waste and Street Cleansing Contract Scrutiny Review Report be considered by Full Council.***

Link to Waste Contract information: [Campaigns - Waste Contract](#)

Issued on Tuesday, 21 January 2025

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 democraticservices@swale.gov.uk. To find out more about the work of the Council, please visit www.swale.gov.uk

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

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Agenda Item 9

This Council notes the call in decision regarding the Highsted Park planning applications, following a request by the MP for Sittingbourne and Sheppey and others.

This Council believes that a visit to Swale by the Secretary of State prior to the release of the Planning Inspector's report would provide invaluable first-hand insight into the local context of the development. Such a visit would enable the Secretary of State to engage directly with ward members and other local representatives - ensuring their voices and concerns are understood and considered. Demonstrating proactive engagement by senior government officials will strengthen public confidence in the transparency and fairness of the planning process which has been tarnished by the actions of the MP for Sittingbourne and Sheppey.

This Council resolves to formally request that the Secretary of State for Housing, Communities and Local Government visits the Highsted Park application area to meet with ward members, planning committee members and, potentially, other local representatives affected by the Highsted Park development.

The Council instructs the Leader to communicate this request to the Secretary of State and to work with relevant parties to organise the visit prior to the Inspector's report being submitted.

Proposed by: Cllr Bowen

Seconded: Cllr Speed

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Support for a More Democratic Devolution Process for Kent

This Council notes that:

- 1 The current devolution process in Kent must prioritise democratic governance and accountability to ensure that decisions are made in the best interests of Kent residents.
- 2 The high cost of standing for metro mayoral elections in England, including a £5,000 deposit and a £5,000 contribution for inclusion in a candidate booklet, deters capable individuals from running for office. While it is essential to discourage frivolous candidacies, alternative mechanisms, such as requiring candidates to gather a specified number of signatures from electors, could achieve this more effectively.
- 3 Spending limits for mayoral elections are disproportionately high, with an allowance of approximately £150,000 for areas as populous as Kent. This creates a significant barrier to genuine democratic participation and fair competition.
- 4 Until 2023, mayoral elections in England were conducted under the Supplementary Vote system, which provided a fairer voting mechanism compared to the First Past the Post system now in use.
- 5 A democratically elected assembly would enhance the devolution process by providing necessary oversight and scrutiny of the mayor's decisions, ensuring power is exercised transparently and in the best interest of Kent's residents.

This Council believes that:

- 1 Reducing the financial barriers to standing for election would foster greater participation and diversity among candidates, strengthening democracy.
- 2 Lowering spending limits for mayoral elections would create a more equitable electoral process, allowing fair competition and enhancing the legitimacy of elected officials.
- 3 Reintroducing a fairer voting system, such as the Supplementary Vote, would ensure a more representative and democratic outcome.
- 4 Establishing a directly elected assembly, along the lines of the London Assembly, as part of the devolution process is essential for maintaining checks and balances and safeguarding transparency and accountability.

This Council resolves to:

- 1 Call for the cost of standing for election to be lowered by reducing deposit requirements, and introducing an alternative mechanism, such as requiring signatures from electors, to discourage frivolous candidacies;
- 2 Submit a formal request in writing to the Electoral Commission to recommend the reduction of spending limits in mayoral elections to ensure fair and equitable competition among candidates;
- 3 Support the reintroduction of a fairer voting system, such as the Supplementary Vote, for mayoral elections in England;
- 4 Support the establishment of a democratically elected assembly as part of the devolution process in Kent, to provide oversight and scrutiny of the mayor's decisions, and write to the Local Government Association (LGA) to investigate whether this move could be backed and supported nationally;
- 5 Support the use of the additional member system or another form of mixed-member

proportional representation as the method by which to elect members to the above assembly;

- 6 Write a letter to the Leader of Kent County Council, the relevant minister in the Department for Levelling Up, Housing, and Communities (DLUHC), and our local MPs, stating the council's position with regard to recommendations one, three, four and five (above) and seeking their support for these reforms.
- 7 Support the above positions during the devolution process in our interactions with Kent County Council, the Ministry of Housing, Communities and Local Government and other relevant stakeholders.

Proposed by: Councillor Rich Lehmann

Seconded by: Councillor Alastair Gould

Council	
Meeting Date	29 January 2025
Report Title	Annual Climate and Ecological Emergency Progress Report
EMT Lead	Emma Wiggins, Director Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Janet Hill, Climate Change Officer
Classification	Open
Recommendations	1. To note the report

1 Purpose of Report and Executive Summary

- 1.1 On 26 June 2019 the Council declared a Climate and Ecological Emergency setting ourselves challenging targets to achieve net zero carbon for the council by 2025 and net zero carbon across the Borough by 2030.
- 1.2 Part of the declaration requires an annual progress report to be taken to Council in January each year.
- 1.3 This is the sixth annual report covering the activities undertaken towards achieving our targets during 2024.
- 1.4 It is very positive to be able to report the amount of progress made despite the pressures on the Council from resource and economic pressures.
- 1.5 This will be the last Annual Report on our current Climate and Ecological Emergency Action Plan. We are currently drafting a new Action Plan with new targets and timelines which will be taken to the Environment Committee for adoption in the Spring.

2 Background

- 2.1 Since the Spring of 2019 councils across the UK have been declaring climate emergencies of varying types and ambition.
- 2.2 One of the first things the newly elected council did after the May 2019 local elections was to develop a Climate and Ecological Emergency declaration motion which was passed unanimously on 26th June 2019.
- 2.3 Swale has set some of the most ambitious targets nationally to achieve net zero carbon by 2025 as an organisation and by 2030 as a Borough.

2.4 Our policies and strategies are being reviewed and changes are being made as necessary to achieve net zero carbon across the Borough by 2030. A Climate and Ecological Action Plan was developed, as required by the declaration, and was adopted on Earth Day, 22nd April 2020.

2.5 The full Annual Report can be found at Appendix I.

Progress highlights

2.6 A steering group of councillors and officers meets regularly to progress actions and includes coverage of all service areas across the Council.

2.7 The refurbishment of the second floor of Swale House is complete. Master's House is fully refurbished and has been successfully let to a charitable enterprise supporting youth in business.

2.8 Most of our fleet vehicles for directly delivered services have been replaced with EVs, this has reduced the carbon footprint of our services. The grounds maintenance contract has seen new electric vehicles and power tools used for the first time on this service. The new waste and street cleaning contract will reduce carbon emissions by re-routing rounds to reduce fuel use by 10-15%, using cleaner more fuel-efficient Euro VI diesel vehicles with an electric lift for the bins and use of EVs for some supervisors and street sweeping vehicles.

2.9 The Improvement and Resilience Fund enabled projects which help to tackle the emergency including LED lighting, tree planting, the car clubs, EV charging points and air quality measures. This fund is now spent.

2.10 We are working with KCC to explore in more detail measures to increase active travel, promote wider adoption of electric vehicles, and improve the air quality especially in the Air Quality Management Areas. We are working with schools close to AQMAs to promote sustainable travel. Further air quality monitoring has been implemented. An air quality tool for health professionals was launched in November. We have developed an air quality planning technical guide and trained planning officers. An Anti-idling campaign has been rolled out with signage, staff training and the ability to issue fixed penalty notices for non-adherence.

2.11 The Climate and Ecological Emergency Declaration stated that we would "eliminate single-use plastic from council operations wherever possible" by 2021. A cross department audit of the council's plastic use was undertaken, and elimination or replacement of single use products is underway both in Swale House and across our estate/services. The drinks and vending machine contracts were not renewed. Where it has not been easily possible to remove products, facilities to recycle specific plastic waste in Swale House have been introduced. For example, coffee cups, crisp packets, pens and blister packs can be recycled. Biodegradable tree guards are being used when trees are planted.

- 2.12 A Fuel and Water Advice Service was developed as a way of reaching our more vulnerable residents to help them reduce bills and carbon emissions. The adviser was appointed in late 2020 for two years. Funding for a third year was agreed in 2022. In 2024 Swale used some of our HSF to continue this service while other external funding was sought. In 2024 1139 fuel vouchers were issued, 150 Winter Warm packs were given out, and 330 energy efficiency packs. £16k of Southern Water debt was cleared and 32 households moved to a lower water tariff. 130 households were added to the Priority Services Register
- 2.13 KCC has secured LEVI funding and we have been working with them to start the process of on street EV chargers being installed. A ten year Kent wide programme should see 650 chargers installed in Swale. The EV chargers in our car parks continue to be well used.
- 2.14 A car club was set up in Faversham in May 2022 and another in Sittingbourne in March 2023. To date the club has reached a utilisation rate of up to 50% which is above expectations. We are working with developers to include car clubs in new developments.
- 2.15 The Planning Committee has successfully requested more renewable energy and energy-efficiency measures to be included in new developments. All new developments are encouraged to achieve a 50% saving in carbon emissions over 2013 building regulations (19% more than current regulations). The emerging Local Plan will work to bringing this down to net zero emissions.
- 2.16 This year we have planted 150 standard trees and 6200 whips.
- 2.17 COVID19 has accelerated the move to virtual and hybrid meetings and new ways of working, resulting in business and commuting miles falling dramatically. However other challenges have arisen, such as the increase in household waste being put out by residents. We are therefore working on education campaigns to get this reduced.
- 2.18 Kent Wildlife Trust approached Swale to be a local authority partner in their 3Cs project which is restoring saltmarshes along the Swale. We are working with Peel Ports on a beneficial use of dredging materials project and we are supporting the local Farmers' Cluster in their work on biodiversity net gain.
- 2.19 Swale supported the University of Kent's successful bid to Innovate UK for the Kemsley Cluster project. Five of the largest manufacturing businesses in Swale are looking at their energy demands and emissions and identifying synergies. Swale sits on the Advisory Board.
- 2.20 Swale is the only second tier authority in Kent with an Active Travel Co-ordinator. A lot of work has been undertaken to promote active travel such as the Local Cycling and Walking Infrastructure Projects, Active Travel bids to KCC with

funding awarded for public consultation and feasibility studies. The three LCWIPs in Swale will be merged into one.

One project unique to Swale is the Swale Cycle Recycle Project. A scheme that takes unwanted or damaged bikes and repairs them in the workshops of HMP Swaleside before they are distributed via charity partners to people who cannot afford bikes. The benefits are bikes are diverted from the waste stream, prisoners learn new skills increasing their employability on release and economically vulnerable people get access to bikes which may make travel to work more viable and improve health. In 2024 150 bikes were donated and 100 distributed.

Looking forward

- 2.21 In 2019 the Council set very ambitious targets to reach net zero. This drove us to start on projects which might have been delayed otherwise – tree planting, LED roll out, car clubs, EV charging, the renovation of Swale House and the Master’s House, to name a few. Our efforts have been recognised by the Carbon Disclosure Project and Climate Emergency UK. Covid brought its challenges but also accelerated the use of virtual meetings and hybrid working, while paper use and business mileage has reduced dramatically
- 2.22 Although we are moving in the right direction, it has become apparent that we will not achieve the aspirational target of being a net-zero council by 2025. There are numerous reasons for this, including a lack of financial support from national government, industry not being able to deliver the required infrastructure, and constantly changing offsetting situations. Despite this, we remain committed to reducing both our own emissions and in leading the residents and businesses of Swale on their own net-zero journey
- 2.23 At Swale we have a small dedicated team which has worked with the Steering Group to embed the cause across the entire organisation. The emergency impacts all our work. Staff recruitment and retention is an issue countywide with staff leaving for London and other unitary authorities. This is a common feature across Kent, where all local authorities are in the process of revisiting their targets and producing refreshed action plans. In doing this, the need to explore more joint working Kentwide has been recognised, and efforts are underway to develop these relationships
- 2.24 Swale Council consulted with the Carbon Trust throughout 2024 to recalculate our carbon footprint, as well as model various carbon reduction scenarios going forward. We are also revisiting targets that were set for Borough wide net-zero, and in the process of developing a renewed Climate and Ecological Emergency Action Plan. This will set fresh actions to ensure that Swale Borough Council maintains our momentum
- 2.25 The financial situation facing local authorities and the cost-of-living crisis has limited our options and we need to understand what is feasible.

2.26 The revised Climate and Ecological Emergency Action Plan will be put to the Environment and Climate Change Committee in Spring 2025 for adoption.

3 Proposals

3.1 To note the report.

4 Alternative Options Considered and Rejected

4.1 There are no decisions to be taken from this report. However, an alternative option would be to revert to our previous pre-Declaration way of working. This would mean our own emissions would decline more slowly than planned. Borough wide, taking no action would have similar consequences. We would also risk reputational damage.

5 Consultation Undertaken or Proposed

5.1 The Climate and Ecological Emergency Steering Group has been involved in the development of this report.

6 Implications

Issue	Implications
Corporate Plan	Progress on the declaration will support the delivering improved quality of life and delivering the council of tomorrow priorities.
Financial, Resource and Property	The annual report identifies funds that have been used. Activities to address the declaration have financial implications and these will be addressed through the base revenue and capital budget processes. Grants from external sources will also be sought wherever possible.
Legal, Statutory and Procurement	None identified at this stage.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The progress made to date supports improving our environment and contributes to the development of a more sustainable council and borough.

Health and Wellbeing	Improvements to the environment and sustainability have tangible health and wellbeing benefits.
Safeguarding of Children, Young People and Vulnerable Adults	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 to be published with this report and form part of the report:

- Appendix I: Annual Climate and Ecological Emergency Progress Report

8 Background Papers

Motion to full council 26 June 2019

<https://services.swale.gov.uk/meetings/documents/g2156/Public%20reports%20pack%2026th-Jun-2019%2019.00%20Council.pdf?T=10>



Annual Climate and Ecological Emergency Progress Report 2025

150

bikes distributed through Swale Cycle Recycle

218 members

of the Green Grid Community Forum

£102,367.87

in grants provided through the community infrastructure grants

617

car club bookings


Only Kent authority with an active travel coordinator

18

installations of solar PV through solar together

7

households with low carbon works through Home Upgrades Grant scheme

1,139

fuel vouchers issued, worth £63,727

330

energy efficiency packs given out

£16k

of water debt cleared

6

schoolteachers Carbon Literacy Trained

40.87%

recycling rate

53

members of the Green Schools Forum

22

staff climate champions

150

standard trees planted

6,200

whips planted



Swale Borough Council

Annual Climate and Ecological Emergency Progress Report January 2025 (looking back at the achievements over 2024)

Background

In June 2019 Swale Borough Council, in common with many other local authorities, passed a motion to declare a Climate and Ecological Emergency.

This motion included the provision of an annual report in January of each year.

This is the sixth annual report and covers 2024's activities to address the emergency.

This will be the final report on the current Action Plan. We are reviewing both our targets and the Action Plan and will publish a new one in the Spring of 2025.

The original motion also included targets to achieve net-zero within our own operations by 2025, and 2030 for Boroughwide net-zero. The Council is in the process of reviewing these targets. The Carbon Trust was commissioned to undertake a review into the Council's emissions throughout 2024 and the findings will be used to inform any decisions around targeting.

A steering group consisting of councillors and officers representing all service areas of the Council meets regularly to progress the actions within the Action Plan.

The refurbishment of the second floor of Swale House is complete and funding has been agreed for solar PV which will be installed in 2025. Masters' House is fully refurbished. The latter has been successfully let to a charitable enterprise supporting young entrepreneurs.

Most of our fleet vehicles have been replaced with EVs, and with a total mileage of 55,000 miles have saved around 11.5tCO₂e throughout 2024. The grounds maintenance contract has seen electric vehicles and power tools used for the first time on this service. The new waste and street cleaning contract has been implemented. While there continues to be teething problems, the use of Euro VI diesel vehicles fitted with electric lifts, and the re-routing of rounds is estimated to reduce emissions by 12-15%.

In 2023, Council funding allowed the roll out of LED lighting replacement, tree planting, a range of air quality measures, and the installation of 18 EV charge points across the Council's car parks. The roll out continued in 2024. Monitoring of the EV chargepoints is underway, and data shows 27,800 electric vehicles were parking in Council owned car parks between January and September 2024. However, most of these were not charging. Less than 1% of parking is EV charging, which is estimated to have offset approximately 66.4 t CO₂e in the same period.

Community Infrastructure Grants (CIG) have provided £102,367.87 to projects which take measures such as insulation and the installation of renewable technologies in community facilities.

Climate and Ecological Emergency Annual Report 2025

The Rural Swale Small Business Grant Scheme has provided £21,000 to small businesses to make capital investments to support growth and carbon reduction measures.

Together, the schemes have seen 17 projects approved that will reduce emissions. These included the installation of solar PV, low energy lighting, bicycle racks, EV charge points, and active travel infrastructure. Provided alongside this is a bespoke low-carbon advisory service, which has given 17 organisations practical guidance on reducing their emissions.

Swale Borough Council partook in the Home Upgrades Grants scheme (HUG2) to support residents with high energy bills and reduce their properties domestic carbon emissions. Throughout 2024 works were completed for seven households, with six more receiving support.

A successful bid to the Local Authority Tree Fund, Highways England and Trees for Communities has allowed Swale to plant 6200 whips and 150 standard trees.

The Council continues to follow the Air Quality Action Plan (2023-2028) to achieve a cleaner, healthier borough. On Clean Air Day 2024 a new Air Pollution training platform for healthcare professionals was launched. We are working with KCC to explore measures to increase active travel, promote wider adoption of electric vehicles (e.g., on street charging), and improve the air quality especially in the Air Quality Management Areas. Further air quality monitoring has been implemented.

The Climate and Ecological Emergency Declaration stated that we would “eliminate single-use plastic from council operations wherever possible” by 2021. A cross department audit of the council’s plastic use was undertaken, and elimination or replacement of single use products is underway both in Swale House and across our estate/services. Facilities to recycle difficult-to-eliminate plastic waste in Swale House were introduced in 2023, including coffee cups, cardboard, newspaper, and plastic bottles. Further facilities have been rolled out in 2024 for the recycling of empty pens, blister packs and crisp packets. Swale has also joined a Digital Kent initiative to allow staff to recycle old devices, which are then recycled and given to members of the community to support digital integration. Biodegradable tree guards are being used when trees are planted.

A fuel and water advice service was developed as a way of reaching our more vulnerable residents to help them reduce bills and carbon emissions. The adviser was appointed in late 2020 for two years. Funding for a third year was agreed in 2022. Although the Special Project’s Fund funding was exhausted in 2024 Swale was able to support the service continuing using some of our Household Support Fund allocation and Children and Families secured additional external funding. This year the service has issued 1139 fuel vouchers worth £63,727, 150 Winter Warm packs, 330 Energy Efficiency packs. 250 information and advice emails have been sent monthly and 6000 people have been reached on social media month. 22 households have been referred to Southern Water and water debt of £16,000 has been cleared. 32 households were moved to a lower water tariff and 3 households received white goods.

Climate and Ecological Emergency Annual Report 2025

130 households were signed up to the Priority Services Register. Free period products have started to be supplied again. Further funding to keep the service going is being explored.

A car club was set up in Faversham in May 2022 and in Sittingbourne in March 2023. The town of Faversham has two hybrid cars and one electric car, while Sittingbourne has three hybrid vehicles. These have completed 617 bookings in the last 15 months, driving a combined total of 64,522 miles. This is estimated to have saved 4.7 tCO₂.

The Local Plan rewrite is underway, and the Council is utilising this opportunity to pursue the most ambitious options to ensure the next generation of housing is net-zero. The revised Action Plan will include these measures.

COVID19 has accelerated the move to virtual and hybrid meetings and new ways of working, resulting in business and commuting miles falling dramatically. However other challenges have arisen, such as the increase in household waste being put out by residents. We are therefore working on education campaigns to get this reduced.

Kent Wildlife Trust approached Swale to be a local authority partner in their 3Cs project. This project is now underway, having successfully secured funding, and will see nine hectares of restored saltmarsh along the Swale. We are supporting the Zoological Society of Londons Tranforming the Thamescape, an intergrated coastal habitat restoration project for the Greater Thames Estuary, as well as working with Peel Ports on a beneficial use of dredging materials project.

Swale Borough Council is a member of the advisory board of the North Kent Local Decarbonisation Project (LIDP), an ambitious project to develop and deliver a joint carbon reduction strategy by the Kelmsley Industrial Cluster, supported by Innovate UK.

Swale remains the only second tier authority in Kent with a dedicated Active Travel Co-ordinator, and work is underway to produce a Swale Local Walking and Cycling Infrastructure Plan.

One project unique to Swale is the Swale Cycle Recycle Project. The scheme takes unwanted or damaged bikes and repairs them in the workshops of HMP Swaleside before they are distributed via charity partners to people who cannot afford bikes. The scheme ensures that bikes are diverted from the waste stream, prisoners learn new skills increasing their employability on release, and economically vulnerable people get access to bikes which may make travel to work more viable and improve health. Over 150 bikes have been distributed into the community throughout 2024.

Events have been held to engage and inform residents about the Climate and Ecological Emergency. During Great Big Green Week, Swale received grants from the Royal Horticultural Society and Cycling UK to hold train station gardening events in Queenborough, Faversham and Sittingbourne, as well as two bike repair cafés in Sheerness. Swale has supported litter picking days at Kingsborough Manor Community Woodland, collecting thousands of tree guards to be recycling by CDDL

Recycling. A schools Eco-Fair in October in partnership with Friends of Milton Creek Country Park, Swale Friends of the Earth, and Take Pride integrated physical activity with climate awareness for five classes of students from six local primary schools. Carbon Literacy Training was delivered to STEM teachers from a local secondary school to roll out certification to over 1200 students. A case study is being prepared to enable the rollout of training to more secondary schools. National Tree Week 2024 saw five events take place around the borough, including whip planting, guided tree walks, litter picking and tree guard removal.

Establishing a Baseline

To achieve our targets, we need to monitor the existing situation in both the Council and the borough as a whole. Latest figures on CO₂ emissions are released annually by the Department for Energy Security and Net Zero (DESNZ). The latest figures give us the data until the end of 2022. Waste collection figures are similarly only updated to the end of the 2023/24 financial year. Until the most update statistics are provided, we will not be able to fully comprehend the impact of the Climate and Ecological Emergency declaration in 2019.

The report from the Tyndall Centre recommended that Swale should aim for an annual emissions reduction of 13% in order to achieve our borough wide targets. At 2017 emissions rates, Swale's carbon budget would be spent within 7 years. Figure 1 demonstrates Swale's emissions across the borough from 2017 compared to the minimum reduction rate of 13% per year.

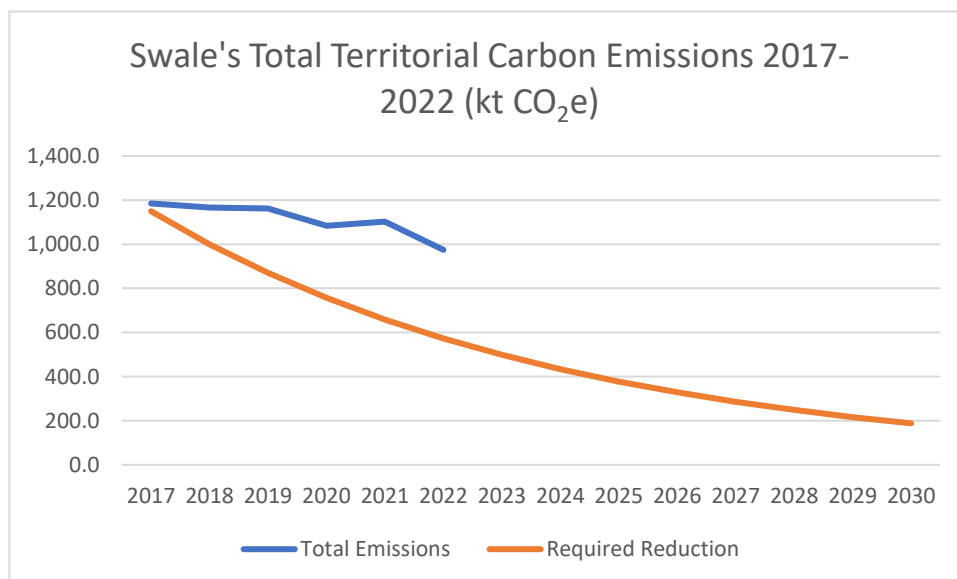


Figure 1: Source, DESNZ

Energy Consumption and Emissions

Traditionally Swale has been a hub of industry, and as such has always had higher energy consumptions arising from the commercial and industrial sectors when compared to other Kent Districts. These two sectors alone are now responsible for 48% of the boroughs total emissions. Emissions from these sectors peaked in 2010 and have consistently declined ever since. This has contributed significantly to the overall downward trend in carbon emissions in the borough (see figure 2).

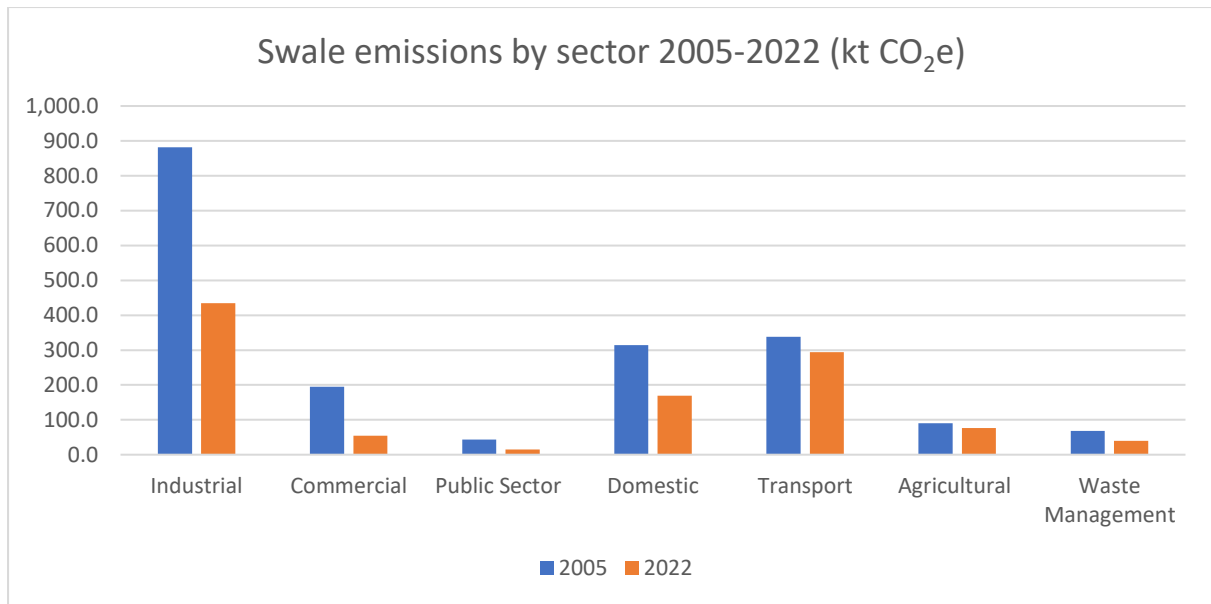


Figure 2: Source, DESNZ

In Swale in 2022, 43% of CO₂ emissions came from the Industry Sector, while only 5% came from the Commercial Sector. Transport accounted for the next largest source of emissions, at 29%, followed by domestic emissions from houses at 17%, agricultural sector emissions (5%), public sector emissions (1%), and waste management (0.1%). Meanwhile, Land Use, Land Change and Forestry meant that 15.4 tCO₂ was sequestered from the atmosphere. This can be attributed to carbon sequestration from forest land and grassland in Swale. The total carbon emissions from the borough have decreased since the declaration was made in 2019, with per capita emissions dropping from 7.8 tCO₂ to 6.3 tCO₂ between 2021 and 2022.

Industrial and Commercial Sectors

Despite a slight rise in 2021, there has been an overall decrease in emissions from industry since 2005, with this trend continuing strongly in 2022. Within the sectors there has been a 52.2% decrease in CO₂ emissions between 2005-2022 (see figure 3).

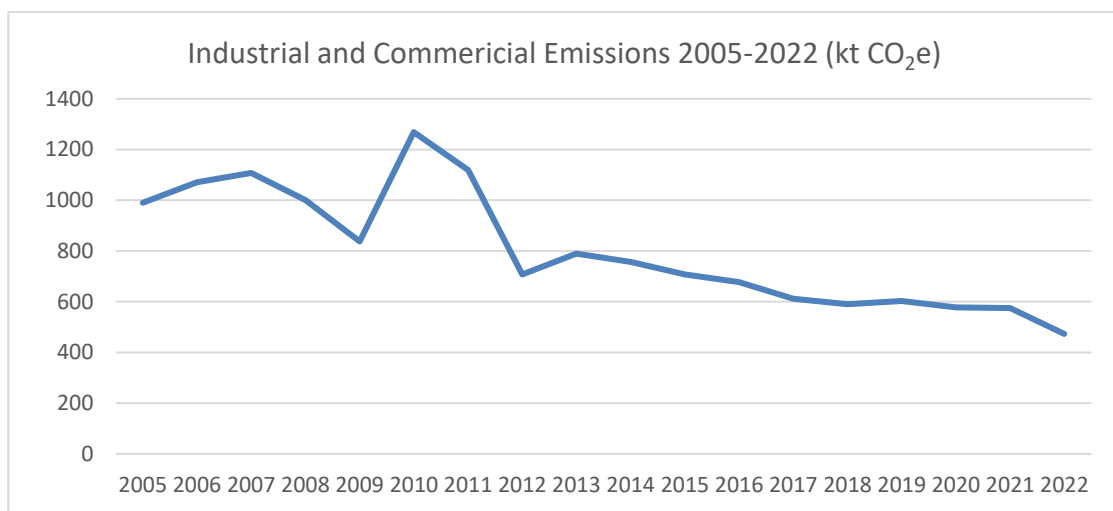


Figure 3: Source, DESNZ

Transport

In Swale, transport emissions have remained stable. The exception to this was during 2020, when reduced movement was seen as the result of Covid-19. The loosening of restrictions in 2021, transport emissions rose by 11.8%, although they remain 12.2% below pre-pandemic levels (figure 4)

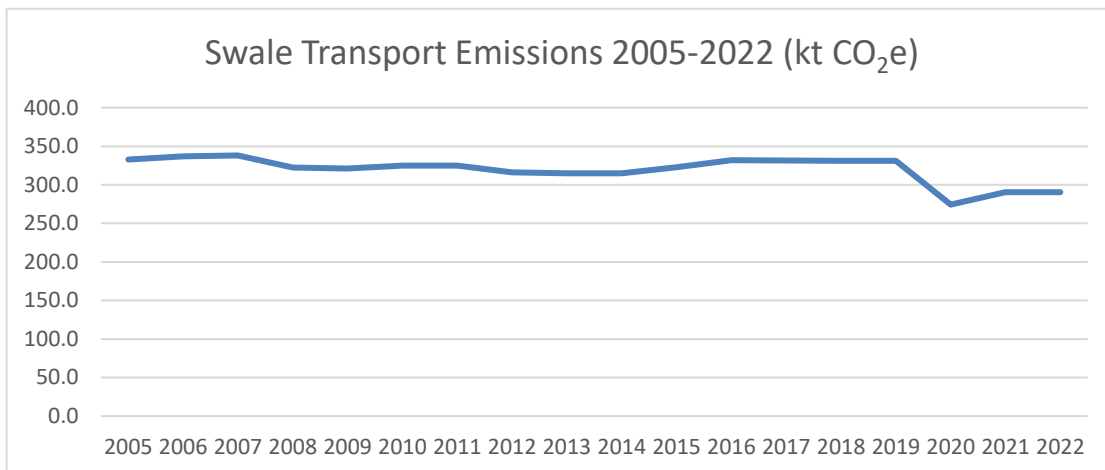


Figure 4: Source, DESNZ

Domestic

Swale's domestic emissions (figure 5) are the 4th highest in Kent, with 72% resulting from domestic gas use. The overall trend in domestic emissions is positive, with a decrease of 46% between 2005-2022. This can largely be attributed to a decrease in emissions relating to domestic electricity use (see figure 6).

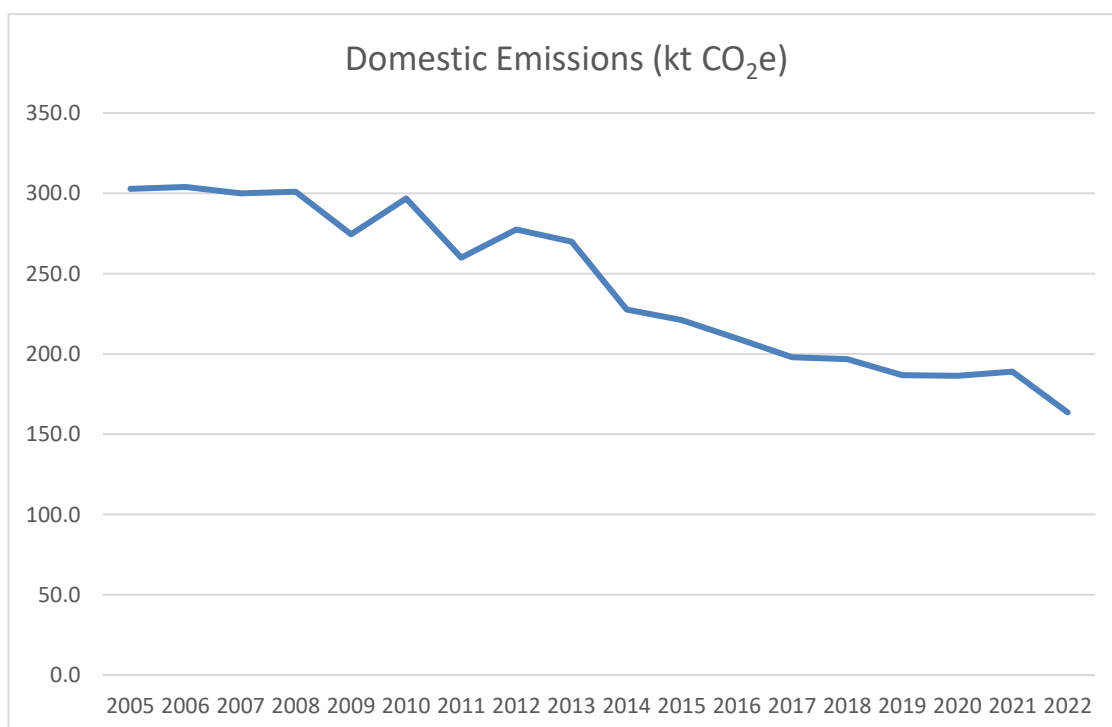


Figure 5: Source, DESNZ

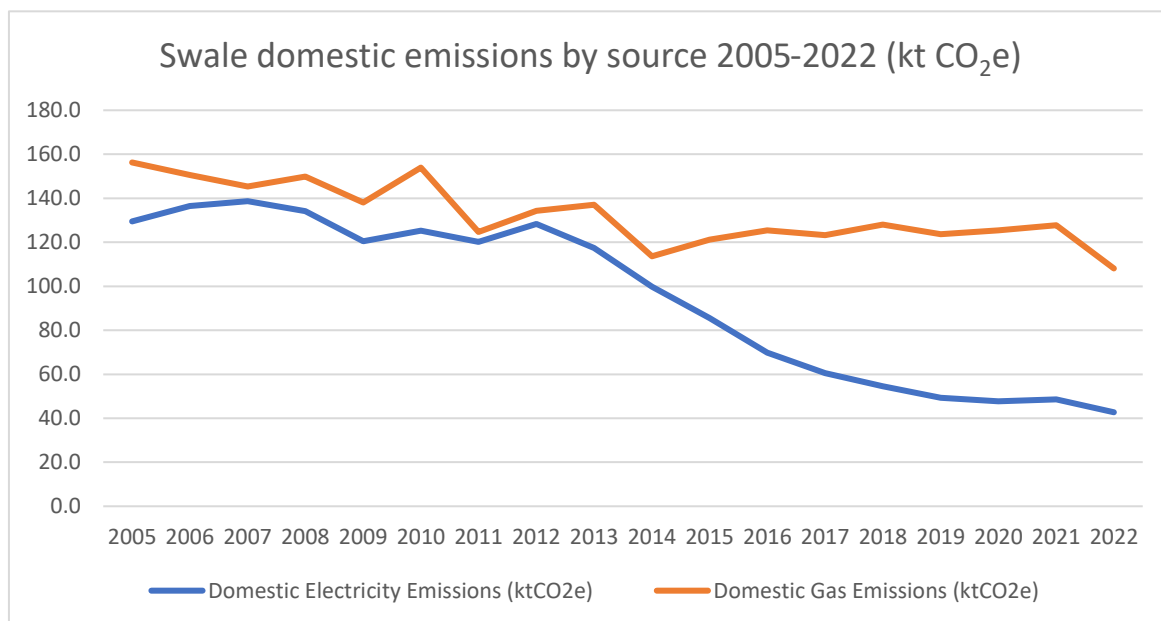


Figure 6: Source, DESNZ

Public Sector

Since 2021, public sector emissions have been included in the DESNZ reporting. These figures show that historically, Swale has had some of the highest public sector emissions in Kent (figure 7).

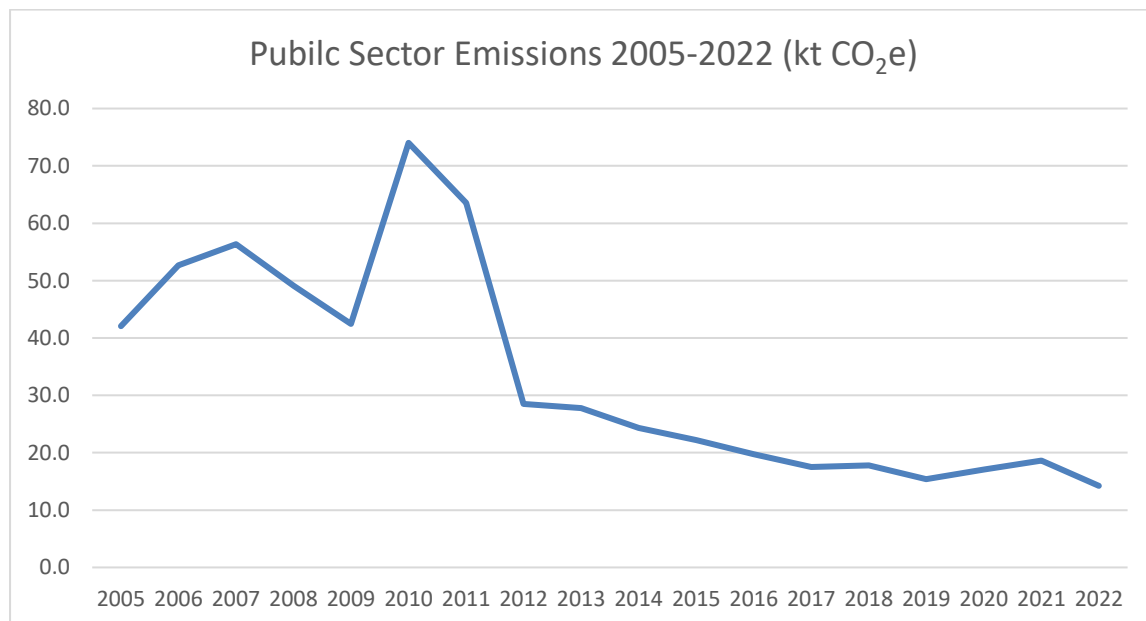


Figure 7: Source, DESNZ

Other Greenhouse Gases

In 2022, DESNZ included a breakdown of other greenhouse gas emissions within territorial emissions data, namely Methane and Nitrous Oxide. Figure 8 shows how these have fallen significantly since 2005.

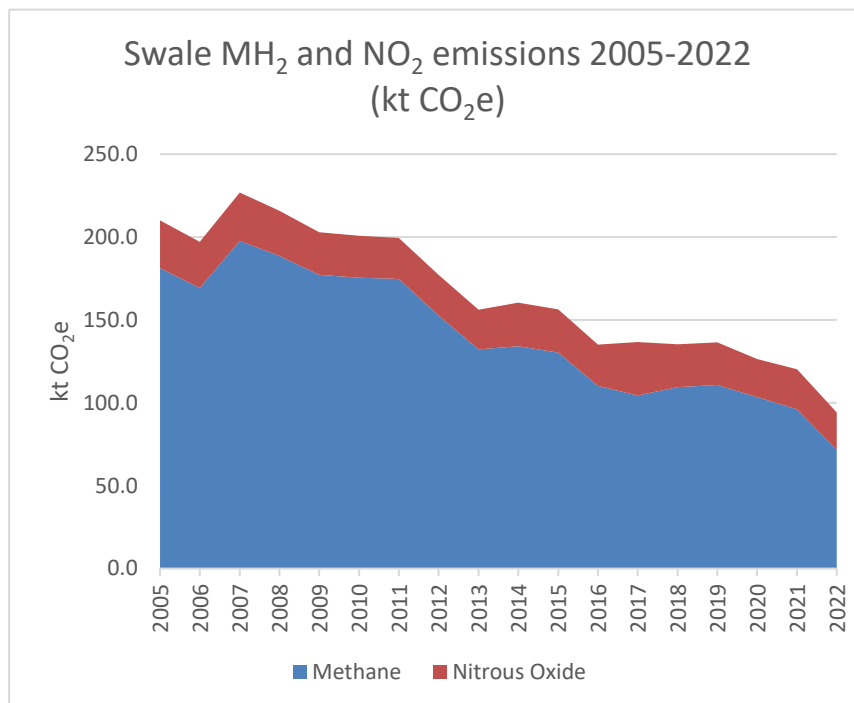


Figure 8: Source, DESNZ

Household Waste

As the waste collection authority, we have targets to reduce the amount of residual waste collected, and increase the proportion sent to recycling and composting. Household waste collection has seen a number of changes this year, with the rollout of the new service from March. Despite the disruption of changing vehicles, disposal locations and having to work from a temporary depot, the new cleaner vehicles and electric lifts will have shown carbon reduction benefits. We have seen an increase in contamination of bins this year which has led to lost recycling loads and we will be focussed on reducing contamination in 2025.

Percentage of household waste recycled and composted (2024)	
Month	% Recycled
January	34.3
February	34.5
March	37.2
April	41
May	42.5
June	45.1
July	39.7
August	34.1
September	35.8
October	32.8

Figure 9 – Source, Waste Contracts Manager

Renewable Generation

At the end of 2022, there were 2,520 installation sites producing renewable electricity in Swale, an increase of 14.2% from 2021. Of these sites, 99.3% were domestic photovoltaics. The remaining sites include 13 onshore wind installations, three sites generating renewable energy from sewerage gas, landfill gas, or municipal solid waste, and one site generating energy from biomass.

The total generation in an estimated 141,589 MWh.

Swale Borough Council's response to the Climate and Ecological Emergency

The Climate and Ecological Emergency was declared on 26 June 2019, shortly after the new coalition administration took office following the May 2019 local elections.

Our Climate and Ecological Emergency Action Plan was adopted by Cabinet on Earth Day - 22 April 2020. It was approved by Council in October 2020.

The full action plan can be found [here](#)¹. The Climate and Ecological Emergency Action Plan sets out the Council's strategy and identifies some enabling tools that are essential to progress across a wide range of areas. The plan then identifies a set of specific actions in the following areas: Council operations; Buildings and energy efficiency; Transport and air quality; Resource consumption and waste; Ecology and biodiversity; Resilience, adaptation, and offsetting. This report reviews progress under each of these headings.

The Action Plan is currently being revised and will be published later in 2025.

Enabling Tools – Cross Cutting Themes and Actions

Swale Borough Council recognises that there are cross-cutting actions needed to underpin the specific actions targeted at the particular causes of carbon emissions. The strategy set out in the Action Plan is based on an approach to Lead, Show, Support.

LEAD: We will lead by taking actions to reduce carbon emissions from the Council's own operations and to enhance biodiversity in the management of the Council's own estate.

SHOW: Use the council's improved operations and estate as beacon of good practice on the road to net zero.

SUPPORT: Assist businesses, organisations, and residents to take their own actions and to build the capacity to move towards a low carbon economy in Swale.

This plan requires that actions which address the carbon footprint of the Council's own operations will be an early focus.

Table 1, below, sets out progress on the enabling actions identified in the Action Plan.

¹ <https://services.swale.gov.uk/assets/Climate-Change-and-Ecological-Emergency/SBC%20CEE%20Action%20Plan%20Final%20with%20illustrations.pdf>

Climate and Ecological Emergency Annual Report 2025

Department	Action	Time scale	Annual carbon reduction (tCO2e)	Progress Dec 2023	Progress Dec 2024	Status
CEE	Rolling out a climate change learning and development programme for staff to improve understanding of carbon and the wider environmental context. The skills programme will include: Base level training for all employees	Short	-	New project officer undergoing train the trainer training and working on this. Member training being developed	Project officer fully trained.	On Track
CEE	Encouraging personal responsibility and roll out of a Green Champions Network.	Short	-	Meetings and activities ongoing	Meeting and activities ongoing	On Track
CEE	More targeted/ intensive training for organisational decision-makers to enable them to adequately assess carbon impacts in their decisions	Short	-	CL training delivered to Environment Committee in January	In conjunction with KMEG	On Track
CEE	Sharing our knowledge – we will provide capacity to share our learning and approaches with others, such as town and parish councils and community groups.	Short	-	Green Grid mailing list continues to grow, and a monthly newsletter is published. Two in person meetings held.	Green Grid mailing list continues to grow, and a monthly newsletter is published. Two in person forum meetings held, one at Milton Creek Country Park and one at Lynsted Community Kitchen Garden. Six school science teachers received Carbon Literacy Training, with view of rolling out training to all year 9 students.	On Track

Climate and Ecological Emergency Annual Report 2025

CEE	Promotion of low carbon food through council facilities and communication. Promotion of vegan and vegetarian diets using seasonal, local sources to support local food networks.	Short	-	Limited work during 2023	The Council purchases very little externally produced catering overall. Ad-hoc Climate events do provide suitable catering. Regular messaging through staff forums encourages positive choices.	Started
CEE	Identify and align to national days of action to reinforce the message of collective action.	Short	-	Highlighted where possible across SBC external comms e.g., social media, Inside Swale. Promoted Great Big Green Week but no external funding this year limited our involvement	Highlighted across SBC external comms e.g., social media, Swale Means Business, CEE website, and Green Grid forum newsletters. Promoted Great Big Green Week and ran six of our events	On Track

Table 1 Progress on Enabling Actions

Ten High Priority Actions

In addition to the enabling tools, we selected ten actions to be classed as 'high priority' for 2024. They are shown in table 2 below and discussed under the theme headings which follow.

	Action	Action Owner	Target date	Annual carbon reduction (tCO2e)
1	Carry out roof top solar PV viability studies on our properties	Property	2023	Large
2	Implement the EV strategy. Lobby KCC re on-street charging	Environment and Leisure	2025	Medium
3	Tree planting on council land (target; 148,100 trees or 60 acres of woodland) to offset 20% of council emissions.	Environment and Leisure	2025	1,481t offset of woodland
4	Improve facilities and incentives for walking and cycling.	ECS, Planning, Environmental Health	2030	Large
5	Increase engagement with staff and members to roll out learning about the climate & ecological emergency.	HR, Environment and Leisure	Short	Small

Climate and Ecological Emergency Annual Report 2025

	Review of staff business travel			
6	Support businesses to reduce carbon emissions and improve ecology and biodiversity.	ED	Medium	Medium
7	Behaviour changes around domestic waste and food recycling	Environment and Leisure	Short	Small
8	Refresh the Action Plan	Environment and Leisure	2024	Small
9	Implement stage 1 of LED roll out across council parks and open spaces	Environment and Leisure	2023	Medium
10	Improve air quality across the whole borough, focussing on the six air quality management areas (AQMAs)	Environmental Health	Short	Small

Table 2 Top Ten Priority Actions 2024

Progress against all actions can be found in the relevant sections of this report.

The chart below gives an indication of overall progress. With the targets for Council operations by 2025 and Borough by 2030 this shows a good level of progress. The following pages summarise the key achievements over the year in each of the areas of the action plan.

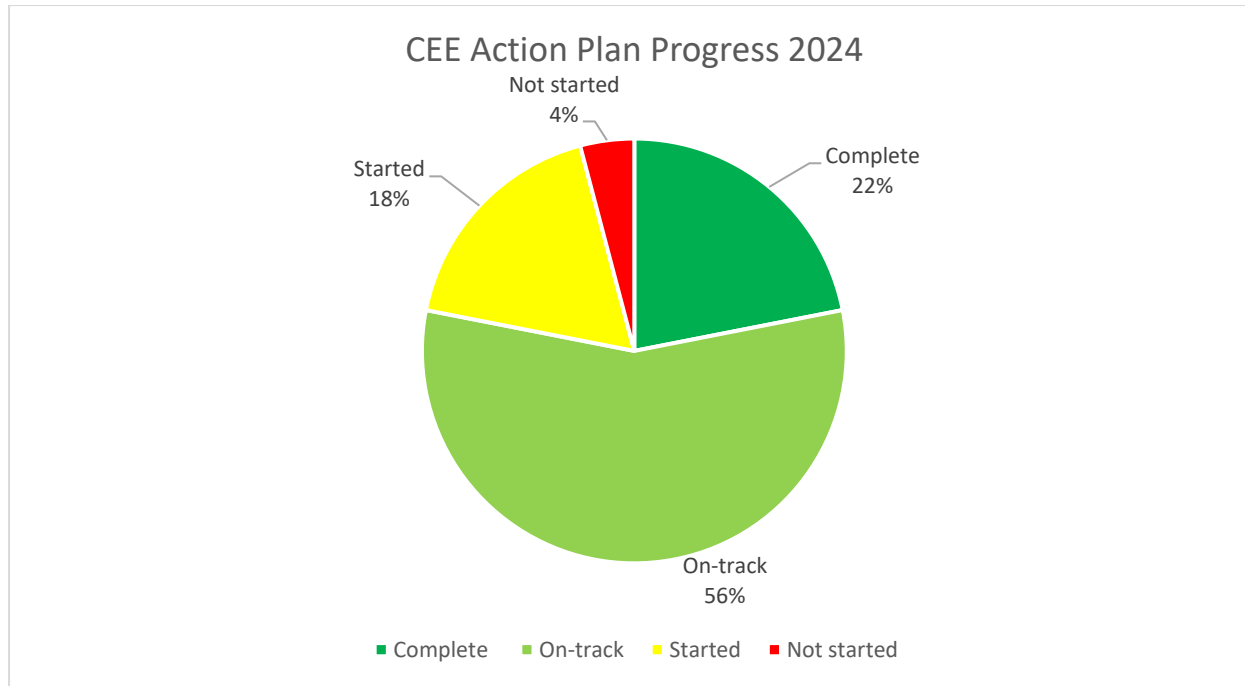


Figure 1 Overall progress against Action Plan as of Dec 2024

Council Operations

Dept.	Action	Time scale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Property	Retro-fit Swale House to cut carbon emissions (eg. extra insulation, triple glazing, heat pump, solar PV).	2025	186	Roof, windows, and insulation complete. Internal work almost complete. Solar feasibility study complete. Master's House units let out	Work complete. Funding for Solar on the roof of Swale House agreed. Currently out for tender, with installation planned for 2025.	On Track
Environment & Leisure	Replace SBC fleet vehicles with electric vehicles.	2025	26	Electrification of fleet complete - 9 electric vehicles are now in use, saving almost 20 tonnes of CO2 each year. The Mayor's car is now an EV, as is the Staying Put Handyman's van and an EV pool car is available to staff. The parking wardens' two vehicles are electric vehicles	Complete	
Commissioning	Revise procurement strategy to embed the climate and ecological emergency into all procurement decisions.	2023	780	This new policy provides more emphasis on this topic and crucially require contractors to report back throughout contract terms on their achievement of targets. The Procurement officer has joined the procurement sub-group of the Kent Climate Change Network	Complete	
Property / CEE	Eliminate single-use plastic from council operations wherever possible	2021		Tea & coffee facilities amended to remove single-use sachets and included milk in glass bottles. Central recycling centre working well and more to be trialled. A team to volunteer to trial not having black bins in their office – evidence shows it improves recycling rates at central recycling points. Climate Champions working to remove plastics in their teams with good progress so far eg. black sacks and	A Sustainable Events Policy is being written which will apply to all outdoor events taking place on Council land. This will be supported by a Sustainable Events Guide.	On Track

Climate and Ecological Emergency Annual Report 2025

				challenging suppliers. More messaging to be shared with staff to encourage best practice.		
CEE / Economy & Regeneration	Carry out regular staff commuting survey and encourage commuting by walking, cycling or public transport.	2025	20	Completed July	Complete	
HR	Encourage use of IT to reduce business travel to meetings.	2025	15	Use of IT for virtual meetings established and maintained through flexible working arrangements. All councillors provided with dedicated laptop	Complete	
HR	Review HR strategy to remove incentives to use a car for business travel.	2025	15	There should also be a wider action on staff travel that looks at car parking, council vehicles, electric cars, and other ways of travel to be taken forward by a project team that should involve other HOS and managers currently responsible for these areas	We have promoted a new staff scheme to encourage take up of public transport season tickets.	Started
HR	Introduce a cycle to work scheme that includes e-bikes.	2021	2	Cycle scheme includes e-bikes	The Cycle to Work scheme includes e-bikes and the total cost of bikes allowed to be bought by the scheme has been increased.	Complete
Property	New waste contract for Swale House to reduce waste & increase recycling.	2020	6	New waste contract now in place (Reduced the number of collections per year, recycling services are more straight forward. Option to introduce food waste collection.) Contract included company working with us to help reduce waste and promote recycling. Swale House. Central recycling point installed and food waste bins in kitchens.	Complete	
Property	Provide facilities to encourage cycling to work (eg. secure cycle storage, shower)	2020	1	Shower refurbishment complete. 6 extra secure spaces for bike storage	Complete	

Climate and Ecological Emergency Annual Report 2025

IT	Develop working practices to use IT to reduce use of paper.	2025	5	Paper used considerably reduced.	Paper used considerably reduced. Committee chairs encouraging paperless meetings	Complete
Property / Environment & Leisure Services	Ensure LED lighting is fitted across the council estate, including parks and open spaces.	2023	19	We have been working closely with KCC's term lighting contractor, which has resulted in an agreed schedule of works and specifications. The previous estimated cost of this work was around £286k, which is well over our available budget. As such, we have split the works into prioritised "phases" which will be completed until funds are exhausted. To date, we have completed an initial phase to replace lighting along Sheerness seafront and have also completed phases 1.1 to 1.7.	We continue to work closely with KCC's term lighting contractor to progress the LED Lighting Upgrade Project. To date we have completed phases 1.1 to 2.6 of the lighting schedule, as well as some lighting replacements along Sheerness Seafront. A quotation has now been received for phases 2.8 to 3.1 of the works and an order has been issued to the contractor. To date, we have replaced 110 units with LED lights. Whilst it is acknowledged that funding will not be sufficient to complete all of our lighting assets, a substantial number of our lights will be upgraded to LED specification under this project. As part of this work, a complete update of Swale's lighting asset records held by UK Power Networks is also being undertaken to ensure accurate information on our assets is held by the electricity provider.	On track

Table 4 Progress against council operations actions

The Carbon Trust was appointed in 2019 to undertake carbon foot-printing and baselining of our own estate and to propose steps to achieve carbon net zero across council operations by 2025.

Climate and Ecological Emergency Annual Report 2025

The report was completed in early 2020 - the full version of which can be found [here](#)²

To reach the target of carbon neutrality by 2025, it was identified that the Council must reduce scope 1 and 2 emissions by approximately 68 tCO₂e per year, and scope 3 emissions by 994 tCO₂e per year.

Scope 1 emissions are direct emissions from owned or controlled sources. Scope 2 emissions are indirect emissions from the generation of purchased energy. Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in the value chain of the Council, including both upstream and downstream emissions. This equates to a 14% reduction in emissions year on year to achieve the target.

The Carbon Trust made several recommendations for our buildings and contracts which we have already fulfilled, such as the electrification of our fleet - 9 electric vehicles are now in use, saving almost 20 tonnes of CO₂ each year. The Mayor's car is now an EV, and an EV pool car is available to staff. The parking wardens' two vehicles are electric vehicles.

The Carbon Trust report showed that about half of the council's direct carbon footprint arises from the waste contract. The specification for the new waste contract highlighted the desire for reducing carbon emissions and submissions during the tender came forward with lots of ideas. The new contract started in March 2024 incorporating the following initiatives.

The contractor is a net producer of renewable energy and will self-supply electricity to the Swale depot. Any electric vehicles charged at these sites will therefore be powered with renewable energy.

Electric vehicles are provided for the delivery of some frontline services. Where staff receive a company car, they are encouraged to choose an electric vehicle, from an extensive range.

A sustainable travel policy has been implemented that encourages all staff to consider the impact of meetings and how to plan business travel sustainably. A Sustainability Champion has been recruited at the depot. They will deliver local environmental initiatives including a biodiversity action plan.

² <https://services.swale.gov.uk/assets/Climate-Change-and-Ecological-Emergency/Carbon-Trust-Report-on-Swales-Carbon-Footprint.pdf>

Climate and Ecological Emergency Annual Report 2025

All Internal Combustion Engine (ICE) vehicles are Euro VI, which reduces levels of harmful exhaust emissions including nitrogen oxide (NOx), carbon monoxide (CO), hydrocarbons (THC and NMHC) and particulate matter (PM). Environmental improvements are delivered from less pollutants and lower CO₂ emissions.

Driver monitoring software is used to support drivers in driving more sustainably e.g., through reduced speed and idling, as well as over revving engines.

Electric bin lifts are fitted to all 26 tonne collection vehicles delivering a 5% saving in fuel, reducing emissions and noise pollution.

Mechanical sweepers are fitted with dust suppression and water recirculation equipment reducing air pollution and water usage. Electric equipment is provided to street cleansing operatives wherever available.

Hydrotreated Vegetable Oil (HVO) is an alternative available solution. It is claimed that it delivers a 90% reduction in carbon dioxide equivalents when compared to diesel. Currently it is not economically viable but the use of HVO will continue to be reviewed and assessed throughout the contract.

For street cleansing, there are electric hand tools such as leaf blowers. There is also a e-glutton available. This uses a powerful vacuum to ensure swift cleansing of 'hard to reach' areas.

Our new contractors, Suez, have given considerable thought to how we tackle weeds yet reduce the use of herbicides. They are using a 'Foamstream' system. It kills weeds, moss and algae using a combination of near boiling water covered by a biodegradable foam made from natural plant oils and sugars, making it 100% biodegradable. Foamstream is uniquely effective because the foam acts as a thermal blanket, ensuring the heat is retained in the water while it's applied to the plant, keeping the plant in the kill zone for 6 times longer than any other herbicide-free alternative. Foamstream is approved for organic use by the British Soil Association, and the Organic Farmers and Growers Association, meaning it can be used around people, animals, and waterways safely.

Our contractors are in negotiations with a well-known local charity to encourage the re-use of various items collected through the bulky waste, WEEE and textiles service. Re-useable products will be stored for the charity to view and remove any items that they find useful.

The current ground's maintenance contract started in January 2022. Since the commencement of the contract, we have been working very closely with the grounds maintenance contractor to support their implementation of a number of improvements. The

Climate and Ecological Emergency Annual Report 2025

contract now benefits from a number of electric vehicles, battery operated handheld power tools, and an ongoing commitment to the gradual reduction and complete elimination of the use of pesticides over the five-year contract. Continual identification and implementation of increased biodiversity and varied maintenance regimes including a number of enhanced wildlife areas. Ongoing monitoring and recording of recycling values has been introduced as part of the new contract. Feb 24 – Sept 24 saw recycling figures 5.6t of Dry Mixed, 3.5t of Mixed Glass and 164.5t of Green Waste.

The refurbishment of Swale House was completed in late summer of 2023. The window replacements are bringing a saving of approximately 39 tonnes of CO₂ per annum. Funding has been agreed for the installation of solar PV panels, which should produce 50% of our electricity demand and saving £32,750 pa at current prices. The payback period should be three years.

The bid to the Public Sector Decarbonisation Grant Fund was successful and this was used in the Master's House refurbishment. It is estimated that the switch from an oil boiler to an air source heat pump is saving 32 tonnes of CO₂ per annum from operational energy. We have been able to use this investment as match funding for our Levelling Up Fund big *Sheerness Revival*, which includes solar panels for Masters House.

Swale House now has LED lighting throughout. A full survey of all of our lighting assets in Swale, both within our open spaces and within our off-street car parks has been undertaken. Plans are being drawn up to upgrade to LED any lighting units that have not already been converted. LEDs consume up to 70% less energy.

Swale House and other buildings under our control now have both 100% renewable electricity supplies and bio-methane gas supplies.



Image 1: the refurbished Masters House.

Buildings and Energy Efficiency

Dept.	Action	Time scale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Plannin g Policy	Prior to the adoption of the new Local Plan, use a planning condition based on a 50% improvement over current building regulations, ratcheting to 75% and 100% improvement by 2025 and 2028 respectively, as the basis for negotiation with developers through pre-application and planning application negotiations.	2020-2030	400 - 1,000+	This is being encouraged currently, with varied success – generally larger house builders are pushing back more than smaller developers. This, however, demonstrates that this condition is viable in Swale and the importance of adopting Local Plan policy to require it.	Net-zero evidence base being undertaken; this will feed into the emerging Local Plan.	On Track
CEE	Bulk buying scheme for solar PV installations paid-for by residents (in partnership with KCC).	2020-21	100	Two more rounds in 2023 with 72 installations including 3 with battery storage. 184 installations since the project started.	18 installations throughout 2024.	On Track
CEE	Fuel and water poverty outreach service to reduce fuel and water bills for vulnerable residents.	2020-23	to be monitored	Project funded by SBC Special Projects ended in October 2023. Over three years over 1500 people reached advised and over 2500 fuel vouchers issued. Part of SBC’s HSF will be used to continue this project managed by Children and Families.	1139 fuel vouchers worth £63,727, 150 Winter Warm packs, and 330 Energy Efficiency packs have been issued. 250 information and advice emails have been sent monthly. 6000 people reached on social media monthly. 22 households have been referred to Southern Water. Water debt of £16,000 has been cleared. 32 households were moved to a lower water tariff and 3 households received white goods. 130 households were signed up to the Priority Services Register. Free period products being supplied again. Further funding to keep the service going is being explored.	Complete

Climate and Ecological Emergency Annual Report 2025

Plannin g Policy	Use the local plan review to investigate the potential to introduce minimum requirements for on-site renewables on new developments.	Short	Large	Included in Local Plan Review	This will be updated as the Local Plan progresses	On Track
Plannin g Policy	Review Local Plan and incorporate recommended actions on spatial land use strategy and integrated transport strategy, including focusing development on Swale's conurbations to utilise existing vacant sites and under-utilised sites within the settlement confines.	2025	Large	The success of this objective is related to the timescale for adoption of the Local Plan Review, which is currently delayed from its published programme (LDS). A new programme/LDS will be confirmed in late spring/summer, with an anticipated revised Regulation 19 Plan going to consultation in the autumn of 2022 and anticipated submission in Spring 2023.	An updated Local Plan timetable was agreed at Full Council in December 2024	On Track
Plannin g Policy	Encourage high-quality, medium-high density dwellings near to transport nodes. Development could be supplemented by restricted parking, and EV pool-cars.	Short	Large	As above. The next iteration of Local Plan will be looking at reinforcing a land use strategy that focuses development in existing conurbations near transport nodes. The Transport Strategy will be updated to accompany to next iteration of the Local Plan.	An updated Local Plan timetable was agreed at Full Council in December 2024. The preferred growth option will be discussed during the course of 2025/26.	On Track
CEE	Signpost householders and businesses to grant schemes for insulation and energy improvements, such as the Renewable Heat Incentive (RHI), Warm Homes and advice services such as the Energy Saving Trust.	Short	Medium	Achieved via FWHA, as well as press release and corresponding social media posts encouraging Warm Homes Grant. Regular advice provided via Inside Swale, often referencing Energy Saving Trust.	Regular signposting taking place through Green Grid newsletters, social media, the CEE webpage, and the One Swale Roadshow.	On Track
CEE	Encourage Town and Parish Councils to fit LED lighting and other low energy technology by providing information on cost savings and carbon reduction.	Short	Small	Have written to town/parish councils with further engagement required.	As Dec 23	Started

Climate and Ecological Emergency Annual Report 2025

Planning Development	Provide pre-application advice on energy efficiency and carbon standards and statements for future developments	Short	Large	Being implemented by DM team and Climate Change Officer	Pre-app advice being provided by the DM team and the Climate Change Officer.	On Track
Planning Policy / CEE	Investigate the potential to set up an offset fund (106 Agreements) or allowable mechanism for developers to pay into if a certain energy efficiency of buildings is not able to be met in the development and use this money for carbon saving projects	Short	Large	Outputs from KWT/SELEP project delayed and possibility that the amount of offsetting from this scheme will be limited. Other options (eg retrofitting existing stock) to be investigated, but this is complex.	Emphasis has switched to Biodiversity Net Gain. However, offsetting as a last resort will be considered in the next Local Plan.	Started
Planning Policy	Investigate options for monitoring and testing conditions compliance on significant major planning applications (250 dwellings +), including those related to climate change (eg the performance gap between buildings designed energy use and actual energy use), with a view to securing S.106 obligations from developers to contribute towards the cost of such compliance monitoring	Short	Large	Being progressed through the Local Plan Review – policy DM3	On hold as implications of new NPPF (Dec 2024) are being investigated.	On Track
Housing	Enforce private rented and non-domestic Minimum Energy Efficiency Standards regulations	Medium	Medium	We are utilising existing legislation under the Housing act to enforce standards in the private rented sector not MEES at present. We do not have any capacity to deal with additional legislation due to high workloads. We continue to contact landlords who we believe may have properties with Low EPC.	No capacity for MEES investigations.	Started

Table 5 Progress against buildings and energy efficiency actions

Climate and Ecological Emergency Annual Report 2025

The next Local Plan is being prepared and will incorporate and build on actions for buildings and energy efficiency set out in the Action Plan. Already, new housing developments are encouraged to reduce carbon emissions by 50% more than required in the current Building Regulations. Guidance has been published to illustrate how developers can achieve the reduction. Applicants are signposted towards this information when seeking pre-application advice.

We are working with the Kent Wildlife Trust and local farmers to explore offsetting options for new developments. Where the carbon emissions of a development cannot be reduced, the developer would make a payment into the fund to enable the carbon emissions to be offset elsewhere in the Borough. The carbon price will be set to allow onsite carbon reduction to provide the lower cost option, to encourage carbon emissions to be avoided rather than offset. We are also working with KWT on biodiversity net gain through a saltmarsh restoration project.

We pledged through the Climate and Ecological Emergency Declaration to take steps to avoid any adverse impacts on our most vulnerable residents. The Fuel and Water Advice Service is available to vulnerable residents across the borough. Funding was secured for a fourth year of delivery using the Household Support Fund and external funding. This year the service has issued 1139 fuel vouchers worth £63,727, 150 Winter Warm packs, 330 Energy Efficiency packs. 250 information and advice emails have been sent monthly and 6000 people have been reached on social media monthly. 22 households have been referred to Southern Water and water debt of £16,000 has been cleared. 32 households were moved to a lower water tariff and 3 households received white goods. 130 households were signed up to the Priority Services Register. Free period products have started to be supplied again. Further funding to keep the service going is being explored.

Transport and Air Quality

Dept.	Action	Time scale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Environment & Leisure	Install EV charging points across the borough.	2025	to be monitored	10 double charge points fully operational	No further installations as public demand is not sufficient. The Council is working with Kent County Council to deliver on-street electric vehicle charge points in residential areas across Swale through the Local Electric Vehicle Infrastructure (LEVI) fund. Tender is currently out for a charge point operator. It is expected that around 600 charge points will be installed around the borough.	Complete
CEE	Improve facilities and incentives for walking and cycling.	2030	Large	Faversham LCWIP adopted. Faversham Parishes to Town Project Complete (EAC funded) Sustrans Solar Cycle Way Options Report Completed (developer funded – c.£7k) Three Active Travel Fund 4 (ATF4) KCC Submissions developed and presented to residents and Councillors. One ATF4 bid – Faversham Cross Town Path – successful and awarded £995k by Active Travel England (ATE) NCN Route 1 Quietways Bid successful (£30,000) – Faversham – Teynham & Conyer - Feasibility Study Complete NCN Route 1 Barrier Redesign bid successful (£48,000) – initial research & assessment complete. Sheppey Light Greenway Project	New permanent Active Travel Officer appointed to role in August 2024. Faversham LCWIP in place and some schemes/initiatives being delivered: <ul style="list-style-type: none"> • East to west walking route • North to south design project • Reviewing LCWIP including better linkage to the Highways Infrastructure Plan (HIP) Faversham Hopper Bus commenced in April '24 to restore public bus service to the residents of Oare, Newnham, Lynsted,	On track

			<p>obtained seed funding and has partnered with Greenways and Cyclerroutes Limited to assess potential routes. Work commenced on clearing the route at Power Station Road. ATE Capability Fund bid successful (£40,000) projects underway are:</p> <ul style="list-style-type: none"> • Sheppey Towns Connectivity Active Travel Feasibility Study (£15,000) • Swale LCWIP data analysis (£10,000) • Faversham Cross Town Path 2 – Construction Bid Study (£15,000) <p>Swale Cycle-re-Cycle established in partnership with HMP Swaleside, Canterbury Bike Project, KCC and FCC</p> <p>Cycling UK Big Bike Revival bid successful (£2,100), community bike rides and events held across the borough.</p> <p>Second Cycling UK Community Cycle Club established with Age UK in Faversham</p> <p>Explore Sittingbourne & Faversham Cycling & Walking Maps completed - available online and at VICs.</p> <p>Linking Coast to Downs Project completed with one new cycle route and two new walking routes. Available online and at VICS</p> <p>WAC funded Swale Trails – two rides and four walks – launched. Available online and at VICs</p> <p>County submissions included to the Kent Cycling & Walking Infrastructure Plan and with Planning Policy, to the Local Transport Policy 5</p>	<p>Faversham and parts of Teynham.</p> <p>Sheppey Light Railway Greenway (SLGR) have now cleared a section of the old railway from Scrapsgate Road to Sheerness Golf. Permissions are being sought from other landowners to progress other parts of the proposed route.</p> <p>Capability Fund has been awarded of £50,750.</p> <p>Sheppey Towns LCWIP stages 1-4 completed.</p> <p>Swale LCWIP stages 1-4 completed.</p> <p>The forward plan for the LCWIP is to now merge the Sheppey Town and Swale LCWIP together as one Swale-wide LCWIP (whilst ensuring the agreed and adopted Faversham LCWIP in also incorporated) and take this through the committee stage and public consultation in 2025.</p> <p>Sittingbourne Connectivity Study has commenced this year to better understand the area of Sittingbourne and agree proposed 'active travel corridors'.</p>	
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Climate and Ecological Emergency Annual Report 2025

				“Rainbow of Rural Solutions” presented at Cycle County Active County, the national active travel conference in Oxford.		
Planning Policy	Review Local Plan and incorporate recommended actions on spatial land use strategy and integrated transport strategy, including favouring public transport and active transport. Use Local Plan Review to reduce the need to travel (e.g., for work).	2025	Large	Being progressed through the Local Plan Review	Being progressed through the Local Plan Review	On Track
ECS	Promote work-place car chargers (Government funding available).	Medium	Medium	Included in business support on CEE webpages and supported by actions in the EV strategy. Businesses sign posted to grants etc	The Workplace Charging Scheme has been promoted across a range of external communications, including Swale Means Business, the CEE webpage, and newsletters for the Green Grid Forum and Green Schools Forum.	On track
Planning Policy	Through the Parking Standards SPD, require that 10% of parking spaces in new developments are provided with Electric Vehicle charge points (best technology available at the time of planning approval) which may be phased with 5% initial provision and the remainder at an agreed trigger level	Short	Medium	Parking Standards SPD Adopted 2020 - action complete	Complete	

Climate and Ecological Emergency Annual Report 2025

<p>Planning Policy</p>	<p>Use the Local Plan Review to require that where a development is for more than 50 residential units measures such as the following be provided-</p> <ul style="list-style-type: none"> • Travel plan including mechanisms for discouraging high emission vehicle use and encouraging the uptake of low emission fuels and technologies • A welcome pack available to all new residents online and as a booklet, containing information and incentives to encourage the use of sustainable transport modes from new occupiers. • EV car club provision within development or support given to local car club/EV car clubs. • Designation of parking spaces for low emission vehicles • Improved cycle paths to link cycle network. • Adequate provision of secure cycle storage. • Using green infrastructure to absorb pollutants. 	<p>Short</p>	<p>Medium</p>	<p>Being progressed through the Local Plan Review</p> <p>Car club established in Faversham and Sittingbourne enabling developers to include additional vehicles in their developments – initial conversations underway.</p>	<p>As Dec 23</p>	<p>On Track</p>
<p>Planning / Air Quality</p>	<p>Incorporate a policy on air quality in the local plan review</p>	<p>Short</p>	<p>Small</p>	<p>Being progressed through the Local Plan Review</p>	<p>Being progressed through the Local Plan Review.</p>	<p>On Track</p>

Climate and Ecological Emergency Annual Report 2025

Planning / Air Quality	Work with KCC to develop the Swale Local Transport Strategy (to run in parallel to the Local Plan Review) and the promotion and facilitation of a major shift in priorities to public transport and active travel.	Short	Medium	A draft Local Transport Strategy went to consultation in Spring 2021 with the Regulation 19 Local Plan Review. This will be updated to accompany the next stage of the Local Plan Review Consultation and together with the Local Plan's Infrastructure Delivery Plan will set out schemes to encourage walking and cycling and sustainable travel	The Council has contributed towards the KCC Local Transport Plan and the current draft Local Transport Strategy will be integrated into the emerging Local Plan.	On Track
Air Quality	Establish an anti-idling campaign, initially around school sites from which it can be expanded.	Short	Small	Campaign ongoing	Anti-idling patrols have started and will run throughout school terms for 42 weeks.	On Track
Environment & Leisure	Develop EV charging strategy including publicly accessible fast and rapid chargers, in council and private car parks (e.g., hotels, shopping centres), and working with KCC for on-street charging.	Short	Medium	ORCS funded EV chargers installed	The Council is working with Kent County Council to deliver on-street electric vehicle charge points in residential areas across Swale through the Local Electric Vehicle Infrastructure (LEVI) fund. Tender is currently out for a charge point operator. It is expected that around 600 charge points will be installed around the borough over a 10-year contract period.	Complete
ECS	Promote business fleet decarbonisation, including the potential cost and reputational benefits.	Medium	Small	Fleet decarbonisation promoted to businesses via ebulletins	Fleet decarbonisation promoted to businesses via ebulletins	On Track
Air Quality	Engage with public transport providers to improve the quality, quantity and affordability of public transport, so that more people commute by public transport, and reduce carbon emissions from buses.	Medium	Medium	Funding largely for subsidised fares. A pilot is operating in Swale.	In 2023 the Environmental Protection Team updated the SBC Air Quality Action Plan (AQAP) (2023 - 2028). The AQAP includes measure 13 Public transport improvements to bus infrastructure/service - Support public transport providers in a lobbying role for improvements to infrastructure	Started

Climate and Ecological Emergency Annual Report 2025

					and service improvement. This measure is still to be actioned.	
Planning Policy / Air Quality	Work with KCC to implement 20mph limit across built up areas of borough as a cost effective and swift way to improve air quality, reduce health inequalities, lower carbon footprint and encourage active travel (following the implementation of a comprehensive 20mph zone in Faversham).	Medium	Small	Data collection on going and will be analysed in 2024.	The 2023 updated AQAP includes the following measure: "20 is plenty" zones - to be monitored and reviewed for AQMAs. Newington's air quality and 20 mph limit will be assessed through continuous monitoring to assess long-term air quality changes within the AQMA and potential impact of speed change. Currently, air quality is improving within the district, in addition to Faversham and Newington, therefore it is hard to assess the impacts.	On Track
Air Quality	Undertake a feasibility study on implementing a Clean Air Zone along the length of the A2 from Brenley Corner to the western boundary with Medway.	Short	Small	SBC have had two high-level officer meetings to discuss support of KCC to advance the non-charging CAZ priority measures. The second meeting (28/04/22) identified significant reservations from KCC highways and at this point in time there is little support that can be offered for implementing the non-charging CAZ. However, KCC are keen to support active travel measures and review highway related schemes through other potential traffic orders. Relevant KCC officers will be attending the steering groups to review the AQAP update measures.	Complete	
Air Quality	Apply to Defra's Air Quality Grant Scheme for an electric bus (joint bid with Arriva our main local bus company).	Short	Small	Schools encourages to use 'Pollution Patrol' which is a free interactive website for primary schools, children and their families developed to help raise awareness of air pollution, the	From successful Defra bid Environmental Health launched a 'Clean Air Academy' (November 18, 2024) which is an online tool for health professionals to use to assist	Complete

Climate and Ecological Emergency Annual Report 2025

				damage it can cause and ways that individuals can help to reduce their impact by changing behaviours.	patients with CHD/COPD in navigating air quality information.	
Air Quality / ECS	Encourage local school and business travel plans to reduce car journeys.	Short	Small	Review under way.	This measure is currently being led by KCC. The updated AQAP includes a measure 3: Air pollution alerts, information to raise awareness on impacts and solutions. Our Kentair website has free air pollution alerts and information. There are currently 336 registered users for the email service. During 2024 SBC have promoted the digital education package 'Pollution Patrol' to schools, with prize draw to encourage schools to use it. Uptake has slowed.	On Track
Environment & Leisure	Establish a tree planting strategy for schools (links with biodiversity)	Short	Small	Swale Green Schools' Forum established to meet regularly with primary and secondary schools to discuss issues and projects such as tree planting and other ecological initiatives.	SBC has limited land so tree planting efforts will gradually turn towards supporting other landowners in the coming years. Officers continue to engage with schools regarding tree planting and biodiversity through the Green Schools Forum. Greenspaces team are to begin drafting a strategy for schools in early 2025.	On Track

Table 6 Progress against transport and air quality actions

The Air Quality Action Plan is now active. It outlines what the council will deliver between 2023 and 2028 to reduce concentrations of air pollutants and people’s exposure to air pollution. It includes a package of measures that have been prioritised relative to their viability, cost effectiveness of air quality and non- air quality benefits.

The AQAP Steering Group was formed in early 2022 to develop and deliver the Strategic AQAP update for Swale and assessed the AQAP options proposed, including a review of the 2018 – 2022 AQAP measures, including the recommended measures from

Climate and Ecological Emergency Annual Report 2025

the CAZ Feasibility and Source Apportionment studies. The group also collaborated to identify what traffic management interventions were required; what may influence local pollution in the future (i.e., five to ten years); and other existing projects in Swale that could contribute to emission reductions (or increases).

The steering group review of measures also considered the viability of measures and used cost benefit analysis to prioritise measures relative to the cost effectiveness, air quality and non- air quality benefits.

The steering group meets quarterly every three to four months. Task and finish sub-groups are responsible for implementing and delivering specific measures and meet more regularly, reporting back to the steering group. The task groups are also responsible for providing further sub-actions and associated measurable milestones.

Updates on milestones are reported to the AQAP Steering Group and are published through the Council's Air Quality Annual Status Reports. Some new measures include; more car clubs and bike hire schemes; installation of more electric vehicle charging points; anti-idling campaigns; campaigns to educate the public about air pollution and improving walking and cycling infrastructure.



Image 2: Bikes donated through the Swale Cycle Recycle scheme.

We have established car clubs in Faversham and Sittingbourne contracting Hiya Car to run them for us. Two self-charging hybrids and one electric car are available and are located in three car parks in both town centres. Use of the cars has been greater than anticipated with utility rates up to 50%. It is generally considered that one car club vehicle takes up to 18 cars off the road. In addition car club users are more likely to consider walking and cycling as alternative methods of travel. We are working with developers to include car clubs in larger developments.

One project unique to Swale is the Swale Cycle Recycle Project. A scheme that takes unwanted or damaged bikes and repairs them in the workshops of HMP Swaleside before they are distributed via charity partners to people who cannot afford bikes. The benefits are bikes are diverted from the waste stream, prisoners learn new skills increasing their employability on release and economically vulnerable people get access to bikes which may make travel to work more viable and improve health. This year over 100 bikes have been distributed and over 150 bikes donated to the project.

Swale remains the only second tier authority in Kent with an Active Travel Co-ordinator. The role was made permanent in the Spring reflecting the Council's commitment to Active Travel. And the new officer took up their role in August.

Climate and Ecological Emergency Annual Report 2025

The Faversham LCWIP is in place and some schemes/initiatives being delivered - the east to west walking route, the north to south design project, a review to include better linkage to the Highways Infrastructure Plan and additional cycle storage engagement activities are being planned to start in early 2025.

The Faversham Hopper Bus run by Faversham Town Council, commenced in April to restore public bus services to the residents of Oare, Newnham, Lynsted, Faversham and parts of Teynham.

The Sheppey Light Railway Greenway (SLGR) has now cleared a section of the old railway from Scrapsgate Road to Sheerness Golf club plus another smaller section along the route. Permissions are being sought from other landowners to progress other parts of the proposed route. SLRG has applied to the Woodland Trust for some trees to help with this project.

Capability Fund funding has been awarded of £50,750 for LCWIP consultation and implementation studies, and the continuation of the Swale Cycle Recycle project.

Stages 1-4 of both the Swale and Sheppey Town LCWIPs have been completed and it has been decided to merge these into one Swale wide LCWIP (whilst ensuring the agreed and adopted Faversham LCWIP is also incorporated) and take this through the committee stage and public consultation in 2025.

A Sittingbourne Connectivity Study has commenced this year to better understand the area of Sittingbourne and agree proposed 'active travel corridors'. This study will enable us to calculate the costs for each corridor, calculate the calories burned by using each corridor and calculate the typical CO₂ emissions saved based on mode shift to walking and cycling.

The Community Infrastructure Grants have been established to support community infrastructure in Swale, using money allocated from two Government funds - the UK Shared Prosperity Fund (UKSPF) and the Rural England Prosperity Fund (REPF). Grants are available for capital investment and will prioritise investments for community benefit and include support for: Investment which improves the environmental and financial sustainability of community facilities/amenities through carbon reduction measures.



Image 2: Solar PV was installed on the roof of Graveney and Goodnestone village hall through the Community Infrastructure Grants.

Successful projects have encouraged walking and cycling or the use of electric vehicles through the installation of active travel infrastructure, bicycle racks, and EV charge points. Three village halls have been awarded grants to install solar PV, while other organisations have installed low energy lighting and water irrigation systems. Applicants have also been able to access advice from a low carbon advisor about their project. For example, they can receive advice about ensuring that the project is value for money and suggestions for improvements to the design of their project. The total grants awarded are currently projected to be £102,367.

Rural Swale Small Business Grant Using money allocated from the Rural England Prosperity Fund (REPF). This funding is available to support small rural businesses to make small capital investments to support growth and carbon reduction measures or support capital projects which help develop the local visitor economy. Businesses can also access support and advice from a Low Carbon Advisor to develop their project. Total grants awarded throughout the scheme amount to £21,000.

Resource Consumption and Waste

Dept.	Action	Timescale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Planning Policy	Provide guidance on waste minimisation and resource consumption via a Sustainable Design & Construction SPD.	Short	Medium	Not yet started Local Plan Review taking precedence. However, the Local Plan will address waste.	Not Started	
Environment & Leisure	Decrease the amount of household waste collected by promoting each separate method of recycling	Short	Medium	Use of KRP videos to promote behaviour change, along with social media campaigns driven by Swale	Some delays due to the new contract roll out KRP promotion on hold	On track
Environment & Leisure	Increase amount of garden and food waste collected for compost.	Short	Medium	Garden waste subscriptions are still fluctuating. The cost-of-living crisis and increase in subscription costs is having an impact on residents signing up	This year garden waste subscriptions have increased to 21,317 as of the end of December.	Started
Environment & Leisure	Encourage residents to recycle small electricals, textiles and batteries.	Short	Medium	Ongoing	This was removed from the new waste collection contract as a fortnightly kerbside service as there are more reliable options for residents this was promoted in our letters to residents during the service change and is included on our website. However, residents can include these items with bulky waste bookings and the contractor will run new drop-in events across each town in 2025.	On track
Environment & Leisure	Signpost residents to recycling facilities for products that cannot be recycled in the kerbside collections.	Short	Small	Waste Wizard tool now on website	As above update.	On Track

Climate and Ecological Emergency Annual Report 2025

Environment & Leisure	Reduce contamination of recycling that leads to rejected loads.	Short	Medium	Targeting of areas of high contamination and behaviour change communication	Unfortunately, contamination has increased this year. Suez have a project officer who will be working with our Education Officer to target this in 2025.	On track
Environment & Leisure	Encourage litter picks and measures to reduce the amount of plastic litter in the sea	Short	-	Ongoing	Swale has supported 20 volunteer litter pick groups throughout 2024.	On Track
Environment & Leisure	Work with KCC to stop export abroad of recyclables	Medium	-	Ongoing, although lack of UK infrastructure to recycle for some specific materials	As Dec 23	On track
Environment & Leisure	Influence KCC to maintain or improve the low levels of waste that go to landfill.	Medium	Small	Ongoing	Less than 1% of Swale waste goes to landfill.	On Track
Environment & Leisure	Promote reduced use of single-use plastic (e.g., in partnership with Plastic-Free Faversham and Plastic-Free Sheerness).	Short	Small	Ongoing	Officers have attended community events to promote the reduced used of single-use plastics e.g the Graveney Flower Festival during Great Big Green Week 2024, with a theme of recycling and flower displayed made from plastic waste.	On Track
Environment & Leisure	Work with Kent Resource Partnership on county-wide education/communication schemes	Short	Medium	Ongoing, Swale remain part of the KRP providing funding for county wide campaigns	KRP has reestablished in the later part of the year and is considering impacts from the new waste legislation focussed on Simpler Recycling.	On Track
Environment & Leisure / ECS	Promote improved recycling of commercial waste with businesses across the Borough	Long	Large	Applying to WRAP business waste pilot project. Providing information about Produced in Kent's 'Food Loop' programme. Sharing Blueprint to a Circular Economy information.	Produced in Kent no longer running Food Loop	Started

Table 7 Progress against resource consumption and waste actions

Climate and Ecological Emergency Annual Report 2025

Wherever possible, use of single-use plastics has been eliminated in Swale House and across our estate. Cleaning product packing has been changed. Drinks machines using plastic sachets have been removed. Vending machine – both food and drink – contracts were not renewed. Biodegradable tree guards are being used for tree and hedge planting in the Council's country parks. A sustainable events policy is being written for outdoor events which take place on Council land, alongside supplementary guidance.

Phase 2 of the Marine Town project was rolled out in October 2023 providing all Marine Town residents the ability to recycle their food waste and reducing refuse collections from weekly to fortnightly encouraging residents to recycle more. Officers have been working hard with the residents of the area providing recycling information and helping to ease any concerns residents had about the change. The project was also rolled out to the few remaining areas of the Borough that did not have this type of collection ahead of the to the start of the new waste contract.

Community litter picks have been supported.

We have continued to work with Defra and LARAC to help steer government policy around the changes to packaging waste legislation.

We support and promote the Repair Cafes in Faversham enabling a large range of household items to be repaired and reused rather than going to waste.

Ecology and Biodiversity

Dept.	Action	Timescale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Environment & Leisure	Establish a baseline of trees and woodland on council land and develop a funded action plan to increase tree cover in Swale and promote the benefits of sequestration.	Short	Medium	Ongoing and additional LATF funding applied for	LATF funded planting completed. LATF round 4 application unsuccessful for planting in winter 2024/2025.	On Track
Planning Development	Ensure the installation and maintenance of landscaping in new developments to contribute to biodiversity net gain via suitable conditions or Section 106 agreements.	Short	Medium	As a result of the Environment Act 2021 a requirement for mandatory minimum 10% Biodiversity Net Gain will come into effect in January/April 2024 for major/small sites schemes	10% Biodiversity Net Gain conditioned in planning permissions. Local Plan will require 20%	On Track
Environment & Leisure	Minimise use of fertilizers, pesticides and weed killers.	Short	Small	Use of pesticides is only undertaken as spot treatment on hard surfaces with contractors having converted to a chemical with a lower rate of active ingredient to further reduce pesticide use. Street cleansing contract to use alternative methods from 2024.	Throughout 2024 100 litres of pesticides in the form of Roundup Pro Active 360 was used. This is down from the 160 litres used throughout 2021.	On Track
environment & Leisure	Promote use of locally produced compost derived from garden and food waste collections	Short	Small	Unfortunately, the compost supplier unable to deliver.	Completed	
Environment & Leisure	Encourage coppicing of council woodland to promote biodiversity and use of local woodland products in Swale's country parks.	Short	Small	Discussion with local coppice contractors to identify appropriate timber from the felling plan for this season's contracts are ongoing. 1.5 Ha coppiced	0.38 hectares coppiced in 2024	On Track

Climate and Ecological Emergency Annual Report 2025

Environment & Leisure	Engage business and community groups to support tree planting and conservation work in Swale's efforts to achieve action 1	Short	Large	Continuing work supporting community groups. Also encouraging tree planting via Swale Green Schools Forum. Successful tree week.	A wide range of organisations have consistently been involved in tree planting efforts. These have included local primary schools, Friends of Milton Creek Country Park, and Friends of Faversham Rec.	On Track
Environment & Leisure	Promote forest and beach schools	Short	Small	Regular interaction with 20+ primary and secondary schools via the Swale Green Schools Forum	Benefits of forest and beach schools promoted through the Green Schools Forum. Continuing to work with and support local organisations which provide forest schools to local primary schools.	On Track
Environment & Leisure	Support Swale in Bloom working with schools, community groups, voluntary groups and Town and Parish Councils to enhance local habitats and wildlife corridors improving biodiversity conditions across Swale	Short	Small	Ongoing but no officer resource to support In Bloom. No funding for plant giveaways in Great Big Green Week	In-Bloom role now obsolete. Swale working with Kent Wildlife Trust Group and local farming cluster on the 3C's project to restore grazing saltmarsh along the Swale.	On Track

Table 8: Progress against ecology and biodiversity actions.

This planting season we have planted 6200 whips and 150 standard trees.

Five events were hosted across the borough during National Tree Week 2024. This saw hundreds of whips planted at Milton Creek Country Park and Faversham Recreation Grounds, tree guard removal and litter picking at Kingsborough Manor Community Woodland, and a guided tree walk through the King George V park.

We are reducing our use of pesticides, herbicides and fertilizer and encouraging the use of compost from food waste recycling. Work is underway to incorporate a term into allotment agreements that prevents the use of pesticides.



Image 3: Hedgerows planted during National Tree Week

Climate and Ecological Emergency Annual Report 2025

The renewed grounds maintenance contract also included increased provisions to reduce fertilisers, pesticides and weed killers, as well as a commitment to replace vehicles and tools with electric models from year one. The waste contract does not use any pesticides.

The Environment Grant scheme reopened in October using ring fenced funds from littering fines.

Developers are being encouraged to leave gaps in garden walls and fences for hedgehogs. Warning stickers from the Hedgehog Preservation Society have been added to strimmers and other heavy machinery used by SBC contractors, Blenwood. Operatives have also been made more aware of the need to protect wildlife through training talks.

This year 0.38 ha of coppicing occurred in Perry Wood. This brings work in line with the management plan. All the timber has been used for fencing locally. Coppicing enhances biodiversity, allowing wildflowers and insects to thrive as light reaches the woodland floor.

Our Green Grid network continues to grow and keeps like-minded organisations and individuals in touch. We publish a monthly e-newsletter with a mailing list of over 200 local businesses, parish councils, community groups and individuals. The combination of twice-yearly networking meetings. In April 2024 we visited the Lynsted Community Kitchen Garden – a new garden which started during Covid and now 201 members growing a wide variety of fruits, vegetables, and flowers organically. In October we visited Milton Creek Country Park to see the work of the Friends group and the new cabin which was partly funded by a Community Infrastructure Grant from Swale, using funding from the UK Shared Prosperity Fund



Image 5: Work begins at Conyer, where the restoration of coastal grazing saltmarsh is underway.



Image 4: Guests at the Green Grid autumn meeting, hosted by Milton Creek Country Park.

The drafted Local Plan includes policies to improve development outcomes with support for access and recreation, green spaces, biodiversity and climate change adaptation and mitigation. There are policies to ensure the installation and maintenance of landscaping in new developments to contribute to biodiversity net gain via suitable conditions or Section 106 agreements. We have gone beyond the Government requirement of a 10% biodiversity net gain and are seeking a net gain of 20%.

Climate and Ecological Emergency Annual Report 2025

We were approached in 2021 by the Kent Wildlife Trust to be their only Kent local authority partner in their Wilder Carbon Project which is investigating both offsetting and biodiversity net gain. We are working with them and a local landowner on a project exploring saltmarsh restoration in the Swale. Work has recently commenced at Conyer. A similar saltmarsh restoration/creation project is being undertaken by Peel Ports to make use of beneficial dredging materials. We are supporting the Zoological Society Of London in their Transforming the Thames project.

A cluster of thirty local farmers is working on the opportunities for biodiversity net gain in the Borough and has identified some sites and exploring the feasibility of others.

Energy Generation and Storage

Dept.	Action	Timescale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Property	Perform a viability survey at all existing council owned sites to potentially accommodate solar PV.	Medium	Small	Feasibility study commissioned and completed	Funding agreed for Solar on Swale House. Tender ongoing, and installation planned for 2025.	Complete
Environmental & Leisure / ECS	Signpost residents and businesses through communicating benefits, understanding financial and business cases for installing energy storage with grid balancing capability.	Long	Medium	General business engagement on energy and low carbon solutions continued, however no specific focus on energy storage due to lack of time, skills, and resources.	Not Started	
Environment & Leisure	Encourage and support community energy projects. Consider community energy as a financial investment.	Medium	Small	Encourage and support local community projects	Not Started	

Table 9 Progress against Energy Generation and Storage actions

Permission was been granted, by the Secretary of State, for the Cleve Hill Solar Park which is now under construction. This will consist of 800,000 solar panels over an area of approximately 360 hectares on the Graveney Marshes. It will have the capacity to generate 350MW of electricity and will have 700MW of battery storage.

The draft Local Plan includes policy on renewable technology at micro and macro levels.

Resilience, Adaptation and Offsetting

Dept.	Action	Timescale	Carbon Red. PA	Progress Dec 2023	Progress Dec 2024	Status
Planning Policy	Incorporate a policy on climate change adaptation in the local plan review	Short	-	Being progressed through the Local Plan Review	Timetable for Local Plan approved (LDS).	Started
Emergency Planning	Regularly update the Emergency Plan for the borough in partnership with the County Council	Short	-	Ongoing	Council website signposts people to the Kent and Medway Prepared website, which highlights resilience plans and actions to be taken in emergencies.	On Track
Planning Policy	Ensure the Local Plan reflects the level of current and future flood risk, and development in flood risk areas is avoided.	Short	-	Being progressed through the Local Plan Review	A Strategic Flood Risk Assessment is being undertaken as part of the emerging Local Plan. This will support better understanding of current and future flood risk.	Started
Planning Policy	Ensure the Local Plan provides for linking habitat restoration and creation to improve access, flood protection and water quality.	Short	-	Being progressed through the Local Plan Review	Emerging local plan to investigate habitat restoration and linkages through a suite of environmental policies, as well as the Councils Green and Blue Infrastructure Strategy.	Started
Planning Policy	Ensure the installation and maintenance of green infrastructure via the Local Plan and suitable conditions or Section 106 agreements in subsequent developments.	Short	Medium	Being progressed through the Local Plan Review and Planning Application decisions	The Green and Blue Infrastructure Strategy is to be a golden thread throughout the emerging Local Plan.	Started

Climate and Ecological Emergency Annual Report 2025

Planning Policy	Work with the Environment Agency, KCC and the Lower Medway Internal Drainage Board to manage flood risk and coastal erosion across Swale.	Medium	-	Ongoing	Planning Policy working on a range of environmental projects with the EA, KCC, and the LMIDB.	On Track
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Planning Policy	Work to restore natural processes within river systems to enhance water storage capacity and improve water quality.	Medium	-	Contact with LMIDB	The Council is supporting: <ul style="list-style-type: none"> • The 3C's project to restore grazing saltmarsh around Conyer Creek. • The ZSL Transforming the Thames/Restoring the Thamescape projects to restore seagrass beds, saltmarsh and native oyster beds in the Thames Estuary. 	On Track
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Planning Policy	Develop and start to implement a Nature Recovery Network, linking habitat restoration and creation to improved access, flood protection and water quality	Medium	Small	Planning Policy are working with KCC on the Local Nature Recovery Strategy. The Local Nature Recovery Network will be an important element of the forthcoming Local Plan	Policy and Resources Committee agreed to confirm that the Council is content with the Local Nature Recovery Strategy to go out for public consultation.	On track
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Climate and Ecological Emergency Annual Report 2025

Planning Policy	Work with Lower Medway Internal Drainage Board to minimize the long-term risk of flooding	Short	-	Ongoing	Planning Policy works closely with LMIDB on a number of projects.	On track
Emergency Planning	Make sure everyone can access the information they need to assess any risk to their lives, livelihoods, health and prosperity posed by flooding and coastal erosion;	Medium	-	Flood Awareness Week promoted via social media	Advice for resilience against major emergencies including flooding promoted on the Swale Borough Council website.	Started
Emergency Planning	Bring the public, private and third sectors together to work with communities and individuals to reduce the risk of harm – particularly those in vulnerable areas.	Medium	-	Promote third party events	Promotion of third-party events ongoing through CEE webpage and Green Grid Community Forum.	Started

Table 10 Progress against Resilience, Adaptation and Offsetting actions

The draft Local Plan includes policy on climate change adaptation.

Strategic Flood Risk Assessments have been undertaken and the Local Plan will reflect the level of current and future flood risk, and development in flood risk areas will be avoided.

The Local Plan will provide for linking habitat restoration and creation to improve access, flood protection and water quality, and the installation and maintenance of green infrastructure via suitable conditions or Section 106 agreements in subsequent developments.

We regularly update the Emergency Plan for the Borough in partnership with the County Council and make sure everyone is able to access the information they need to assess any risk to their lives, livelihoods, health and prosperity posed by flooding and coastal erosion.

We bring the public, private and third sectors together to work with communities and individuals to reduce the risk of harm – particularly those in vulnerable areas. We have supported communities in the development of their localised emergency and flood plans. We advertise the Environment Agency run awareness weeks.

Climate and Ecological Emergency Annual Report 2025

We are working with the Environment Agency, KCC and the Lower Medway Internal Drainage Board to manage flood risk and coastal erosion as appropriate across the Borough.

Looking forward

In 2019 the Council set very ambitious targets to reach net zero. This drove us to start on projects which might have been delayed otherwise – tree planting, LED roll out, car clubs, EV charging, the renovation of Swale House and the Master’s House, to name a few. Our efforts have been recognised by the Carbon Disclosure Project and Climate Emergency UK. Covid brought its challenges but also accelerated the use of virtual meetings and hybrid working, while paper use and business mileage has reduced dramatically.

Although we are moving in the right direction, it has become apparent that we will not achieve the aspirational target of being a net-zero council by 2025. There are numerous reasons for this, including a lack of financial support from national government, industry not being able to deliver the required infrastructure, and constantly changing offsetting situations. Despite this, we remain committed to reducing both our own emissions and in leading the residents and businesses of Swale on their own net-zero journey.

At Swale we have a small, dedicated team which has worked with the Steering Group to embed the cause across the entire organisation. The emergency impacts all our work. Staff recruitment and retention is an issue countywide with staff leaving for London and other unitary authorities.

This is a common feature across Kent, where all local authorities are in the process of revisiting their targets and producing freshened action plans. In doing this, the need to explore more joint working Kentwide has been recognised, and efforts are underway to develop these relationships.

Swale Council consulted with the Carbon Trust throughout 2024 to recalculate our carbon footprint, as well as model various carbon reduction scenarios going forward. We are also revisiting targets that were set for Borough wide net-zero, and in the process of developing a renewed Climate and Ecological Emergency Action Plan. This will set fresh actions to ensure that Swale Borough Council maintains our momentum.

The financial situation facing local authorities, as well as the cost-of-living crisis has limited our options and going forward, we will need to assess what is feasible.

The revised Climate and Ecological Emergency Action Plan will be put to the Environment and Climate Change Committee in the early part of 2025.

Climate and Ecological Emergency Annual Report 2025

Conclusion

The Climate and Ecological Emergency Action Plan was adopted in 2020 and was scheduled for review in 2025. The new Action Plan is due to be published in early 2025. As such, this is the final report based on the original action plan.

The past five and a half years have been extremely unusual and challenging and have certainly contributed to the hampering of the transition to net-zero. Yet in the time since Swale declared a Climate and Ecological Emergency the Council has remained strong in our ambition and achievements, both in the measures we have taken to decarbonise within our operations and influence wider net-zero throughout the Borough.

Among the highlights of our works are the electrification of the SBC fleet, the improvement of electric vehicle infrastructure across the borough, the establishment of car clubs in two of the district's towns, the use of the Public Sector Decarbonisation Fund to complete low-carbon refurbishments of Swale House and Masters House. The new refuse collection contract facilitates progressive savings and will oversee the use of more efficient and cleaner vehicles. Work on Biodiversity Net Gain is underway, while a progressive Local Plan is being developed.

The Council has forged strong partnerships with a wide range of businesses, community groups, and environmental organisations to engage and inspire residents around the topics of climate change and biodiversity loss, encouraging positive community action.

It is always the case that initial reductions in carbon emissions will be the easiest to make, and that without ambitious support from central government, substantial year-on-year cuts will become increasingly difficult.

While our new Action Plan will reflect these barriers, it will also build on the efforts and relationships that have been developed as the result of the 2020 Climate and Ecological Emergency Action Plan, ensuring that Swale Borough Council continues to lead by example and support the wider Borough in achieving net-zero.

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Full Council	
Meeting Date	29 January 2025
Report Title	Local Plan Review – Housing Historic Delivery & Local Plan Review Housing Target
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
SMT Lead	Joanne Johnson, Head of Place
Lead Officer	Stuart Watson, Project Manager (Planning Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That Full Council consider the approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the Planning and Transportation Policy Working Group (PTPWG) report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience. 2. That Full Council considers the proposed growth within the draft Plan Regulation 18 consultation of 7,990 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings). Delegation be given to Head of Place to amend figures, with the Policy and Resources Committee Chair and Vice-Chair, solely in line with any additional planning permissions granted, new dwellings completed, annual changes in government published statistics and any evidence which concludes previously granted or allocated sites are no longer deliverable.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to ask Full Council to agree the proposed housing target approach as reported to the Policy and Resources committee (P&R) on 27th November 2024. The P&R report is provided in Appendix I.

- 1.2 It should be noted that the figures in recommendation 2 will fluctuate over time as the Local Housing Need that informs the starting point for the local housing target is updated annually by Government statistics or through changes to National Policy. The figures will also need to be updated as additional planning permissions are granted, new dwellings are completed, and new information comes forward on

sites which demonstrates them to no longer be deliverable. Finally, there also maybe be the need to amend the figures as the Local Plan moves forward and detailed evidence is developed to investigate if there any hard constraints to meeting the Local Housing Need.

2 Background

- 2.1 A report on the Council's historic housing delivery and proposed housing target approach was taken to PTPWG on the 8th August and that report provides detail on these issues and is provided in Appendix II.
- 2.2 There was discussion at P&R on the 27th November 2024 that amongst other matters included the possibility of a reduced housing target for the Council as identified from the findings of the Housing Targets Exceptional Circumstances Study (Appendix III).
- 2.3 The Housing Targets Exceptional Circumstances Study was produced for the Council in response to changes to the National Planning Policy Framework (NPPF) in December 2023 which stated nationally set housing targets were advisory, rather than mandatory and could be departed from where 'exceptional circumstances' could be evidenced. The study addresses two distinct elements to help inform whether there is a case for a lower housing target. They are:
 - **Housing need** – whether exceptional circumstances exist to justify calculating need using a methodology other than the Governments imposed standard method,
 - **Housing requirement** – whether there are wider factors (essentially constraints / opportunities, unmet need issues and supply options) exist to justify adopting a housing requirement below the housing need.
- 2.4 The Study found that there was not exceptional circumstances to depart from the Government's imposed standard method of calculation but there might be the possibility through the housing requirement. This means the starting point for determining the housing target for the Local Plan is the use of the Government's imposed standard method of calculation. The output of the calculation is known as Local Housing Need.
- 2.5 The Local Housing Need for Swale for the monitoring year 2024/25 was 1,040 dwellings per annum under the NPPF December 2023 version. The Government in its July 2024 consultation for the National Planning Policy Framework proposed amending the standard method for calculating Local Housing Need.
- 2.6 The July 2024 consultation proposed amendments to the Standard method calculation that included changing the Governments statistics from household growth projections to an existing house stock base starting point and use of a 3 year average on affordability of new dwellings. If those changes were to have been adopted it would change have changed the Councils Local Housing Need for this

monitoring year to 1,061 dwellings. In December 2024 the Government published its latest version of the NPPF that included minor changes to the standard method as proposed in July 2024, that includes increasing the historical period of housing affordability consideration from 3 years to 5 years and an adjustment to the mathematical formula. Under the NPPF December 2024 the Councils Local Housing Need has now changed to 1,048 dwellings and increase of 8 dwellings on the approach set out in the NPPF December 2023.

- 2.7 Since P&R committee on the 27th November 2024, the latest version of the NPPF was published in December 2024 providing certainty to the Governments imposed standard method of calculating Local Housing Need. The new standard method is different to that proposed in July 2024 and has resulted in a lower housing need for Swale than anticipated. This means that the extra 336 dwellings that were added to the Local Plan Housing target for potential NPPF changes to the standard method in the P&R proposals can now be removed.
- 2.8 The approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, includes a 5% buffer to the target. One of the purposes of the buffer is to ensure that there is resilience to the Council's approach removing the need to review the figures in detail when there are minor fluctuations as is the case in the Local Housing Need calculation as set out above in paragraph 2.6 of this report.
- 2.9 As the Local Plan drafting progresses through evidence development and consultation, there may become identified planning reasons that set out hard constraints to strategic development that may result in a lower housing requirement for the Plan period. At that point it would then be appropriate to amend in detail the Councils Local Plan housing target.

3 Proposals

- 3.1 On 27th November 2024, P&R resolved:
 1. That Full Council considers the Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience, and along with the extra 336 dwellings set out in the current NPPF consultation be taken forward for consultation in the Local Plan Review Regulation 18.
 2. That Full Council considers the proposed growth within the draft Plan Regulation 18 consultation of 8,326 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings), and additional units to allow for the proposed new NPPF housing target (336 dwellings) be taken forward for consultation in the Local Plan Review Regulation 18, and delegation be given to Head of Place

to amend figures, with the Committee Chair and Vice-Chair, solely in line with additional planning permissions granted, new dwellings completed and any evidence which concludes previously granted or allocated sites are no longer deliverable.

3.2 Since P&R committee the latest version of the NPPF was published in December 2024 providing certainty to the Governments imposed standard method of calculating Local Housing Need. This means that the extra 336 dwellings that were added to the Local Plan Housing target for potential NPPF changes can now be removed. As a result, the proposals to Full Council can be amended to:

1. That Full Council consider the approach to setting a Local Plan housing target, as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience.
2. That Full Council considers the proposed growth within the draft Plan Regulation 18 consultation of 7,990 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings), and that delegation be given to Head of Place to amend figures, with the Policy and Resources Committee Chair and Vice-Chair, solely in line with any additional planning permissions granted, new dwellings completed, annual changes in government published statistics and any evidence which concludes previously granted or allocated sites are no longer deliverable.

4 Alternative Options Considered and Rejected

- 4.1 No alternatives are put forward with regard to historic housing delivery, as that is a presentation of factual, historic information.
- 4.2 Officers outlined in the PTPWG report that there are limited options for alternative housing targets. Pursuing a lower housing target is unlikely to result in a Local Plan proceeding successfully through examination. The Housing Targets Exceptional Circumstances Study discussed at P&R has some limited windows open for reducing the housing target. However, at this stage of Local Plan preparation the Council must use the Local Housing Need figure as determined by the Governments imposed standard method as the starting point, and then gather evidence to see if those windows open.

5 Consultation Undertaken or Proposed

- 5.1 Consultation is proposed for the Local Plan Regulation 18 to take place from October 2025, which would include the Local Plan housing target approach as discussed if the recommendations in this report are taken forward.

6 Implications

Issue	Implications
Corporate Plan	The Local Plan is responsible for delivering the spatial elements of the Corporate Plan.
Financial, Resource and Property	This paper has no specific financial or resource implications.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	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 Appendix I P&R report LPR Housing Historic Delivery LPR Housing Targets.
- 7.2 Appendix II Local Plan Review Housing historic delivery and housing target report PTPWG 8th August 2024
- 7.3 Appendix III Housing Targets Exceptional Circumstances Study

8 Background Papers

- 8.1 Planning and Transportation Policy Working Group 8th August 2024 minutes link:
[PTPWG 8th August 2024 printed draft minutes](#)

- 8.2 Policy and Resources Committee 27th November 2024 minutes link:
[P&R 27th November 2024 printed draft minutes](#)

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Policy and Resources Committee	
Meeting Date	27 November 2024
Report Title	Local Plan Review – Housing Historic Delivery & Local Plan Review Housing Target
EMT Lead	Emma Wiggins Director of Regeneration and Neighbourhoods
SMT Lead	Joanne Johnson Head of Place
Lead Officer	Stuart Watson Project Manager (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to recommend to Full Council that the Local Plan housing target as set out in paragraphs 3.1 and 3.2 of the PTPWG report on Housing Historic Delivery and Local Plan Review Housing Targets, including the 5% buffer for consultation and examination resilience, and along with the extra 336 dwellings set out in the current NPPF consultation is taken forward for consultation in the Local Plan Review Regulation 18. 2. Members of the Policy and Resources committee are recommended by the Planning and Transportation Policy Working Group to recommend to Full Council that the proposed growth within the draft Plan Regulation 18 consultation of 8,326 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance of housing need (6,287 dwellings), and additional units to allow for the proposed new NPPF housing target (336 dwellings) be taken forward for consultation in the Local Plan Review Regulation 18, with these figures delegated to be amended by the Head of Place, in consultation with the Committee Chair, solely in line with additional planning permissions granted, new dwellings completed and any evidence which concludes previously granted or allocated sites are no longer deliverable. 3. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to support – and agree funding for – site-specific transport modelling for each of the six growth options under consideration, in advance of Reg 18 consultation.

	<p>4. Member of the Policy and Resources Committee are recommended by the Planning and Transportation Working Group to support - and agree funding for – additional sustainability work, in advance of the Regulation 18 draft Plan consultation, namely research into unsustainable commuting patterns.</p> <p>5. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to delegate to officers, in consultation with the Chairs of the Policy and Resources Committee and Planning and Transportation Policy Working Group, to update the Local Development Scheme to accommodate this additional work, and to take directly to Full Council in December 2024.</p> <p>6. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to support the deferral the Vision, Objectives and Growth Options paper at Full Council, to allow further evidence to be gathered prior to a recommendation being made.</p>
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1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to seek recommendation to Full Council of the proposed housing target as reported to the Planning and Transportation Policy Working Group (PTPWG) on 8th August 2024. The PTPWG report is provided at Appendix II. The minutes of the 8th August PTPWG meeting are provided in Appendix III.
- 1.2 It should be noted that the figures in resolution 2 will fluctuate over time as the Local Housing Need that informs the starting point for the local housing target is updated annually by Government statistics or through changes to National Policy. The figures will also need to be updated as additional planning permissions are granted, new dwellings are completed, and new information comes forward on sites which demonstrates them to no longer be deliverable. Finally, there also maybe be the need to amend the figures as the Local Plan moves forward and detailed evidence is developed to investigate if there any hard constraints to meeting the Local Housing Need.
- 1.3 The report highlights additional recommendations from the Planning and Transportation Policy Working Group in response to its consideration of the Housing Targets Exceptional Circumstances Study (Appendix IV) on 13th November 2024.

2 Background

- 2.1 An earlier report on the Council's proposed housing target approach was taken to Policy & Resources (P&R) Committee on 11th September 2024. The Committee resolved to defer consideration of the report until Members of PTPWG had been able to view the Housing Targets Exceptional Circumstances Study (Appendix IV). The minutes of P&R on the 11th September are provided in Appendix I.
- 2.2 The Housing Targets Exceptional Circumstances Study was in response to changes to the National Planning Policy Framework (NPPF) in December 2023 which stated nationally-set housing targets were advisory, rather than mandatory and could be departed from where 'exceptional circumstances' could be evidenced. The study addresses two distinct elements to help inform whether there is a case for a lower housing target. They are:
- **Housing need** – whether exceptional circumstances exist to justify calculating need using a methodology other than the standard method,
 - **Housing requirement** – whether there are wider factors (essentially constraints / opportunities, unmet need issues and supply options) exist to justify adopting a housing requirement below the housing need.
- 2.3 The discussion at PTPWG on 8th August 2024 involved the discussion of two matters: historic housing delivery, and Local Plan Review housing targets. The historic housing delivery information was noted, with the focus of the debate on the Local Plan Review housing targets. The draft minutes of the meeting provided at Appendix II provide a commentary of the debate.
- 2.4 It should be noted that between the PTPWG papers being issued, and the meeting taking place on 8th August, the consultation on the draft National Planning Policy Framework (NPPF) was published, along with a draft new approach to setting a Local Housing Need for an authority that is the starting point for determining a Local Plan housing target. At the time of writing this report the proposed changes have not been adopted into National Planning Policy. However, one of the purposes of the housing target resilience buffer of 5% is to accommodate increases in target through possible changes to the Local Housing Need for the Council.
- 2.5 The Housing Targets Exceptional Circumstances Study was presented to PTPWG on 13th November 2024. There was discussion at the meeting on the following topics:
- The national issue of dwelling stock discrepancies between Local Authority monitoring and the census counts and the need to investigate in detail the discrepancy of an additional 3,000 dwellings identified in the study between the Councils own monitoring of additional dwelling stock growth and the published Census data;
 - Transport concerns were raised by members from findings in the study including high levels of out commuting from the borough. ; and

- And that both the transport impacts and sustainability of the Local Plan Review growth options be assessed in detail before a decision could be made on a preferred option and selection of allocated sites.

3 Proposals

3.1 On 8th August 2024, PTPWG resolved:

- 1 That the Local Plan housing target as set out in paragraphs 3.1 and 3.2 of the [PTPWG] report, including the 5% buffer for consultation and examination resilience for the draft Plan Regulation 18 Plan consultation, be recommended to Policy and Resources Committee, along with the extra 336 dwellings set out in the current NPPF consultation;
- 2 That the proposed growth within the draft Plan Regulation 18 consultation be 8,326 dwellings, including the review of the remaining Local Plan Bearing Fruits (1,703 dwellings), as well as the balance housing need (6,287 dwellings)., and the additional units subject to the amended wording as minuted (336 dwellings).

3.2 On 13th November 2024, PTPWG resolved:

1. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to support – and agree funding for – site-specific transport modelling for each of the six growth options under consideration, in advance of Reg 18 consultation.
2. Member of the Policy and Resources Committee are recommended by the Planning and Transportation Working Group to support - and agree funding for – additional sustainability work, in advance of the Regulation 18 draft Plan consultation, namely research into unsustainable commuting patterns.
3. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to delegate to officers, in consultation with the Chairs of the Policy and Resources Committee and Planning and Transportation Policy Working Group, to update the Local Development Scheme to accommodate this additional work, and to take directly to Full Council in January 2025.
4. Members of the Policy and Resources Committee are recommended by the Planning and Transportation Policy Working Group to support the deferral the Vision, Objectives and Growth Options paper at Full Council, to allow further evidence to be gathered prior to a recommendation being made.

3.3 It is standard practice in plan making to undertake traffic modelling for the preferred growth option as part of Reg 18 draft Plan consultation work, and as such officers

have budgeted for one option to be modelled. This is within the budget envelope for the Local Plan. To model all six options (an additional five) will cost an estimated extra £13,000 per additional scenario, totalling £65,000 for the additional five. Synergies between some of the growth options may reduce this cost if we proceed to commissioning. This is an additional cost that PTPWG have requested P&R Committee agree to resource.

3.4 Transport modelling all six options would be a highly unusual departure from standard practice and was not initially recommended by officers. This is due to the work not adding substantial value to the growth options decision-making process. Whilst different growth options may require different levels of mitigation, transport is one of a collection of considerations when choosing a vision for growth within the Borough. Further, this work would result in delays to drafting the Plan, and ultimately adoption (with the associated and inherent risks of an out of date Local Plan), and create additional costs. The work is also likely to demonstrate that each growth option could be deliverable with mitigation setting out what infrastructure amendments and additions would be required, deliverability issues including costs and time frame involved. Further, the extra traffic runs would not allow the Council to exclude any of the options at this stage of Plan drafting. Whilst the Housing Targets Exceptional Circumstances study (appendix IV) sets out concerns regarding transport and the unique challenges of the geography of Swale/Kent and that J7 (Brenley Corner), where the M2 and A2 currently has no committed national improvement scheme. It is for the transport modelling to assess those constraints and provide the detail on the mitigation required. In consideration that all options can be mitigated for on transport matters the process of choosing a preferred growth option is part of setting the Council's vision for the Local Plan that provides the strategic approach that resonates most strongly with the perceived development needs and opportunities of the borough.

3.5 With regards to on sustainability. As part of choosing the Regulation 18 draft Plan approach a Sustainability Appraisal^[1] and Habitats Regulation Assessment^[2] is already intended to be carried out before consultation that will assess the preferred growth option and reasonable alternatives, including preferred allocated sites and discounted sites identified in the Council's Housing and Economic Land Availability Assessment. A Sustainability Appraisal assesses a draft Local Plan with a view to avoiding and mitigating adverse effects and maximising the positives with the aim to ensure that the plan contributes to the achievement of sustainable development. The Sustainability Appraisal is an iterative process which runs alongside the development of a plan informing the decision-making process and is consulted upon alongside the draft Plan. The appraisal sets out a series of objectives for the Plan that include, Air quality, Biodiversity, Climate

^[1] NPPF 2023 paragraph 32 sets out the purpose of a sustainability appraisal to be "...demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)

^[2] a Habitat Regulations Assessment is required any time a development project is being carried out on a European site that is protected by Habitat Regulations. This would include SPAs, SACs, Ramsar sites and any areas that have been secured to compensate for damage caused to a European site.

change mitigation, Communities, Economy and employment, Flood risk, Heritage, housing, Land, Landscape, Transport and Water. The transport element of the Sustainability Appraisal has parts of the assessment is informed by outputs from the transport modelling including the identified mitigation requirements. This means that the issues of sustainability of the Local Plan is assessed through a Sustainability Appraisal that is developed alongside and informs the drafting of the Local Plan. Therefore, these matters are programmed into the Local Plan process and require no additional transport evidence or further funding.

- 3.6 If the additional work on unsustainable commuting patterns is to be carried out, officers will agree a brief/scope of the work with the PTPWG Chair. Officers will also need to look for precedent examples of this type of study, as we are not aware of this type of commission locally. At this stage due to the complex nature of identifying the actual social causes of out commuting and transport patterns this work is estimated cost in the region of £35,000. This evidence is not recommended by officers as it is not a statutory requirement for Plan making and will likely only demonstrate the necessity to ensure that proposed development is sustainable. The objective of sustainability in Plan making is required within National Planning Legislation and Policy, the NPPF 2023 Paragraph 16a that states Plans “*be prepared with the objective of contributing to the achievement of sustainable development*” This objective is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

4 Alternative Options Considered and Rejected

- 4.1 No alternatives were put forward with regard to historic housing delivery, as that is a presentation of factual, historic information.
- 4.2 Officers outlined in their report that there are limited options for alternative housing targets. Pursuing a lower housing target is unlikely to result in a Local Plan proceeding successfully through examination without substantive evidence.
- 4.3 For transport modelling, as discussed in the report, officers recommended approach is to test the preferred growth option only and not the alternatives as it is likely each approach would be deliverable with varying levels of mitigation required, including possible constraints in the Plan’s short term that would then be made up in the later years of the Plan period through a “stepped trajectory.”
- 4.4 For the unsustainable commuting patterns research as discussed in the report, officers recommended approach is to not proceed with this work as the principles this work will identify will confirm the need to ensure for sustainable development an objective already established in Plan Making legislation and Policy.

5 Consultation Undertaken or Proposed

- 5.1 Consultation is proposed for the Local Plan Regulation 18 to take place from May 2024, which would include the Local Plan housing target approach as discussed if the recommendations in this report are taken forward.

6 Implications

Issue	Implications
Corporate Plan	The Corporate Plan includes the dedicated action: A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	If the additional transport modelling and unsustainable commuting patterns studies are agreed this will add a pressure of approximately £100,000 to the budget requirement which is already under significant pressure. The use of reserves is required to balance the draft budget and this request for further funding increases the budget gap.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	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 Appendix I Printed minutes 11th September 2024 Policy and Resources Committee.
- 7.2 Appendix II Local Plan Review Housing Historic Delivery and Local Plan Review housing targets discussion PTPWG 8th August.
- 7.2 Appendix III Printed minutes 8th August 2024 Planning and Transportation Policy Working Group.
- 7.3 Appendix IV Housing Targets Exceptional Circumstances Study 2024

8 Background Papers

- 8.1 None

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Planning and Transportation Policy Working Group	
Meeting Date	8th August 2024
Report Title	Local Plan Review - Housing historic delivery and Local Plan Review housing targets
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officers	Stuart Watson, Project Manager (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That members of Planning and Transportation Policy Working Group are asked to recommend to Policy and Resources the Local Plan housing target as set out in paragraphs 3.1 and 3.2 of this report, that includes a 5% buffer for consultation and examination resilience for the draft Plan Regulation 18 Plan consultation. 2. Members are also asked to recommend to Policy and Resources Committee that proposed growth within the draft Plan Regulation 18 consultation should be for 7,990 dwellings that includes review of the remaining Local Plan Bearing Fruits (1,703 dwellings) as well as the balance housing need (6,287 dwellings).

1. Introduction

- 1.1 As part of preparing the draft Plan Regulation 18 document it is necessary to agree the housing target for the Plan consultation. Setting the housing target will then identify what the balance of housing need will be after existing known supplies of land have been considered. This balance of housing need will determine what additional land should be considered for allocation in the Regulation 18 consultation.
- 1.2 This paper sets out two main issues:
- Housing historic delivery up to 1 April 2024; and,
 - Local Plan Review Housing target and balance of housing need.

2. Historic housing delivery up to 1 April 2024

- 2.1 The Local Plan Bearing Fruits 2017 (LPBF 2017) Strategic Policy 2 (ST2) sets out the Borough's development targets for the life time of the Plan (years 2014 to 2031). For housing the target set was 13,192 or 776 dwellings per annum with 618 dwellings having

been completed by the time of the Plan's examination in 2016. Strategic Policy 3 (ST3) of LPBF 2017 then set out the settlement hierarchy for the borough and the growth strategy for the new dwellings proposed within the Plan.

- 2.2 Table 4.3.4 (page 54) in LPBF 2017 sets out the Growth Strategy for the Plan by settlement hierarchy and is a predominately Sittingbourne (tier 1 settlement) led approach with moderate levels of development set for Faversham (tier 2), Queenborough and Rushenden, and Minster and Halfway (tier 3).
- 2.3 Analysis has been carried out to determine the actual performance of housing land supply and delivery since examination of the Plan against the growth targets of LPBF 2017, with the findings set out in table 1 below.
- 2.4 Between 1 April 2016 and 31 March 2024, 6,082 dwellings have been delivered and including the 618 before examination of the Plan gives a total dwellings completion of 6,700 during the Plan life time to date, an average of 670 dwellings per annum (6,700 dwellings/10 years). This means that 51% of the intended dwellings for the Plan period have been delivered ($6,700/13,192 * 100$) in the first 10 out of 17 years and gives a good indication the LPBF 2017 is on course to meet the objectives that were set for housing growth.
- 2.5 In addition to completions during the Plan period there is also a significant amount of dwellings that have gained planning consent but have not yet been built out. At 1 April 2024 there were 7,047 dwellings consented and not built out totalling 53.4% of the LPBF 2017 target ($7,047/13,192 * 100$) and this provides a strong indication that the existing Plan strategy will continue to perform well against its housing target.
- 2.6 Table 1 below sets out the quantum of dwellings that have been delivered and those consented but not built out and their location against the targets of LPBF 2017. When comparing the location of completed dwellings and those consented and not built out against the LPBF 2017 growth targets it can be identified that growth in Sittingbourne and Queenborough and Rushenden are falling considerably short of target by 16.8% and 11.2% respectively whilst growth in other non Plan target areas has been considerable, in excess of 21.7%. This means that whilst lower tier settlements' targets have been broadly met, targets for two of the Borough's highest settlements have been considerably missed. The location of the top 5 other settlements not in the Plan target areas has been set out in table 2 below.
- 2.7 Under the LPBF 2017 target to deliver 13,192 dwellings, 6,700 dwellings have been completed with 7,047 dwellings consented, which means that there is a positive balance of 555 dwellings to date providing that all permitted dwellings are built out.
- 2.8 Table 3 below sets out that at 1 April 2024 there only remains 1,703 dwellings on Local Plan Bearing Fruits 2017 allocated sites that have not been consented and their location against the Plans growth strategy. The table shows that Sittingbourne and Queenborough & Rushenden have the two largest amounts of dwellings left to gain

planning from allocated land whilst there are only minimal allocations in other settlements in the growth strategy.

2.9 Whilst the data presented demonstrates the Council is making good progress against the targets set out in the Local Plan Bearing Fruits 2017, the NPPF on Plan making and housing targets has since been amended. These amendments include the requirement to review Local Plans that are more than 5 years old and as part of that review to use the Government’s Standard method for calculating a local housing need. The Council’s local housing need under the Government’s standard method in April 2024 is 1,040 dwellings per annum. This is an increase of 264 dwellings against the LPBF 2017 annual target of 776, which is an uplift in requirement of 34%. The next section below looks at the Councils Local Housing need at 1 April 2024 and how it determines a housing target for the draft Plan Regulation 18 consultation that is scheduled for later this year.

Table 1. Local Plan Bearing Fruits 2017 target comparison to supply and completions 1 April 2024

	LPBF 2017 target	Actual Performance (completions + extants)	Difference	Total (completions + extants)	% extant permissions 2023/24	Extant permissions 2023/24	% Completions	Completions 2016/17 to 2023/24
Sittingbourne	43.5%	26.7%	-16.8%	3,518	29%	2,065	24%	1,453
Faversham	17.1%	16.3%	-0.8%	2,155	10%	734	23%	1,421
Sheerness *0%	0.0%	3.3%	3.3%	431	2%	131	5%	300
Queenborough and Rushenden	12.3%	1.1%	-11.2%	140	0%	2	2%	138
Minister and Halfway	14.7%	15.5%	0.8%	2,037	19%	1,370	11%	667
Boughton *below 1 %	0.4%	0.2%	-0.2%	25	0%	10	0%	15
Teynham	4.0%	3.8%	-0.2%	495	5%	330	3%	165
Newington	1.3%	3.1%	1.8%	405	3%	227	3%	178
Iwade	6.0%	4.7%	-1.3%	618	7%	521	2%	97
East Church *below 1 %	0.2%	0.7%	0.5%	95	0%	6	1%	89
Leysdown *below 1 %	0.1%	3.1%	3.0%	409	0%	11	7%	398
Other		21.7%		2,855	23%	1,640	20%	1,215
Total				13,183	100%	7,047	100%	6,082

Table 2. Parishes with five largest supply and completions not within Local Plan Bearing Fruits 2017 strategic approach 1 April 2024

	% Total (other location completions + extants)	Total (completions + extants)	% extant permission 2023/24	Extant permissions 2023/24	% Completions	Total completions 2016/17 to 2023/24
Borden	29%	739	43%	713	3%	26
Tonge	25%	652	24%	391	27%	261
Bapchild	17%	449	18%	293	16%	156
Upchurch	9%	240	7%	113	13%	127
Bobbing	7%	187	4%	60	13%	127

Table 3. Location and quantum of remaining Local Plan Bearing Fruits allocations without planning consent at 1 April 2024

	LP 2017 allocations not consented (%)	LP 2017 allocations not consented (dwellings)
Sittingbourne	24%	407
Faversham	5%	88
Sheerness		
Queenborough and Rushenden	61%	1043
Minister and Halfway	4%	60
Boughton	1%	21
Teynham	3%	43
Newington		
Iwade	2%	31
East Church		
Leysdown	1%	10
Total	100%	1703

3. Housing target and balance of housing need April 2024

- 3.1 The Council's local housing need is determined by the current Government's Standard Method that applies the Office for National Statistics (ONS) household projections for 2014 with an uplift based on the affordability ratio for average house prices to average workplace based earning (ONS 2023). The local housing need for Swale is currently

1,040 dwellings per annum - a change from 1,086 dwellings at 1 April 2023. This change is largely due to the affordability ratio dropping from 10.95 to 9.6 in March 2024 and a slightly lower household projection for the years 2024 to 2034. **Under the standard method the Council's need for the Plan period to 2040 (16 years) would be 16,640 dwellings.**

- 3.2 For the purpose of Plan drafting and resilience through the consultation process and Plan examination process it is appropriate to apply a buffer to this figure to cover any removal of housing sites. A buffer of 5% should ensure that there will not be the need to consult on further sites late in the Plan drafting process. **Applying a 5% resilience buffer to 16,640 dwellings for the proposed Plan period would result in a proposed Local Plan housing target of 17,472 dwellings.**
- 3.3 When considering how the housing target will be addressed during the Plan period it is appropriate to make an allowance for existing supplies of housing land supply and a projection for likely market trends. These forms of supply will greatly reduce the need for new land to be found for allocation and include:
- the extant stock of sites with planning consent considered deliverable during the Plan period;
 - the remaining Local Plan Allocations without planning consent that could be rolled forward into the Local Plan Review;
 - made Neighbourhood Plan allocations without planning consent; and,
 - an allowance for sites (known as windfall) that would come through the market and gain planning consent during the Plan period that have not been identified in the Local Plan.
- 3.4 With regards to known supply the Planning Policy officers identified that at 1st April 2024 there were 7,047 dwellings on sites with planning consent that have not been built out. The monitoring also identified that there were 1,703 dwellings on the remaining stock of Local Plan allocated sites without planning consent.
- 3.5 Further, the Council can also include recently made Neighbourhood Plan allocations or those likely to be made that have not gained planning consent. This includes both the Boughton-Under-Blean and Dunkirk Neighbourhood Plan (made 2023) that allocates 1 site for 12 dwellings and The Faversham Neighbourhood Plan (referendum Autumn/Winter 2024) that proposes 10 allocations totalling approximately 219 dwellings. The Faversham Neighbourhood Plan, once made, will supersede the Faversham Creek Neighbourhood Plan including any remaining allocations from that Neighbourhood Plan.
- 3.6 Based on windfall sites analysis carried out to support the Council's 5 year housing land supply position at a base date of 1st April 2024, it can be determined that after existing permitted small sites (1 to 4 homes) have been considered to be built in years 1 to 3 of the Plan period the Council can expect a small sites windfall allowance of 80 dwellings per year for the remaining 13 years of the proposed 16 year Plan period. This means there is a potential small sites windfall allowance of 1,040 dwellings for the Plan period.

- 3.7 A further windfall allowance can be made for large sites (5 or more dwellings) during the Plan period after both existing permitted large sites have been built out and non strategic site allocations will have been considered built out in years 1 to 10 of the Plan period. Based on this approach the Council can expect a large sites windfall allowance of 194 dwellings per year for the last 6 years of the proposed plan period. This means there is a potential large sites windfall allowance of 1,164 dwellings for the Plan period.
- 3.8 Table 4 below sets out the housing land supply knowns and allowances and that at 1st April 2024 demonstrate there is a balance of housing need for the Local Plan Review of 6,287 dwellings.
- 3.9 Due to the length of time since the Local Plan “Bearing Fruits” was adopted it is appropriate to reassess the remaining allocations without planning consent to determine if they still remain suitable and deliverable for the new plan period. However, this approach is not necessary for the Neighbourhood Plan allocations due to their having either been made recently or likely to be made before submission of the Local Plan.
- 3.10 **This means that future growth of the Borough should Plan for a total 7,990 dwellings (1 April 2024) that would include review of dwellings on remaining Local Plan allocations (1,703) as well as the balance of dwellings need (6,287).**

Table 4. Balance of housing need for the proposed Plan period under Government Standard method

A	Local Plan Housing need target 2024 to 2040	17,472	
B	Extant planning consents		7,047
C	Remaining LP 2017 allocations		1,703
D	Neighbourhood Plan allocations		231
E	Small windfall sites allowance		1,040
F	Large windfall sites allowance		1,164
G	Known supply and allowance (B to F)	11,185	
	Dwellings requiring new land allocation (A-G)	6,287	

4. Proposals

- 4.1 That members of Planning and Transportation Working Group are asked to recommend to Policy and Resources committee the Local Plan housing target as set out in paragraphs 3.1 and 3.2 of this report, that includes a 5% buffer for consultation and examination resilience for the draft Plan Regulation 18 Plan consultation.
- 4.2 Members are also asked to recommend to Policy and Resources committee that proposed growth within the draft Plan Regulation 19 consultation should be for 7,990 dwellings that includes review of the remaining Local Plan Bearing Fruits (1,703 dwellings) as well as the balance housing need (6,287 dwellings).

5 Alternative Options Considered and Rejected

- 5.1 The National Planning Policy Framework amended in December 2023 changed housing targets from statutory to advisory (in certain, evidenced circumstances) and allows for Councils to consider an alternative lower target than that set by the Standard Method for setting a Local Housing Need. The Council commissioned evidence to identify whether there is an exception circumstance for a lower housing requirement for Swale with early findings indicating that there were not. Since publication of the December 2023 NPPF a new Government was elected in July 2024 with a mandate of changing housing targets back to mandatory and increasing yearly build out rates for the nation from 300,000 to 370,000 dwellings.
- 5.2 At time of writing this report a consultation on the next version of the NPPF has just been launched that does not fundamentally changed the approach to Plan making. However, the consultation includes an alternative standard method of applying the MHCLG dwelling stock estimates 2023 and applying an uplift based on the affordability ratio of average house price to average workplace based earning (ONS 2023). The proposed approach would increase the local housing need for Swale from 1,040 to 1,061 dwellings, an increase of 336 dwellings over the proposed Plan period. At this stage any changes to the NPPF and standard method are only those proposed and are subject to consultation and could be changed. This means that use of the existing standard method for calculating a local housing need provides a starting point for Local Plan Review housing target. Should the revised Standard Method become adopted then this increase in housing requirement could be accommodated through the 5% resilience buffer as presented in this report.
- 5.3 The 5% resilience buffer to the Council's Local Housing need has been discussed informally with members and is presented as a reasonable option to ensure that there will not be a need to consult on additional sites late in the Plan drafting process.

6 Consultation Undertaken and Proposed

- 6.1 The approach to setting a Local Plan housing target and proposed growth within the Local Plan Review has been discussed informally with members of this working group. The Local Plan Review draft Plan Regulation 18 that will go out for statutory consultation later this year will provide formal consultation on these matters.

7 Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the economic objective of the Corporate Plan – To progress a Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	The implications of this report will have no specific budgetary implications.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	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.

Housing Targets Exceptional Circumstances Study

Swale Borough Council

September 2024

Quality information

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Table of Contents

1. Introduction	1
Objectives	1
Outline of this report.....	4
2. Context	6
Swale Local Plan Review	6
Definitions	7
3. Approach	9
4. Housing Need	11
Introduction	11
Household Growth & Housing Delivery	11
Review of Standard Method Demographic Inputs	17
Comparison of Projections and Outturn.....	17
Inputs to Standard Method Calculation	19
Demographics.....	20
Affordability Uplift	22
Review of Economic Trends.....	25
The Use of Alternative Approaches	28
Example 1: Isle Of Wight.....	28
Example 2: Oxford	30
Conclusion	32
5. Housing Requirement	34
Introduction.....	34
Growth Opportunities	35
Environmental Constraints	40
Viability and Deliverability.....	49
Sources of Land Supply	57
6. Conclusions	63
Recommendations	64

1. Introduction

- 1.1.1. AECOM was commissioned in April 2024 to undertake a ‘Housing Targets Exceptional Circumstances Study’ in support of the emerging Swale Local Plan Review (LPR).
- 1.1.2. During the course of the study the General Election in July led to a change of Government, followed by draft proposals for an amended National Planning Policy Framework¹. The proposed changes, including to the Standard Method for calculating housing need at the local authority level, have not yet been finalised. As such, these proposed changes are signalled in this report but the analysis and commentary remains based on existing planning policy and guidance.

1.2. Objectives

- 1.2.1. The Council requires an exceptional circumstances study to examine whether its housing requirement can be set at a level below the need identified by the Government’s standard method. At the time of writing, the standard method figure for Swale is 1,040 dwellings per annum².
- 1.2.2. This study addresses two distinct elements, housing need and the housing requirement:
- **Housing need** – whether exceptional circumstances exist to justify calculating need using a methodology other than the standard method, in accordance with National Planning Policy Framework (NPPF) para 61. Secondly, if exceptional circumstances are found to exist, determine housing need in a way that aligns with NPPF para 61, namely with a view to reflecting current and future demographic trends and market signals.
 - **Housing requirement** – explore wider factors – essentially constraints / opportunities, unmet need issues and supply options – to examine whether there are factors which justify adopting a housing requirement below need, in accordance with NPPF paragraphs 11, 60, 61 and 67.

Figure 1-1: Relevant National Planning Policy Framework Policies

11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the

¹

² See Section 4 Housing Need for summary calculation undertaken in June 2024

environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

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

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote 7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.

60. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area²⁵ which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Footnote 25 Such particular demographic characteristics could, for example, include areas that are islands with no land bridge that have a significant proportion of elderly residents.

67. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for

example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³³. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

- 1.2.3. For local plan-making, paragraph 11 in the NPPF sets out the aim to meet housing needs only in so far as is consistent with wider sustainable development objectives. For example, in relation to the Worthing Local Plan, the PINS report into the soundness of the plan, published on 14th October 2022, established that: LHN is the standard-method derived figure, namely 885 homes per year; and the housing requirement should be set at 230 homes per year, due to a lack of suitable supply options, given the constraints to growth locally.
- 1.2.4. As such, this report makes a clear distinction between ‘need’ as identified by the standard method (or an appropriate alternative method) and ‘requirement’ which is the figure or ‘target’ identified through the plan making process based on the consideration of wider factors.
- 1.2.5. During the course of this study, the new Government set out proposals to the NPPF and guidance for calculating the Standard Method. The revised paragraph 62 removes ‘exceptional circumstances’ from the approach to calculating housing need and as such, the use of alternative methods for calculating need on the basis of exceptional circumstances.

Figure 1-2: Proposed Amendments to NPPF July 2024 Consultation

The revised NPPF text, paragraph 62 (formerly 61) states:

62. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

- 1.2.6. In the consultation document accompanying the proposed NPPF text, the Government sets out a new Standard Method for assessing housing need.

Figure 1-3: Proposed New Standard Method

At paragraph 7 of the 'Proposed Reforms to the National Planning Policy Framework and other changes to the planning System' consultation document, new Standard Method is set out as follows:

- a. uses a baseline set at a percentage of existing housing stock levels, designed to provide a stable baseline that drives a level of delivery proportionate to the existing size of settlements, rebalancing the national distribution to better reflect the growth ambitions across the Midlands and North;
- b. tops up this baseline by focusing on those areas that are facing the greatest affordability pressures, using a stronger affordability multiplier to increase this baseline in proportion to price pressures; and
- c. removes arbitrary caps and additions so that the approach is driven by an objective assessment of need.

Two important data changes are proposed to the calculation:

Instead of the use of household projections, the new method proposes 0.8% of existing housing stock in each local planning authority as the baseline starting point. The most robust data source of stock levels is the annually published Dwelling stock estimates by local authority district and the most recent data published at the time should be used.

Step 2 adjusts for affordability using a similar approach to the existing calculation but increases the multiplier to 0.6% compared to the current 0.25%.

- 1.2.7. Under the proposed new Standard Method the resulting housing need figure for Swale would be 1,061³. This compares to 1,040 under the current method. It is outside the scope of this study to compare the inputs and assumptions of the two methods (current and proposed) but, where appropriate, this report references the implications of the proposed approach.

1.3. Outline of this report

- 1.3.1. This report has 11 sections, covering housing needs and the principal factors that may inform the housing requirement:

- Section 2 Context
- Section 3 Methodology
- Section 4 Housing Need
- Section 5 Housing Requirement
- Section 6 Growth opportunities

³ Data provided in the 'Outcome of the proposed revised method' spreadsheet accompanying the consultation document.

- Section 7 Environmental constraints
- Section 8 Infrastructure constraints
- Section 9 Viability and deliverability challenges
- Section 10 Sources of land supply
- Section 11 Conclusions

2. Context

2.1. Swale Local Plan Review

2.1.1. The Local Plan Review (LPR) will establish a spatial strategy for growth and change - in response to key issues and opportunities - over the period 2022 to 2038. The LPR will build on the adopted Local Plan ('Bearing Fruits'), which covers the period 2014 to 2031. The LPR will allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

2.1.2. The adopted Local Plan (2017) includes a housing requirement set at local housing need, which was understood at the time to be 776 dwellings per annum (dpa), although the submitted version had originally proposed a housing requirement below need. The Inspector's Report presents limited information on arguments for a lower need figure, but important information on reasons for considering setting the housing requirement at the objectively assessed need, figure. See excerpt from the Inspector's Report⁴ below that remains pertinent to this report (our **emphasis**):

48. The Plan cites three broad reasons to justify not planning to deliver the OAN of 14,800 dwellings. The first is the issue of **viability and deliverability**, including past performance and the need to maximise housing delivery whilst maintaining the focus for growth on the Thames Gateway where viability is poorest. Other constraints relate to **environmental concerns, including impact on best and most versatile agricultural land (BMV)** and infrastructure, particularly the **impact of development on the strategic road network**.

49. In considering the housing market it is common ground that Swale is one of the weaker housing markets in Kent with particularly poor viability in the Thames Gateway area, where the settlement strategy seeks to direct housing growth. The Council recognises that short term viability issues should not lead to a viability-led strategy which could undermine the growth in the Thames Gateway. However poor housing delivery in the past does not justify taking a pessimistic approach to the future. This would be inconsistent with paragraph 47 of the NPPF which seeks to boost significantly the supply of housing. Setting a target that is too low could be self-fulfilling and act as a constraint to development, whilst with a revised plan period extending to 2031 short term viability concerns do not justify suppressing growth.

51. The latest information on highway infrastructure reveals uncertainties about the details of projects needed to support the housing to be delivered in the later part of the Plan period. However this can be addressed by an early review as

⁴ Swale Borough Council Swale Local Plan, Inspector's Report June 2017

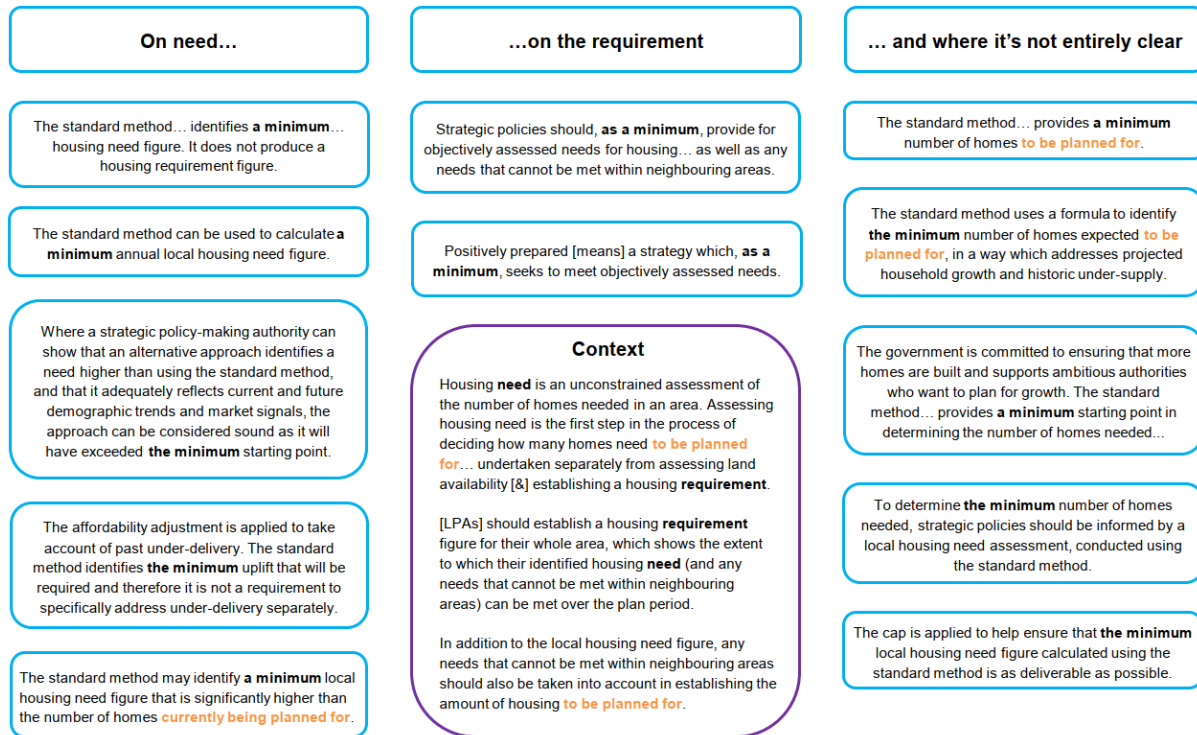
concluded in Issue 9 and it should not prevent the Council from planning to deliver the full OAN over the Plan period to 2031.

- 2.1.3. The Proposed Submission Local Plan Review (2021) proposed a housing requirement set at local housing need, which was understood at the time to be ~1,038 dpa on the basis of the Government's standard method. The view at the time was that there were no exceptional circumstances to use an alternative method for calculating need, and through the Sustainability Appraisal (SA) process the option of a requirement below need was judged 'unreasonable' (after having considered specific supply options). Regarding impacts to the transport network, the view was that need could be provided for subject to transport-led strategy / site selection achieving modal shift.
- 2.1.4. Following the Regulation 19 consultation the Council decided to take a step back and consult under Regulation 18 on "Issues and Preferred Options". Subsequently the Council decided to pause the local plan process pending clarity on changes to the NPPF, with the new NPPF then published in December 2023.

2.2. Definitions

- 2.2.1. There has been much debate nationally regarding the implications of the changes in respect what the Secretary of State recently referred to as 'target-setting', and which might more accurately be described as 'requirement-setting'.
- 2.2.2. Two headlines are: 1) there is now increased potential to argue a case for a housing requirement set at a level below need (however that is defined); and 2) it remains the case (unchanged since 2018) that housing need can be calculated using a method other than the standard method in 'exceptional circumstances'.
- 2.2.3. However, there is an absence of clarity, e.g. see Figure 1 (overleaf), which lists examples of the NPPF and PPG describing: A) the standard method as providing a "minimum" need figure; and B) housing requirements having to be set at need as a "minimum". Also, there is an ongoing absence of clarity on the distinction between "objective (NPPF paras 11 and 35) / 'policy off' consideration of need and 'policy on' plan-making, including in respect of accounting for employment growth and unmet need.

Figure 1 NPPF & PPG statements on “minimum” housing figures



2.2.4. Finally, following the outcome of the general election July 2024, at the time of writing, the new Government has set out its intention to reform planning policy with the following specific aims in relation to housing need:

- To make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options;
- To reverse other changes to the NPPF made in December 2023 which were detrimental to housing supply;
- To implement a new standard method and calculation to ensure local plans are ambitious enough to support the Government’s manifesto commitment of 1.5 million new homes in this Parliament.

2.2.5. Whilst the proposed changes make the standard method mandatory, it remains possible for local planning authorities to plan for a lower figure if there are ‘hard constraints’. This maintains the distinction between ‘need’ and ‘requirement’ as described earlier in this section.

3. Approach

3.1.1. This section sets out our approach to examining whether there are exceptional circumstances relating to housing need and then, secondly, the task of exploring the wider factors with a bearing on the housing requirement.

3.1.2. The approach involves two components:

- **Housing Need:** this component reviews existing evidence to establish whether it is likely that exceptional circumstances exist to depart from the use of the standard method and how an alternative assessment could be undertaken if so. This includes:
 - Examining the demographic inputs to the standard method and setting them in the context of population, housing and dwelling growth over the longer term. The starting point for this work is a review of previous work undertaken for Swale by demographer John Hollis.
 - Examining the affordability uplift in the standard method and checking for anomalies and how Swale’s figures compare to other Kent authorities.
 - Considering whether Swale’s economic growth trends would justify an alternative approach to estimating housing needs.
 - Considering how other authorities have examined exceptional circumstances and alternative methods.
- **Housing requirement:** this component reviews existing evidence and maps available data across 5 themes to build an initial picture of the constraints and opportunities that may have a bearing on the housing requirement for Swale:
 - Growth opportunities
 - Environmental constraints
 - Infrastructure constraints
 - Viability and deliverability challenges
 - Sources of land supply

3.1.3. It is important to state that this presents an initial headline review of the factors which may impact on the housing requirement and the extent to which need can be met. It is not the role of this study to replace the SA or wider plan making process, including consideration of Swale in the wider region and its relationship with its neighbours (Figure 2). As such, caution is required in reading the conclusions of this report in isolation and in advance of Swale Borough Council’s emerging spatial strategy and sites, i.e. ahead of detailed testing of options.

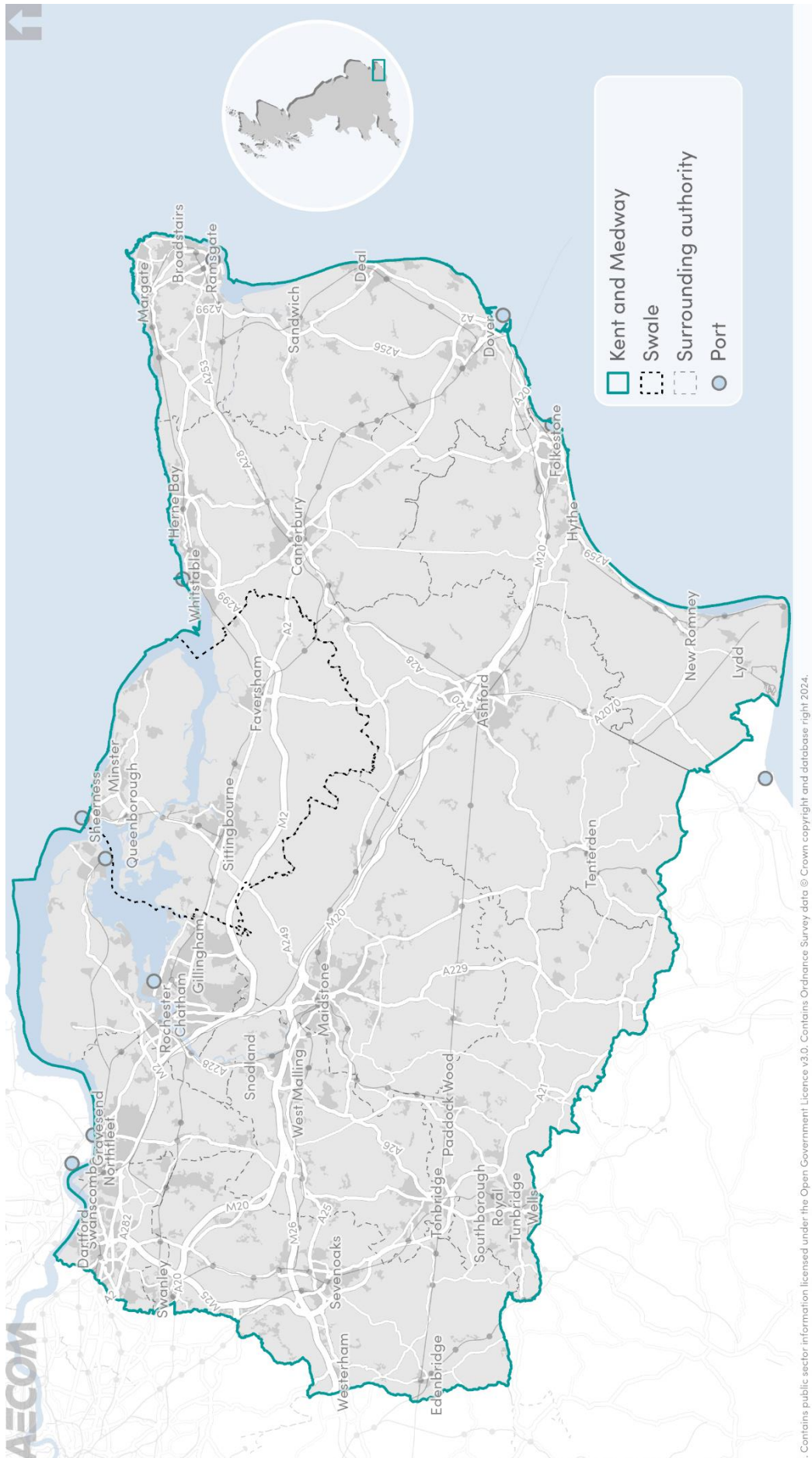


Figure 2 Swale in the wider Sub Region

4. Housing Need

4.1. Introduction

4.1.1. This section examines whether there are exceptional circumstances that would justify using an alternative method to Government's standard method to identify housing need within Swale under existing NPPF 2023 policy and guidance. This section:

- Examines long term patterns of household growth and housing delivery to understand how Swale compares to other Kent authorities and the wider region and England.
- Then considers the inputs to the standard method calculation and whether there are any exceptional circumstances relating to Swale's demographics of affordability patterns which would justify an alternative methodology.
- Considers economic trends and whether these justify the use of an alternative method.
- Reviews two different examples where Councils have considered or used alternative methods.

4.2. Household Growth & Housing Delivery

4.2.1. It is useful to examine long term trends in population, households and dwellings within Swale compared to the South East region and England to understand how patterns have changed and the extent to which Swale is different to wider areas.

4.2.2. Table 4-1 presents data on population, households and dwelling growth from 1991-2021 (30 year period) using Census data. Table 4-2 presents the percentage change over each decade and for the last 20 years.

4.2.3. Swale's population increased by 24% over the last 20 years (2001-2021) with a 23% increase in households. The dwelling stock increased by a greater proportion at 30% over the same period. On all of these measures, Swale's growth has been higher than both the South East and England as a whole.

4.2.4. Over the 20 year period 2001-2021, Swale's population increased by 1,444 per annum, households grew by 562 per annum, with dwelling stock growth of 756 per annum.

Table 4-1: Long Term Population, Household and Dwelling Change 1991-2021

	Swale	South East	England
Population			
1991	112,112	7,132,968	44,875,946
2001	122,801	8,000,645	49,138,831
2011	135,835	8,634,750	53,012,456
2021	151,676	9,278,065	56,490,048
Households			
1991	44,328	2,945,334	18,683,338
2001	49,257	3,287,489	20,451,427
2011	55,585	3,555,463	22,063,368
2021	60,495	3,807,967	23,436,086
Dwellings			
1991	44,136	2,923,837	18,545,529
2001	51,078	3,391,833	21,206,804
2011	57,989	3,694,388	22,976,066
2021	66,200	4,026,340	24,927,591

Source: Census

Table 4-2: Long Term Population, Household and Dwelling Change %

Population Change	Swale	South East	England
1991-2001	10%	12%	9%
2001-2011	11%	8%	8%
2011-2021	12%	7%	7%
20 years (2001-2021)	24%	16%	15%
Household Change			
1991-2001	11%	12%	9%
2001-2011	13%	8%	8%
2011-2021	9%	7%	6%
20 years (2001-2021)	23%	16%	15%
Dwelling Stock Change			
1991-2001	16%	16%	14%
2001-2011	14%	9%	8%
2011-2021	14%	9%	8%
20 years (2001-2021)	30%	19%	18%

Source: Census, AECOM calculations

Table 4-3: Dwellings ‘not usually occupied by households’ %

	Swale	South East	England
2001	3.6%	3.1%	3.6%
2011	4.1%	3.8%	4.0%
2021	8.6%	5.4%	6.0%

Source: Census, AECOM calculations

4.2.5. The difference between household growth and dwelling stock growth is reflected in the proportion of dwellings ‘not usually occupied’ (Table 4-3). At any one time, a proportion of dwellings will be empty and this reflects the normal functioning of the housing market so that households can move eg rented homes may be vacant for short periods, or as dwellings are repaired or renovated. Some dwellings will be owned as second homes or holiday lets and not occupied by households on a permanent basis.

4.2.6. In the two prior Censuses (2001 and 2011), the proportion of dwellings ‘not usually occupied’ in Swale was around 4% and this level was similar to the South East and England as a whole. However, in 2021, the proportion of unoccupied dwellings in Swale increased to 8.6%. Whilst there was growth in unoccupied dwellings across the region (to 5.4%) and England (6.0%), the increase in Swale has been greater.

4.2.7. There are a number of possible explanations for the increase in unoccupied dwellings in Swale:

- The most likely reason for this increase is growth in the number of second homes and holiday lets. Further analysis of the location of ‘dwellings not usually occupied by households’ suggests that the largest proportion are found in Sheppey East ward. Half (50.3%) of dwellings not usually occupied in Swale are found in Sheppey East. The absolute number is 2,699 within this ward, compared to 5,705 in Swale as a whole. The only other ward with a level of unoccupied dwellings that is substantially above the England average (6%) is Sheerness (at 8.8% of dwellings: 504 dwellings in total). Both wards are on the Isle of Sheppey.
- It is also possible that some dwellings were vacated during the Covid lockdown (which was in operation during the Census survey period) as some single person households moved in with other households to avoid isolation. However, the latter does not explain the difference with the region and England as whole which would be expected to be similar.

4.2.8. Given the differences apparent in the growth of households and dwellings in Swale compared to the South East and England, it is useful to drill down further to understand how Swale compares to the other Kent and Medway authorities.

4.2.9. Table 4-4 presents long term population change across Kent and Medway. Swale’s population growth over the 20 year period 2001-2021 is amongst the

highest but there are four other authorities with higher population growth including neighbouring Maidstone (27%) and Ashford (29%). Swale's population growth is not exceptional within Kent and Medway.

Table 4-4: Long term Population Change, Kent and Medway 2001-2021

	2001	2011	2021	Change 10 years		Change 20 years	
Ashford	102,661	117,956	132,747	14,791	13%	30,086	29%
Canterbury	135,278	151,145	157,432	6,287	4%	22,154	16%
Dartford	85,911	97,365	116,753	19,388	20%	30,842	36%
Dover	104,566	111,674	116,410	4,736	4%	11,844	11%
Folkestone & Hythe	96,238	107,969	109,758	1,789	2%	13,520	14%
Gravesham	95,717	101,720	106,900	5,180	5%	11,183	12%
Maidstone	138,948	155,143	175,782	20,639	13%	36,834	27%
Medway	249,488	263,925	279,773	15,848	6%	30,285	12%
Sevenoaks	109,305	114,893	120,514	5,621	5%	11,209	10%
Swale	122,801	135,835	151,676	15,841	12%	28,875	24%
Thanet	126,702	134,186	140,587	6,401	5%	13,885	11%
Tonbridge & Malling	107,561	120,805	132,201	11,396	9%	24,640	23%
Tunbridge Wells	104,030	115,049	115,311	262	0%	11,281	11%
Kent & Medway	1,579,206	1,727,665	1,855,844	128,179	7%	276,638	18%

Source: Census, AECOM calculations

4.2.10. Table 4-5 presents similar data for households. The pattern is similar to population: Swale has experienced relatively high growth in households (23%) over 20 years, above the average rate for Kent and Medway (18%) but this growth rate is lower than some other Kent authorities including Ashford (29%) and Maidstone (26%).

Table 4-5: Long Term Household Growth, Kent and Medway, 2001-2021

	2001	2011	2021	Change 10 years		Change 20 years	
Ashford	41,450	47,787	53,586	5,799	12%	12,136	29%
Canterbury	55,584	60,771	63,794	3,023	5%	8,210	15%
Dartford	35,240	40,081	45,697	5,616	14%	10,457	30%
Dover	44,314	48,310	50,548	2,238	5%	6,234	14%
Folkestone and Hythe	41,155	47,379	48,336	957	2%	7,181	17%
Gravesham	38,266	40,431	41,722	1,291	3%	3,456	9%
Maidstone	56,454	63,447	71,207	7,760	12%	14,753	26%
Medway	99,566	106,209	111,459	5,250	5%	11,893	12%
Sevenoaks	44,364	47,020	49,014	1,994	4%	4,650	10%
Swale	49,257	55,585	60,495	4,910	9%	11,238	23%
Thanet	55,228	59,513	62,199	2,686	5%	6,971	13%
Tonbridge and Malling	42,736	48,140	53,573	5,433	11%	10,837	25%
Tunbridge Wells	42,695	47,174	48,223	1,049	2%	5,528	13%
Kent & Medway	646,309	711,847	759,853	48,006	7%	113,544	18%

Source: Census, AECOM calculations

Table 4-6: Long Term Dwelling Stock Change, Kent and Medway, 2001-2021

	2001	2011	2021	Change 10 years		Change 20 years	
Ashford	42,923	49,747	56,653	6,906	14%	13,730	32%
Canterbury	57,827	63,859	67,946	4,087	6%	10,119	17%
Dartford	35,998	41,220	47,921	6,701	16%	11,923	33%
Dover	46,265	51,453	54,720	3,267	6%	8,455	18%
Folkestone and Hythe	44,322	49,568	53,108	3,540	7%	8,786	20%
Gravesham	39,110	41,699	44,071	2,372	6%	4,961	13%
Maidstone	58,019	65,526	75,558	10,032	15%	17,539	30%
Medway	102,578	110,107	117,443	7,336	7%	14,865	14%
Sevenoaks	45,585	48,376	51,605	3,229	7%	6,020	13%
Swale	51,078	57,989	66,200	8,211	14%	15,122	30%
Thanet	59,036	64,998	68,964	3,966	6%	9,928	17%
Tonbridge and Malling	43,856	49,972	55,487	5,515	11%	11,631	27%
Tunbridge Wells	43,786	48,922	50,935	2,013	4%	7,149	16%
Kent & Medway	670,383	743,436	810,611	67,175	9%	140,228	21%

Source: Census, AECOM calculations

4.2.11. Swale's dwelling stock grew by 30% between 2001-2021 compared to 21% across Kent and Medway. This includes changes within the existing dwelling

stock (eg conversions and subdivisions) as well as new dwelling completions. Growth was amongst the highest in Kent and Medway with Maidstone, Ashford and Dartford also experiencing dwelling stock growth of 30% or more.

- 4.2.12. It is relevant to note that the proposed new Standard Method consultation would use dwelling stock (0.8%) as the starting point for the calculation of housing need rather than household projections. In Swale, the dwelling stock according to Census 2021, which is taken forward into Table 125 (Dwelling stock (including vacants) – Gov.uk), was recorded as 66,200 in 2021. This compares to 57,989 in 2011, an increase of 8,211 dwellings according to the Census. However, net additions to the housing stock, including new builds, conversions etc, are recorded as substantially lower over the period in Swale with around 3,000 additional dwellings in Census 2021 unexplained by the completions data. In the Government’s ‘dwelling stock’ Table 125 (the starting point for the new Standard Method), the housing stock figures reflect the Census with the ‘net additions’ data Tables 122 and 123 amended to reflect the Census outturn. For Swale, this involves adding 282 dwellings per annum over the period 2011-2021 to the ‘net additions’ tables.
- 4.2.13. Whilst ‘exceptional circumstances’ are removed from the proposed new Standard Method calculation, further examination of the dwelling stock data and apparent discrepancies between net additions in Swale (2011-2021) and the housing stock recorded in the Census 2021 would be a valuable exercise. It is possible that, if errors are found in the data, it may be possible to use a revised dwelling stock figure. At this stage, it is unclear whether it is net additions data (made up of completions, conversions, permitted development etc) which is inaccurate or whether the Census count of dwellings has resulted in an overestimate for Swale.
- 4.2.14. As discussed above, the proportion of Swale’s dwelling stock that is not usually occupied by a household has increased to 8.6% in 2021. This is a higher rate than in Kent and Medway as a whole (6.3%) but similar to the level in some other authorities including Thanet (9.8%), Folkestone and Hythe (9.0%) and Dover (7.6%).
- 4.2.15. There may be different factors in operation in different authority areas including second/holiday homes, pockets of low demand or regeneration activities in some areas and potentially Covid lockdown effects with some households vacating dwellings at the time of the Census. These trends may merit further investigation but the key point to note for this study is that Swale has a higher rate of unoccupied dwellings than in the past, but is not out of step with other areas of Kent. Furthermore, most of these properties are located in the east of the Isle of Sheppey. It is not a pervasive issue across the borough.
- 4.2.16. A key point to note in this analysis is that Swale straddles two housing market and travel to work areas.⁵ The east of borough is part of the Canterbury TTWA

⁵ Swale Housing Market Assessment (2020) by HDH Planning and Development

(including Faversham). The north of borough including Sheppey and Sittingbourne is part of Medway TTWA. The highest numbers of people moving out of Swale also move to these LPAs with Maidstone also a significant destination. The same is true in the other direction (people moving in to Swale from these authority areas).

4.2.17. The growth in population, households and dwelling stock growth needs to be seen in this context. Growth in Swale’s population and housing stock is likely to have supported job growth in Medway which has experienced greater employment growth but limited growth in dwellings and households.

4.3. Review of Standard Method Demographic Inputs

4.3.1. This subsection briefly reviews the inputs to the standard method calculation for Swale. The core input and starting point for the calculation are the Government’s 2014 based household projections. It is useful therefore to consider whether these projections have been borne out in Swale.

Comparison of Projections and Outturn

4.3.2. Table 4-7 presents household and population data for 2021 comparing what was *expected* in the 2014 based projections to the actual figures recorded in Census 2021. By 2021, the projections expected 63,931 households in Swale. The Census recorded 60,495 households, 3,426 fewer households than projected. This pattern is replicated in many locations across the country.

4.3.3. There was also a difference in the scale of the population projected but the difference between the projection and Census record for 2021 was less marked. The 2014 based projected anticipated 2,384 more people than the Census 2021 recorded as living in Swale in that year.

4.3.4. Household size grew between Census 2011 and 2021. Household size in Swale in 2011 was 2.4 and this had increased to 2.5 in 2021. Household projections (2014 based) assumed average household size of 2.34 by 2021. Larger household size than in the past, or expected by projections, can indicate suppressed household formation. Potential households eg younger people may wish to form their own households but are unable to afford to buy or rent and so may remain in the family home or share with others.

Table 4-7: Households, Population and Household Size in 2021: Projection versus Actual

	Swale
Household projection (2014 based)	63,931
Actual (Census 2021)	60,495
Difference	3,436
Population projection (2014 based)	149,292

Actual (Census 2021)	151,676
Difference	2,384
Household size projected (2014 based)	2.34
Household size actual (Census 2021)	2.51

Source: Census 2021, DLUHC 2014 Based Household Projections, AECOM calculations

- 4.3.5. The number and proportion of households with grown up children living at home (known as households with non dependent children) is an indicator of the suppression of household formation. In 2021, 13.6% of Swale’s households contained non dependent children (Table 4-8). This has increased from 11.9% in 2011 and is likely to indicate, to some extent, the difficulty that younger people have in affording to buy or rent and establish independent households.
- 4.3.6. The number of households with non dependent children has increased in Swale to a greater extent than in the South East and England as a whole. This is likely to reflect relatively greater suppression of household formation. It indicates that, if housing was more affordable to rent or buy in Swale, more households may have been able to form over time and household growth would have been higher than recorded. It also explains to some extent why household size has increased in Swale over the last 10 years.

Table 4-8: Households with Non Dependent Children

	Swale	South East	England
Proportion of households with non dependent children (2021)	13.6%	12.8%	12.4%
Number (2021)	20,247	7,097,787	1,128,713
Proportion of households with non dependent children (2011)	11.9%	11.8%	11.2%
Number (2011)	15,865	6,154,114	945,903
Change (number) 2011-2021	4,382	943,673	182,810
Change (%) 2011-2021	28%	15%	19%

Source: Census, AECOM calculations

4.3.7. It is interesting to note that the number of dwellings recorded by the Census in 2021 in Swale is 66,200. This compares to 60,495 households in the same year ie there are more dwellings than households. The dwelling stock appears to be of sufficient size to accommodate the households that were anticipated for 2021 in the 2014 based household projections (63,931). However, the growth in the number of households in Swale has not been as high as projected.

4.3.8. However, it is apparent from the analysis of households and dwellings at the localised level that a large proportion of unoccupied dwellings are concentrated in East Sheppey and that this is not a general phenomenon across the district.

Inputs to Standard Method Calculation

4.3.9. The current housing need figure for Swale under the standard method calculation is 1,040 (as at June 2024):

- Step 1: projected household growth of 770 households each year (2024-2034)
- Step 2: an affordability uplift of 35% taking the figure to **1,040**.
- Step 3: the capped figure is higher than step 2 and so does not apply.

4.3.10. There are two core components in the standard method calculation: household projections for the 10 year period of the calculation and an affordability uplift. This subsection considers the inputs into these two components. It is important to emphasise that both of these components have been reviewed in detail by demographer John Hollis, working with STANTEC, on behalf of Swale Borough Council.⁶

4.3.11. AECOM has reviewed this work and considers it a very thorough analysis of the inputs into the standard method calculation and the implications of sensitivity

⁶ Estimating Swale's Future Local Housing Need – A Technical Report Commissioned by Swale Borough Council from PBA – Undertaken by John Hollis Sept 2019 (revised June 2020)

analysis on these inputs. There is no value in repeating this analysis and it cannot be updated because the data (essentially inputs into the 2014 based projections) is historic and therefore does not change. However, it is worth drawing out key points from this study in terms of the demographic inputs into 2014 based household projections. It is also possible to review the affordability inputs (median house prices and earnings measures) as these were not specifically examined in the study.

Demographics

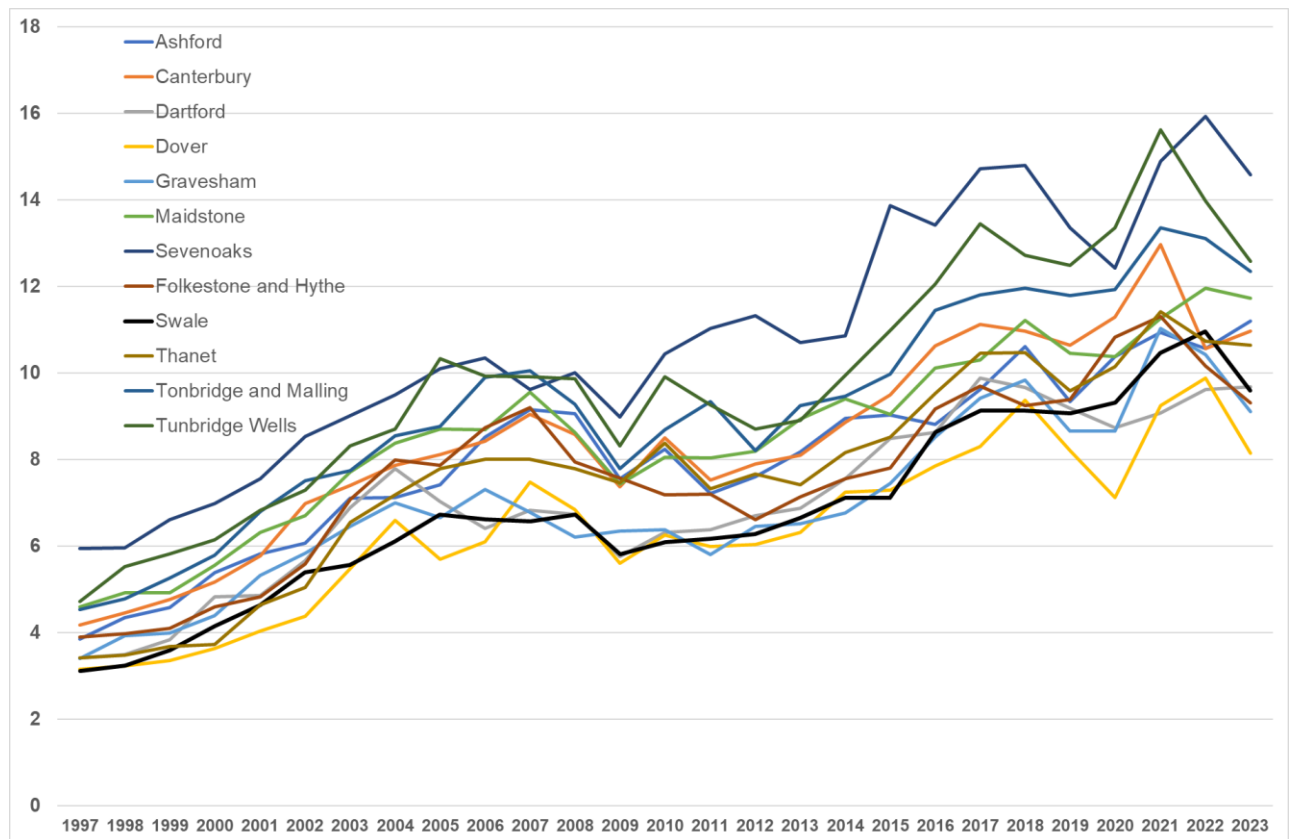
- 4.3.12. Estimating Swale's Future Local Housing Need – A Technical Report Commissioned by Swale Borough Council from Peter Brett Associates (now STANTEC) was undertaken by John Hollis in September 2019 (revised June 2020).
- 4.3.13. The report comments on the meaning of exceptional circumstances: 'If an alternative method for assessing housing need is used then this will be scrutinised closely at examination. The NPPG says at paragraph reference ID: 2a-003-20190220 that any other method will be used only in exceptional circumstances. This means there will need to be clear evidence to justify any departure. As part of demonstrating any exceptional circumstances the population and household projection data will need to be scrutinised to assess whether any of the components; births, death, migration, unattributable population change and household formation rates contain errors or anomalies that are sufficiently large to constitute exceptional circumstances for departing from the Standard Method.'
- 4.3.14. Having assessed historical data for births, deaths and migration flows, unattributable population change and household formation rates the report concludes that there are no errors in the data and no exceptional circumstances that would justify departing from the Standard Method formula.
- 4.3.15. The report first considers the 2014 based population projection. This consists of trends in births, deaths and migration flows. Some notable observations from the report are:
- The pattern of births and deaths in Swale during the trend period which feeds in to the 2014 appears normal with no obvious anomalies or errors apparent in the data.
 - Domestic migration patterns are assessed over the 5 years 2009/10-2013/14. Fluctuations can be seen in the data but the net flow has been relatively consistent albeit a rising trend over the sets of projections.
 - The report reaches a similar conclusion with international inflows of migrants – there was a substantial rise to 2007 then fluctuations. Outflows ie people moving out of the country have been subject to a revised method which results in a lower net figure but the report does not consider this will have caused problems with the projection.

- Swale's Unattributable Population Change for the period 2001-11 was - 1,313, the minus sign indicating that the combined effect of the ONS's estimates for births, deaths and migration flows *over-estimated* the population change suggested by the 2001 and 2011 censuses. That overestimate was 10% of the population change suggested by the censuses.
 - As natural change is very accurate, being based on the registration system, most of the discrepancy would be with estimates of migration and any other special changes. The report states that this 'error' is relatively small as there are 83 authorities for which the discrepancy is more than 50%.
- 4.3.16. The report goes on to test the impact of using later sets of Government household projections (2016, 2018 and 2020 based). It notes that the 2014 and 2016 based methodologies have substantial differences with the 2014 based projections the last set produced by DLUHC before the exercise was taken over by ONS.
- 4.3.17. Projections are sensitive to the trend period used – which partly explains why the 2016-based projections suggest somewhat lower population and household growth than the 2014-based set. A housing need figure for Swale based on the 2016 based household projections would have reflected the relatively low levels of house building in its trend period.
- 4.3.18. Testing of the 2018 and 2020 based projections produced a range of 980-1,153 homes per annum under the standard method calculation for Swale at the time that the study was undertaken.
- 4.3.19. The report noted that the standard method affordability uplift increases housing need by 32% above the demographic need implied by the household projections. The affordability trend at the time suggested this measure would continue to worsen and result in higher uplifts in the future. It also noted that Government may also change the methodology to make future uplifts higher as demographic need in future sets of projections falls. This would ensure the figures across the country align all LPA need to the 300k national target.
- 4.3.20. Overall, the report concluded that there is nothing in the historical data for births, death and migration flows to suggest there are errors or anomalies in the statistics. The overall conclusion is that there are no exceptional circumstances that would justify departing from the standard method formula based on the 2014-based household projections.
- 4.3.21. The report provides a useful reminder household projections are not forecasts. They show the number of households there would be if a set of assumptions about the size and structure of the population and the patterns of household formation were realised in practice. They do not predict the impact of future public policy, changing economic circumstances or other factors which may influence household growth.

Affordability Uplift

- 4.3.22. The 'Estimating Swale's Future Local Housing Need' report as reviewed above tested the impact of different affordability ratios but did not specifically examine the inputs into the affordability uplift. The uplift is calculated on the basis of the ratio between median average house prices and median average workplace earnings.
- 4.3.23. AECOM has reviewed these data sets and compared trends to the other Kent authorities to ensure that there are no anomalies or obvious errors in the data which might result in an erroneous uplift being applied. In summary, both median house prices and median earnings data for Swale appear to be robust and in line with the other Kent authorities. As such, the median affordability ratio appears to be correct. There do not appear to be any exceptional circumstances revealed in Swale's data that would justify using a different approach.
- 4.3.24. Figure 4-1 presents the median affordability ratio from 1997-2023 for Swale (black line) and the other Kent authorities. Swale's affordability ratio is amongst the lowest in Kent and this has remained consistent over the last 25 years ie Swale is relatively more affordable than most of the other Kent authorities, with the exception of Dover, Folkestone and Hythe and Gravesham in 2023. It is important to note that this is relative affordability and in fact median house prices in Swale are almost 10 times higher than median earnings. Nevertheless, the affordability ratio does not appear to be abnormally high and therefore is not resulting in an erroneous uplift in the standard method calculation.

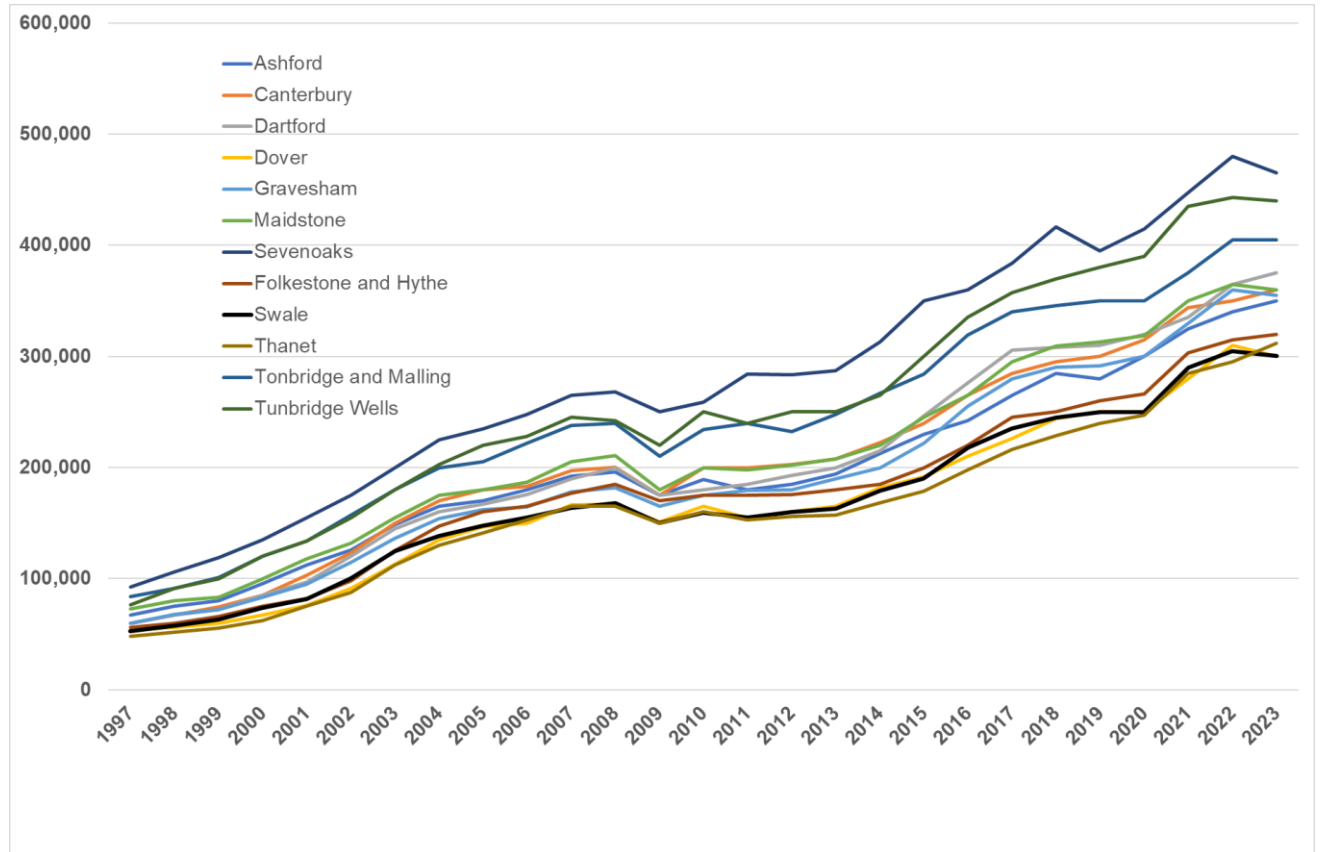
Figure 4-1: Median Affordability Ratio (median house price: median workplace earnings) in Swale and Kent authorities 1997-2023



Source: ONS

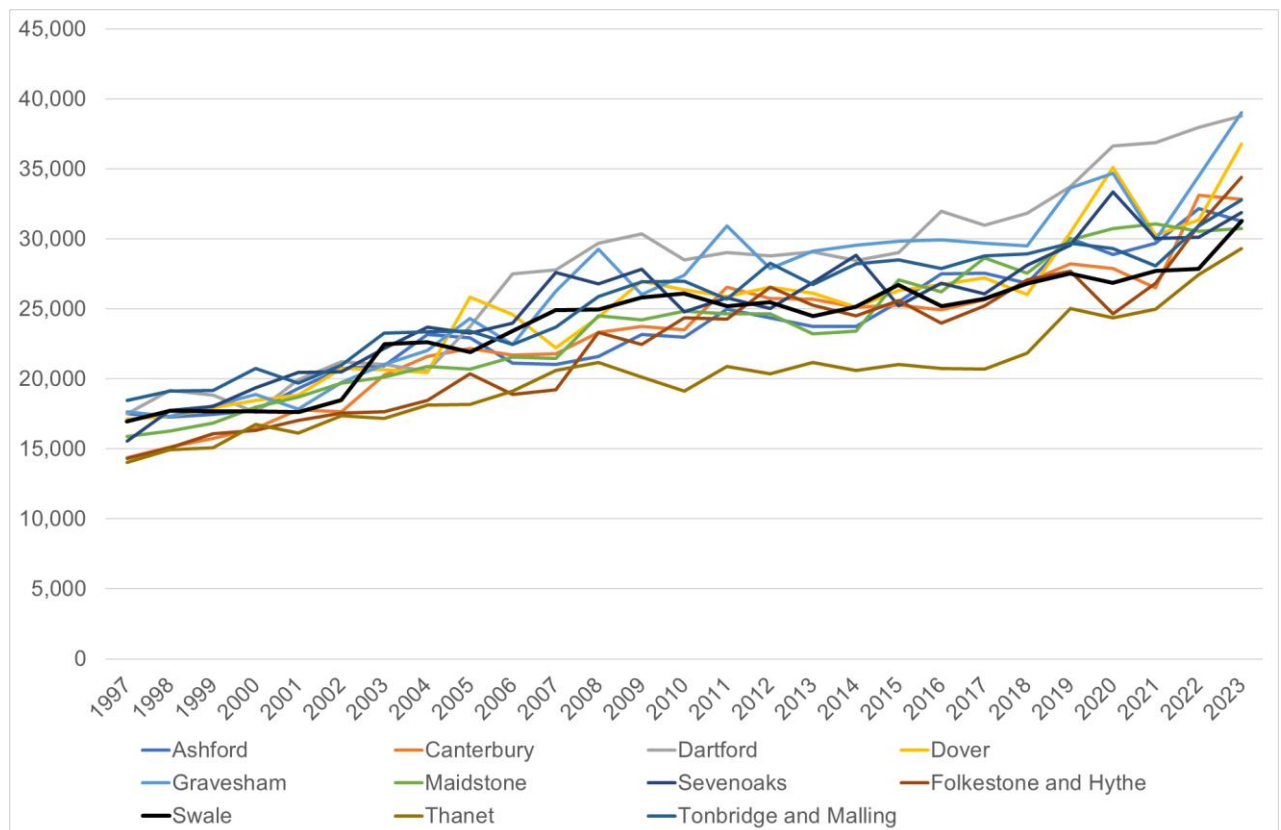
- 4.3.25. Figure 4-2 and 4-3 show the individual inputs into this ratio: median house prices and median earnings. Swale has amongst the lowest median house prices in Kent, along with Dover and Folkestone. This is consistent with the pattern of house prices identified in Swale’s Housing Market Assessment (2020) which also noted that prices in Swale were lower than the South East and England when adjusted for mix but have increased more rapidly than both in recent years. There is significant variability across the borough with the Isle of Sheppey cheaper than the mainland.
- 4.3.26. Swale also has amongst the lowest median earnings in Kent although the difference between the Kent authorities on this measure is less marked than for house prices.
- 4.3.27. On both measures, Swales figures appear to be reasonable and reflective of its position within Kent over the 25 year period. There are no obvious errors or anomalies.
- 4.3.28. The ratio improved in Swale (ie median house prices became more affordable) in the most recent year (2023) due to slight falls in house prices across most of the County alongside some earnings growth in the same year.

Figure 4-2: Median house price (££) in Swale and Kent authorities 1997-2023



Source: ONS

Figure 4-3: Median workplace earnings (££) in Swale and Kent 1997-2023



Source: ONS

4.4. Review of Economic Trends

- 4.4.1. In previous iterations of the guidance for estimating housing need (prior to the introduction of the standard method), economic and employment projections were factored in to take account of the need for housing to support economic growth.
- 4.4.2. As new jobs are created, workers are needed to fill them and this usually results in a need to increase the working age population and, in turn, the number of homes to accommodate this growing workforce. The alternative is that workers commute in from other areas to take up the new jobs and this can result in unsustainable travel patterns ie more car journeys etc.
- 4.4.3. There are many complexities behind the relationship between jobs and homes, with current unemployed people offering an opportunity to fill jobs without the need for more housing and some people taking on more than one job. However, in broad terms, employment growth generates the need for a larger workforce and accommodation for these new households.
- 4.4.4. In AECOM's experience, the number of homes needed to support projected employment growth in most areas is generally *below* the number generated by the affordability uplift in the standard method. In other words, the affordability uplift is generally large enough to encompass any employment uplift (if one were to be applied). There are exceptions to this, for example, in areas with ambitious employment forecasts linked to regeneration and growth ambitions but relatively with low demand housing markets. In these cases, affordability may be relatively good and as a result only limited uplift applied to demographic projections in the standard method. Some authority areas that have experienced very high employment growth may also find that an approach which translates jobs into homes needed would result in higher figures than those that emerge from the standard method affordability uplift (see Oxford example later in this section).
- 4.4.5. It is useful therefore to briefly consider whether the recent growth in employment in Swale, or projected growth in the future, would indicate the need to take a different approach to estimating housing need in the Borough.
- 4.4.6. At the headline level, there are around 55,000 jobs within Swale in 2022 (the latest available data) (Table 4-9). The number of jobs has increased by around 3,000 since 2015, or 375 per annum. This measure will underestimate employment to some extent as it excludes some self employed people (if they are not registered for VAT or PAYE).
- 4.4.7. This employment figure compares to 60,459 households in 2021. Not all households contain economically active people – some are retired or not working for other reasons. However, the ratio between economically active people and the number of jobs in the borough is also below 1. This means that there are more economically active people (workers) than jobs within the

borough. A substantial number of Swale workers commute out of the borough to access employment elsewhere.

Table 4-9: Number of Jobs in Swale, 2015-2022

	Employment (jobs)
2015	52,000
2016	53,000
2017	53,000
2018	53,000
2019	53,000
2020	52,000
2021	54,000
2022	55,000

Source: Business Register and Employment Survey. Note this includes employees and number of working owners and therefore includes self-employment workers as long as they are registered for VAT/ PAYE schemes. Self employed people not registered for these are excluded.

4.4.8. Key figures in the recent Employment Land Review for Swale (updated 2024) are as follows:

- Economically active people account for broadly half the total population in Swale. However, while population has grown steadily to 152,200 in 2021 (up 12% since 2011), until a recent 2021 upturn, economic activity had not grown at all over the entire decade. This is because the growth in population has been those not in the labour market.
- Unemployment has fallen over time (2010-2022). The 79,700 economically active residents in Swale in 2022 as a proportion of those aged 16-64 represents an activity rate of 84%. This rate is high amongst the highest in Kent.
- Job density, which measures the balance between total jobs in an area and the working age population (aged 16-64). A density of 1.0 would indicate labour supply and job availability are in balance, whereas a density less than 1.0 indicates more workers than jobs. The latest available employment density statistics were analysed in the Employment Land Review 2023 with a table from the report included at Figure 4-10 below. Swale remains second bottom in the East Kent 'league table' with only Medway having a lower ratio.

Figure 4-10: Swale Employment Land Review 2023 Update Table 3.1

Table 3.1 Jobs Density for East Kent, 2021

Area	Total jobs	Jobs density
Ashford	72,000	0.89
England	30,664,000	0.86
Canterbury	82,000	0.85
Kent	775,000	0.81
Maidstone	87,000	0.80
Folkestone and Hythe	46,000	0.71
Thanet	57,000	0.69
Dover	45,000	0.66
Swale	61,000	0.65
Medway	113,000	0.64

Source: ONS jobs density for 2021

- This job density data suggests an imbalance between the number of jobs within the borough and the labour force. The 2018 ELR found that 10,000 Swale residents (a large proportion) commute out for work to other parts of Kent and London made attractive by the high-speed rail connection at both Sittingbourne and Faversham. The ELR concluded on commuting rates in 2018 that without a significant shift in the pattern and quality of local employment it is unlikely that the Borough could ever reduce this flow.
- 4.4.9. AECOM has reviewed the travel to work data released from the Census 2021. However, AECOM consider this data may be misleading due to the timing of the Census survey during a national Covid lockdown. The Census form specifically asked people to answer on the basis of what they were doing at the time (and not what they did pre Covid). This may have resulted in data with increased numbers of people working from home or within Swale when, in practice, they would usually commute outside of the borough to work.
- 4.4.10. In terms of potential job growth in the future which might impact on the need for housing, the ELR presents economic forecasts (produced by Experian in 2022). Table 5.17 in the ELR anticipates job change of 177 per annum according to these forecasts over the period 2022-2040. It also notes that these forecasts are less positive than trend based job growth in the past and so actual job growth may be higher than forecast. Either way, anticipated job growth is modest compared to the standard method figure (currently 375 per annum job growth vs 1,040 dwellings per annum).

- 4.4.11. Based on this estimated job growth in projections of 177 per annum between 2022 and 2040, AECOM has estimated the number of homes that would be required to deliver a workforce to meet these employment needs.⁷ This involves determining the proportion of the working age population in Swale that are economically active and converting this population figure into households. The vacancy rate within the dwelling stock is also taken into account. This employment projection led estimate generates a need for 162 dwellings per annum (or 2,907 between 2022 and 2040) to fill the estimated job growth.
- 4.4.12. The same calculation for trend based job growth in Swale of 375 jobs per annum results in a need for 342 dwellings per annum.
- 4.4.13. Both employment led estimates generate a need for new homes which is well below the Standard Method figure calculated above. The standard method figure would deliver sufficient homes to allow the expansion of the working age population (and economically active people) to fill the jobs anticipated in the future. In fact, the anticipated job growth in Swale is likely to be insufficient to provide jobs for the increased population. In practice, residents will continue to commute out of the borough to access jobs in neighbouring employment centres, particularly Medway and Maidstone.
- 4.4.14. The imbalance between homes and jobs currently or in the future is not something that the standard method addresses. Swale is also not exceptional in experiencing an imbalance between jobs and homes and to some extent it reflects the normal pattern of housing and labour markets with some areas providing the employment and others providing the homes. However, it may be a material factor in determining the overall housing requirement for Swale, particularly if it results in unsustainable travel patterns.

4.5. The Use of Alternative Approaches

- 4.5.1. The review of inputs into the standard method calculation suggests that there is no clear justification for using a different method. However, it is useful to comment on examples in other local authorities where a different approach has been taken.

Example 1: Isle Of Wight

- 4.5.2. The Island Planning Strategy Evidence Paper 2022 on exceptional circumstances in relation to the Isle of Wight (IOW) housing number provides a useful consideration about whether an alternative to the standard method can or should be used for the authority area.
- 4.5.3. In the public consultation on the Draft Island Planning Strategy in 2021 numerous responses asked the Council to make the argument for 'exceptional

⁷ This simple estimate calculates the growth in the overall population needed to increase the number of economically active people to take up the new jobs. It assumes current levels of economic activity in the population of working age people. It then translates the population increase into households using current household size (Census 2021) and assumes the same proportion of unoccupied dwellings to translate households to dwellings.

circumstances' in setting the LHN. The comments requesting the Council to pursue 'exceptional circumstances' identified two principal factors to justify a departure from the standard method:

- That the 2014-based household projections for the Island (which are used in the standard method) derive from the 2014-based sub-national population projections. The Island Planning Strategy evidence paper June 2022 show household growth for the Island is largely (if not entirely) a consequence of net internal migration, primarily of older households, to the Island from other parts of the UK.
- That the standard method includes an affordability uplift which is added to the demographic-based household growth but, some responses argue, there is no evidence that this uplift will address affordability problems on the Island.

4.5.4. The Council's Paper cites the following arguments in response to this:

- Demographic data shows the IOW has an ageing population with in-migration from other parts of the UK comprising a significant component of the expected growth in the future. Census 2021 data demonstrates that there has been an increase of 24.7% in people aged 65 and over since 2011 (compared to +20.1% in England).
- The paper states that 'Planning Practice Guidance requires any alternative approach for establishing local housing need to be based on realistic assumptions of demographic growth.' It goes on to say that there is no evidence to suggest that the data is not realistic nor any alternative data which is more realistic or more robust.
- The paper responds to arguments that if the net internal migration element of expected demographic growth was not included in the household growth used to identify the LHN, the figure would be lower. This is an argument that could be applied in many local authorities, including Swale. However, the IOW paper states that '*there is nothing in national policy to suggest that net internal migration should not be a component of an area's LHN. It would be highly unrealistic to presume that movement around the country could be prevented through simply not making any provision for it within an area's local housing need calculation.*' If net internal migration were excluded it is very unlikely it would be seen as a 'realistic assumption' at the local plan examination.

4.5.5. The paper then deals with the second component of the standard method calculation – the affordability uplift.

4.5.6. The paper addresses the argument that the affordability uplift in the standard method does not make housing more affordable, especially with net in-migration. The paper suggests that this is not specific to the IOW. AECOM would add that this is an argument that is made in relation to the affordability

uplift and to the use of market signals in the development of a housing requirement relatively frequently. The paper makes clear that *'Government guidance does not argue that the affordability uplift will increase the affordability of homes but suggests that it will "start to address" the issue. Its primary focus is to increase the overall supply of homes.'*

- 4.5.7. Further, AECOM would add, that substantial academic research informed the development of 'market signals' in the calculation of need which led to the affordability uplift in the current standard method. This research began during the Barker Review of Housing Supply (2003/04) where the impact on prices of building different levels of homes was tested at the national level. The conclusion of this, and subsequent work by the National Housing and Planning Advice Unit, was that substantial increases in the number of new homes would impact on prices in the long term. The converse is also true, under delivery of homes in relation to need and demand results in rising prices and declining affordability.
- 4.5.8. The 300,000 homes target nationally, around which there is some political consensus with indications from the new Labour Government that this will be maintained, evolved from this research and a series of political commitments. The affordability uplift in the standard method is an evolution of the approach to ensure previous undersupply of housing nationally is taken into account in future plans.
- 4.5.9. In the case of the IOW, the Council reached the conclusion that "By taking the approach of accepting the standard method... but then assembling a robust evidence base that demonstrates why such a figure is not deliverable on the Island... this helps to mitigate against the plan being found unsound. It is the view of officers, which is supported by KC advice, that this approach has a greater likelihood of success over not accepting the standard method and instead arguing 'exceptional circumstances'."

Example 2: Oxford

- 4.5.10. Oxford City Council considered an alternative to the standard method so as not to *underestimate* need for housing. Because of the scale of economic growth in the City it was considered that the affordability uplift alone may underestimate the need for housing.
- 4.5.11. The Housing and Economic Needs Assessment 2022 (Cambridge Econometrics, Icen, JG Consulting) (HENA) was commissioned jointly with Cherwell District Council to examine the need for housing. An approach was taken to consider needs across Oxfordshire as a whole.
- 4.5.12. The principal factors justifying a departure from the standard method were cited as:
- 2021 Census data shows that the 2014-based demographic projections are inaccurate in Oxford. There were 4,300 fewer people in 2021 than had been

projected in the 2014-based SNPP. In comparison, in Oxfordshire there were 18,700 more people than projected in the 2014- based SNPP. AECOM would observe that this is common to many authorities across the country so it is unlikely to be accepted as the sole reason for exceptional circumstances.

- Historic suppression of household formation is evident in the demographic data. As the standard method is based on projections it effectively factors in historic suppression of household growth (i.e. households that would have formed but were unable to because of the unaffordability or unavailability of suitable housing). That there were c.4,000 fewer people than the projections suggested, is highly likely to be a function of this suppression. This issue seems to be further illustrated by the percentage loss of young people in Oxford, particularly in the 0-4 age bracket. The decrease of children, particularly very young children, suggests that households with young children are leaving the city in order to find suitable housing, because it is not available within the city.
 - Evident in affordability issues. The impacts of the suppression of household formation due to an insufficient supply of housing are clear in the data showing the need for affordable housing. This is calculated in the HENA to be 1,010 affordable homes needed in Oxford per annum. This number is greater than the standard method calculation of Oxford's overall housing need (762). The scale of the affordable housing need demonstrates that the standard method calculation, including the small affordability adjustment, is not an accurate reflection of housing need in the case of Oxford.
 - High levels of in-commuting. Oxfordshire currently has a net commuting inflow of 20,500 people, reflecting the strength of Oxfordshire's labour market and its high employment density. Oxfordshire's tight labour market has been reliant on workers residing outside the county to sustain its economic growth. The high level of in-commuting to Oxford and to Oxfordshire is a symptom of the supply of housing not keeping up with the supply of jobs and a historic and on-going undersupply of homes.
 - Economic growth is not well factored into the standard method. It does not account for actual economic trends or strategies that reflect the importance of Oxford and Oxfordshire to the regional and national economy. Employment growth has been in excess of housing delivery in Oxfordshire, resulting in a growing surplus of workforce workers over resident workers and growth in net commuting into Oxfordshire and deteriorating housing affordability resulting from the associated supply/demand imbalance.
- 4.5.13. The HENA considered 4 scenarios for calculating the housing need. The first two scenarios are based on demographic projections, with affordability considerations also factored in. The other two scenarios consider how many additional jobs may be created and from this, the population needing homes is estimated (with an assumption about how many will be commuting into the

county and therefore not needing homes in the county), and from that the number of additional households and therefore homes required is calculated.

- The Standard Method: This standard method collated figure for Oxfordshire shows a need for 3,388 dwellings per annum (as at 2022).
- The Census-adjusted Standard Method: This scenario adjusts the standard method to reflect the release of the population results from the 2021 Census. The Census-adjusted standard method scenario for Oxfordshire shows a need for 4,721 dwellings per annum.
- Cambridge Econometrics baseline trend scenario: Cambridge Econometrics model forecasts jobs growth from which the level of associated housing need is derived. The CE baseline trend scenario for Oxfordshire shows a need for 4,406 dwellings per annum.
- Economic development-led scenario: This scenario uses jobs growth based on the Local Investment Plan (LIP) that supplements the Local Industrial Strategy (LIS). From the predicted jobs growth, the level of associated housing need is derived. This scenario for Oxfordshire shows a need for 5,830 dwellings per annum.

4.5.14. The Census-adjusted Standard Method and the CE Baseline Trends forecast give very similar results, which are in the middle of the other two scenarios. The HENA and Oxford City Council argue that the robustness of these scenarios is demonstrated by their similarity and so either could be selected as an appropriate scenario for identifying Oxfordshire's housing need. They consider that, on balance, the Census releases are not complete, and because one exceptional circumstance that justifies departing from the Standard Method is likely to be insufficient because it does not directly account for economic needs and runs the risk of making existing housing shortages worse, the economic baseline trend scenario is the most appropriate scenario (4,406 dwellings per annum).

4.6. Conclusion

4.6.1. AECOM's review considers that the demographic inputs into standard method are reasonable for Swale. There are no errors or anomalies in Swale's demographic data, as examined in depth by the John Hollis work.

4.6.2. The Census 2021 reveals a discrepancy with the 2014 based projections but this is common across country and also reflects household suppression and under delivery of new homes in the past. Government will need to address the use of 2014 based projections now that the Census has been released and AECOM would expect a revised standard method in the short term alongside amendments to the NPPF and PPG.

- 4.6.3. The standard method affordability uplift for Swale appears to be reasonable – there are no obvious errors or anomalies in either the house price or earnings data that would affect the ratio and therefore the uplift.
- 4.6.4. The affordability uplift produces a 35% uplift on household growth in Swale. The IOW Council’s discussion on this is useful and clear. The uplift is essentially a mechanism for addressing historic undersupply nationally. It is, in part, designed to achieve 300,000 homes nationally overall and so works on a collective basis.
- 4.6.5. The standard method’s demographic projections are dated and the affordability uplift appears somewhat arbitrary, but the calculation is no more or less appropriate to Swale as it is to any other LPA in England.
- 4.6.6. This section has considered whether any alternative approaches to the standard method should be considered. The main alternative approach to assessing the need for housing is to consider the number of homes needed to support anticipated job growth. This approach is generally only used when LPAs need or want to deliver more housing than the standard method implies, backed up by NPPF and PPG wording which considers the existence of a Growth Deal justification for using an alternative approach.
- 4.6.7. Swale’s job growth has been limited and there is net out commuting of workers to other authority areas to access jobs. There may be an argument around unsustainable commuting patterns resulting from Swale’s housing growth and limited job growth. AECOM would suggest this is best addressed through strategic planning that considers the functional housing and travel to work areas and the best places within these to promote growth and deliver homes.
- 4.6.8. Overall, on the basis of the evidence AECOM has reviewed there are no clear exceptional circumstances that would justify the use of an alternative method to the standard method to calculate local housing need in Swale.
- 4.6.9. Finally, the new proposed Standard Method would use the dwelling stock as its starting point rather than household projections. Whilst the proposed NPPF text out for consultation would remove ‘exceptional circumstances’ in the calculation of housing need, there appear to be some data discrepancies relating to Swale’s dwelling stock data which would merit further examination.

5. Housing Requirement

5.1. Introduction

5.1.1. This section summarises the major influencing factors that are likely to inform the housing requirement in Swale's LPR:

- **Growth related opportunities** locally – exploring the need for housing growth, including in support of the local economy, infrastructure delivery and regeneration.
- **Environmental constraints** to growth – illustrating the key environmental issues, assets and designations locally.
- **Infrastructure constraints** to growth – this situation is complex and ever-changing. The most up to date Infrastructure Delivery Plan has been reviewed with key extracts presented to highlight capacity issue or where reinforcements are most likely to be needed.
- **Viability and deliverability** challenges – the Borough's existing available evidence on viability is used to identify spatial challenges to delivery over the coming plan period.
- **Scoping of potential supply options** – a recap of the local supply is provided based on existing available evidence, including with reference to the pending planning applications for major urban extensions.

5.1.2. An important point to note is that there is a large supply of housing that is already committed in Swale i.e. development is set to come forward on sites which already have planning permission and/or an allocation in the current Local plan. The great majority is expected to deliver housing in the period 2022 to 2038. These sites will be 'rolled-forward' into the new LPR, such that the task of the LPR can be thought of as building on a baseline position characterised by a 'healthy' existing committed supply.

5.1.3. Indeed, committed housing supply that is expected to deliver in the LPR plan period amounts to around two thirds of the total housing need for the LPR plan period, which leads to a good degree of flexibility when preparing the LPR, particularly in respect of selecting sites for allocation.

5.2. Growth Opportunities

- 5.2.1. This sub-section includes a summary of the key growth (and corporate) strategies adopted locally that seek to attract inward investment and deliver economic growth. Each of the key documents are summarised briefly below to understand their interrelationship with housing need, policy and delivery.

2023 Kent Property Market Report

- 5.2.2. The 2023 Kent Property Market Report⁸ (an annual guide to investment and development in Kent) states that in Swale there has been:

“significant interest and development, particularly around the industrial sectors...Construction on the new Wallbrook Business Park – 38,000ft² (3,530m²) on the Isle of Sheppey is well advanced and...A new logistics/manufacturing building called Saxon 53 is planned for close to the Trinity Trading Estate, Sittingbourne [52,743ft ²(4,900m²)]...Construction has also started on Project Fortress (formerly Cleve Hill Solar Farm) which is a photovoltaic power station on the Graveney Marshes between Faversham and Whitstable...it will be the largest solar farm in the UK, generating 373MW of electricity from 900 acres (360ha) and 700MWh of battery storage.”

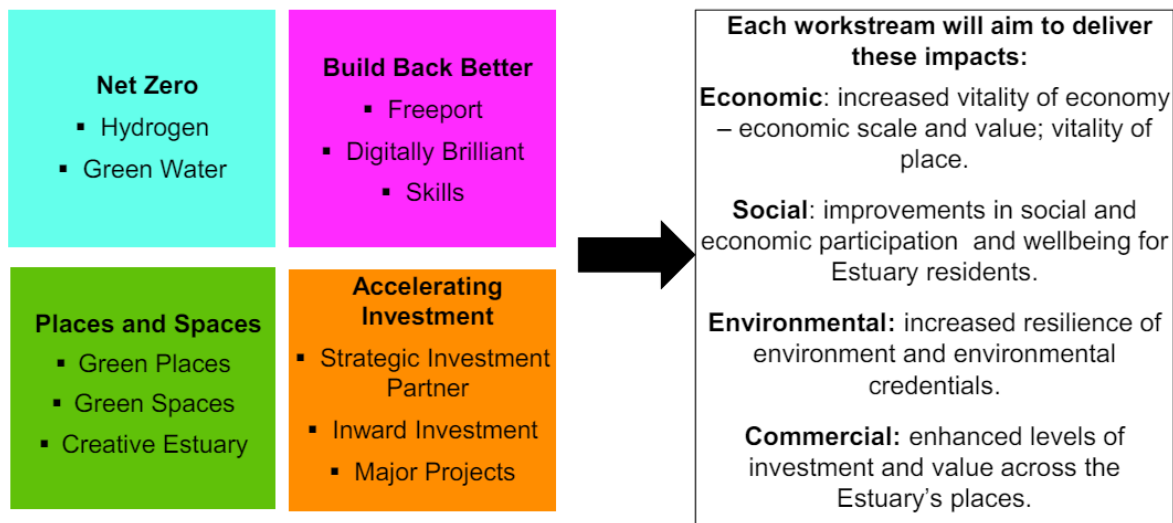
- 5.2.3. These observations of the local market suggest that there is private sector appetite to develop non-residential uses in Swale.

Thames Estuary Growth Board ‘Green Blue’ Vision (updated 2022)

- 5.2.4. The ‘Green Blue’ is the Thames Estuary’s vision for the region. The Workplan describes what the Board will do to deliver the ‘Green Blue’ vision and how they will measure the impact.

⁸ Accessed at: <https://www.kentpropertymarket.com/>

Figure 5-1 Thames Estuary Growth Board Vision Themes and Impacts



5.2.5. One of the results targeted in the accompanying ‘Green Blue’ work plan is to achieve: *‘Speed/scale housing delivery, investment in affordable homes, investment in social and community infrastructure.’* The Board envisage that this shall be achieved, in part, by delivering a: *‘growth focused Infrastructure study with Homes England, targeting activities to accelerate critical infrastructure delivery, the promotion of good design and placemaking.’* It is likely that the new Government and existing Growth Board shall continue to consider strategic growth opportunities in the Thames Estuary over the next plan period, working in collaborations with KCC and Swale.

Framing Kent’s Future (2022)

5.2.6. Framing Kent’s Future is KCC’s top-level council strategy for 2022 to 2026. The strategy is built around four key priorities, which aim to shape and frame Kent County Council’s response to the challenges and opportunities up to 2026:

- Levelling Up Kent
- Infrastructure for Communities
- Environmental Step Change
- New Models of Care and Support

5.2.7. KCC prioritise the environment, sustainability and climate change as part of their corporate objectives. One of its four key priorities being an ‘Environmental Step Change’. This includes commitments to:

- Improve how KCC values and protect Kent’s environment;
- Take steps to achieve Kent’s target of Net Zero by 2050;
- Back carbon-zero energy production; and
- Ensure the county is well placed to adapt to climate change.

5.2.8. The strategy also seeks to: “Support strategic opportunities for growth through the delivery of sites and premises and support for new investment and business

expansion, where it will deliver higher-value jobs and increased productivity and contributes to our Net Zero target.”

- 5.2.9. KCC aim to deliver growth through an ‘infrastructure first’ approach. As the Local Highways Authority, Local Education Authority and Lead Local Flood Authority, KCC have a large influence on the constituent Local Plans in the County. KCC’s strategy is to leverage economic growth alongside commensurate levels of infrastructure investment and delivery.

Kent & Medway Economic Framework (2024)

- 5.2.10. KCC and Swale are active members of the Kent and Medway Economic Partnership (KMEP) with the power to help positively deliver on the aspirations of the Kent & Medway Economic Framework (KMEF). The KMEP is the economic partnership for Kent and Medway which aims to drive forward economic growth and prosperity throughout the region. It was set up in 2013. KMEP is governed by a Board and chaired by the private sector, with membership drawn from business, local government, further and higher education (including Swale and KCC representatives).
- 5.2.11. KMEP will remain one of the four federated partnerships which comprised the former South East Local Enterprise Partnership (SELEP). Both KMEP and SELEP worked on the transition of LEP responsibilities to local authorities by April 2024.
- 5.2.12. To support this, KMEP published the KMEF in 2024. It highlights that the area is a large complex and polycentric economy with: “Around 45% of the county’s population lives in Greater North Kent, stretching from Dartford via Gravesham and Medway to Swale and Maidstone. Historically, an important area of industrial activity along the Thames Estuary and the Medway, North Kent has seen substantial industrial restructuring and diversification over recent decades, leading to some of the UK’s most significant (and successful) regeneration projects...[including] important local concentrations (such as manufacturing in Swale).”
- 5.2.13. The KMEF includes a high level economic framework setting out three overarching objectives (supporting the development of an economy that is more “productive, sustainable and inclusive”). This is supported by Five Ambitions: key themes, within which we have set out a series of ‘areas for action’ at county-wide level over the medium term.

Figure 5-2: KMEF Economic Framework



5.2.14. Action Area 4: Supporting the conditions for growth includes ambitions to support future growth. The KMEP state they will “take an active role in bringing forward new development, investing in co-working and innovation space, de-risking sites and providing investor confidence.”

Employment Land Review Update (2023)

5.2.15. The Employment Land Review Update (Stantec, 2023) is an addendum to the 2018 ELR. The update reports a growing strength in the industrial and logistics and life sciences markets, with the office market remaining static since the earlier study. The study concludes the following for industrial land and office floorspace:

- **Industrial land:** “73 ha – with demand of 48 ha, plus a margin of 25 ha. Pragmatically the Council could view the 48 ha (of new land) as the minimum needed for the plan period, with the higher 73 ha requirement (inclusive of the 25 ha margin) the target to aim for.”
- **Office floorspace:** “the unmet need for new office floorspace is just 1.1 ha; virtually no requirement. In effect our assessment is that over the Plan period office floorspace is likely to remain in quantitative terms where it is today, and what new office / hybrid space comes forward will be counter-balanced by the continued loss of outdated office premises. The focus should remain on the refurbishment of existing stock and/or providing good quality flexibly industrial/hybrid space.”

Retail & Leisure Needs Assessment - 2023 Retail Capacity Update

5.2.16. Swale Retail & Leisure Needs Assessment – 2023 Retail Capacity Update (Alder King, December 2022) concludes that there is convenience retail

capacity in Sittingbourne and Sheerness, but not Faversham. For comparison goods capacity there is a higher capacity identified in all three settlements since the 2018 study:

“The update shows that convenience goods floorspace capacity is estimated to have increased in both Sittingbourne and Sheerness where capacity for a medium sized foodstore in Sittingbourne and a small sized foodstore/small format store in Sheerness could potentially be supported in the 10 year NPPF period. The capacity assessment also assesses that there continues to be no convenience goods floorspace capacity in Faversham in the 10 year NPPF period or the longer plan period.

In terms of comparison goods capacity, the updated assessment identifies reduced capacity in all three of the borough’s centres. This is primarily due to changing consumer behaviour coupled with the impact of the Covid-19 pandemic and rising inflation which has resulted in: reduced forecasts of growth in comparison goods expenditure per head; higher forecast comparison goods sales density growth. Within the NPPF 10 year minimum period for identifying capacity, there is assessed to be 2,300-4,200sq m net floorspace capacity in Sittingbourne, 100-200sq m net capacity in Faversham, and 800-1,400sq m net capacity in Sheerness.”

Summary

- 5.2.17. Swale’s location within the wider Thames Estuary and Greater North Kent means that the Borough forms part of a nationally/regionally important growth area prioritised by Government, the County Council and sub-regional public-private partnerships (e.g. KMEP). Local market evidence and the Council’s most recent Employment Land Review and Retail Needs Study evidence that commercial development markets are relatively buoyant and land is still required for allocation as part of the LPR to meet demand. In order to achieve a sustainable level of self-containment and to reduce out-commuting by private vehicle, it is necessary for Swale to have good quality public transport infrastructure and homes available locally to meet needs that are driven, in part, by economic growth.
- 5.2.18. Based on a review of the critical growth strategies locally, there is not a strong argument for setting a housing requirement below the LHN on this basis. The housing requirement should be set at a level that boosts the supply of housing and in response to local economic factors.

5.3. Environmental Constraints

- 5.3.1. This sub-section summarises the headline environmental constraints that might have a bearing on Swale’s housing requirement.

Environmental assets and designations

- 5.3.2. A key issue for the Borough as a whole is avoiding impacts to the Swale and Medway SPA/Ramsar sites (“North Kent Estuaries European sites”), including via increased recreational pressure, development of land that is functionally linked to the European sites (e.g. fields used for foraging or roosting by significant wildfowl or wading bird populations) and/or coastal squeeze, i.e. a situation whereby coastal habitats are not able to retreat inland in response to sea level rise. However, growth opportunities in problematic locations are quite limited (more so than was the case for the adopted Local Plan).
- 5.3.3. Aside from the internationally designated sites, nationally designated SSSIs are a limited constraint to growth at locations potentially in contention for allocation; however, locally important habitats are a widespread constraint, and there is also a need to recognise landscape-scale constraints and opportunities. The Biodiversity Baseline Study (2020) notably identifies a spatial framework of landscape-scale ‘Priority Areas’, which will be taken forward through a Local Nature Recovery Strategy.
- 5.3.4. The areas of greatest constraint are located in the Northern and Southern extents of the Borough aligned with the SPA, National Landscape and Flood Zone 3. There is also significant incidence of the Best and Most Versatile agricultural land in Swale (as like much of Kent).

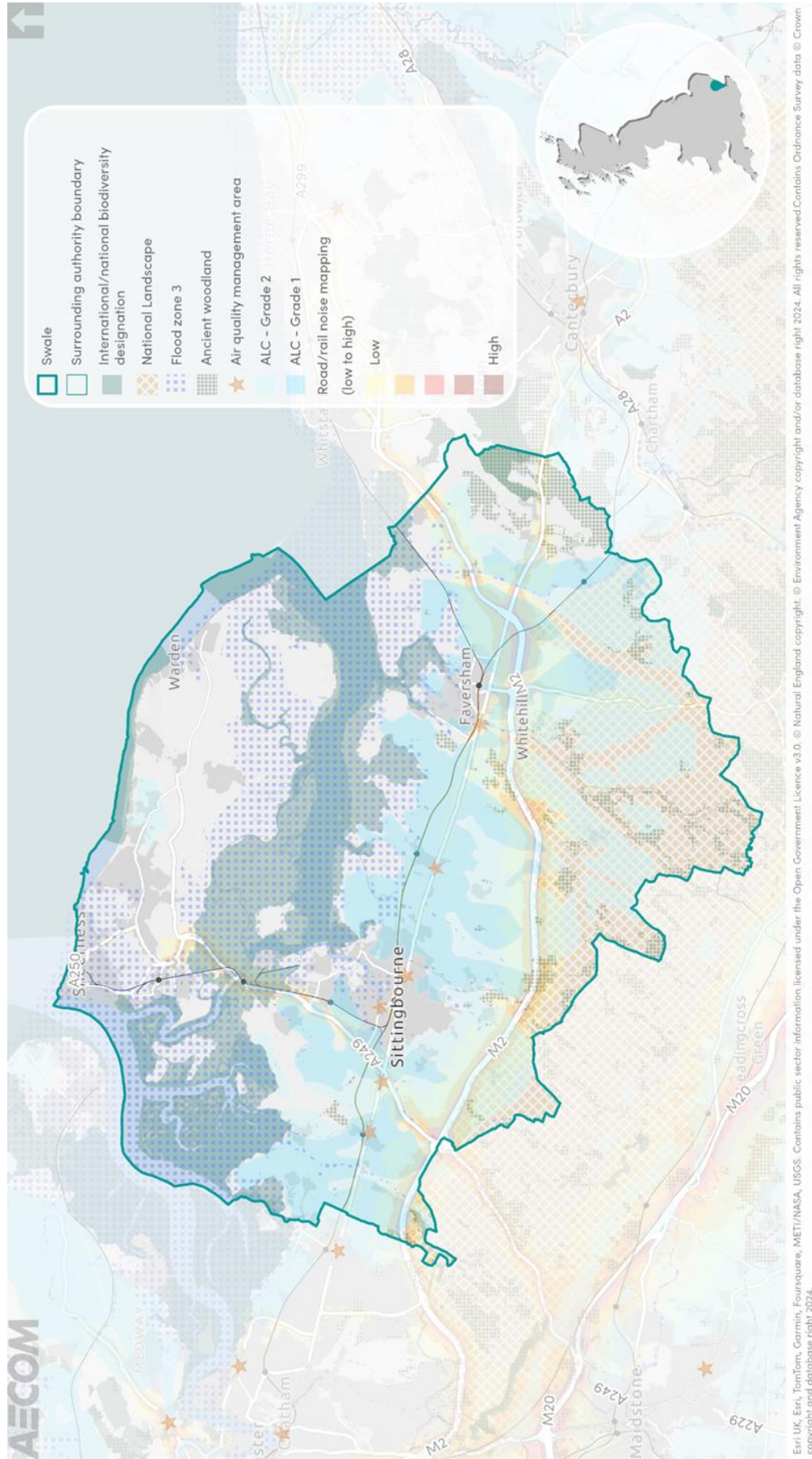


Figure 5-3 Environmental Constraints

Summary

- 5.3.5. Swale is a coastal authority with a large area of the Kent Downs National Landscape in the south of the authority and a high incidence of high quality agricultural land. As such, identification of sites is challenging locally and striking the right balance between growth/housing delivery and conservation and enhancements of the natural environment will take careful planning. The environmental constraints present in Swale are recognised in paragraph 11(b) (and footnote 7) of the NPPF as key factors that must be considered in plan making when deciding if objectively assessed housing needs can be met.
- 5.3.6. However, the LPR LHN and land availability position in Swale (in and around) the established settlements suggest that there is not a strong argument for planning below LHN. This should be tested in greater detail through the Sustainability Appraisal and Habitats Regulation Assessment to fully understand the cumulative impacts before proceeding with a basket of sites and strategy that is capable of passing the NPPF's tests of soundness.

5.4. Infrastructure Constraints

- 5.4.1. This sub-section covers a review of physical and social infrastructure capacity. The most recent publicly available Infrastructure Delivery Plan (IDP) was published in January 2021 and extracts are included under the themes of:
- Power
 - Potable Water
 - Foul Water
 - Transport
 - Education
 - Health
 - Social Provision.
- 5.4.2. Generally speaking, physical infrastructure (such as utilities) will not be viewed as an absolute constraint on development where reinforcements can help to address identified capacity issues. Having said this, the timing of reinforcements is important and can be material to the deliverability of sites during the LPR plan period. Similarly, the geography of Swale/Kent can present unique challenges. For example, the highways network has been identified by statutory consultees as a key challenge to growth in the Borough. Similarly, Kent is generally reliant on groundwater for potable water supply. If one or more infrastructure challenges cannot be resolved in a timely fashion through public intervention or enabling development this can have implications on the overall soundness of the spatial strategy.

- 5.4.3. The edited extracts are limited to content in the IDP regarding spatial implications, sites and future provision only.

Power

- 5.4.4. Queenborough and Rushenden - there is a 6.6kV main sub-station in the vicinity of the Rushenden South site that has available headroom to serve the developments previously proposed as part of the earlier formal consultation. However, should there be several large developments in the area reinforcement may be required... as the development continues to progress at the site, it is expected that a gas network reinforcement project would be required to ensure security of supply not only to the development, but also to the surrounding area.
- 5.4.5. Sheerness - the area is served by a 6.6kV main sub-station which has headroom. There are no capacity issues, therefore, for smaller developments although large one off developments may require reinforcement.
- 5.4.6. Sittingbourne - there are two 11kV main sub-stations serving the area both of which have headroom. Reinforcement of the extra high voltage (EHV) network may be required at some point to provide additional capacity depending on loading requirements, for example to serve larger industrial developments.
- 5.4.7. Faversham - the east of Faversham is served by an 11kv main sub-station that has recently been upgraded to give a large increase in headroom and the 'second comer' regime(25) may apply depending on when developments come forward and seek a connection to the network. The south east of Faversham could, depending on gas demand and the connection point(s) to the gas network of the development(s), potentially trigger the requirement to reinforce the gas network on the eastern side of Faversham.
- 5.4.8. Lamberhurst Farm - there may be a need for significant reinforcement but this will depend on the type of employment users that occupy the development and whether there is sufficient network capacity for their likely loading requirements.
- 5.4.9. Rural areas - local network reinforcement would be required.

Potable Water

- 5.4.10. The north west of the Borough, including the Isle of Sheppey, is within Southern Water's Kent Medway WRZ (supplied from a mixture of groundwater and water from rivers), whilst the remainder of the Borough is located in the South East Water's WRZ8, where drinking water is supplied by groundwater and imported water from Southern Water. Neither water company has identified issues with the supply of water over the plan period.

Foul Water

- 5.4.11. There was sufficient permitted capacity at the Eastchurch, Motney Hill and Teynham Waste Water Treatment Works (WwTWs) to accept the planned level of growth. The headroom at the Faversham WwTW was already limited and at

Queenborough WwTWs the available headroom capacity would be used by 2024, requiring Southern Water to apply for new discharge permits. More stringent quality conditions would be required relating to Biological Oxygen Discharge to ensure no deterioration in the water quality of the Swale Estuary. However, the Study concluded that this could be achieved through conventional treatment and that a technical solution would be feasible.

5.4.12. Following assessment of the site allocations proposed in the Regulation 19 Local Plan, Southern Water have advised that there will be a need for reinforcement of the wastewater network in order to provide capacity for development in Sheerness, Sittingbourne, Faversham, Teynham and Neames Forstal.

5.4.13. Southern Water have also advised that the Faversham WwTW may require upgrading towards the end of the plan period. Southern Water would seek funding for any upgrade through a future AMP cycle but the timing of an upgrade to the WwTW would depend on the build out rate of larger sites and available capacity at the WwTW.

Transport

5.4.14. The road network in Swale is focused east/west along the M2/A2 corridor with the A249 and A251 providing the main north/south routes. Traffic and transport capacity issues are significant limitations of the existing network and at key junctions between the local and strategic highway network giving rise to capacity issues at peak hours, typically queuing from slip roads onto the main carriageway of the strategic road network (SRN).

5.4.15. National Highways have commented that the Isle of Sheppey and wider Borough is effectively a cul-de-sac resulting in all but very localised traffic normally making use of the SRN. As such, future development needs to carefully consider the transport implications and associated infrastructure issues on the SRN and local highway network, including the M2/A2/A249 corridor. As the major roads are linked across the Borough the cumulative impact across all major junctions needs to be considered. National Highways have also indicated the need, due to known capacity issues within the Borough, for the phasing of large scale development with the timescales for the delivery of planned junction improvements or improvements identified as a consequence of bringing forward the reviewed Local Plan. They also emphasise that this should be combined with maximising the move to sustainable transport use.

A249 Stockbury Roundabout at J5

5.4.16. National Highways are undertaking improvements to the A249 Stockbury Roundabout at J5⁹, which was operating over capacity. National Highways currently seek to restrict, through the imposition of a Grampian condition on a

⁹ Accessed at: <https://nationalhighways.co.uk/our-roads/south-east/m2-junction-5-improvements/>

planning permission, occupancy of developments that may be permitted until the completion and opening of the scheme to traffic. Following scheme completion, J5 will have capacity to support the delivery of growth planned in the adopted Local Plan but further assessment will be required to determine how much, if any, of the further growth now planned for through the LPR can be accommodated.

M2 Junction 6

5.4.17. J6 is not a well-used junction due to its layout and proximity to J7 and there is currently some spare capacity at the junction. There is, however, a risk of traffic on the A2/A251 queuing back to J6 and National Highways have highlighted the possible need for additional mitigation over and above that currently planned in the KCC A2/A251 junction improvement scheme.

M2 Junction 7

5.4.18. J7 (Brenley Corner), where the M2 and A2 meet, is a pinch point on the strategic transport route for traffic travelling onto Canterbury and Dover, particularly for HGVs travelling to the Dover port. The junction is currently operating at capacity level with the current configuration of the junction regularly creating peak hour congestion as traffic on the SRN mixes with traffic on the local road network leading to queuing on the approach roads. The capacity of the junction, therefore, is not only a constraint to development locally but also more widely across north and east Kent, particularly development in local authority areas along the M2/A2 corridor and also has wider strategic impacts on the economy of the south east.

5.4.19. There is currently no committed national improvement scheme to mitigate the above issues although KCC have proposals for minor improvements to the local roads approaching the junction. An improvement scheme to remove the congestion due to the gyratory, creating a continuous M2/A2 route and providing for a free flow of traffic is planned. The scheme has been included as a pipeline scheme in the national Road Investment Strategy 2 (RIS2) for development during 2020 - 2025, with potential delivery beyond 2025, although there is no commitment to the scheme ultimately being included in RIS3 for funding and taken through to construction. National Highways have previously indicated that until firm proposals for an improvement scheme come forward the RIS2 proposals cannot be relied on to mitigate the development planned for in the emerging Local Plan and there will be a need to assess impacts and mitigation measures at a local level; this work is ongoing.

A249 Junctions

5.4.20. There are improvement schemes proposed for three junctions on the A249¹⁰, at Key Street, Bobbing and Grovehurst Road. The aim of the improvements is to reduce congestion, improve journey time reliability and provide additional road capacity for planned new housing as well as improve facilities for

¹⁰ Accessed at: <https://www.kent.gov.uk/roads-and-travel/road-projects/in-progress-road-projects>

pedestrians and cyclists. The schemes proposed for each junction are summarised below.

Education

5.4.21. For early years, KCC will either seek developer funding to provide nursery provision, which may include securing community rental or leasehold accommodation availability for private, voluntary or independent sector providers of 0-4 childcare. When a new school is delivered a nursery space is now included in the design, with KCC working to identify early years provision and the most appropriate way to deliver this.

5.4.22. KCC have indicated that there will be a need for a mixture of SEN provision, including:

- the expansion of the new SEN school on the Isle of Sheppey for primary SEN provision;
- a new SEN school;
- contributions towards specialist resource provision in new mainstream primary and secondary schools.

5.4.23. The adopted Local Plan IDS identified a need for the following secondary provision:

- New 6FE school on North West Sittingbourne mixed use allocation (over 2 phases)

5.4.24. Since then, KCC have also identified the need for the expansion of several existing schools to provide additional secondary places arising and these are reflected in the Infrastructure Delivery Schedule. Following discussion on the development now proposed across the Borough, KCC have indicated that there will also be a requirement for the following education provision:

- New 4FE school on site to east of Faversham

5.4.25. For sixth form and further education, an assessment in the previous Commissioning Plan of capacity in non-selective and selective schools indicated that across Swale there is sufficient capacity in non-selective provision, with the exception of the Faversham area where a deficit in provision was forecast from 2022/23. In the case of selective school provision, there was a need for additional provision in the Canterbury and Faversham planning area (from 2021/22) and Sittingbourne and Sheppey, although the need here was required from 2024/25.

Social Provision

5.4.26. The IDP has a section on 'Social Provision' which refers to community facilities that do not fall under the headings of Education or Health. This may include community centres, social care, community learning and/or library services.

5.4.27. There is no spare capacity to meet the additional demands on youth services arising from new developments, KCC will seek a developer contribution towards the provision of additional facilities locally to mitigate development impacts.

Health

5.4.28. GP practices in Swale have some of the highest patient/full time equivalent GP ratios in the country. In July 2019, the ratio of patient/FTE GP in Swale CCG was 2,608 (4th percentile) and the ratio for Canterbury and Coastal CCG was 2,051 (2nd percentile). This compares to a national average of 1,721 patients/FTE.

5.4.29. Both Swale and Canterbury and Coastal CCGs published estate strategies, which define at PCN level the priorities for general practice development over a five year period to respond to population growth and ensure the estate is 'fit for purpose'. The most recent strategies focus on planning for population growth and the impact this has on the capacity of general practice premises and the requirement for improvements to existing facilities or the need for purpose built facilities. The strategies are used by Kent and Medway CCG in assessing the impact of proposed developments on local practices and responding to planning applications. The priorities identified in the strategies are:

- Maximising use of Sheppey Community Hospital site
- Expansion of Sheppey Healthy Living Centre
- Re-opening of Warden Bay branch surgery
- Maximising use of Sittingbourne Community Hospital site
- Expansion of Memorial Medical Centre
- Extension to Chestnuts Surgery
- Relocation of existing Lakeside and Milton Regis premises to a new building
- Extension to Meads Medical Practice
- Extension to Newton Road Surgery
- Reconfiguration of Faversham Health Centre

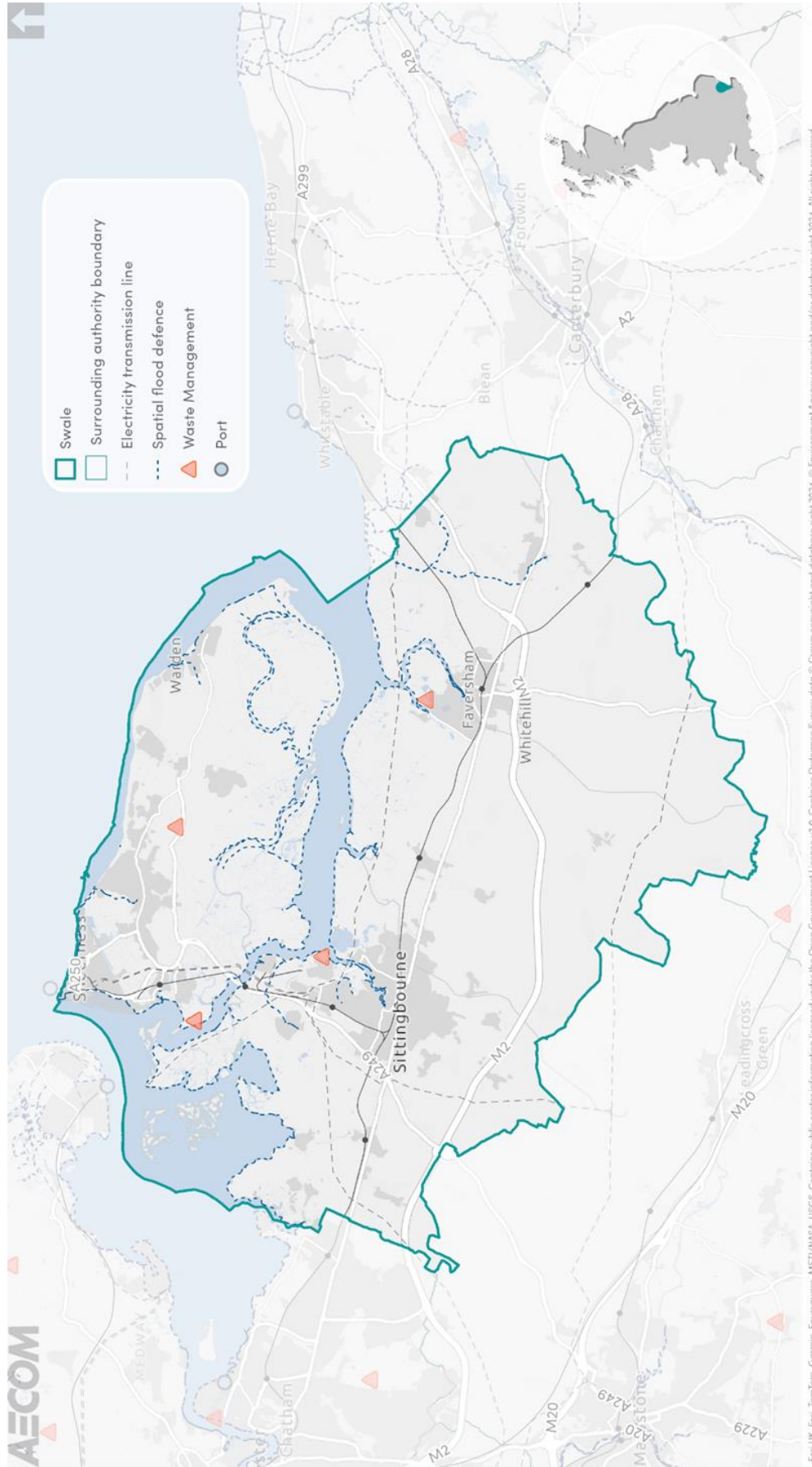


Figure 5-4 Strategic Infrastructure in Swale

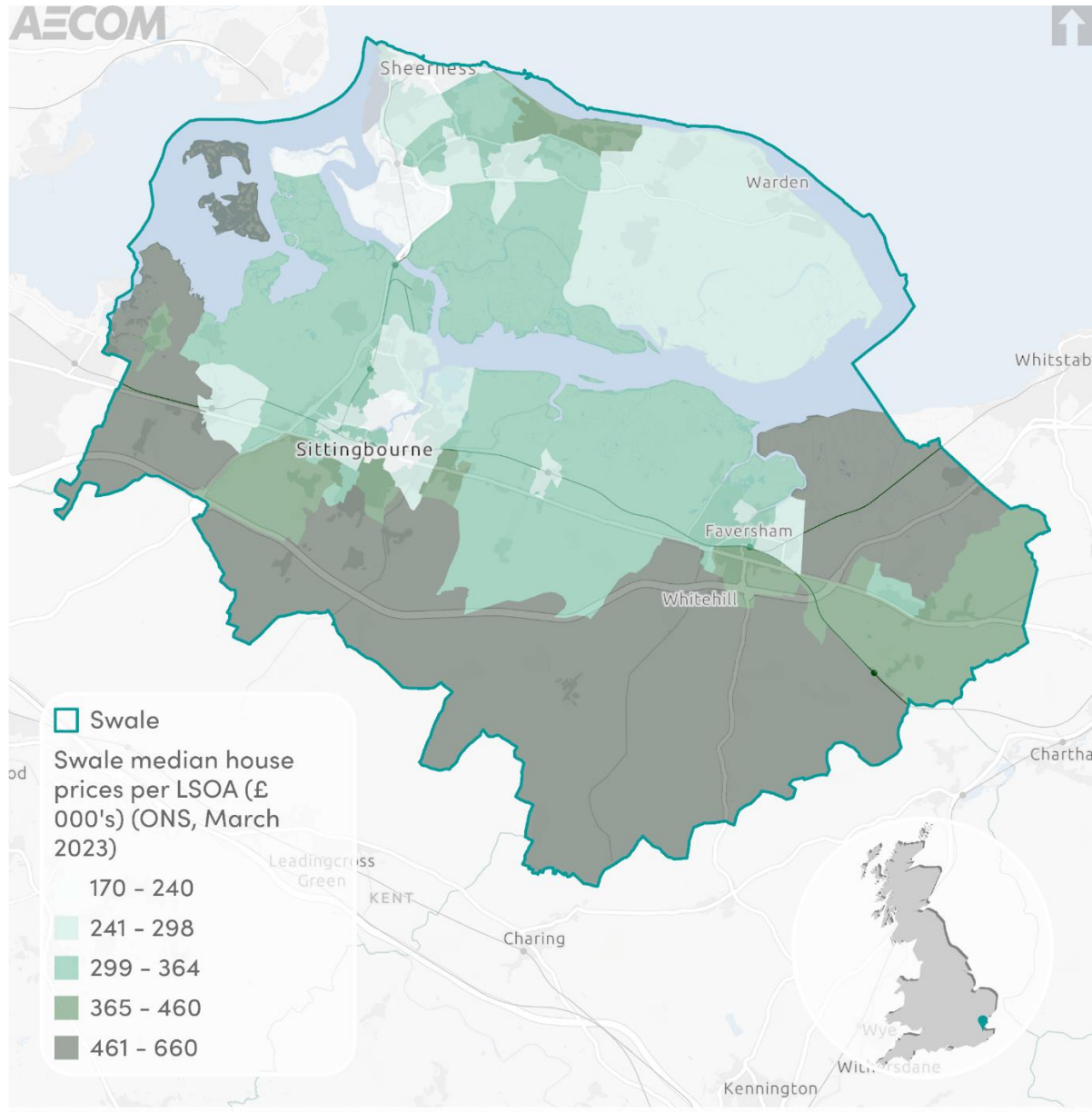
Summary

- 5.4.30. As noted in the introduction to this section, most physical infrastructure capacity issues can be resolved via an engineering solution. However, the delivery of social infrastructure is more complex and shall require careful planning with key stakeholders to match new population growth locally with commensurate education, health and community facilities.
- 5.4.31. Based on the evidence available, there could be a case for setting a housing requirement below LHN on the basis of the transport issues, principally highways capacity, acting as a break on growth in the Borough if satisfactory reinforcements cannot be delivered in a timely fashion. Elsewhere in the UK, Local Planning Authorities have deployed stepped housing trajectories to account for delays in delivery on key infrastructure items related to strategic sites.

5.5. Viability and Deliverability

- 5.5.1. This sub-section explores viability and deliverability challenges in Swale, with reference to the Local Plan viability studies (2020 and 2024); the Kent County Council Developer Contributions Guide (2023); and mapping local house prices based on the most up to date data from the ONS (2023) (Figure 9-1). The evidence demonstrates that house values and relative levels of deliverability are highest in the rural areas (South and Western/Eastern extents of the Borough). The most challenging areas are in the Central and Northern areas (the Isle of Sheppey, Sittingbourne and Faversham), albeit some locations adjacent to the major settlements are located in higher value areas.

Figure 5-5: Swale Median House Prices by LSOA (ONS, March 2023)

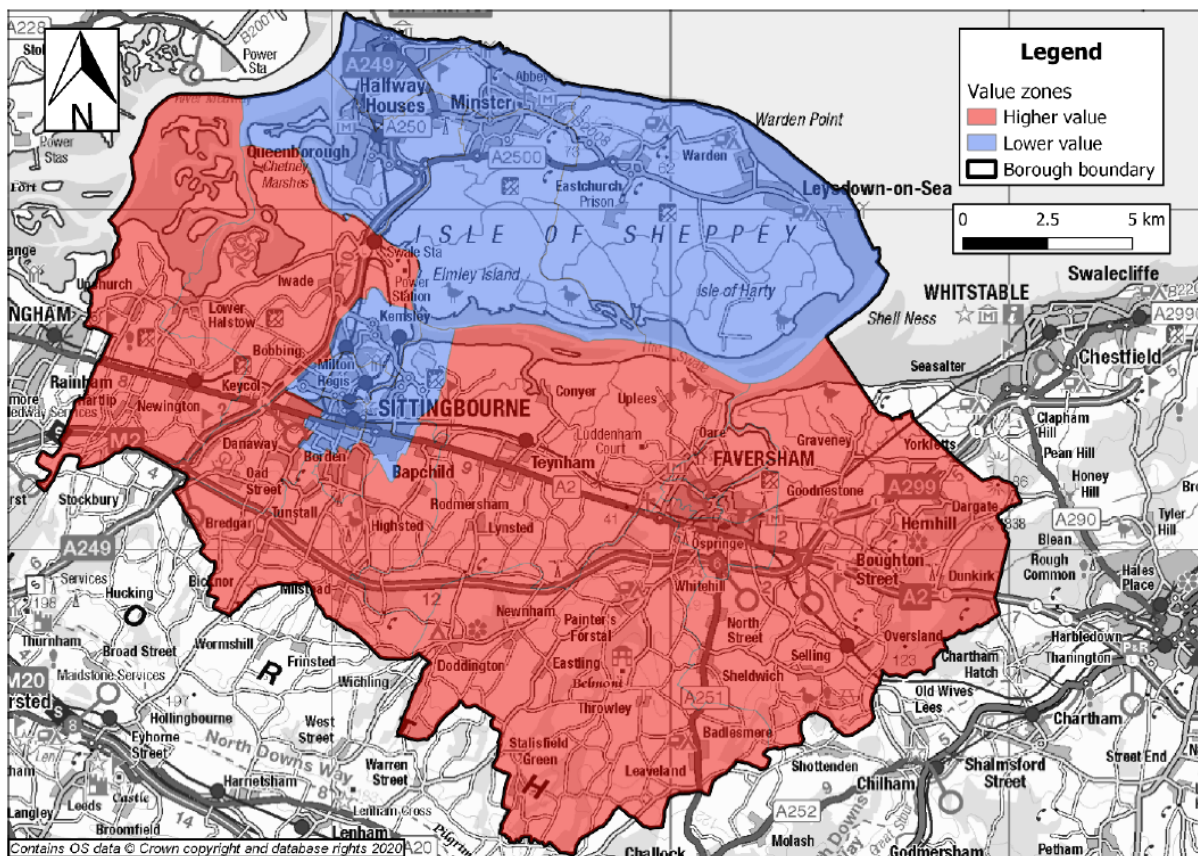


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Local Plan Viability Study 2020 (Aspinall Verdi)

5.5.2. The earlier ‘Local Plan Viability Study’ (Aspinall Verdi, December 2020) tested a series of development typologies based on location (greenfield, brownfield) and value zones. In order to classify the typologies the viability consultant collected data on average property prices and mapped house values according to prices paid displayed as a heatmap and then aggregated by Ward. This analysis was then used in the study to identify the high and low value areas for the purposes of testing (Figure 9-2).

Figure 5-6 Value zones used in viability testing (Aspinall Verdi, 2020)



5.5.3. The study showed that greenfield sites were able to bear higher levels of affordable housing, policy requirements and developer contributions, as compared to less viable brownfield sites. The study also showed that Build to Rent products were unviable.

Kent County Council Developer Contributions Guide 2023

- 5.5.4. KCC is responsible for delivering and maintaining much of the large-scale infrastructure that Kent residents and businesses require, including roads, schools, waste disposal services and libraries. Much of this provision is already at capacity and therefore, the impact of growth is a key consideration.
- 5.5.5. KCC may seek contributions and/or facilities from developments to mitigate the impact of growth on infrastructure and services including, but not limited to:
- Adult Social Care (ASC)
 - Community Learning and Skills
 - Education - Primary
 - Education - Secondary
 - Education - Early Years
 - Education - Special Education Needs
 - Highways and Transportation
 - Integrated Children's Services - Youth Services/Early Years Service
 - Land for Education, Highways and Waste
 - Libraries, Archives and Registrations
 - Public Rights of Way (PRoW)
 - Waste Disposal and Recycling
- 5.5.6. Table 5-1 below within the Kent County Council Developer Contributions Guide includes a summary of contributions required by each KCC service area as of 2022/23 (below). For the contributions available, this equates to approximately £24,516.13 per house. This is based on Q1 2022 prices and excludes elements of CIL and requirements for Land, Buildings and Contributions In-Kind.
- 5.5.7. The document also states that for large-scale/Garden Communities to be delivered in line with KCC principles, County will work with districts from an early stage. Such projects may require their own demographic modelling if a predicted population change results in a significant increase in young families, for example. This may then result in the requirement for bespoke infrastructure to meet their growth needs.
- 5.5.8. KCC may use bespoke evidence, including from these existing large-scale sites, to ensure appropriate infrastructure is planned and provided on future similar developments. Responses to infrastructure planning at the plan-making and planning application stages will be based on demographic modelling specific to the proposed development – an approach supported by the Department for Education.

Table 5-1 Summary of Contributions Required by KCC Service Area as of 2022/23

Service Area	Threshold for Seeking S106 Contributions	Expected Contribution	Index
Adult Social Care (TA1)	10 dwellings and above or a site size of 0.5Ha or more.	£180.88 per dwelling	BCIS All-In Tender Price
Community Learning and Skills (TA2)	10 dwellings and above or a site size of 0.5Ha or more.	£34.21 per dwelling	BCIS All-In Tender Price
Education – Primary – New Build (TA 4 & 6)	10 dwellings and above or a site size of 0.5Ha or more.	£7,081.20per applicable* House and £1,770.30 per applicable* Flat	BCIS All-In Tender Price
Education – Primary – Expansion (TA 4 & 6)	10 dwellings and above or a site size of 0.5Ha or more.	£5,412.74 per applicable* House and £1,353.18 per applicable* Flat	BCIS All-In Tender Price
Education – Secondary – New Build (TA 4 & 6)	10 dwellings and above or a site size of 0.5Ha or more.	£5,587.19 per applicable* House and £1,396.80 per applicable* Flat	BCIS All-In Tender Price
Education – Secondary – Expansion (TA 4 & 6)	10 dwellings and above or a site size of 0.5Ha or more.	£5,329.27 per applicable* House and £1,332.32 per applicable* Flat	BCIS All-In Tender Price
Special Educational Needs and Disabilities (TA 4 & 7)	10 dwellings and above or a site size of 0.5Ha or more.	£559.83 per applicable* House and £139.96 per applicable* Flat	BCIS All-In Tender Price
Education Land (TA 4, 8, 9 & 11)	10 dwellings and above or a site size of 0.5Ha or more.	To Be Advised	BCIS All-In Tender Price
Flood Risk Management and Sustainable Drainage (TA 12)	Strategic Development	To Be Advised	BCIS All-In Tender Price
Heritage and Archaeology – Community Archaeology Provision (TA 13)	Sites which are strategic in size or sited in areas of significant archaeological potential	To Be Advised	BCIS All-In Tender Price

Highways and Transportation (TA 14)	Any development impacting upon the highway.	Highway works required to mitigate impacts demonstrated within the applications Transport Statement/Assessment via s278, S38 Agreements. Highway Works and/or Travel Plan interventions via s106 contributions and/or commuted sums for maintenance.	Road Construction Index (ROADCON) or BCIS General Build
Integrated Children's Services – Youth and Early Years Services (TA15)	10 dwellings and above or a site size of 0.5Ha or more.	£74.05 per dwelling	BCIS All-In Tender Price
Libraries, Registration & Archives (TA16)	10 dwellings and above or a site size of 0.5Ha or more.	£62.63 per dwelling	BCIS All-In Tender Price
S106 Monitoring Fee	All S106 agreements	£300 per payment trigger	BCIS All-In Tender Price
Public Rights of Way (PRoW) (TA17)	Assessed on a case-by-case basis	To Be Advised	Road Construction Index (ROADCON) or BCIS General Build
Waste Disposal and Recycling (TA18)	10 dwellings and above or a site size of 0.5Ha or more.	£194.13 per dwelling (maximum - dependent on projects required for the locality)	BCIS All-In Tender Price

Draft Local Plan Viability Study 2024 (HDH Planning and Development Ltd)

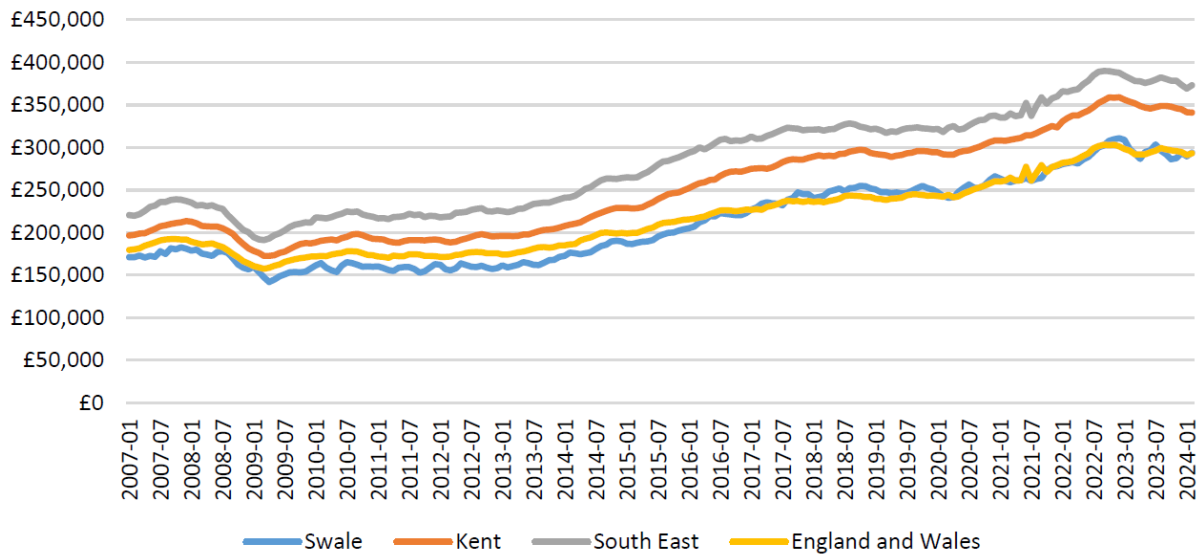
5.5.9. The forthcoming Draft Local Plan Viability Study 2024 tests a series of residential and non-residential typologies. Unlike the 2020 study's two value areas (lower and higher value areas), the 2024 study breaks the Borough down into four broad value areas:

- *Isle of Sheppey – being all the Isle of Sheppey*
- *Sittingbourne and West – being the town of Sittingbourne, the sites to the southwest and west of the town and in the rural areas to the west of the town. This includes sites associated with Rainham.*

- *Sittingbourne East – being the sites to the north, northeast and south of the town and the areas to the east of the town. This excludes the sites associated with Faversham.*
- *Faversham and East – being the town of Faversham, sites associated with the town and the area to the east, towards Canterbury.*

5.5.10. The study highlights that Swale’s house values are below the regional, County and national average (Figure 5-7).

Figure 5-7: Average House Prices (£)



Source: Land Registry (February 2024). Contains public sector information licensed under the Open Government Licence v3.0

5.5.11. The study notes that at this early stage of the plan-making process it would be premature to finalise the policy requirements. As such the study models several scenarios and different levels of policy requirements and planning contributions to illustrate whether typologies and strategic sites would be viable and the maximum level of developer contributions based on the value areas. The following combination of requirements were tested as a pragmatic compromise (see below).

- a. Affordable Housing Greenfield Sites 30%. Brownfield Sites 10% (threshold 10). Potential Strategic Sites 25% Affordable housing mix in line with the requirements for 10% AHO and 25% of affordable homes to be First Homes (30% discount) and the balance of AHO as shared ownership. The balance as Affordable Rent.
- b. Design 95% Part M4(2) Accessible and Adaptable and 5% Part M4(3) Wheelchair Accessible. Zero Carbon, Water Efficiency, 20% Biodiversity Net Gain.

- c. Developer Contributions Birdwise payments on all sites and open space payments on brownfield sites, plus allowance of £10,000 per unit on typologies and £25,000 per unit on the potential strategic sites.¹¹
- 5.5.12. The draft report concludes by cautioning against a reliance on brownfield sites in the five-year land supply and overall housing trajectory, but noting a small proportion of the possible allocations can be brownfield sites. The report also cautions against a reliance on Build to Rent development which would be require some form of public sector intervention.
- 5.5.13. This is likely to influence the selection of sites for allocation. Notwithstanding this, the report notes that ‘a significant number of the brownfield sites that may come forward for development are within the Council’s control. The Council has a good record of securing ‘gap funding’ to enable the delivery of large-scale greenfield schemes and anticipates that this will continue in the future’.
- 5.5.14. With respect to Strategic Sites, the modelling highlights some delivery challenges and the report recommends front loaded engagement with promoters and to only includes sites if they can be demonstrated to be viable (as per the PPG and NPPF). The report acknowledges that strategic sites are typically phased and delivered differently to the standard model recommended by the PPG for viability testing (which assumes all sites are debt funded and purchased on ‘day 1’). The reports notes that large sites are typically purchased in phases that benefit the developer in terms of cashflow and this will have a material impact on viability.

Summary

- 5.5.15. The earlier Local Plan Viability Study (Aspinall Verdi, 2020) was prepared prior to the publication of the Kent County Council Developer Contributions Guide (KCC, 2023). As such, the developer contribution assumptions in the 2020 study should not be relied upon as an indicator of site specific or typology based viability in 2024. However, it is noteworthy that the results are fairly consistent with the latest Draft 2024 viability study, demonstrating that Swale remains a challenging Borough in which to bring forward brownfield land. However, the viability reports both note that a flexible spatial approach to policy requirements would aid viability/deliverability. Notably, several of the strategic site results were shown to score a ‘amber’ i.e. generating residual values in excess of the existing use value but below the benchmark land value. This suggests that a flexible policy approach will be required to mitigate against the cumulative impact of policies on those strategi sites in lower value areas.
- 5.5.16. Based upon the viability and deliverability evidence reviewed, there is not a strong argument for exceptional circumstances. Most Local Planning Authorities experience different viability and deliverability challenges. However, it is the role of the viability evidence and subsequent plan making and policy

¹¹ Reflecting the KCC Developer Contributions requirements for large-scale developments – see 9.3

contained with the Local Plan that must react to these challenges. For, example this may take the form of spatial affordable housing requirements based on location and house values or tenure-based. Similarly, striking the right balance between policy and deliverability for any requirements over and above the Building Regulations that balance viability with the needs of a locality and sustainability objectives.

5.6. Sources of Land Supply

5.6.1. As can be seen from earlier analysis in this section, there are challenging constraints present within the Borough. This section seeks to illustrate where the predominant sources of potential land supply are located. In summarising publicly available information on land supply, it is not the role of this document to comment on the merits of individual sites or whether particular development typologies of site are preferable (e.g. brownfield versus greenfield). Instead we are seeking to understand if there is theoretical capacity to meet housing needs when in advance of more detailed plan making and decision making processes to identify a spatial strategy (and reasonable alternatives) prior to submission of the plan.

Strategic Housing Land Availability Assessment (2020)

5.6.2. The 2020 SHLAA included 238 available sites following two 'Call for Sites' exercises conducted in 2018 and 2019. Work is ongoing on an updated Housing and Economic Land Availability Assessment (HELAA).

5.6.3. The published SHLAA does not include a composite map but mapping shown in the 2021 transport modelling (shows in Figures 5-8 and 5-9) highlights the broad locations of development identified in earlier consultations as potentially deliverable/developable/committed in the years 2027 and 2037 respectively.

Figure 5-8: 3 2027 modelled housing developments

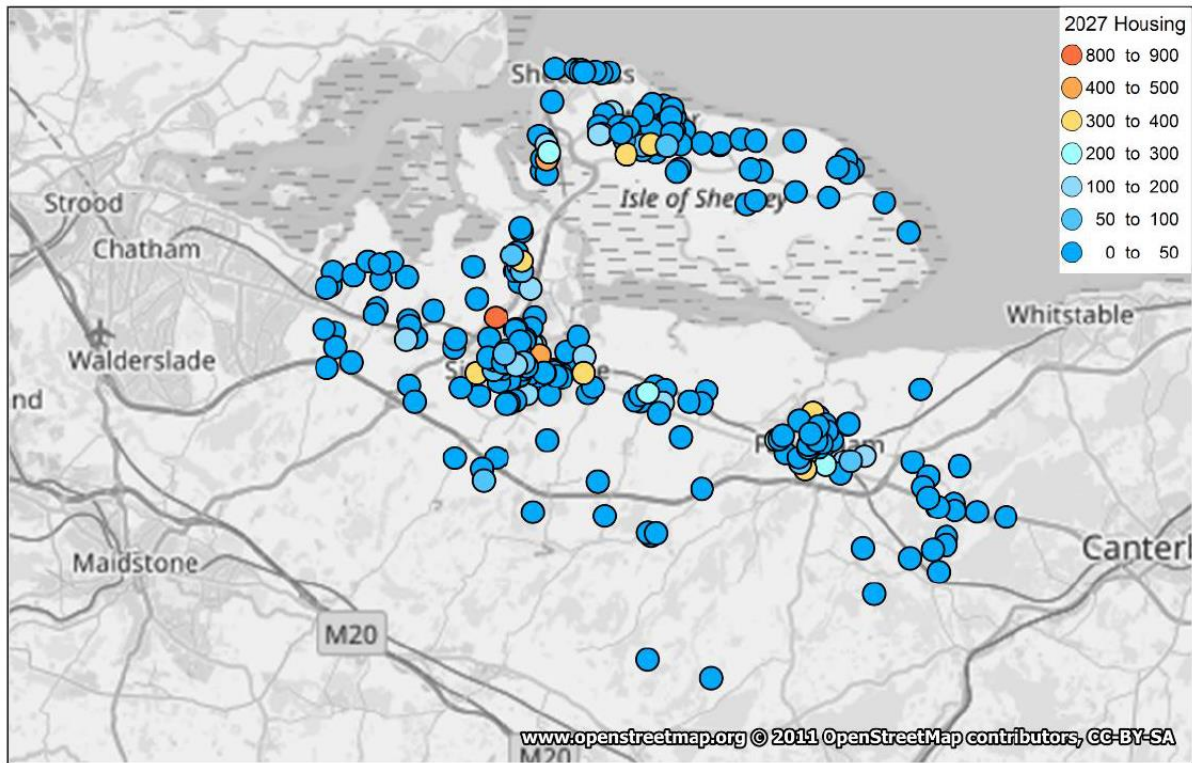
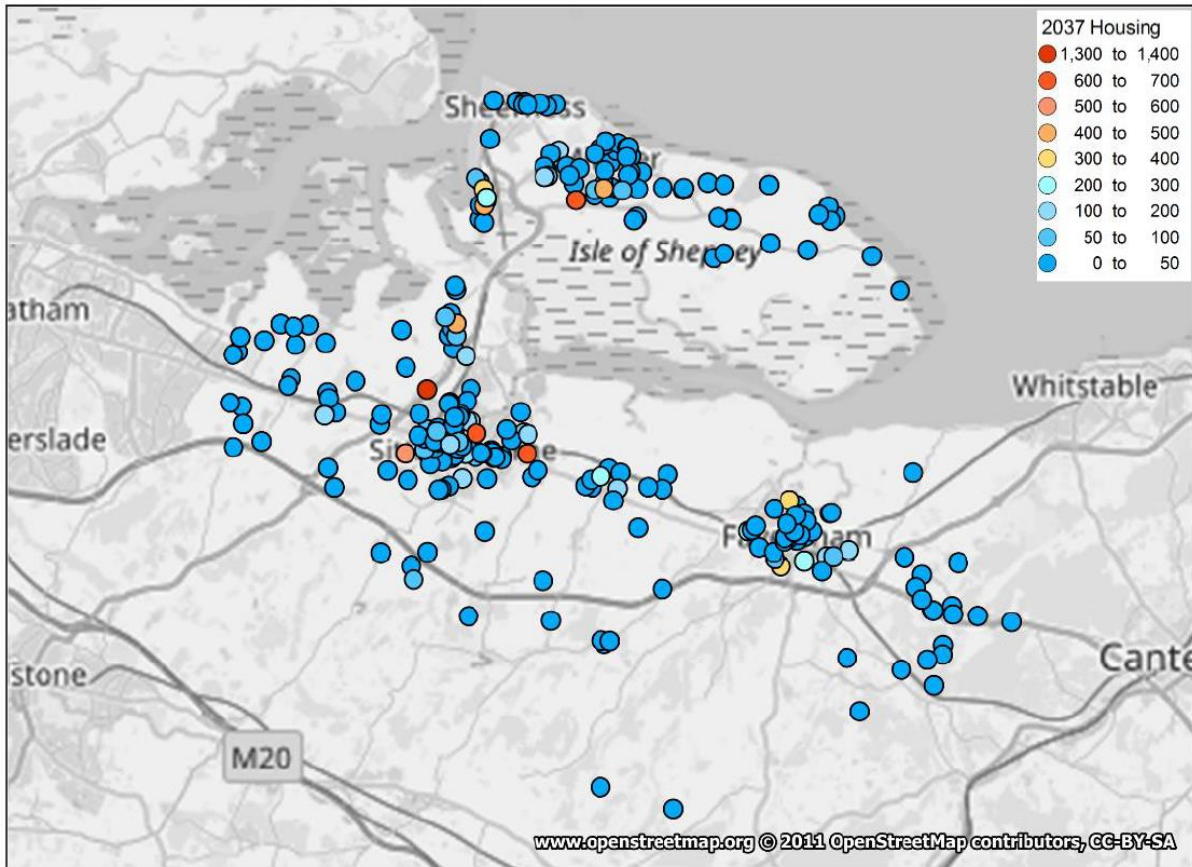


Figure 5-9: 4 2037 modelled housing developments



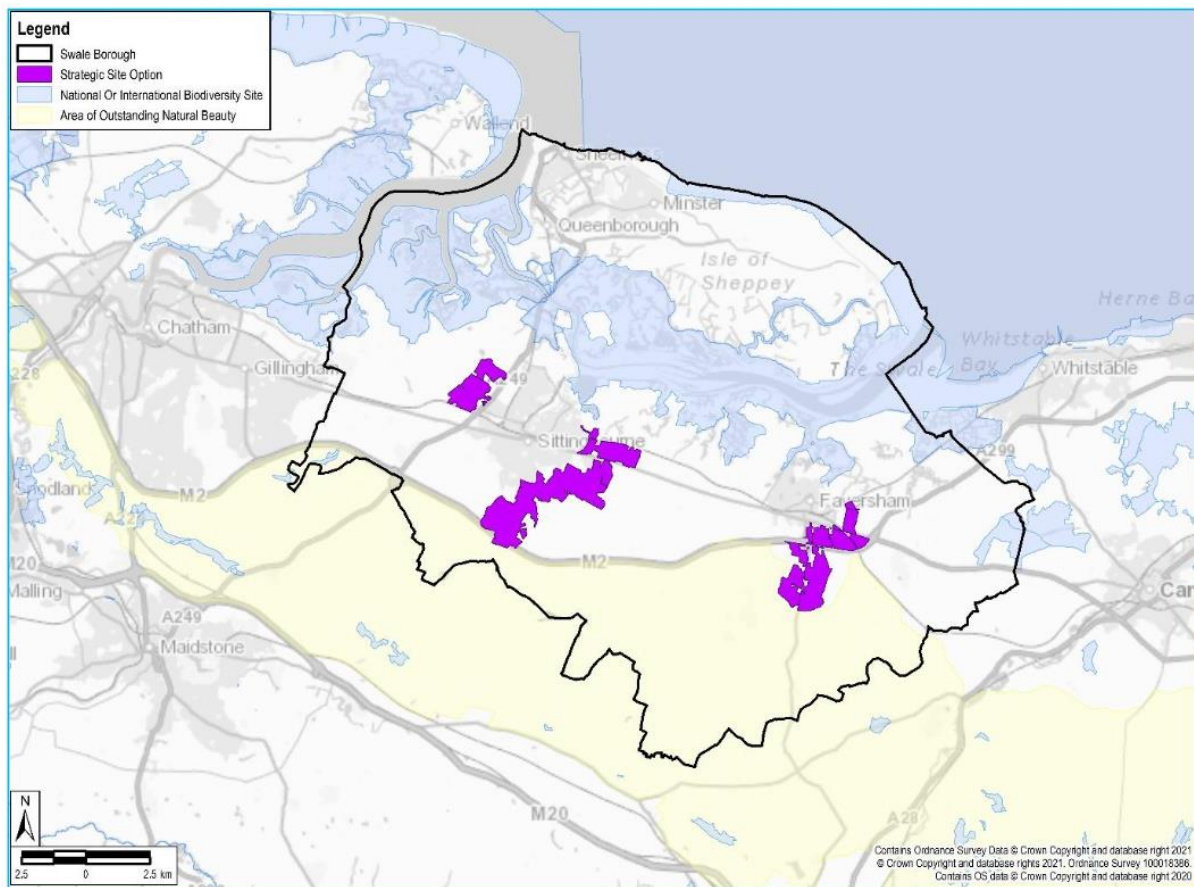
Strategic Development Options (2018)

5.6.4. Formerly known as New Garden Communities, in 2018 Swale Borough Council asked landowners and developers to submit proposals for new communities so that the Council could see if this option should be considered through earlier stages of the Local Plan review process. Officers carried out assessments of the proposals submitted supported by their appointed consultants (Stantec).

5.6.5. The following submissions were received:

- NS1 SE Sittingbourne
- NS3 Land at Bobbing
- NS4 SE Faversham
- NS5 South of Faversham

Figure 5-10: 5 Strategic Development Options (Source: SA, AECOM 2021)



5.6.6. There has been a long-standing focus on exploring large-scale garden community options, in line with NPPF paragraph 74. The SA Report previously published at the Regulation 19 stage in 2021 provided an overview in Section 5.3, including with reference to a dedicated consultation on a garden communities ‘prospectus’ in 2018.

5.6.7. The SA Report then identified a shortlist of four options, and subjected these to detailed appraisal, which led to a conclusion that two were sequentially

preferable, namely SE Faversham and Bobbing (and, of the remaining two options, there was a preference for SE Sittingbourne over North Street).

- 5.6.8. It should be noted that the subsequent Regulation 18 “issues and options” consultation identified the potential to focus growth at one or more garden communities and listed the same shortlist of four sites as previously discussed in the SA Report.

Commitments and Extant Allocations

Five Year Housing Land Supply

- 5.6.9. Following the latest affordability ratio data for the Council published by the Office for National Statistics on the 25th March 2024, and changes to the NPPF in December 2023, the Council can now demonstrate at a base date of 1 April 2023 5.13 years’ worth of housing land supply (see Table 10-1) based on the adopted Local Plan. This includes 4,351 homes of extant permissions and 450 homes as extant allocations.

Table 5-2: Five Year Housing Land Supply calculation (Affordability ratio update March 2024)

5 year housing requirement	
a. Annual Local Housing Need Target (Government standard method)	1,048
b. Five year housing land supply require (1048 x 5)	5,240
c. Total 5 year housing requirement	5,240
Housing land supply 01/04/23 to 31/03/28	
d. Extant planning permissions (Appendix A)	4,351
e. Local Plan Allocations (Appendix B)	450
f. Windfalls (Appendix C)	578
g. Total Supply (d+e+f)	5,379
Five year housing land supply position	
h. Total five year housing land supply (g/c x5)	5.13
i. Surplus in dwellings (g-c)	139

Garden Communities

5.6.11. The latest situation is that planning applications have been submitted for three of the four shortlisted garden community options (see para 10.5 above), specifically all bar North Street (likely the worst performing of the four options, as discussed). Also, an application was recently submitted for a fourth garden community option in the east of the Borough, to the east of Boughton / south of Dunkirk.

5.6.12. Whilst it is not possible to comment on the merits of any of these options, let alone a strategy involving support for more than one (recognising in-combination effects / considerations), it is fair to highlight that having four pending planning applications for garden communities is unusual, and does serve as a reason for exploring options further through the plan-making process. As part of this, it would be helpful and appropriate to draw upon evidence gathered in support of the pending planning applications, albeit with caution applied given scheme specifics are subject to change. Planning application references are:

- SE Sittingbourne (7,150 homes) - [21/503914/EIOUT](#)
- Bobbing (2,500 homes) - [22/503654/EIOUT](#)
- SE Faversham (2,500) - [23/505533/EIHYB](#)
- Dunkirk (1,815) - [24/502123/EIOUT](#)

Summary

5.6.13. Based on a high-level review of land capacity and the location of possible future supply of housing there does not appear to be a case to justify a housing requirement below LHN. Put simply, there is physical capacity among the identified potential housing sites to meet the residual level of LHN identified for the forthcoming plan period. Albeit this is an entirely 'policy off' statement and clearly detailed assessment is required to judge the achievability and suitability of the available sites.

6. Conclusions

- 6.1.1. With respect to Housing Need, AECOM's review considers that the demographic inputs into the existing standard method are reasonable for Swale. There are no errors or anomalies in Swale's demographic data, as examined in depth by the John Hollis work (2020).
- 6.1.2. The standard method affordability uplift for Swale also appears to be reasonable – there are no obvious errors or anomalies in either the house price or earnings data that would affect the ratio and therefore the uplift.
- 6.1.3. Swale's job growth has been limited and there is net out commuting of workers to other authority areas to access jobs. There may be an argument around unsustainable commuting patterns resulting from Swale's housing growth and limited job growth. However, this is a matter that could be addressed through spatial planning aimed at delivering new jobs and directing homes to locations well linked to job growth. It does not appear that this issue generates a strong justification for using an alternative methodology to the Standard Method for calculating Local Housing Need (LHN).
- 6.1.4. As discussed in previous sections, the proposed changes to the NPPF would remove 'exceptional circumstances' from the calculation of housing need. However, the dwelling stock figure used as the starting point for the calculation under the proposed new method raises some issues for Swale given the discrepancies between Census 2021 and net additions data for the 10 years up to the Census. This would merit further examination to ensure the stock based starting point for Swale is as accurate as possible.
- 6.1.5. With respect to Housing Requirement, based on Section 5, there is no clear argument to justify a starting position of setting the LPR housing requirement figure below LHN. However, a review of the existing available evidence has highlighted several characteristics that present very real challenges to growth and plan making in Swale.
- 6.1.6. This includes NPPF footnote 7 constraints (see Figure below) but also wider constraints, with a cumulative effect on the overall extent to which the Borough is constrained.
- 6.1.7. The nature of the Borough as a coastal authority with significant landscape, agricultural and biodiversity constraints makes deliverability challenging. The effect of environmental constraints is compounded by physical constraints (such as flood zones, highways capacity) and viability/market constraints as a consequence of the Borough's high incidence of areas with low house values (relative to national and County levels).
- 6.1.8. However, it is also true that policy and plan making can be used as a tool to address these challenges, directing growth to the most sustainable locations and, in turn, helping to derisk private sector investment. There are clearly

numerous growth locations and a range of borough-wide spatial strategy / growth scenarios that should be explored through the plan-making process. Having done so, it will be possible to reach an evidenced conclusion on the appropriate housing requirement.

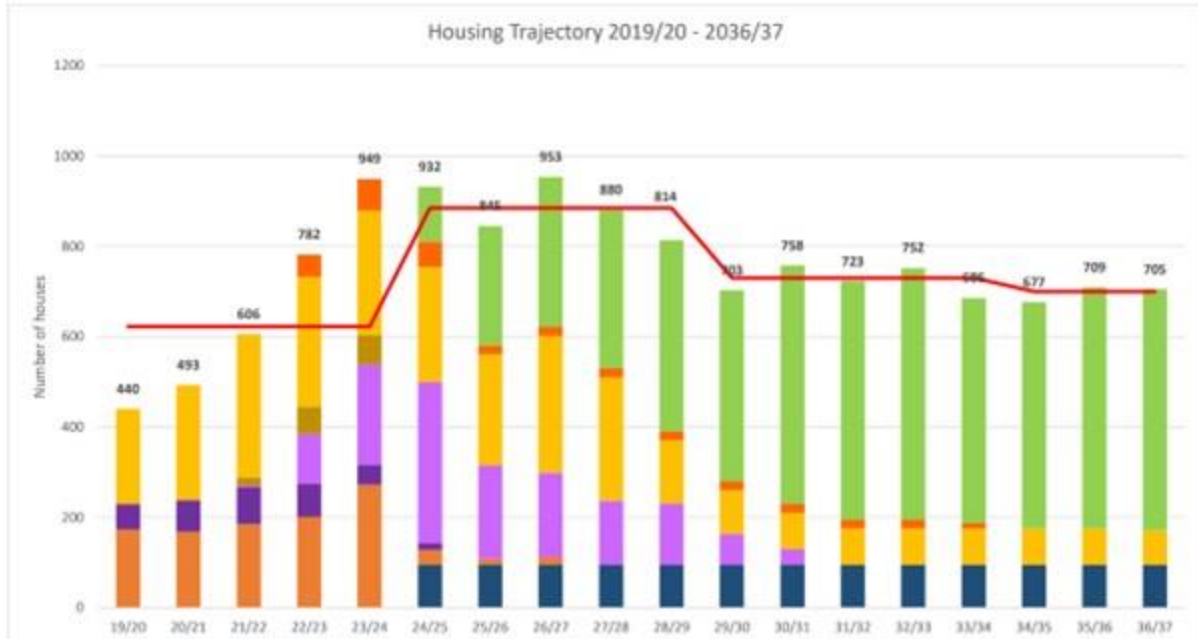
- 6.1.9. Attention should likely focus on scenarios that would involve setting the housing requirement at LHN, as this is essentially the default approach nationally. However, on the basis of our review, we also conclude that it is also reasonable to remain open to lower growth scenarios, at least in the early stages of plan-making. This is a notable departure from the position taken in 2020/21, when lower growth (i.e. a housing requirement set below LHN) was ruled out as ‘unreasonable’.
- 6.1.10. Having said this, any consideration of lower growth scenarios must be undertaken in the knowledge that unmet need must be provided for, as far as possible. As stated by the Swale Local Plan Issues and Preferred Options consultation document (October 2021): *“Should the council have a case to support not being able to meet its full need, it would need to negotiate unmet need being delivered in other areas in order to secure a sound local plan.”*
- 6.1.11. Making provision for unmet need would undoubtedly prove highly challenging, given a constrained sub-region where unmet need / risk of unmet need is already an issue. Notably, Medway Borough has faced major challenges progressing a local plan over a number of years, including on account of infrastructure constraints, and local authorities to the west of Medway are constrained by the London Metropolitan Green Belt, including Gravesham Borough, where the Local Plan is likely to generate significant unmet need.
- 6.1.12. There is a need to expedite plan-making, and we would recommend that a means of doing so is to make an early commitment to providing for need in full, i.e. setting the housing requirement at LHN. The Issues and Preferred Options consultation document referred to a need for “compelling evidence” in order to justify a housing requirement set below LHN, and we would broadly concur with this, albeit the precise level of the evidential threshold that must be reached is unclear from the NPPF and guidance (unlike in respect of deciding LHN, where there is a need for ‘exceptional circumstances’ in order to depart from use of the standard method). Generating compelling evidence would undoubtedly take considerable time and effort.

6.2. Recommendations

- 6.2.1. Local Plan-making should be undertaken with a focus on setting the housing requirement at Standard Method LHN, but the Council can/should remain open to setting the housing requirement at a lower/higher figure.
- 6.2.2. Options will need to be refined, and a final decision ultimately made, in light of detailed evidence of strategy and supply options, including informed by appraisal of “reasonable alternatives” through the Sustainability Appraisal (SA)

- process. It will also be important that the Council maintains an ongoing dialogue with key partner and stakeholder organisations, to include giving an early indication of any risk of unmet need arising from the Borough.
- 6.2.3. A final recommendation is that ongoing consideration should be given to the possibility of an upward stepped housing requirement, given the number of strategic growth options locally, i.e. site options that would deliver late in the plan period. Specifically, an upward stepped requirement would involve a requirement set below the average annual requirement (for the plan period as a whole) in the early years of the plan period, which is then compensated for by a requirement set above the average annual requirement in the latter years.
- 6.2.4. This could make providing for housing need in full (and perhaps even higher growth) a more acceptable option. However, there are drawbacks to delaying housing delivery.
- 6.2.5. Numerous neighbouring and nearby local authorities have adopted or are giving consideration to a stepped requirement, for example Folkestone and Hythe – see below.
- 6.2.6. Specifically, there are four housing requirements established for the plan period, and the average of these is 738 homes per annum, which is standard method LHN. The Inspector’s Report (2022; see [paras 30-33](#)) explained how this “alternative approach” to establishing a housing requirement is necessary “to reflect the anticipated delivery of the major phases of the New Garden Settlement as well as other larger sites.”
- 6.2.7. The other point to note is that there are only two or three years where the identified supply significantly exceeds the housing requirement (i.e. there is a ‘supply buffer’ as a contingency for unforeseen delivery issues). However, the inspector concluded that the identified supply (as measured against the housing requirement) was robust and, as of early 2024, the Council was able to demonstrate a five year housing land supply.

Figure 11-1: The adopted Folkestone and Hythe Local Plan housing trajectory



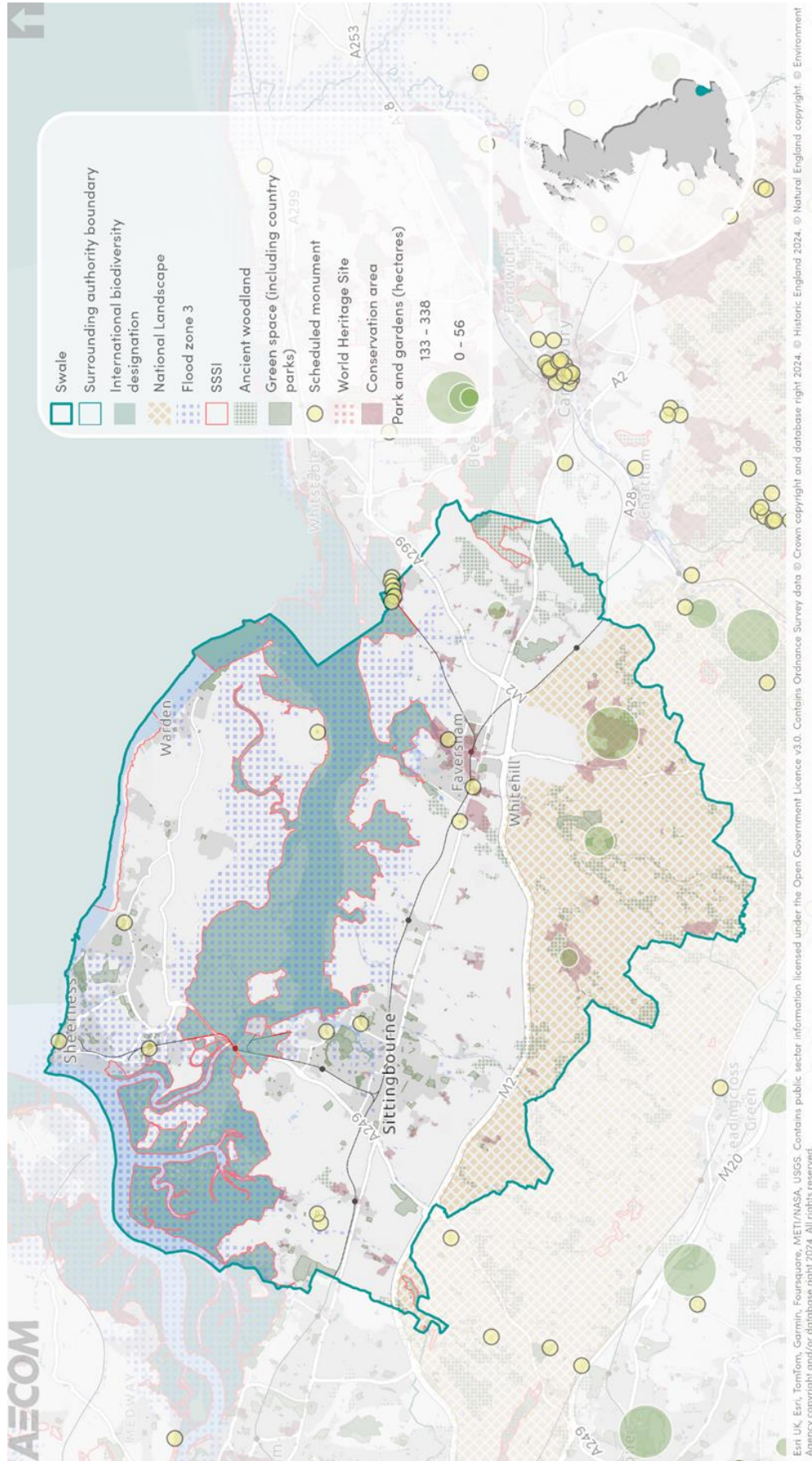


Figure 6-2:6 NPPF Footnote 7 Composite Map

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Council Meeting	
Meeting Date	29 January 2025
Report Title	Local Government Boundary Review, Council size submission
EMT Lead	Larissa Reed, Chief Executive
Head of Service	
Lead Officer	Janet Dart, Policy & Engagement Officer
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That Council discusses the Council Size Submission as set out in Appendix I. 2. That the Council Size Submission document, as attached at Appendix I, be approved as the Council's formal submission to the Local Government Boundary Commission for England as part of the Council's Local Government Boundary Review. 3. That Council note the Government policy position set out in the English Devolution White Paper on 16 December 2024 on devolution and local government reorganisation, may have an impact on the progression of the boundary review in Swale.

1 Purpose of Report and Executive Summary

- 1.1 To consider the recommended Council Size of 55 and the supporting evidence provided, and decide whether or not the Council Size Submission document should be the Council's formal submission to the Local Government Boundary Commission for England (LGBCE).

2 Background

- 2.1 In 2024 the Chief Executive was contacted by the LGBCE who advised that after carrying out their annual assessment of local authorities, they had decided they would be carrying out a boundary review of Swale. The reason for this is that they had found that 8 out of the 24 Swale electoral wards, or 33%, had a variance of greater than 10%. This means that the electoral arrangements in the borough have got out of balance and some councillors represent more electors than others.
- 2.2 The outcome of this assessment has triggered the first phase of a boundary review and Swale Borough Council (SBC) are invited to prepare a Council Size Submission.

- 2.3 The LGBCE provided a template and guidance for completing the Council Size Submission. The Commission specifically seeks to understand elected member requirements across strategic leadership, accountability and Community Leadership.
- 2.4 The Submission should recognise the wider local and national policy context, elaborating on local geography, demographics and community characteristics. It should articulate councillors' roles and responsibilities and consider the impacts of technology and social media. Submissions will demonstrate a robust understanding of elected member requirements, now and in the future.

3 Proposals

- 3.1 That Council discusses the Council Size Submission as set out in Appendix I.
- 3.2 That, the Council Size Submission document, as attached at Appendix I, be approved as the Council's formal submission to the Local Government Boundary Commission for England as part of the Council's Local Government Boundary Review.
- 3.3 That Council note the Government policy position set out in the English Devolution White Paper on 16 December 2024 on devolution and local government reorganisation, may have an impact on the progression of the boundary review in Swale.

4 Alternative Options Considered and Rejected

- 4.1 Members and officers considered the option of a lower Council Size Submission but as the evidence in the submission demonstrates, a figure lower than 55 will not provide the support for residents, to help achieve the Council's ambitions and priorities as set out in the Corporate Plan. The proposal of 55 will more evenly spread the workload of councillors thus addressing many of the issues raised in the member workload survey on work/life balance.
- 4.2 The Council could decide not to make a size submission, but this is not recommended as it would result in the LGBCE imposing a size with no input from the Council.

5 Consultation Undertaken or Proposed

- 5.1 A Member Workload Survey of SBC Councillors was carried out and 30 of the 47 Members responded. The results were used as evidence to support the proposal in the Council Size Submission. Full survey results can be found in Appendix I.

- 5.2 Group Leaders were consulted on the proposal for the Council Size Submission of 55. The draft submission report was circulated to all SBC members for comment.

6 Implications

Issue	Implications
Corporate Plan	It is not anticipated that the proposed Council Size will affect the achievement of any of the corporate priorities. However, they will support the Council's overall achievement of its ambitions by ensuring an appropriate size for Council.
Financial, Resource and Property	The proposed Council Size could have financial consequences from May 2027 when the new arrangements are implemented and would be handled separately through the budget process.
Legal, Statutory and Procurement	This work is part of the Local Government Boundary Review being conducted by the LGBCE and the submission has been put together in accordance with their template, guidance and agreed timetable. The review will be conducted by the LGBCE under its powers in the Local Democracy, Economic Development and Construction Act 2009.
Crime and Disorder	None identified at this time.
Environment and Climate/Ecological Emergency	None identified at this time.
Health and Wellbeing	None identified at this time.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this time.
Risk Management and Health and Safety	<p>Although the LGBCE will take this Council Size Submission into account, they may decide after carrying out the electoral review process that a number different to 55 is an appropriate Council Size.</p> <p>The Government policy position set out in the English Devolution White Paper on 16 December 2024 on devolution and local Government reorganisation, may have an impact on the progression of the boundary review in Swale.</p>

Equality and Diversity	No direct impacts identified, however, one of the key aims of the boundary review is to ensure that there is equality for electors in their democratic representation.
Privacy and Data Protection	None identified at this time

7 Appendices

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

- Appendix I: Swale Borough Council – Council Size Submission

8 Background Papers

None.

Swale Borough Council

Council Size Submission

About You

The respondent should use this space to provide the Commission with a little detail about who is making the submission, whether it is the full Council, Officers on behalf of the Council, a political party or group, a resident group, or an individual.

Swale Borough Council, developed by members and officers. Going to Full Council 29 January 2025

Reason for Review (Request Reviews Only)

Please explain the authority's reasons for requesting this electoral review; it is useful for the Commission to have context. *NB/ If the Commission has identified the authority for review under one of its published criteria, then you are not required to answer this question.*

Identified by the Commission.

The Context for your proposal

Your submission gives you the opportunity to examine how you wish to organise and run the council for the next 15 - 20 years. **The consideration of future governance arrangements and council size should be set in the wider local and national policy context.** The Commission expects you to challenge your current arrangements and determine the most appropriate arrangements going forward. In providing context for your submission below, please demonstrate that you have considered the following issues.

- When did your Council last change/reorganise its internal governance arrangements and what impact on effectiveness did that activity have?
- To what extent has transference of strategic and/or service functions impacted on the effectiveness of service delivery and the ability of the Council to focus on its remaining functions?
- Have any governance or capacity issues been raised by any Inspectorate or similar?
- What influence will local and national policy trends likely have on the Council as an institution?
- What impact on the Council's effectiveness will your council size proposal have?

The rainbow coalition administration, which was established after the 2019 borough election, agreed that one of its priorities was to renew local democracy and make the council fit for the future. Achieving this objective has involved far-reaching governance changes, culminating in the decision to move to a committee system from May 2022.

The motivation behind this priority was the desire to diffuse decision-making power more broadly among members than had been the case under the cabinet model. There was a wish to make sure all members could play the decision-making role that their constituents had elected them to play.

Implementing this decision involved a full rewrite of the council's constitution, which was undertaken by the constitution review group. This group – which is made up of one or two senior members from each political group - has continued to meet to review the effectiveness of the new constitution in practice and to work through a list of residual issues, as well as to consider further constitutional improvements going forwards.

The new constitution includes five service committees as replacements for the former cabinet, with 15 members on each committee. The full Constitution can be found via this link: [Agenda for Swale Borough Council Constitution on Monday, 7 October 2024](#)

In March 2023 a Local Government Peer Review was carried out and one of their recommendations was to “*Conduct a review of committee meetings including the number of meetings and capacity to support their frequency. Test further opportunities for wider scrutiny and challenge within the committee system.*” Link to the Peer Review feedback report can be found here: [Council - Peer Review \(swale.gov.uk\)](#) The review was carried out and resulted in the number of committees staying the same, but they now meet less often. However, there are a number of working groups that report to service committees, which involve a large time commitment over a period of months to deliver the work tasked to them by their parent committee. These include the Constitution Working Group, Community Development Strategy Members Task Group, UKSPF Member Working Group, Parking Policy Review Working Group, Leisure Services Working Group, Waste & Street Cleansing Member Working Group and Waste & Street Cleansing Scrutiny Review Working Group.

No governance or capacity issues have been raised by any inspectorate.

The main areas where local and national policy trends are likely to influence the Council as an institution are the fall in funding means in real terms we are not able to do as much as we once did. The biggest issue affecting the Council other than finance is changes to planning legislation and potential devolution.

With regard to the impact of our Council size proposal, where there is more disquiet about the Council's effectiveness, the workload of councillors increases. The recent period of disruption following the implementation of a new waste contract is a good example of this.

Local Authority Profile

Please provide a short description of the authority and its setting, in particular the local geography, demographics and community characteristics. This should set the scene for the Commission and give it a greater understanding of any current issues. The description should cover all of the following:

- Brief outline of area - are there any notable geographic constraints for example that may affect the review?
- Rural or urban - what are the characteristics of the authority?
- Demographic pressures - such as distinctive age profiles, migrant or transient populations, is there any large growth anticipated?
- Community characteristics – is there presence of “hidden” or otherwise complex deprivation?
- Are there any other constraints, challenges, issues or changes ahead?

Further to providing a description, the Commission will be looking for a submission that demonstrates an understanding of place and communities by putting forth arguments on council size based upon local evidence and insight. For example, how does local

geography, demographics and community characteristics impact on councillor casework, workload and community engagement?

Swale is one of 12 districts 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 360km², roughly one-tenth of Kent, and is home to 151,700 people (*ONS 2023 mid-year estimate 155,900*) living in 67,235 households, which is projected to grow to 180,700 by 2042.

The population in Swale grew by 11.7% between the 2011 and 2021 census - a higher rate than the South-East which grew 7.5% during the same period.

The borough is a remarkably diverse place, including the historic market town of Faversham, the traditional seaside resort of Sheerness, the more industrial market town of Sittingbourne and rural villages.

The 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. Running east-west through Swale is the M2, providing access to destinations between the Channel ports and London. Some southern parts of the borough lie within the Kent Downs, a designated National Landscape. Around the Isle of Sheppey, we have a coastline of approximately 45km (28 miles), and for the mainland we have approximately 27km (17 miles) of coastline from our boundary with Medway Council (Rainham) to Kingsferry Bridge, and approximately 18km (11 miles) from Kingsferry Bridge to our boundary with Canterbury City Council at Seasalter. This gives Swale a total coastline of around 90km or 56 miles. This does not include the creeks and inlets.

There are challenges when travelling around the borough, the route between the Isle of Sheppey and Faversham is lengthy and there are often delays due to ongoing roadworks. This is difficult for both residents going about their day-to-day business and Members carrying out the council work.

In terms of geography, the North Sheppey Coastline from Minster Leas round to Warden Bay does not have any coastal defences and the London Clay cliffs form part of SSSI sites (Site of Special Scientific Interest) designated by Natural England. The sea defences are owned and maintained by the Environment Agency (when the purpose of the defence is to prevent flooding) and Swale Borough Council (when the defence is to protect against coastal erosion).

As a coastal borough, the Port of Sheerness gives access, via its deep water berths, to the largest ships in the world; its imports distributed to all corners of the UK.

Swale's demographic make-up is no less diverse than its geography, including a mix of affluent and less affluent communities. In general, the area is less well-off than is typical for the region, 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 in 2019 showed Swale's overall position had 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.

In 2024 Swale Borough Council (SBC) adopted its reviewed [Corporate Equality Scheme 2024-2028](#) and agreed 4 equality priorities:

- Supporting integration and cohesion in our local communities
- Supporting our vulnerable residents
- Ensuring easy, clear and convenient access to our services
- Promoting equality as a local employer

Swale has a growing population with more and more people coming to live here from other areas of the UK. The Census 2021 data also shows that people of other ethnic backgrounds are part of this population growth. At the time of the 2021 Census, Swale was among the highest district in Kent where people live with a long-term health problem or disability. Swale is above the average for all Kent districts in this respect, and higher than the average for the South East and England and Wales.

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 is at the lower end of the skills spectrum and the average weekly earnings are significantly below regional and national averages.

Below is a list of key areas of importance within the community:

- Oare Country Park
- Milton Creek Country Park
- Barton's Point Country Park
- Elmley Nature Reserve
- Perry Wood
- Rose Hill Woods and Grove Park
- The Meads Community Woodland
- Kingsborough Manor Community Woodland
- Leysdown Coastal Park
- Thistle Hill Community Woodland

Link to the Corporate Plan can be found via this link: [Corporate-Plan-2023-2027-final-adopted-version.pdf](#) . The purpose of the Corporate Plan is to ensure that the Council's resources are allocated in a coherent, accountable and effective way, by setting out the five priorities which we will be working on over the next four years, together with the broad objectives we will pursue in support of these priorities.

Community - To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience.

Economy - Working with our businesses and community organisations to work towards a sustainable economy which delivers for local people.

Environment - To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead.

Health & Housing - To aspire to be a borough where everyone has access to a decent home and improved health and wellbeing.

Running the Council - Working within our resources to proactively engage with communities and outside bodies to deliver in a transparent and efficient way”.

With reference to any other constraints, challenges, issues or changes ahead, finances are one of the main issues we face. Additionally, the Government policy position set out in the English Devolution White Paper on 16 December 2024 on devolution and local government reorganisation will impact Swale. The decision by the Secretary of State to call in the Highsted Park Planning Applications on 7 November 2024 and subsequent inquiry will significantly impact the Council’s finances.

We have 3 very clear geographies with different demographics. Faversham is very different to both Sittingbourne and Sheppey and the issues faced are different. Having said that some of most deprived wards are in Faversham. We have different levels of engagement in different areas, although we have had issues in every area which have brought together communities and have increased engagement.

Council Size

The Commission believes that councillors have three broad aspects to their role. These are categorised as: **Strategic Leadership, Accountability (Scrutiny, Regulatory and Partnerships), and Community Leadership**. Submissions should address each of these in turn and provide supporting evidence. Prompts in the boxes below should help shape responses.

Strategic Leadership

Respondents should provide the Commission with details as to how elected members will provide strategic leadership for the authority. Responses should also indicate how many members will be required for this role and why this is justified. **Responses should demonstrate that alternative council sizes have been explored.**

Topic		
Governance Model	<i>Key lines of explanation</i>	<ul style="list-style-type: none"> ➤ <i>What governance model will your authority operate? e.g. Committee System, Executive or other?</i> ➤ <i>Swale Borough Council changed from a Cabinet governance model to a Committee System in May 2022.</i> ➤ <i>The Cabinet model, for example, usually requires 6 to 10 members. How many members will you require?</i> ➤ <i>N/A</i>

		<p>➤ <i>If the authority runs a Committee system, we want to understand why the number and size of the committees you propose represents the most appropriate for the authority.</i></p> <p>Service committees are generally thematically based, with each committee being responsible for a range of issues and/or a range of council services.</p> <p>Each councillor sits on at least one service committee. The service committees each have 15 members and the five thematic service committees are:</p> <ul style="list-style-type: none"> • Community & Leisure • Economy & Property • Environment & Climate Change • Housing & Health • Policy & Resources <p>The full functions of each service committee can be found under section 2.2 of the SBC Constitution via this link Part 2 Responsibility for functions</p> <p>➤ <i>By what process does the council aim to formulate strategic and operational policies? How will members in executive, executive support and/or scrutiny positions be involved? What particular demands will this make of them?</i></p> <p>➤ We chose the committee system to increase the numbers of councillors involved in decision making. We have increased the number of working groups (cross party) to ensure that policies are developed by a wide sector of our member core. Scrutiny is undertaken at committee level, however we have also had scrutiny reviews on specific areas of work (eg waste)</p> <p>➤ <i>Whichever governance model you currently operate, a simple assertion that you want to keep the current structure does not in itself, provide an explanation of why that structure best meets the needs of the council and your communities.</i></p> <p>➤ Members voted unanimously to move a committee system and the recent review demonstrated that there was still an appetite to maintain it. This is largely due to the numbers of groups we have in the council and the political make-up of the council.</p>
<p>Portfolios</p>	<p><i>Key lines of explanation</i></p>	<p>➤ <i>How many portfolios will there be?</i></p> <p>➤ <i>What will the role of a portfolio holder be?</i></p> <p>➤ <i>Will this be a full-time position?</i></p> <p>➤ <i>Will decisions be delegated to portfolio holders? Or will the executive/mayor take decisions?</i></p>

		➤ N/A
	Analysis	This section does not apply to Swale Borough Council as the authority operates a Committee System governance model.
Delegated Responsibilities	Key lines of explanation	<ul style="list-style-type: none"> ➤ <i>What responsibilities will be delegated to officers or committees?</i> ➤ See section 2.8 of the SBC Constitution for the Scheme of Officer Delegations via this link: Part 2.8 Scheme of officer delegation ➤ <i>How many councillors will be involved in taking major decisions?</i> ➤ Since the adoption of the committee system in May 2022, all councillors are now involved in taking major decisions through service committees and full council (the exception is single independent councillors who are not able to sit on service committees, unless they are gifted a seat by a group).
	Analysis	<p>In a committee system, there is no executive. There is still a leader, elected by council in the same way as in the leader-and-cabinet model, but s/he does not have executive powers. There are no cabinet and no cabinet members, and thus little or no decision-making by individual councillors.</p> <p>Council is responsible for agreeing the overarching policy and budget frameworks which the service committee (policy & resources) proposes to it. For all decision making the framework is for service committees to propose their recommendations, and once adopted by council, all service committees would take their decisions in accordance with it.</p> <p>Service committees may set up subcommittees and/or working groups. The subcommittees will have decision making powers where these are delegated to them by the Committee. The subcommittees may make recommendations to the whole committee on particular elements of the area of responsibility of the committee.</p> <p>The Housing and Health Committee has a Subcommittee called the Swale Rainbow Homes Shareholder Representation Subcommittee which is made up of members who have received appropriate training. This makes decisions in respect of the Council's role as shareholder of Swale Rainbow Homes.</p>

		Any subcommittee or working group must report to the service committee and its membership is set by the service committee. The membership of a subcommittee must be drawn from the parent committee but the membership of a working group need not do. The political balance rules and access to information rules do not apply to any working groups but they do operate in an open and transparent way and membership is drawn from members who are from different political groups on the Council. Where a working group is supported by officers, the Chief Executive is consulted before it is established.
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Accountability

Give the Commission details as to how the authority and its decision makers and partners will be held to account. The Commission is interested in both the internal and external dimensions of this role. **Responses should demonstrate that alternative council sizes have been explored.**

Topic	
Internal Scrutiny	The scrutiny function of authorities has changed considerably. Some use theme or task-and-finish groups, for example, and others have a committee system. Scrutiny arrangements may also be affected by the officer support available.
<i>Key lines of explanation</i>	<ul style="list-style-type: none"> ➤ <i>How will decision makers be held to account?</i> ➤ <i>How many committees will be required? And what will their functions be?</i> ➤ <i>How many task and finish groups will there be? And what will their functions be? What time commitment will be involved for members? And how often will meetings take place?</i> ➤ <i>How many members will be required to fulfil these positions?</i> ➤ <i>Explain why you have increased, decreased, or not changed the number of scrutiny committees in the authority.</i> ➤ <i>Explain the reasoning behind the number of members per committee in terms of adding value.</i> ➤ <i>As Swale Borough Council operate a committee system model, there is no scrutiny committee. The scrutiny mechanism is carried out by the service committees and Full Council. This is generally carried out by working groups with cross party membership taken from the responsible service committee. There is no scrutiny officer but support is provided by the relevant service area and the policy team.</i>
Analysis	Scrutiny is usually embedded into the work of individual committees, with each committee responsible for monitoring

		budgets and performance relating to its functions. In addition, members of the committee could highlight areas of concern and request reports on issues relating to their functions.
Statutory Function		This includes planning, licencing and any other regulatory responsibilities. Consider under each of the headings the extent to which decisions will be delegated to officers. How many members will be required to fulfil the statutory requirements of the council?
Planning	Key lines of explanation	<ul style="list-style-type: none"> ➤ <i>What proportion of planning applications will be determined by members?</i> ➤ <i>Has this changed in the last few years? And are further changes anticipated?</i> ➤ <i>Will there be area planning committees? Or a single council-wide committee?</i> ➤ <i>Will executive members serve on the planning committees?</i> ➤ <i>What will be the time commitment to the planning committee for members?</i>
	Analysis	<p>The Planning Committee currently meets once a month to determine planning applications and consider other planning issues.</p> <p>17 members sit on Planning Committee, which is politically balanced.</p> <p>Planning Committee meetings currently start at 7pm and meeting length can vary significantly according to the agenda.</p> <p>Members are required to undertake training before they can sit on Planning Committee. A substitute system is available however only for those members who have also undertaken the relevant training. Full training is supplemented by 'bitesize' training sessions prior to each alternate Planning Committee meeting.</p> <p>There is a Planning Working Group that visits site(s) of planning applications, that have been deferred by the Planning Committee.</p> <p>There is also a Planning and Transportation Policy Working Group with 11 Members which supports the development of policy in these fields, and in particular the Local Plan.</p>
Licensing	Key lines of explanation	<ul style="list-style-type: none"> ➤ <i>How many licencing panels will the council have in the average year?</i> ➤ <i>And what will be the time commitment for members?</i> ➤ <i>Will there be standing licencing panels, or will they be ad-hoc?</i> ➤ <i>Will there be core members and regular attendees, or will different members serve on them?</i> ➤

	Analysis	<p>Licensing Committee (14 Members)</p> <p>All members of the committee are required to undertake Licensing Training before they can sit on the Committee.</p> <p>A sub-committee of 3 members sits to hear appeals, cases of non-compliance etc. Membership of these are selected from the Licensing Committee dependent on the availability of members and to ensure that ward members are not selected, or those where members may have an interest. Sub-committees are usually held during the day to reflect that all interested parties may wish to attend. These sub-committees do not need to be politically balanced but we do try and ensure they are cross party where possible.</p> <p>The Licensing Committee is scheduled to meet three times a year. The sub committees meet as and when needed.</p>
Other Regulatory Bodies	Key lines of explanation	<ul style="list-style-type: none"> ➤ <i>What will they be, and how many members will they require?</i> ➤ <i>Explain the number and membership of your Regulatory Committees with respect to greater delegation to officers.</i>
	Analysis	<p>Standards Committee is made up of 11 members of the council plus three non-voting co-opted parish representatives. The responsibilities of the Standards Committee can be found under para 2.4.5.2 of the Constitution. There is also a sub-committee called the Standards Hearing Panel which is comprised of 3 members of the Standards Committee who have received appropriate training on the conducting of hearings.</p> <p>Audit Committee comprises 9 members of the Council and there are four scheduled meetings per year. The purpose of the Audit Committee is to provide independent assurance of the adequacy of the risk management framework and the associated control environment, independent scrutiny of the authority's financial and non-financial performance to the extent that it affects the authority's exposure to risk and weakens the control environment, and to oversee the reporting process. Specific briefings and training sessions are provided to audit committee members to ensure that they are trained to fulfil their role on the committee.</p>
External Partnerships		Service delivery has changed for councils over time, and many authorities now have a range of delivery partners to work with and hold to account.
Key lines of explanation		➤ <i>Will council members serve on decision-making partnerships, sub-regional, regional or national bodies? In</i>

	<p><i>doing so, are they able to take decisions/make commitments on behalf of the council?</i></p> <ul style="list-style-type: none"> ➤ <i>How many councillors will be involved in this activity? And what is their expected workload? What proportion of this work is undertaken by portfolio holders?</i> ➤ <i>What other external bodies will members be involved in? And what is the anticipated workload?</i>
Analysis	<p>South Thames Gateway Building Control Joint Committee Swale Joint Transportation Board Swale Community Safety Partnership Mid Kent Services Kent and Medway Economic Partnership (KMEP)</p>

Community Leadership

The Commission understands that there is no single approach to community leadership and that members represent, and provide leadership to, their communities in different ways. The Commission wants to know how members are required to provide effective community leadership and what support the council offers them in this role. For example, does the authority have a defined role and performance system for its elected members? And what support networks are available within the council to help members in their duties? The Commission also wants to see a consideration of **how the use of technology and social media by the council as a whole, and by councillors individually, will affect casework, community engagement and local democratic representation. Responses should demonstrate that alternative council sizes have been explored.**

Topic		Description
Community Leadership	<i>Key lines of explanation</i>	<ul style="list-style-type: none"> ➤ <i>In general terms how do councillors carry out their representational role with electors?</i> ➤ <i>A Councillor's role and responsibilities can include:</i> <ul style="list-style-type: none"> • <i>Representing the ward for which they are elected</i> • <i>Community leadership and engagement – speaking up for and behalf of residents and groups; encouraging residents to engage and participate</i> • <i>Taking decisions at Council meetings</i> • <i>Regulatory, quasi-judicial and statutory duties (eg. deciding on Planning and Licensing issues)</i> • <i>Developing and reviewing Council policy</i> • <i>Scrutinising decisions at committee meetings</i> • <i>Representing the Council on external organisations (outside bodies)</i> • <i>Seeking to influence decision-making for the benefit of the Borough</i> ➤ <i>Does the council have area committees and what are their powers?</i> ➤ <i>In September 2020 SBC established and launched 4 area committees the purpose of which is to enhance the quality of life and of council services in the relevant area and to bring greater local insight to bear in council decision-making. The membership of each area</i>

		<p>committee includes all ward members in the area. Area committee boundaries align with ward boundaries. Substitute members are not permitted on area committees. There are 4 rounds of area committees each year and the chair and vice-chair are selected each year.</p> <p>There are Area Committees in the following areas;</p> <p>Eastern (Abbey; Boughton and Courtenay; East Downs; Priory; St Ann’s; Teynham and Lynsted; Watling). 12 Members;</p> <p>Sheppey (Minster Cliffs; Queenborough and Halfway; Sheerness; Sheppey Central; Sheppey East). 14 Members</p> <p>Sittingbourne (Chalkwell; Homewood; Kemsley; Milton Regis; Murston; Roman). 11 Members;</p> <p>Western (Bobbing, Iwade and Lower Halstow; Borden and Grove Park; Hartlip, Newington and Upchurch; The Meads; Woodstock; West Downs). 10 Members.</p> <ul style="list-style-type: none"> ➤ ➤ <i>How do councillors seek to engage with their constituents? Do they hold surgeries, send newsletters, hold public meetings or maintain blogs</i> ➤ <i>A Member Workload Survey was carried out (see Appendix I) and the majority of members who responded used social media, newsletters and ward walkabouts to engage with their constituents. Other methods of engagement include holding surgeries, maintaining blogs, direct emails with residents, door knocking, attending community meetings, events and activities and incidental contact when out and about.</i> ➤ <i>Are there any mechanisms in place that help councillors interact with young people, those not on the electoral register, and/or other minority groups and their representative bodies?</i> ➤ <i>For the UK Parliament Week 2024 in November 2024, officers produced a resources pack for secondary schools with the offer of local councillors to come into schools to engage with young people. Unfortunately, no schools took the offer up. The SBC Communications Team also created a post to see if any other schools, youth groups would like to be involved but again there was no interest. Councillors were asked this question in the member workload survey and most stated they interacted with young people, those not on the electoral register, and/or other minority groups and their representative bodies through local community groups in their wards or volunteering.</i> ➤ <i>Are councillors expected to attend community meetings, such as parish or resident’s association meetings? If so, what is their level of involvement and what roles do they play?</i>
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		<p>➤ <i>There is an expectation that councillors attend community meetings such as parish/town councils and residents' associations. At a minimum this is to remain engaged and informed about the community that is within their wards. Explain your approach to the Area Governance structure. Is your Area Governance a decision-making forum or an advisory board? What is their relationship with locally elected members and Community bodies such as Town and Parish Councils? Looking forward how could they be improved to enhance decision-making?</i></p>
	<p>Analysis</p>	<p>➤ <i>The Member Workload Survey and of the members who responded, 73% represented a parished area. 42% of the councillors who responded spend between 2 to 5 hours per week on parish work. A lot of councillors are members of their local community groups. This can be difficult for some if their ward covers quite a few parishes. The Member Workload Survey showed that 50% of councillors who responded spend 1 to 2 hours working with community groups and 30% spend 2 to 5 hours on this work.</i></p>
<p>Casework</p>	<p><i>Key lines of explanation</i></p>	<p>➤ <i>How do councillors deal with their casework? Do they pass it on to council officers? Or do they take a more in-depth approach to resolving issues?</i></p> <p>➤ <i>What support do members receive?</i></p> <p>➤ <i>How has technology influenced the way in which councillors work? And interact with their electorate?</i></p> <p>➤ <i>In what ways does the council promote service users' engagement/dispute resolution with service providers and managers rather than through councillors?</i></p>
	<p>Analysis</p>	<p>The Member Workload Survey addressed the questions on casework. The response to the survey can be found under Appendix I. Councillors deal with all casework themselves, often using their own knowledge, experience or consulting with other Members. They also get in touch with SBC officers to resolve queries or if the problems is the responsibility of a partner organisation they get in touch with the relevant external department to seek a resolution. They then feed the information back to the resident themselves, seeing the issue through to its conclusion. As part of their induction, Members are provided with a handbook which includes a contact list of officer roles and responsibilities. They also all have a dedicated officer contact.</p> <p>Questions 7 and 8 of the Member Workload Survey consider how technology has impacted both council and case work. Members commented that although technology has made some tasks easier, it has raised expectations from residents. In 2012, the main methods of communicating with ward councillors was by telephone, letter, email and in person.</p>

		<p>Now social media has greatly increased the amount of time councillors spend, monitoring and responding to questions, they can often come in via multiple sources and one post from a resident on social media can trigger many other related queries which all need to be answered. Councillors acknowledged that this is of benefit to residents, but greatly increases the amount of time spent answering queries.</p>
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Summary

In following this template respondents should have been able to provide the Commission with a robust and well-evidenced case for their proposed council size; one which gives a clear explanation as to the governance arrangements and number of councillors required to represent the authority in the future.

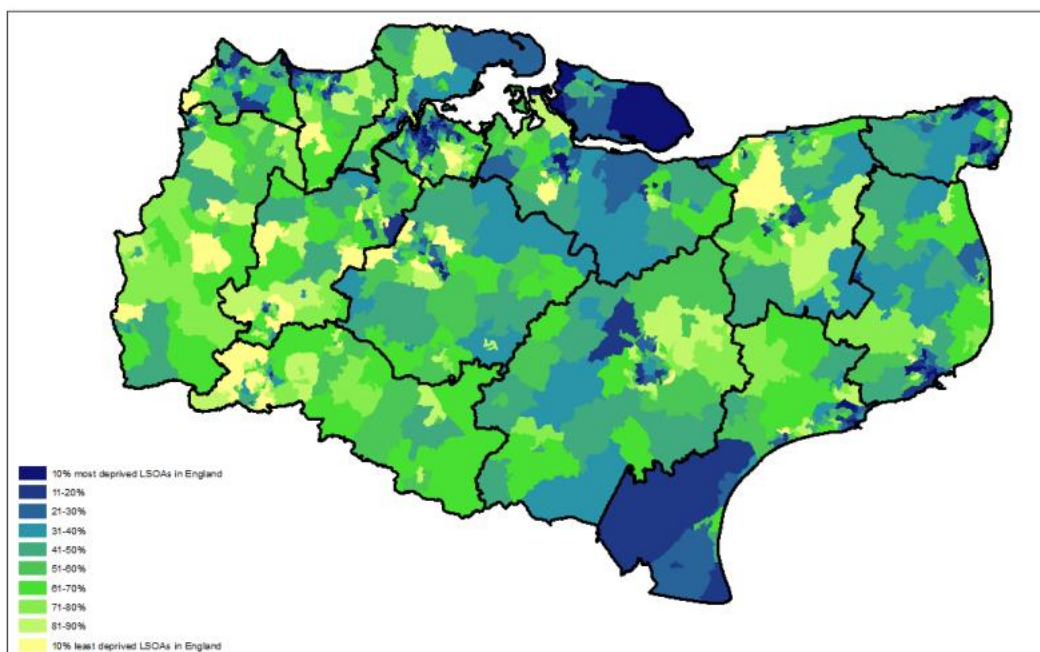
Use this space to summarise the proposals and indicate other options considered. Explain why these alternatives were not appropriate in terms of their ability to deliver effective Strategic Leadership, Accountability (Scrutiny, Regulation and Partnerships), and Community Leadership.

Swale Borough Council are proposing a council size of 55 which is an increase of 8 councillors. The case for this is as follows:

- 1) At the last Local Government Boundary Review in 2012, there was a Cabinet system of Governance. This was changed to a Committee system model in 2022 which increased the number of councillors involved in decision making. The Member Workload Survey asked councillors if their workload had increased since moving from a Cabinet to a Committee system, 69% said it had increased, 31% said it had stayed about the same and none said it had decreased.
- 2) The Independent Remuneration Panel report ([Independent Remuneration Panel Report May 2022](#)), paragraph 4.1.7 states that *“we find that the average time commitment required to execute the role of a councillor with no special responsibilities is 14 hours per week within a Committee Model of governance. This is an increase of two hours per week since the March 2020 review recommendation.”* This provides evidence that the change from a Cabinet to Committee system does result in an additional time commitment for councillors.
- 3) If you multiply the current council size of 47 by the additional 2 hours work, 94 hours extra councillor time is required per week. If you divide this by the March 2020 time commitment of 12 hours per councillor per week, that amounts to a requirement of 8 extra councillors, therefore council size of 55 is proposed.
- 4) Question 5 of the Member Workload Survey asked about the average number of hours councillors spent per week on different types of council business. Removing the figures for tasks relating to special responsibilities, of the councillors who responded, the average amount of time councillors currently spend on council business is 25 hours per week.
- 5) Question 10 of the survey asked about councillors work/life balance. The majority of responses described how undertaking council business encroached on family life, work commitments, caring responsibilities and other voluntary work.

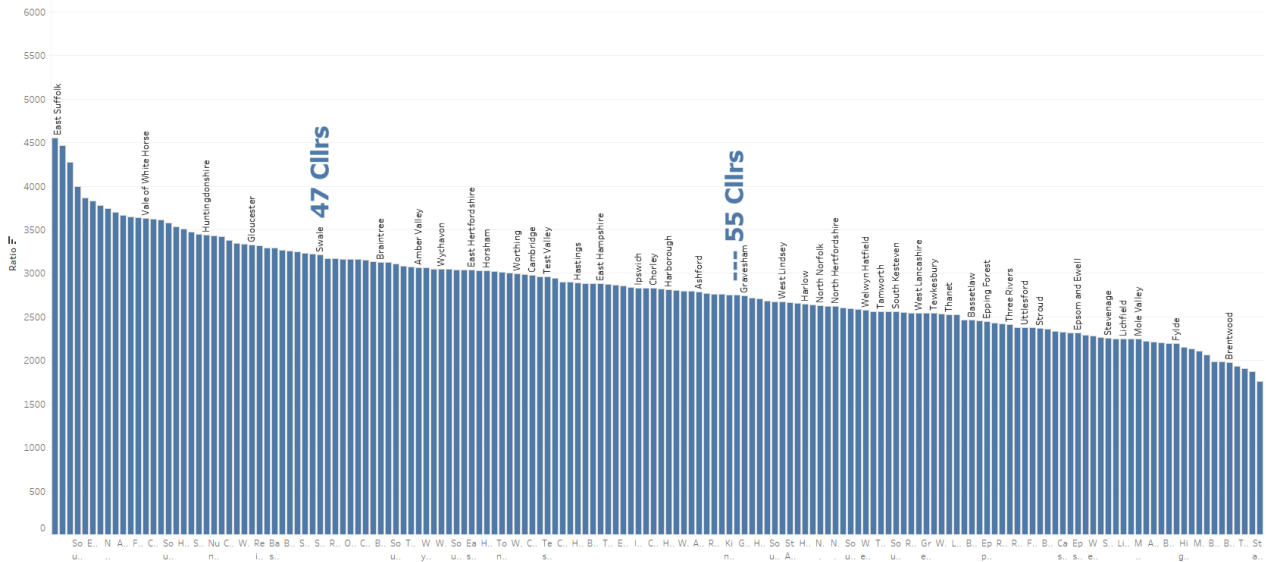
- 6) The projected elector figures submitted as part of the LG Boundary Review Commission's information request demonstrate that the majority of the Commission's projections have been challenged as the proposed housing development figures are higher.
- 7) Questions 7 and 8 of the Member Workload Survey consider how technology has impacted both council and case work. Members commented that although technology has made some tasks easier, it has raised expectations from residents. In 2012, the main methods of communicating with ward councillors was by telephone, letter, email and in person. Now social media has greatly increased the amount of time councillors spend, monitoring and responding to questions, they can often come in via multiple sources and one post from a resident on social media can trigger many other related queries which all need to be answered. Councillors acknowledged that this is of benefit to residents, but greatly increases the amount of time spent answering queries.
- 8) One of the Corporate Plan 2023-2027 objectives is to ensure effective partnership working, in particular to renew contract and partnership arrangements to ensure the most appropriate and efficient means of delivering services to our diverse communities and customers. Appendix II sets out the Outside Bodies nominations for 2024/25. By having more councillors, outreach will be more effective as working relations with outside bodies will be improved and easier.
- 9) Swale is a diverse borough, there are areas of affluence next to areas of high deprivation. The indices of multiple deprivation in 2019 showed Swale's overall position had 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. These areas of need result in an increased workload for councillors as they work with residents who are in difficulties, either by approaching partner organisations on their behalf or signposting them to seek assistance.

Indices of Deprivation 2019 (IoD2019): Overall IMD2019
National rank of Lower Super Output Areas in Kent & Medway



Source: The English Indices of Deprivation 2019 (IoD2019): The Ministry of Housing, Communities & Local Government (MHCLG)
Map produced by Strategic Commissioning - Analytics, Kent County Council © Crown Copyright and database right 2019, Ordnance Survey 100019238

- 10) When comparing the council size to population ratio of other local authorities, Swale has a lower ratio of councillors to population as can be seen in this chart:

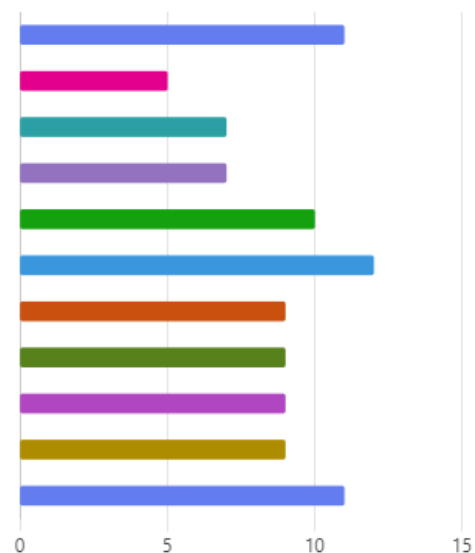


11) Swale Borough Council have considered the option of a lower council size proposal but as the evidence above demonstrates, a figure lower than 55 will not provide the support for residents, or help to achieve the Council’s ambitions and priorities as set out in the Corporate Plan. The proposal of 55 will more evenly spread the workload of councillors thus addressing many of the issues raised in the member workload survey on work/life balance.

Local Government Boundary Review – Member Workload Survey responses

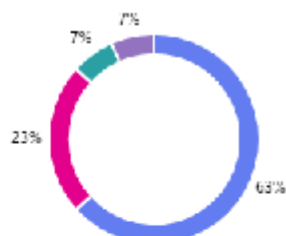
1. Which of these roles do you hold? (select all that apply):

● Committee Chair	11
● Committee Vice-Chair	5
● Member of Audit Committee	7
● Member of Standards Committee	7
● Member of Licensing Committee	10
● Member of Planning Committee	12
● Member of Community & Leisure Committee	9
● Member of Economy & Property Committee	9
● Member of Environment & Climate Change Committee	9
● Member of Health & Housing Committee	9
● Member of Policy & Resources Committee	11



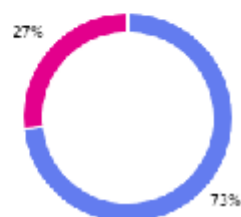
2. How long have you been a Swale Borough Councillor (if elected at a by-election, please select the closest date)?

● Since 2023	19
● Since 2019	7
● Since 2015	2
● Longer	2



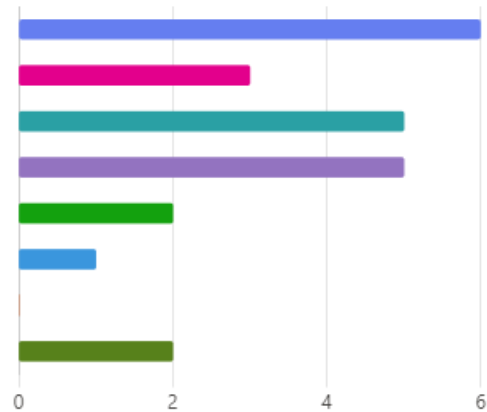
3. Do you represent a parished area?:

● Yes	22
● No	8



4. If 'Yes' on 3, how many parish/town council meetings do you attend a month?

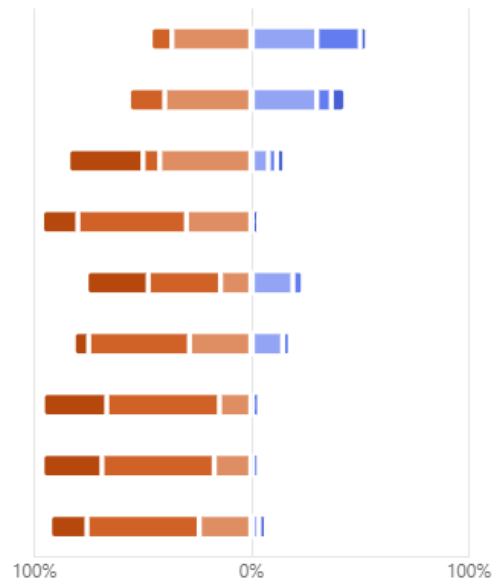
None	6
One	3
Two	5
Three	5
Four	2
Five	1
Six	0
More than six	2



5. Before the implementation of the Waste Contract in March 2024, on average, how many **hours a week** did you spend ...

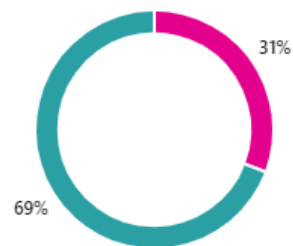
- Less than an hour
- 1-2 hours
- 2-5 hours
- 5-10 hours
- 10-15 hours
- 15 hours or more

- Council work eg attending or preparing for council meetings (not as chair/vice-chair), training or working groups
- Ward case work eg responding to residents, liaising with officers etc.
- Parish work eg attending parish/town council meetings, addressing issues raised by the parish/town council
- Working with local community groups in your ward
- Work relating to being a chair or vice-chair of a committee
- Attending or reading briefings
- Outside bodies, including external boards and partnership meetings
- Travelling on council business
- Other tasks as councillor, not listed above



6. For those who were councillors before the move to a committee system, would you say the amount of time you spend on...

Decreased	0
About the same	4
Increased	9



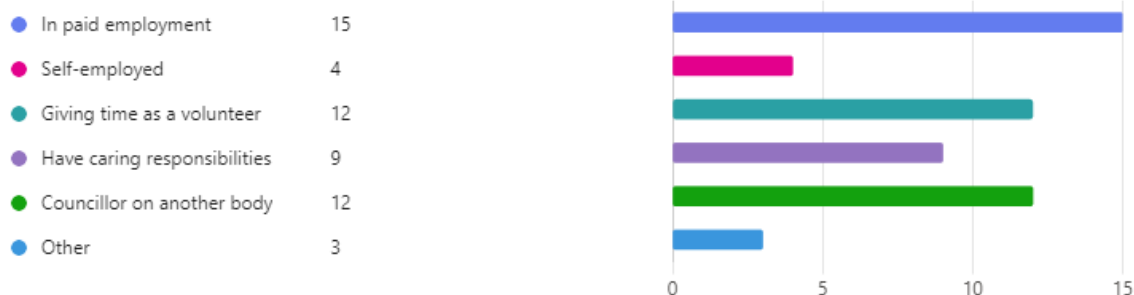
Question 7 - Please comment on how technology impacts your COUNCIL work either positively or negatively (comments summarised below):

- The SBC supplied laptops make council business easier;
- The website needs improvement, the forms don't work on older mobile phones;
- SBC should be on Instagram;
- remote meetings are good, but connectivity can be difficult in rural areas;
- technology makes research easier;
- Teams meetings can be attended from anywhere and it means less travel;
- better use of IT could be made;
- the decision to stop sending paper copies of agendas is a negative one;
- social media and emails have a negative impact;
- Modern.Gov app very helpful;
- email and Teams are very good;
- too many SBC email updates are sent, important updates can be overlooked;
- broadband costs should be covered by SBC;
- not all residents can be reached via technology, face-to-face contact is still needed; and
- although technology is easier, it can increase the workload for councillors.

Question 8 - Please comment on how technology impacts your CASE work either positively or negatively:

- Expectations from residents have changed in recent years. When letters were the main method of contact, residents were happy to wait for a reply. Now replies are expected instantly;
- residents don't realise councillors do not have officer assistance with responding to case work messages;
- research and communicating with officers is easier;
- easy to share information with residents;
- more use could be made of Teams and reporting systems;
- there are many channels of communication that need to be monitored and responded to which is additional work;
- not all councillors are IT literate;
- reduction of paper copies which improves data security;
- reaching people can be difficult;
- not all residents can be reached via technology, face-to-face contact is still needed;
- having a social media presence improves engagement with residents;
- sometimes experience login problems which can't be resolved out of hours; and
- the high volume of emails can mean important emails are missed.

9. In addition to your work as a SBC councillor, are you? (select all that apply):

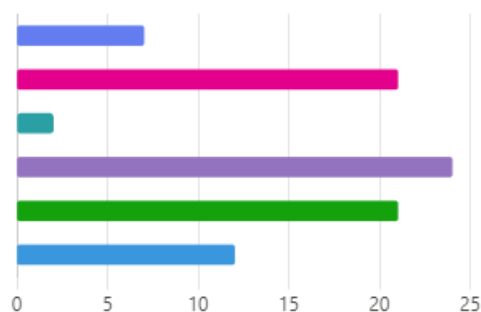


Question 10 - Please comment on your work/life balance, how does your work as an SBC councillor impact any other occupation or family life?:

- regularly have to take unpaid leave to attend meetings;
- some weeks have to attend 3 or 4 evening meetings which impacts family life;
- often have to miss or postpone family/social events;
- not enough time for a personal life;
- daytime meetings often clash with work commitments;
- it can eat into time for personal development which can slow career progression;
- after doing a full day's work, often have to work past midnight on case work;
- work life is flexible which fits around being a councillor;
- family life difficult with young children;
- try to put time aside for family but not always successful;
- difficult to switch off, residents expect councillors to be available 24/7;
- the councillor allowance doesn't pay the bills;
- commuting for work means it is not possible to attend day time meetings or be part of working groups;
- had to give up paid work in order to work effectively as a councillor;
- dealing with the waste contract increased workload by 10-20 hours a week;
- substituting for other councillors on committees adds to time at meetings;
- the committee system has increased time spent on preparing for meetings and evening commitments. Would prefer longer meetings across fewer evenings;
- parish council meetings take time;
- constant juggling of SBC/family life;
- 5 out of 30 councillors responded their family life was not impacted by being a councillor;
- it would help if committee meetings were online;
- difficult to support partner with family commitments such as childcare;
- when travelling from work to an evening meeting there isn't time to eat; and
- difficult to get time off in the day to attend Planning Committee site meetings.

11. How do you engage with your constituents? (select all that apply):

● Hold surgeries	7
● Send newsletters	21
● Maintain blogs	2
● Social media	24
● Ward walkabouts	21
● Other	12



Question 12 - How do you interact with young people, those not on the electoral register, and/or other minority groups and their representative bodies?

- Through work as a charity and community organisation trustee;
- by attending community events;
- by getting out and about to meet people face-to-face;
- through an invitation to a mosque;
- via social media;
- giving talks at schools and youth clubs;
- door knocking;
- this is something that needs improvement;
- difficult to do in wards with no official community groups;
- canvassing;
- through established contacts with young people and minority groups;
- by email/telephone when necessary;
- as a driver for the Swale Community Volunteer Service;
- youth working group; and
- parish council events at schools.

Question 13 - What support do you get from the Council to help with casework (ie direct contact with officers, use of website)

- officers are responsive but more are needed as they are overstretched;
- sometimes have to wait for response from officers;
- website needs improvement;
- use council laptop;
- proactive engagement from officers to anticipate problems before they arise would be beneficial;
- receive support from the Chief Executive and senior management;
- officers help with contact to partner organisations and outside bodies;
- councillor colleagues are helpful;
- do not receive help with funding for ward business; and
- some officers are only contactable at certain times.

Question 14 - What further support could the Council provide with your casework?:

- Increase the budget for officers and project work to support residents;
- improve the website;
- officers to respond to all email enquiries;
- happy to attend more training/briefings to improve knowledge;
- develop a casework database;
- more training;
- admin support for casework;
- if councillors had access to information, it would mean they wouldn't have to contact officers as much;
- have regular 1-1s with officers to assist with resolving difficult casework;
- contact with officers on Friday afternoons;
- contact list of officer roles and responsibilities;
- fewer meetings;
- realistic expectations of residents;
- each councillor to have a dedicated officer contact;
- councillor emails to be set up with an automatic response so resident knows it has been received;
- a more reflective and transparent councillor allowance scheme so residents can see what time they spend on work;
- improve the safety of councillors when out and about doing ward work;
- councillors should have compulsory Disclosure & Barring Service (DBS) check;
- link officer and member safeguarding policies so that groups that work with councillors know that SBC take safeguarding seriously; and
- officers should be more accessible to residents.

Appendix II – Outside Bodies:

Organisation	Nominations for 2023/24	Nominations for 2024/25
Bensted's Charity	Kieran Golding (to 2027) Ben J Martin (to 2027) Hannah Perkin (to 2025)	Kieran Golding (to 2027) Ben J Martin (to 2027) Hannah Perkin (to 2025)
Charity of Sir William Stede	Charlie Miller (to 2027) Angie Valls (to 2027) Tony Winckless (to 2027)	Charlie Miller (to 2027) Tony Winckless (to 2027) Kieran Mishchuk
Citizens Advice Service, Swale*	Kieran Golding Elliott Jayes Pete Neal (resigned)	Kieran Golding (to 2026) Elliott Jayes (to 2026) Hannah Perkin (to 2027)
Council for Voluntary Services	Simon Clark Paul Stephen Sarah Stephen	Simon Clark Paul Stephen Sarah Stephen
Faversham Swimming Pool Management Committee	Claire Martin	Vacancy due to resignation.
Kent Downs National Landscape Joint Advisory Committee (was Kent Downs AONB Joint Advisory Committee)	Terry Thompson	Terry Thompson
Kent Health and Wellbeing Board	Angela Harrison	Angela Harrison
Local Children's Partnership Group in Swale (was Swale District Partnership Conversation)	Angela Harrison	Angela Harrison
Lower Medway Internal Drainage Board	Derek Carnell Richard Palmer Peter Marchington Terry Thompson Tony Winckless Dolley Wooster	Derek Carnell Richard Palmer Peter Marchington Terry Thompson Tony Winckless Dolley Wooster
Medway Maritime Hospital	Angela Harrison (to 2025)	Angela Harrison (to 2025)
Oare Gunpowder Works Advisory Group	Rich Lehmann Julien Speed Ashley Wise	Charles Gibson Rich Lehmann Julien Speed
PATROL Adjudication Joint Committee (Parking and Traffic Regulations Outside London)	Richard Palmer	Richard Palmer
Kent and Medway Police and Crime Panel	Richard Palmer	Richard Palmer
Sheppey Matters	Elliott Jayes	Elliott Jayes
South East England Councils	Mike Baldock Tim Gibson	Mike Baldock Tim Gibson
Southern Housing Kent Regional Residents Panel (was Optivo Kent General Panel)	Karen Watson	Karen Watson
The Meads Woodland Group	James Hunt (to 17 October 2026)	James Hunt (to 17 October 2026)

United Charities of Milton Regis	Derek Carnell (to 2027) Charlie Miller (to 2027) Angie Valls (to 2027) Tony Winckless (to 2027)	Derek Carnell (to 2027) Charlie Miller (to 2027) Tony Winckless (to 2027) Kieran Mishchuk
West Faversham Community Association	Carole Jackson	Carole Jackson

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Council Meeting	
Meeting Date	29 January 2025
Report Title	Review of Polling District and Place
EMT Lead	Larissa Reed, Chief Executive and Returning Officer
Head of Service	
Lead Officer	Jo Millard, Democratic and Electoral Services Manager
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That Council notes the consultation responses to the Polling District and Place review as set out in Appendix 1. 2. That, subject to the outcome of the Boundary Review, recommendations of proposed changes to polling districts and places be considered by Council at a future date.

1 Purpose of Report and Executive Summary

- 1.1 The Council is required to carry out a review of its arrangements for polling districts and places for parliamentary elections and in accordance with legislation, this must be complete by 31 January 2025.
- 1.2 Due to the uncertainty around the outcome of the Local Government Boundary Review, and more recently, the Government's white paper on Devolution, whilst the review has taken place and feedback received, any implementation of suggestions of changes have been paused. A further review will be required when the outcome of the Boundary Review and Devolution is known as this may introduce new boundaries for local elections from 2027.

2 Background

- 2.1 A polling district is a geographical sub-division of an area, such as a Council ward and a polling place is a geographical area within a polling district that the polling station must be located within. The Council sets the polling district and polling place, whilst the Returning Officer is responsible for designating the polling station which must be located within the polling place.
- 2.2 When designating polling districts and places, the Council must seek to ensure that all electors in the constituency have reasonable facilities for voting as are practicable in the circumstances and that, so far as reasonable and practicable, every polling place is accessible for electors who are disabled. The Returning

Officer must also have regard to the Electoral Commission guidance which suggests that no more than 2,250 electors should be elected to a polling station.

- 2.3 Notice of the review was given on 14 October 2024 and this started a consultation period. This was published on our website, displayed at Swale Borough Council offices and all Councillors, Parish Councils, MP's, returning officer for Faversham and Mid-Kent constituency, local schools and charitable organisations such as Age Concern directly consulted. Feedback was invited on all polling districts and places, but in particular regarding arrangements for voters who are impacted by school closures on polling day and from disabled residents.
- 2.4 The feedback received was disappointingly low and was mainly focused on two areas – Ethelbert Road School, Faversham and Minster, Isle of Sheppey, and can be seen at Appendix 1.

3 Proposals

- 3.1 It is proposed that, subject to the outcome of the Boundary Review and given the uncertainty around changes that might arise out of the Devolution proposals, all consultation responses be noted, and suggested venue changes be researched and suitable alternative venues be agreed by Council as required. Polling districts and places are kept under constant review and a further full review will be undertaken at a future date.

4 Alternative Options Considered and Rejected

- 4.1 In accordance with legislation, the review must be completed by 31 January 2025, however due to uncertainties around the outcome of the Local Government Boundary Review and the Government's white paper on Devolution, it is practical to pause consideration of changes. Council may continue to make suggestions for alternative venues; however consideration does need to be given to practical aspects in terms of the venues available within the wards.

5 Consultation Undertaken or Proposed

- 5.1 All Members, Parish Councils, MP's, returning Officer for Faversham and Mid-Kent constituency, local schools and charitable organisations have been consulted and the notice of the review was published on the Council's website and displayed at Council buildings.

6 Implications

Issue	Implications
Corporate Plan	Ensuring voters are able to vote at the most convenient and commodious venue within the polling place contributes to the objective to strengthen democracy within the emerging corporate plan.
Financial, Resource and Property	None identified at this time.
Legal, Statutory and Procurement	The Council is required to take a full review in accordance with the Electoral Administration Act 2006, but in practice keeps polling stations under regular review.
Crime and Disorder	None identified at this time.
Environment and Climate/Ecological Emergency	None identified at this time.
Health and Wellbeing	None identified at this time.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this time.
Risk Management and Health and Safety	The purpose of the review is to ensure that all voters have reasonable facilities for voting. It is important that venues meet health and safety requirements so as not to put voters at risk and election staff have assessed the venue. Polling Station staff are encouraged to give feedback on venues and each station is visited by a Polling Station Inspector on election day.
Equality and Diversity	One purpose of the review is to ensure that all electors in the Borough have reasonable facilities for voting, and that as far as is reasonable and practicable, facilities for voting are accessible for disabled people.
Privacy and Data Protection	None identified at this time

7 Appendices

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

- Appendix I: Feedback from consultation

8 Background Papers

Notice of Review of Polling District and Places

Swale Borough Council – Polling District Review 2024

Polling station	Feedback	Action/Response
St. Augustine church, Painters Forstal	<p>I am responding to your review of polling districts and places. I am one of the Trustees of Painters Forstal Community Association and help run a community drop in session on Tuesday afternoon since we opened in 2023.</p> <p>I have spoken with many residents in Painters Forstal who are unhappy with the current voting situation. Presently it takes place at the Anglican Catholic church of St Augustine. Residents feel that a church is not a suitable place in order to cast their vote and would prefer a neutral venue with parking facilities. We now have a community hall which provides not only better facilities for your polling volunteers, but far more parking spaces.</p> <p>Although we do have a preschool there, they are only in one half of the hall. You would only need the other half of the hall and perhaps the lobby area. The hall is divided by a removable wall which would remain until voting had closed.</p>	Election staff have inspected the Community hall and met with staff and this venue is a suitable facilities that could be considered in the future.
Ethelbert Road School, Faversham	1.I am concerned that Ethelbert Road School seems to now be regularly used as a Polling station. Post covid with the high school absenteeism rate and school being seen by some as optional I think using Ethelbert sends the completely wrong message- that school can take second place to other priorities, when in fact it should be top priority. With so many other buildings available in Faversham I am sure must be more suitable venues that don't carry this cost.	

	<p>2. I would like to express my concern about the continued use of my son's school Ethelbert Road primary as a polling station. So far he has lost at least a week's worth of schooling whilst he's been at there. On top of that we then have to make childcare provision which are not only costly but completely unnecessary when everyone has the optional of a postal vote. There is a post box in the middle of Athelstan Road accessible for everyone in the vicinity.</p> <p>The use of the school discriminates against all the parents that send their children there disadvantaging not only the lost days of our children's education and their finances. I look forward to hearing from you.</p> <p>3. I am writing as a Faversham resident and parent. My children's school, Ethelbert Road Primary School, is used as a polling place for each election. There have been multiple elections every year, and each day there is one, the school must close. This is extremely disruptive to the children's education. While this would always be difficult, it is made worse given the gaps in education that occurred during lockdowns. It is unreasonable to continually shut down an entire school multiple times a year. Apart from the lost days of teaching, the closures also mean that we have to take time off of work, reducing our impact on the economy. It also places great burdens on the staff and teachers of the school as they have to still prepare the school to make it suitable for polling, including removing furniture, and taking down (and putting back up) displays with any children pictured/identifiable for safeguarding reasons. The school also has no parking, which means it is not a suitable place to any voters with mobility needs. There is a high school (Abbey School) nearby with multiple buildings that could be used or a football club at the Mount. Both of these would not need to disrupt children's education and they have parking.</p> <p>4. In relation to the review of Swale polling districts and venues I would like to comment on the use of Ethelbert Road Primary School in Faversham as a polling station.</p>	<p>Electors must be given the choice of how they vote and postal voting does not suit all voters.</p> <p>The Abbey School option will be investigated, but replacing a school venue with another school venue requires careful management. The football club at The Mount will be investigated.</p>
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	<p>Both my children attend Ethelbert Road Primary School and each time it is used as a polling station the whole school is shut for the day. This means either my husband or I lose a day's work in order to look after the children, therefore there is a financial cost to us each time it is used. In addition, this is usually on a Thursday and taking time off work or moving shifts mid-week is not very easy. Furthermore when the school is closed my children lose a day of education that they will not get back; it is hugely disruptive for them and they are negatively impacted.</p> <p>I live in the ward myself and my polling station is Preston School rooms next to St Catherine's church. There is never anyone in there when I have voted in the past; so I wonder why it would not be able to cover the whole ward? There would certainly be sufficient space and St Catherine's Church itself could also be used for overflow if required. Alternatively, other venues could be the Club house on the Mount (which would also have toilets and parking) or the sports hall at the Abbey School.</p> <p>5. I am writing regarding the Polling District Review and the use of Ethelbert Road Primary School as a polling station venue. The closure of the school on election days creates significant challenges for working parents who need to arrange alternative childcare.</p> <p>To help address these issues, I'd like to suggest two alternative polling venues that may be more suitable and reduce the impact on families:</p> <ol style="list-style-type: none"> 1. The Mount Sports Hall (from Strike Force)– located at King Georges Playing Field (The Mount) London Road . This venue is centrally located, fully accessible, and frequently used for community events. It would offer a convenient option for local voters while avoiding the disruption of a school closure. 2. The Abbey School sports Centre – has ample space for setting up a polling station and is accessible for people with disabilities. Its 	<p>Preston School Rooms has been used as a double station for some elections and can be considered as an option.</p> <p>St. Catherine's Church, the Clubhouse on The Mount and the Sports Hall at Abbey School will be investigated.</p> <p>The Mount Sports Hall will be investigated.</p>
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	<p>proximity to public transport could also make it a convenient choice for residents.</p> <p>Thank you for considering these alternatives as you work to ensure accessible polling arrangements. I hope this helps to find a solution that minimizes disruption to school schedules while maintaining accessible facilities for voters.</p> <p>6. I am writing to you to request you reconsider the use of Ethelbert Road Primary School as a polling station. It is incredibly disruptive to the education of my daughter, and all her peers. Last academic year the school was closed twice (2nd May, 4th July), which aside from being disruptive to my daughter' development and wellbeing, as well as being a challenge for myself and my husband to arrange and fund alternative childcare arrangements or use up limited annual leave allowances, it is also hugely hypocritical considering recent increase to fines due to school absence- introduced because of the importance of school attendance.</p> <p>While the Department for Education's stance is that <i>"Every moment in school counts and days missed add up quickly. Evidence shows that pupils who have good attendance enjoy better wellbeing and school performance than those who don't."</i> (Fines for parents for taking children out of school: What you need to know – The Education Hub), the use of Ethelbert as a polling station directly contravenes this, and instead demonstrates a distinct lack of consideration for the pupils there.</p> <p>I strongly urge you to stop the use of Ethelbert Primary Road School as a polling station, and instead find a more appropriate venue that does not displace over 200 children.</p> <p>7. Further to your communication regarding the review of polling districts and venues and asking for people who are impacted by the closure of a school that is used as a polling station venue, I'd like to confirm that the</p>	<p>The Abbey School sports centre will be investigated.</p>
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	<p>use or Ethelbert Road Primary School in Faversham as a polling station causes an impact.</p> <p>Annual leave has to be taken by those parents who work in order to look after their children when they are off school for the day.</p> <p>The Abbey School, which is in very close proximity has a number of halls and some of which can exclusively be used by the public without having to close the school, could be used instead.</p> <p>I believe for some occasions it is used instead.</p> <p>8. Please accept this email as my views and thoughts on the polling station within our local primary school.</p> <p>I have previously spoken to the Chair of Governors at our local primary school (Ethelbert Road Primary School, Faversham) where we not only vote but our child is also a pupil.</p> <p>It is my strong opinion that not only are there alternative options locally to locate a polling station but that it is also wholly possible to accommodate the polling station as well as open the school for the pupils if only they tried.</p> <p>I have given my suggestions on how this could be achieved whilst maintaining safeguarding for the staff and pupils, which were accepted during that conversation as workable suggestions.</p> <p>The difficulty for many families to accommodate these unnecessary school closures cannot be underestimated and the decisions to close the schools are clearly made by those who themselves are either unaffected by such school closures or simply don't care or consider the community.</p> <p>I struggle to understand how a family can be fined for taking their child out of school without authorisation yet the constant closure of a school for polling station duties is an acceptable loss of educational time!!</p> <p>You MUST do better by the communities you serve. I know of families who cannot afford to take time off work to look after children whenever there is a closure of this kind. I will repeat. YOU MUST DO BETTER!!</p> <p>9. We've been invited to submit comments as per your review.</p>	<p>Halls at The Abbey School will be investigated.</p>
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	<p>As a parent of attendees of the school I would like an alternative to be found. I don't think it's right that the school should close on polling days. There must be suitable alternatives, one of the Sports Halls at the Abbey School for example or even the Strikeforce clubhouse on King Georges Playing Field.</p> <p>These could be used with no impact to school children and their families on polling days.</p> <p>10. I would like to request that Ethelbert Road School is not used as a polling station. It disrupts the children's learning and places additional pressure on parents for childcare expenses.</p> <p>Please consider alternative venues.</p> <p>11. I am the Headteacher of Ethelbert Road Primary School and I am writing to you to consider using a different venue for polling.</p> <p>The school is forced to close when it is used as a polling station, which impacts on 210 children's education. Due to a packed curriculum learning is lost and the teachers do not have time to go back and revisit lost learning due to the school closure. Our children with Special Educational Needs are extremely affected by the closure of the school, as they require the security of routine. Our parents are also greatly affected, with most having to take days off work unpaid for child care.</p> <p>Ethelbert Road Primary does not have a carpark, and the only available parking spaces are on the roads leading to the school. This impacts on local residents, as well as people coming to vote, as they need to walk to the school.</p> <p>The only room available is a small wooden lodge in the playground. This room is only large enough for one booth, leading to queues of voters, who have to wait outside.</p> <p>I would like to suggest you use the Abbey School site, as it has a large carpark and a room which can be used without impacting on the school.</p> <p>The local authority could run a minibus to collect and return disabled voters who do not drive as in the past I have been informed that the Abbey School</p>	<p>Sports Halls at Abbey School and Strikeforce Clubhouse on King George's Playing field will be investigated.</p> <p>It is not practical to run a minibus for voters but other suggestions will be considered</p>
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	<p>could not be used due to the footbridge not being accessible for wheelchair users.</p> <p>12. As a parent from Ethelbert Road Primary school I am writing to contribute to the decision of the school being used as a polling station. As a self employed person, additionally my husband is self employed, when schools are used for polling and the schools have to closed for safe guarding this is a huge impact on our income as a family as one of use has to take the day off work for child care reasons. We are not fortunate to have careers where we work from home nor do we have family to assist with child care.</p> <p>It is irresponsible in this day and age to expect parents to take additional time off work with the cost of living rising aside from the impact it has on children missing vital education. There are plenty of mostly un-used churches and village halls empty in the area to use for polling days. I hope this email is taken into consideration on your decision of a location for the next polling days.</p>	
Various polling stations in Minster	<p>I would like to see us move polling stations out of school's where possible, I understand that public buildings are available at cost but hate to see children's education affected by elections.</p> <p>Alternative locations in minster could be:</p> <ul style="list-style-type: none"> Minster on Sea Parish Council meeting room Friendship house Minster working men's club Minster Abbey Church hall 	All suggestions will be investigated

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Council Meeting	
Meeting Date	29 January 2025
Report Title	Recalculation of Political Balance and Allocation of Committee seats as a result of a by-election
EMT Lead	Lisa Fillery – Director of Resources
Head of Service	
Lead Officer	Jo Millard – Democratic and Electoral Services Manager
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That Council is asked to agree the political balance calculation as set out in Appendix II. 2. That Council is asked to allocate seats to those Committees and to agree the appointment of Members to those Committees, in accordance with the wishes of Group Leaders, as set out in Appendix III.

1 Purpose of Report and Executive Summary

- 1.1 This report sets out changes to the Political Balance and Committee Seat Allocations and memberships as a result of a recent by-election and changes to the membership of political groups.

2 Background

- 2.1 Section 15 of the Local Government and Housing Act 1989 requires Local Authorities to review the allocation of seats on Committees at the annual meeting, or as soon as possible after it. Once the Council has agreed the allocation of Committee places between the political groups the Council must then appoint the nominees of the political groups to the Committees. This was last agreed at Council in October 2024 (Appendix I).
- 2.2 Where changes to the membership of political groups take place between elections, the Local Government (Committees and Political Groups) Regulations 1990 require the Council to recalculate the political balance and the allocation of committee seats ‘as soon as practicable’ after notice of changes to groups is delivered to the proper officer.
- 2.3 Due to a recent by-election, the political balance has been recalculated as set out in Appendix II.
- 2.4 The following principles apply to the allocation of seats:

- (a) That not all seats on the body to which appointments are being made are allocated to the same political group;
 - (b) That the majority of seats on each Committee is allocated to a particular group if the number of persons belong to that group is a majority of the authority's membership;
 - (c) Subject to (a) and (b), that, when allocating seats to a political group, the total number of their seats across all the ordinary committees of the Council, must reflect their proportion of the authority's membership; and
 - (d) Subject to (a) and (c), that the number of seats on each Committee is as far as possible in proportion to the group's membership of the authority.
- 2.5 There are 134 seats to be allocated under the Committee System. The seat entitlement of each group, on each Committee is thus based on the group's percentage representation on the Council as detailed in Appendix II. Whilst an initial version of this can be calculated mathematically, this usually results in a discrepancy between the strict entitlement of each group and the overall number of Committee seats to be allocated, requiring 'manual' adjustment to ensure that the number seats allocated to each group is fair. This process is known as 'gifting'.
- 2.6 To ensure overall political balance:
- The Labour Group lose three seats from their current total rounded entitlement, therefore one seat from Community and Leisure, Housing and Health and Environment and Climate Change.
- The SIA Group gain two seats from their current total rounded entitlement, therefore one seat on Housing and Health and one seat on Environment and Climate Change.
- The Liberal Democrat group gain one seat on Community and Leisure.
- 2.7 Whilst sub-committees are also governed by the political balance rules, the overall requirement for total places to be balanced only applies to ordinary committees so sub-committee places do not need to be included in the overall calculation, but the membership of sub-committee places should be proportionate as far as is reasonably practical.
- 2.8 The Joint Transportation Board and the Planning and Transportation Policy Working Group are not committees covered by Section 101 of the Local Government Act 1972 and Section 15 of the Local Government Housing Act does not apply. The membership of the Planning and Transportation Policy Working Group was determined by the Policy and Resources Committee at its June 2023 meeting.
- 2.8 Group Leaders have been requested to provide nominations to the places on Committees to which their respective groups are entitled; this has been set out in Appendix II.

3 Proposals

- 3.1 That Council is asked to agree the political balance calculation as set out in Appendix II.
- 3.2 That Council is asked to allocate seats to those Committees and to agree to the appointment of Members to those Committees, in accordance with the wishes of Group Leaders, as set out in Appendix III.

4 Alternative Options

- 4.1 In view of changes to the membership of political groups, there is no lawful alternative to the recalculation of political balance and associated committee seat allocations.

5 Consultation Undertaken or Proposed

- 5.1 All Group Leaders have been asked to advise Democratic Services of their nominations to seats on Committees for their respective Groups. This will be circulated at the Council meeting.

6 Implications

Issue	Implications
Corporate Plan	The recommendations in this report contribute to the council priority to renew local democracy and make the council fit for the future.
Financial, Resource and Property	The Council's Committee Structure includes Committee(s) with Financial, Resource and Property within their remits.
Legal, Statutory and Procurement	The Head of Legal has been consulted on this report. The relevant legal provisions are set out in the body of the report.
Crime and Disorder	The Council's Committee Structure includes Committee(s) with Crime and Disorder within their remits.
Environment and Climate/Ecological Emergency	The Council's Committee Structure includes Committee(s) with Environment and Climate/Ecological Emergency within their remits.
Health and Wellbeing	The Council's Committee Structure includes Committee(s) with Health and Wellbeing within their remits.

Safeguarding of Children, Young People and Vulnerable Adults	The Council's Committee Structure includes Committee(s) with Safeguarding of Children, Young People and Vulnerable Adults within their remits.
Risk Management and Health and Safety	The Council's Committee Structure includes Committee(s) with Risk Management and Health and Safety within their remits.
Equality and Diversity	The Council's Committee Structure includes Committee(s) with Equality and Diversity within their remits.
Privacy and Data Protection	The Council's Committee Structure includes Committee(s) with Privacy and Data Protection within their remits.

7 Appendices

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

- Appendix I: Political Balance Calculation agreed at Council October 2024.
- Appendix II: Political Balance Calculation as a result of changes due to a by-election.
- Appendix III: Membership of Committees. (To-follow)

8 Background Papers

Link to Council October 2024:

[Agenda for Council 2 October 2024](#)

Political Balance
Calculations Oct 24

Group	Labour	SIA				Conservative				Lib Dem				Green				Ungrouped Member (Independent)					Rounded Total	Shortfall	Total	Ungrouped Member (Independent)										
		Strict Entitlement	Rounded Allocation	Current Allocation	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Adjust	New Allocation														
Number of Members	16	11				10				5				3				0.0000								45	2									
Overall proportionality	0.3556	0.2444				0.2222				0.1111				0.0667				0.0000								100%										
Total entitlement	47.6444	32.7556				29.7778				14.8889				8.9333				0.0000								134	0									
Total rounded entitlement	48	33				30				15				9				0								135	0									
Size		Strict Entitlement	Rounded Allocation	Current Allocation	Adjust	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Adjust	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Adjust	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Adjust	New Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Adjust	New Allocation	Rounded Total	current total	Actual allocation							
Service Committees																																				
Policy and Resources	15	5.3333	5	5		5	3.6667	4	4		4	3.3333	3	4		4	1.6667	2	1		1	1.0000	1	1		1	0.0000	0	0		0	15	15	15	0	
Community & Leisure	15	5.3333	5	6		6	3.6667	4	4		4	3.3333	3	3		3	1.6667	2	1		1	1.0000	1	1		1	0.0000	0	0		0	15	15	15	0	
Environment & Climate Change	15	5.3333	5	6		6	3.6667	4	3	-1	3	3.3333	3	3		3	1.6667	2	2		2	1.0000	1	1		1	0.0000	0	0		0	15	15	15	0	
Housing and Health	15	5.3333	5	6		6	3.6667	4	4		4	3.3333	3	3		3	1.6667	2	1	1		1	1.0000	1	1		1	0.0000	0	0		0	15	15	15	0
Economy and Property	15	5.3333	5	5		5	3.6667	4	4		4	3.3333	3	4		4	1.6667	2	1		1	1.0000	1	1		1	0.0000	0	0		0	15	15	15	0	
Regulatory Committees																																				
Licensing	15	5.3333	5	6	-1	5	3.6667	4	4		4	3.3333	3	3		3	1.6667	2	1	1		1	1.0000	1	1		1	0.0000	0	0		0	15	15	15	0
Planning	17	6.0444	6	6		6	4.1556	4	4		4	3.7778	4	4		4	1.8889	2	2		2	1.1333	1	1		1	0.0000	0	0		0	17	17	17	0	
Other Committees																																				
Urgent Decisions	7	2.4889	2	2		2	1.7111	2	2		2	1.5556	2	2		2	0.7778	1	1		1	0.4667	0	0		0	0.0000	0	0		0	7	7	7	0	
Audit	9	3.2000	3	3		3	2.2000	2	2		2	2.0000	2	2		2	1.0000	1	1		1	0.6000	1	1		1	0.0000	0	0		0	9	9	9	0	
Standards	11	3.9111	4	4		4	2.6889	3	3		3	2.4444	2	2		2	1.2222	1	1		1	0.7333	1	1		1	0.0000	0	0		0	11	11	11	0	
Total Seats	134	47.6444	45	49	-1	48	32.7556	35	34		33	29.7778	28	30	0	30	14.8889	17	12	2	14	8.9333	9	9	0	9	0.0000	0	0	0	0	134	134	134	0	

To achieve overall

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Political Balance
Calculations Jan 25

Group	Labour					SIA					Conservative					Lib Dem					Green					Rounded Total			Shortfall	Total					
	Size	Strict Entitlement	Rounded Allocation	Current Allocation	Proposed Adjust	Adjusted Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Proposed Adjust	Adjusted Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Proposed Adjust	Adjusted Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Proposed Adjust	Adjusted Allocation	Strict Entitlement	Rounded Allocation	Current Allocation	Proposed Adjust	Adjusted Allocation	Rounded Total	current total	Adjusted allocation						
Number of Members	15 33%					12 27%					10 22%					5 11%					3 7%									45	100%				
Overall proportionality																																			
Service Committees																																			
Policy and Resources	15	5.0000	5	5	5	4.0000	4	4	4	4	3.3333	3	4	4	3.3333	3	3	3	3	3	1.6667	2	1	1	1	1.0000	1	1	1	1	15	15	15	0	
Community & Leisure	15	5.0000	5	6	-1	5	4.0000	4	4	4	3.3333	3	3	3	3.3333	3	3	3	3	3	1.6667	2	1	1	2	1.0000	1	1	1	1	15	15	15	0	
Environment & Climate Change	15	5.0000	5	6	-1	5	4.0000	4	3	1	4	3.3333	3	3	3	3.3333	3	3	3	3	1.6667	2	2	2	2	1.0000	1	1	1	1	15	15	15	0	
Housing and Health	15	5.0000	5	6	-1	5	4.0000	4	3	1	4	3.3333	3	3	3	3.3333	3	3	3	3	1.6667	2	2	2	2	1.0000	1	1	1	1	15	15	15	0	
Economy and Property	15	5.0000	5	5	5	4.0000	4	4	4	4	3.3333	3	4	4	3.3333	3	4	4	4	4	1.6667	2	1	1	1	1.0000	1	1	1	1	15	15	15	0	
Regulatory Committees																																			
Licensing	15	5.0000	5	5	5	4.0000	4	4	4	4	3.3333	3	3	3	3.3333	3	3	3	3	3	1.6667	2	2	2	2	1.0000	1	1	1	1	15	15	15	0	
Planning	17	5.6667	6	6	6	4.5333	4	4	4	4	3.7778	4	4	4	4	3.7778	4	4	4	4	1.8889	2	2	2	2	1.1333	1	1	1	1	17	17	17	0	
Other Committees																																			
Urgent Decisions	7	2.3333	2	2	2	1.8667	2	2	2	2	1.5556	2	2	2	2	1.5556	2	2	2	2	0.7778	1	1	1	1	0.4667	0	0	0	0	7	7	7	0	
Audit	9	3.0000	3	3	3	2.4000	2	2	2	2	2.0000	2	2	2	2	2.0000	2	2	2	2	1.0000	1	1	1	1	0.6000	1	1	1	1	9	9	9	0	
Standards	11	3.6667	4	4	4	2.9333	3	3	3	3	2.4444	2	2	2	2	2.4444	2	2	2	2	1.2222	1	1	1	1	0.7333	1	1	1	1	11	11	11	0	
Total Seats	134	44.6667	45	48	-3	45	35.7333	35	33	2	35	29.7778	28	30	0	30	14.8889	17	14	1	15	8.9333	9	9	0	9	134	134	134	0	0	0	0		

To achieve overall

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