

Agenda

Policy and Resources Committee Meeting

Date: Wednesday, 27 November 2024
Time 7.00 pm
Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT

Membership:

Councillors Mike Baldock (Vice-Chair), Monique Bonney, Lloyd Bowen, Derek Carnell, Charles Gibson, Tim Gibson (Chair), Angela Harrison, James Hunt, Mark Last, Rich Lehmann, Peter Marchington, Richard Palmer, Julien Speed, Ashley Wise and Dolley Wooster.

Quorum = 5

Pages

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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 16 October 2024 (Minute Nos. 341 – 355) 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. Local Plan Review - Housing Historic Delivery and Local Plan Review
Housing Targets - To-Follow
- 6. Local Development Scheme Update 5 - 28
- 7. Kent's Local Nature Recovery Strategy - Role of Swale Borough Council 29 - 34
- 8. Local Heritage List 35 - 82
- 9. Cellar Hill and Greenstreet Conservation Area Appraisal 83 - 200
- 10. Adoption of Good Causes Lottery Anti-Money Laundering Policy 201 - 212
- 11. Adoption of Operators Gambling Policy 213 - 228
- 12. Performance Monitoring Mid-Year Report 2024/2025 (end Q2) 229 - 234
- 13. Update of the Commissioning and Procurement Policy 235 -

14.	Financial Management Report - Mid Year 2024/25	256 257 - 268
15.	Update of Sundry Debt Policy	269 - 286
16.	Draft Budget 2025/26	287 - 354
17.	Recommendations from the Swale Joint Transportation Board meeting held on 7 October 2024	355 - 356
18.	Forward Decisions Plan	357 - 358
19.	South Thames Gateway Building Control Partnership - Draft Business Plan 2025-2028	359 - 362
20.	Exclusion of the Press and Public	
	To decide whether to pass the resolution set out below in respect of the following items:	
	That under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3.	
	3. Information relating to the financial or business affairs of any particular person (including the authority holding that information). See note below.	
21.	South Thames Gateway Building Control Partnership Business Plan 2025-2028 - Exempt Appendix	363 - 402

Issued on Tuesday, 19 November 2024

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 this meeting, please visit www.swale.gov.uk

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

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Policy and Resources Committee	
Meeting Date	27 November 2024
Report Title	Local Development Scheme autumn 2024
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 Policy and Resources Committee are recommended (by the Planning and Transportation Policy Working Group) to recommend <ul style="list-style-type: none"> • That the amended revised timetable for Regulation 18 draft Plan consultation in quarter 2 of 2025 and a Regulation 19 pre-submission plan consultation in quarter 4 of 2025 be recommended to Full Council. • That the accompanying Local Development Scheme that formally sets out the consultation timetable at Appendix III of this report be recommended to Full Council.

1 Purpose of Report and Executive Summary

1.1 The purpose of this report is to seek recommendation to Full Council that the Local Plan Review process be updated to a Regulation 18 draft Plan consultation in quarter 2 of 2025 and a Regulation 19 pre-submission plan consultation in quarter 4 of 2025, and subsequently to recommend the accompanying Local Development Scheme that formally set out the timetable. The report taken to Planning and Transportation Policy Working Group (PTPWG) on 17th September 2024 is provided at Appendix I.

2 Background

2.1 The discussion at PTPWG involved the proposed timing of the Regulation 18 draft Plan consultation and the local elections for Kent County Council in May 2025 and the need to schedule meetings so that decisions can be made before the purdah period.

2.2 There was also short discussions on the value of evidence to improve landscape and design standards and the process for identifying sites and their proposals for development. As a result PTPWG resolved that *the design code and landscape character work be brought forward as far as possible, alongside the Local Plan consultations*. Officers are working to optimally schedule these valuable pieces of

evidence, but it is not appropriate to reflect this level of detail in the Local Development Scheme.

2.3 The draft minutes of the 17th September PTPWG meeting are provided in Appendix II.

3 Proposals

3.1 On 17th September 2024, PTPWG resolved:

- 1 That the amended revised timetable for Regulation 18 draft Plan consultation in quarter 2 of 2025 and a Regulation 19 pre-submission plan consultation in quarter 4 of 2025 be recommended to the Policy and Resources Committee.
- 2 That the Local Development Scheme shown at Appendix I of the report be recommended to the Policy and Resources Committee.

4 Alternative Options Considered and Rejected

4.1 An alternative option was presented to PTPWG and rejected. The option was to not update the timetable for Local Plan consultation set out in Local Development Scheme. However, not updating the timetable would mean that the additional call for sites work requested by members including site suitability assessments would not be completed within the existing timetable. This alternative option would make the published Local Development Scheme out of date and the Council would fail in its legislative duty to keep local communities and stakeholders up to date on its intentions towards Local Plan making.

5 Consultation Undertaken or Proposed

5.1 Consultation undertaken for the proposed revision to the consultation timetable is set out within the 17th September 2024 PTPWG report and include the formal recommendation of the working group.

6 Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action: A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	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.

7 Appendices

- 7.1 Appendix I Local Development Scheme update report to Planning and Transportation Policy Working Group – 17th September 2024.
- 7.2 Appendix II Printed minutes Planning and Transportation Policy Working Group – 17th September 2024.
- 7.3 Appendix III Proposed Local Development Scheme Autumn 2024.

8 Background Papers

- 8.1 None

Planning and Transportation Policy Working Group	
Meeting Date	17 September 2024
Report Title	Local Development Scheme Autumn 2024 update
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. Members of PTPWG are asked to recommend to Policy and Resources committee the revised timetable for a Regulation 18 draft Plan consultation in quarter 2 of 2025 and a Regulation 19 pre-submission Plan consultation in quarter 4 of 2025. 2. Members are also asked to recommend the updated Local Development Scheme at Appendix I that includes the revised timetable.

1 Purpose of the Report and Executive Summary

1.1 This report sets out a proposed update to the timetable for the Local Plan Review consultations as set out in the Council’s Local Development Scheme. The update is required to address members’ request to carry out additional work that could be considered as part of drafting the Regulation 18 version of the Local Plan. The work includes:

1. identify sites in Sittingbourne for additional homes;
2. identify sites for rural older persons housing;
3. review specific sites for densification potential; and,
4. review draft HELAA allocations from the perspective of alternative transport solutions (given the perceived direction of travel of national government in that regard).

2. Background

2.1 The requirement to produce a Local Development Scheme is set out under section 15 of the Planning and Compulsory Purchase Act 2004. The Act sets out that schemes must specify (among other matters) the development plan documents including local plans that when prepared, will comprise part of the development plan for the area. The Local Development Scheme should be made publicly accessible and kept up to date so that that local communities and interested parties can keep track of progress.

- 2.2 On 24th July 2024 the Council agreed the Local Plan Review consultation approach option 2 that included a Regulation 18 draft Plan consultation in quarter 4 of 2024 and a Regulation 19 pre-submission Plan consultation in quarter 1 of 2025 and, that the updated Local Development Scheme be agreed.
- 2.3 Since the Full Council decision, a consultation on proposed changes to the National Planning Policy Framework has been undertaken by the government. Whilst at the time of writing this report the proposed changes have not been adopted into national policy, it is clear that the government continues to place emphasis on the importance of Local Authorities to have up to date Local Plans and that Plans and should meet central government’s understanding of local needs.
- 2.4 To allow time for new legislation on Plan Making to be brought forward and for Local Authorities to address changes proposed in the NPPF, the government has extended the timeframe for Local Plans to be submitted under the current Plan Making system to December 2026. This is an extension of 18 months from the previous governments’ intended deadline of June 2025.
- 2.5 As part of informal discussions with members on sites that can be considered for drafting the Local Plan, members have asked for further work on the site options as set out in paragraph 1.1 above. To help facilitate the first two requests in a robust and defensible manner, officers will need to carry out a new call for sites exercise and assess those sites to determine their suitability for consideration in Plan drafting. This will ensure that all sites proposed for draft allocations have been through the same assessment, a process that is a requirement for Plan Making and is tested through the Plans Sustainability Appraisal.
- 2.6 The call for sites workstream has been estimated by officers to take approximately 6 months. Alongside the call for sites officers will also be working on the third and fourth requests of members. As a result of these work streams the proposed Regulation 18 draft Local Plan consultation schedule for Quarter 4 of this year will be need to be pushed back to Quarter 2 of 2025.
- 2.7 Additionally, the time between the Regulation 18 consultation and Regulation 19 consultation is proposed to be extended by 3 months to ensure officers have enough time to comprehensively consider responses to the Regulation 18 consultation before producing the next draft of the Local Plan. Whilst the previous timeframe for this work was achievable, albeit tight the government has allowed more time for Plan Making under the current system. The extension of time would also be appropriate based on the recent experience of neighbouring authorities who have experienced higher levels of response to consultations than previously experienced. The revised timetable proposed in the LDS is set out below.

Project Plan going forward	
Publication of Regulation 18 draft Local Plan consultation	April to June 2025
Publication of submission draft local plan review for public Consultation (Reg 19)	October to December 2025

Submission of Plan for Examination (with results of the public consultation) Reg 22	January to March 2026
Examination hearing sessions (Reg 24) *	July to September 2026
Main modifications consultation *	October to December 2026
Adoption, full Council (Regulation 26) *	January to March 2027

* Indicative time frames as finalise of dates will be dependent on the availability of the Planning Inspectorate.

- 2.8 When balancing the priorities of the timeframe to December 2026 to submit a Plan for examination under the proposed NPPF transitional arrangements, costs of Plan production and robustness of Plan drafting that includes the 4 workstreams set out in paragraph 1.1 above, officers consider a 6 month extension to the timetable to the Regulation 18 consultation and a further 3 months after the consultation to refine drafting of the Regulation 19 draft Plan to be the best approach to support member aspirations for the Local Plan Review

3. Conclusion

- 3.1 This report recommends changes to the Local Plan Review timetable for consultation to include a 6 month extension for preparation of the Regulation 18 document and a 3 month extension to the review period before the Regulation 19 consultation. The proposed timetable extension ensures that the Council can deliver the Local Plan Review within the new timeframe for Plan Making set out by the government. Updating the Local Development Scheme to reflect the timetabling changes will ensure that local communities and stakeholders are kept up to date on the Council's Local Plan progress.

4. Proposals

- 4.1 Members of the PTPWG are asked to recommend to Policy and Resources committee the revised timetable for a Regulation 18 draft Plan consultation in quarter 2 of 2025 and a Regulation 19 pre-submission Plan consultation in quarter 4 of 2025. Members are also asked to recommend the updated Local Development Scheme at Appendix I that includes the revised timetable.

5. Alternative Options Considered and Rejected

- 5.1 To not update the timetable for Local Plan consultation set out in Local Development Scheme – The additional call for sites work including site suitability assessments would not be completed within the existing timetable. This would make the published Local Development Scheme out of date and the Council would

fail in its legislative duty to keep local communities and stakeholders up to date on its intentions towards Local Plan making.

6. Consultation Undertaken or Proposed

- 6.1 The timescales for Local Plan production and the timetable for consultation are a matter for the Council's Local Development Scheme (LDS). The LDS which is contained in Appendix I has been updated to reflect the timetabling changes set out in this report.
- 6.2 The timetabling changes were discussed informally with administration members in August 2024 once proposed changes to the NPPF and Plan making were known.

7. Implications

Issue	Implications
Corporate Plan	The LPR is responsible for delivering the spatial elements of the Corporate Plan.
Financial, Resource and Property	Updating the Local Development Scheme to reflect the timetable changes and publication of the document on the website can be accommodated within existing resources.
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	<p>The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.</p> <p>The sustainability appraisal process appraises the social, environmental and economic effects of a plan from the outset. In doing so it helps ensure that Plan making decisions are made that contribute to achieving sustainable development.</p> <p>Habitats regulations assessments test if a Plan and the site allocations and policies within it could significantly harm the designated features of a site or sites protected by the Conservation of Habitats and Species Regulations 2017.</p> <p>Drafting of the Plan and its Policies will also take in to account the Council's Climate and Ecological Emergency Action Plan.</p>
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	<p>There is a considerable (although now reduced – given the extended timeframe) risk that SBC may not be able to recruit or retain the required full complement of permanent staff to deliver the Local Plan within the window of the transitional arrangements.</p> <p>There is an identified national shortage of skilled planners, and many Local Authorities will be seeking similar skills at a similar period of time.</p>
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

8. Appendices

- 8.1 Appendix I Local Development Scheme 2024
- 8.2 Appendix II Local Plan Review Evidence Base list

9. Background Papers

- 9.1 [Full Council report Local Plan Review Consultation timetable options and LDS 24th July 2024.pdf \(swale.gov.uk\)](#)

Planning and Transportation Policy Working Group

MINUTES of the Meeting held in the Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT on Tuesday, 17 September 2024 from 7.00 pm - 8.40 pm.

PRESENT: Councillors Mike Baldock, Monique Bonney (Vice-Chair), Ann Cavanagh (Substitute for Councillor Kieran Golding), Charles Gibson, Alastair Gould (Chair), James Hunt, Richard Palmer (Substitute for Councillor Elliott Jayes), Julien Speed, Tony Winckless and Ashley Wise (Substitute for Councillor Karen Watson).

OFFICERS PRESENT: Billy Attaway, Paul Casey, Natalie Earl, Joanne Johnson, Stuart Watson and Ceri Williams.

ALSO IN ATTENDANCE (VIRTUALLY): Councillors Lloyd Bowen and Jackson.

APOLOGIES: Councillors Kieran Golding, Elliott Jayes, Karen Watson and Mike Whiting.

243 **Election of Chair**

Councillor Mike Baldock nominated Councillor Alastair Gould to be Chair for the municipal year 2024-2025. This was seconded by Councillor Tony Winckless. On being put to the vote, it was agreed.

Resolved:

(1) That Councillor Alastair Gould be elected as Chair for the municipal year 2024-2025.

244 **Election of Vice-Chair**

Resolved:

(1) That Councillor Monique Bonney be elected as Vice-Chair for the municipal year 2024-2025.

245 **Emergency Evacuation Procedure**

The Chair outlined the emergency evacuation procedure.

246 **Minutes**

The Minutes of the Meeting held on 14 March 2024 (Minute Nos. 769 – 772) and the Minutes of the Extraordinary Meeting held on 8 August 2024 (Minute Nos. 166 – 172) were taken as read approved and signed by the Chair as correct records.

247 **Declarations of Interest**

No interests were declared.

248 **Swale Planning Enforcement Strategy - Draft for Adoption**

The Team Leader (Planning Investigations) introduced the report and asked for Members' comments on the updated draft Planning Enforcement Strategy following the eight-week public consultation process between February and April 2024.

The Chair invited Members to make comments which included:

- Page 15, needed to be changed so that all Members were consulted when officers make a decision on whether to take enforcement action under the current scheme of delegations;
- paragraph 3.1 referred to the online reporting form being the 'easiest' way to report enforcement breaches, but residents often struggled to complete the form, so the wording needed to be changed to 'quickest' or 'best';
- suggested the wording be changed to 'best' to emphasise that it was not the easiest, but best way for members of the public to ensure the breach had been reported;
- what was the situation with out-of-office hours working?;
- were officers expected to work out of normal working hours when required?;
- what enforcement breaches required police intervention?;
- why were unauthorised encampments not category one?;
- understood that not all reports of planning breaches were published online, but hoped that this could be looked at in the future;
- the document needed to clarify what types of breaches would be reported online so that the public and parish town councils knew what to expect on the portal; and
- needed to be clear about what type of fly tipping was the responsibility of Swale Borough Council and what was the responsibility of the Environment Agency as it was often confusing for parish/town councils as well as Ward Members.

The Team Leader (Planning Investigations) responded explaining that as well as the online reporting tool, an email address could be added to the website so that residents could email directly any enforcement breaches if they struggled to complete the online reporting tool. He added that a three-day response time for unauthorised encampments was what had been agreed but officers could review the response times before the report came back to the Policy and Resources Committee.

With regards to the out-of-office expectation of officers, the Head of Place explained that once an enforcement case had been reported, the strategy would be applied. The course of action might require the officer to work outside of normal working hours to deal with the breach.

With regards to the enforcement breaches which would require police action, the Team Leader (Planning Investigations) said that the police would only be called upon if there was a risk to investigating officers and a potential breach of the peace, and the investigation lay with the Council and not the police.

The Team Leader (Planning Investigations) agreed to take into consideration Members' comments on the strategy and to update the document before it was considered at the next Policy and Resources Committee.

Councillor Mike Baldock moved the recommendation, which was seconded by Councillor Tony Winckless.

Recommended:

- (1) That the draft Swale Planning Enforcement Strategy be updated as per the proposed changes as minuted and it be recommended to the Policy and Resources Committee for adoption.**

249 Local Development Scheme Autumn 2024 update

The Project Manager (Planning Policy) introduced the report which set out the changes to the timetable for the Local Plan Review consultations to address members' requests, as part of the drafting for the Regulation 18 document of the Local Plan.

The Chair invited Members to make comments, which included:

- Concerned that the Kent County Councillor elections in May 2025 could affect the timetable due to the pre-election period;
- concerned that extra meetings would need to be scheduled and requested that officers look at the timetable of meetings to ensure the decisions could be made in time before purdah period commenced;
- considered this the better option as it allowed the Council to spend more time on an important document;
- the Swale Highway model, on page 55 of the report, needed to be considered in more detail;
- the landscape character assessment, on page 56 of the report, needed to be looked at in more detail and requested that more information be circulated to Members;
- the design of past developments had been awful at times so it was important to get the design code in the local plan accurate;
- considered any further delays to the process would impact the Council's already lacking a 5-year housing land supply; and
- asked officers if it was possible to consult on the Design Code alongside the regulation 18 document.

The Planning Manager (Policy) responded explaining that the Design Code work was estimated to be approximately £140,000 and was very resource intensive, and for budgetary and resource reasons was programmed to follow the Local Plan work. She added that design coding was a very prescribed process and the policies within the current plan were robust and required officers to carry out the process of working on the design coding. With regard to the highways model work and landscaping models she added that the work was going to be carried out at a later stage and be bespoke to certain areas of the borough.

The Vice-Chair proposed the following amendment: that the design code and landscape character work be brought forward as far as possible, alongside the Local Plan consultations. This was seconded by Councillor Mike Baldock. On being put to the vote it was agreed by Members.

The Chair invited Members to make further comments, which included:

- What was the process for obtaining site proposals for future development?;
- were housing agencies and charities asked if they had any vacant land suitable for development?; and
- when already existing land allocation owners were being asked for possible suitable development, were officers asking if the owners would consider greater densification

at the same time?

The Planning Manager (Policy) said that officers were having meetings about the site allocation questions and that one of the questions they would ask regarding the new and current allocations, was if they would consider greater densification.

Councillor Mike Baldock proposed the recommendations as set out in the report as amended. This was seconded by Councillor Richard Palmer.

Recommended:

- (1) That the amended revised timetable for Regulation 18 draft Plan consultation in quarter 2 of 2025 and a Regulation 19 pre-submission plan consultation in quarter 4 of 2025 be recommended to the Policy and Resources Committee.***
- (2) That the Local Development Scheme shown at Appendix I of the report be recommended to the Policy and Resources Committee.***
- (3) That the design code and landscape character work be brought forward as far as possible, alongside the Local Plan consultations.***

250 **Statement of Community Involvement - Update for Emerging Local Plan**

The Planning Manager (Policy) introduced the report setting out how the Statement of Community Involvement consultation would support all planning matters, including; planning applications, planning policy documents and enforcement.

The Chair invited members to make comments, which included:

- Important to use digital and online technology to send messages out to members of the public as it was straightforward and cost efficient;
- thought points raised in paragraph 4.12, on page 75 of the report, needed to be changed to 'The Council will' rather than 'may' as it was important for the public to be able to view consultation documents; and
- putting documents in local libraries and putting information on how to view the documents in the local press was an easy thing to do.

Councillor Mike Baldock moved the following amendment that paragraph 4.12 be changed to read: 'The Council will:'. This was seconded by Councillor Julien Speed. On being put to the vote, the amendment was agreed by Members.

The Chair invited Members to make further comments and these included:

- Paragraph 3.12 on page 73 was not correct as the Community Infrastructure Levy (CIL) was not being implemented;
- the biggest complaints that Ward Members received were that neighbouring properties were not being informed about planning applications, and this needed to be looked into;
- it was hard to put a specific distance of 'who was entitled' to know about a planning application as some properties in the borough were miles apart from each other;
- requested that proper sized maps with in-depth explanations were included in the consultation documents so that members of the public could fully understand and interpret what was being proposed; and
- commented that it was Ward Members' responsibility to ensure that residents were made aware of the proposals in the Local Plan that would affect their local area.

The Planning Manager (Policy) noted members' comments and agreed to make the small changes to the Statement of Community Involvement.

The Vice-Chair moved the recommendations' in the report and this was seconded by Councillor Richard Palmer. On being put to the vote it was agreed.

Recommended:

- (1) That the Statement of Community Involvement report be noted.***
- (2) That the Statement of Community Involvement be recommended to the Policy and Resources Committee, subject to minor changes as minuted, to be published for public consultation.***

251 **Local Plan Review - Agricultural Land Report - Stage 1: Baseline Information**

The Planning Policy (Manager) presented the Agricultural Land Report – Stage 1: Baseline Information which would form part of the Local Plan Review evidence base, and would be published later in 2024.

Members made comments on the report and asked if there was a way the map could clearly differentiate the different grading of 3a & 3b agricultural land. The Planning Policy (Manager) responded to say that the information provided was given to them by the Department for Environment Food and Rural Affairs (DEFRA) and that officers would review the data to see if they could differentiate the different gradings of agricultural land.

Recommended:

- (1) That the Agricultural Land Report Stage 1 be noted.***

Chair

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All minutes are draft until agreed at the next meeting of the Committee/Panel

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Appendix I. Local Development Scheme tbc 2024 Draft**1. Introduction**

- 1.1 Swale Borough Council is required to prepare and maintain a Local Development Scheme (LDS) in accordance with Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011).
- 1.2 This LDS came into effect upon agreement by the Full Council at its meeting on TBC 2024. As set out in the Planning and Compulsory Purchase Act 2004 (Section 15) the LDS must specify:
- The local development documents which are to be development plan documents;
 - The subject matter and geographical areas to which each development plan document is to relate;
 - Which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities;
 - Any matter or area in respect of which the authority has agreed (or propose to agree) the constitution of a joint committee under section 29;
 - The timetable for the preparation and revision of the development plan documents.
- 1.3 The LDS is a project plan which sets out the timetable for the production of new or revised development plan documents which will form the Council's Local Development Plan. This LDS sets out a work programme for the Council's Local Plan Review over the period to March 2027. Progress against this LDS will be reviewed annually and reported by the Councils Planning Policy team.

2. Background

- 2.1 The Council produced its first LDS in 2005, followed by subsequent revisions in 2008, 2010, 2015, and 2016. These related to the former Local Plan (Adopted Feb 2008); and the current adopted Local Plan 'Bearing Fruits' (Adopted July 2017).
- 2.2 Work on the Local Plan Review (LPR) began once Bearing Fruits was adopted and the first LDS was published in 2018. Revised LDSs was published in March 2020, October 2021, July 2022 and July 2024 to reflect changes in approach that the Council deemed appropriate at that time. This latest version has been produced as a result of changes to the timetable for Regulation 18 and 19 consultation to allow time for officers to identify additional suitable sites for consideration in Plan drafting for Sittingbourne and for rural/older persons housing.
- 2.3 The Council remains committed to having an up-to-date local plan and recognises the need to progress with the LPR and to have a robust and proportionate evidence base. This new LDS (tbc 2024) reflects the statutory

stages of the plan process and the Statutory Regulations and will supersede the LDS (July 2024) programme for Local Plan Review.

3. The current adopted development plan for Swale

3.1 The current statutory adopted elements of the development plan for Swale Borough are:

- Bearing Fruits 2031: The Swale Borough Local Plan (adopted July 2017)
- Faversham Creek Neighbourhood Plan (made June 2017)
- Boughton-under-Blean and Dunkirk Neighbourhood Plan (made April 2023)
- Kent Minerals and Waste Local Plan 2013 – 2030, as amended by early partial review (adopted September 2020)

4. Current Supplementary Planning Documents (SPD)

4.1 The Local Plan is supported by a number of existing and proposed Supplementary Planning Documents and Supplementary Planning Guidance and Technical Advice Notes which set out the details for implementing local plan policies. All of these documents were subject to public consultation. These can be viewed at [Publications - Planning and Planning Policy \(swale.gov.uk\)](https://www.swale.gov.uk/publications-planning-and-planning-policy)

4.2 Currently adopted SPDs for the Borough are:

- Developer Contributions SPD (adopted, November 2009)
- Queenborough and Rushenden Masterplan SPD (November 2010)
- Sittingbourne Town Centre and Milton Creek Masterplan SPD (September 2010)
- Swale Landscape Character and Biodiversity Appraisal SPD (2011)
- Stones Farm Development Brief SPD (May 2011)
- Parking Standards SPD (May 2020)
- Sittingbourne Town Centre Supplementary Planning Document (2022)

4.3 Supplementary Planning Guidance (SPG) documents are:

- The Conversion of Buildings into Flats and Houses in Multiple Occupation
- Listed Buildings – A Guide for Owners and Occupiers
- The Conservation of Traditional Farm Buildings
- The Design of Shop Fronts, Signs and Advertisements
- Designing an Extension – A Guide for Householders
- Planting on New Developments – A Guide for Developers
- The Erection of Stables and Keeping of Horses
- Conservation Areas
- Lynsted Parish Design Statement
- Abbott Laboratories Ltd. – Development Brief

4.4 Technical Guidance Notes (TGN) documents are:

- Air Quality
- Noise and Vibration Planning Technical Guidance

4.5 The Full Council agreed an interim Planning Policy statement the “Interim Planning Policy for Park Home residences” ahead of the Policy consideration in the Local Plan Review on 17 June 2020, the.

4.6 Additionally, part of the Kent Downs National Landscape formerly known as the Kent Downs Area of Outstanding Natural Beauty falls within Swale and has a management plan that is adopted by all local authorities within their area. This is used as a material consideration for planning applications and can be viewed at [Planning and the Management Plan - Kent Downs](#)

5. Other Relevant Documents

5.1 Statement of Community Involvement (SCI)

The Swale Statement of Community Involvement (February 2018) currently being updated sets out the Council’s approach to public and key stakeholder participation in all planning matters, including the preparation of the local plan, supplementary planning documents and arrangements for consultations on planning applications.

5.2 Sustainability Appraisal

The Council will meet the requirements of sustainability appraisal through the local plan preparation process, which will involve carrying out iterative appraisals of the sustainability of the options, proposals and draft policies in the local plan and prepare reports on the findings. These will be carried out at the key stages of plan preparation and will inform progress on the Plan. The sustainability appraisals carried out at the key stages of plan preparation will also accompany consultation drafts of the Plan for public comment.

5.3 Swale Borough Council Corporate Plan (2023 – 2027)

The corporate plan sets out the Council’s priorities and the local plan is responsible for delivering those of a spatial nature. The priorities most specific to the Councils Local Plan review include:

- Priority Community: To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience.;
- Priority Economy: Working with our businesses and community organisations to work towards a sustainable economy which delivers for local people.
- Priority Environment: To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead.
- Priority Health and Housing: To aspire to be a borough where everyone has access to a decent home and improved health and wellbeing.

5.4 **Authority Monitoring Report**

The Council will publish monitoring information on its website on an annual basis relating to the previous monitoring year (running from 1 April to 31 March). This will provide updates on the status of the LDS timetable; progress on the Local Plan Review; reports on public consultations; duty to co-operate statements; neighbourhood planning and borough wide performance statistics on planning topics such as housing, employment, environment and transport.

5.5 **Policies Map**

The Council is required to produce a Policies Map which shows the location of development proposals in all current, adopted development plan documents on an ordnance survey base map. For Swale, this is the Proposals Map which accompanies the Bearing Fruits Local Plan (2017). The area annotated as Policy NP1 denotes the area covered by the adopted Faversham Creek Neighbourhood Plan.

6. **Emerging Development Plans for Swale**

Swale Borough Local Plan Review 2022 – 2040

- 6.1 The Local Plan Review (LPR) will set the framework for the development needs for the whole of the Swale Borough area from 2022 – 2040. This will include addressing revisions to the National Planning Policy Framework and associated Practice Guidance (2023); addressing the future development needs of the Borough including housing, the local economy, environmental considerations and community infrastructure needs and transport.
- 6.2 The LPR will include strategic policies to address these matters and put forward a development strategy for the Borough. It will also include site specific allocations to meet identified need and retain, update or include new detailed topic development management policies to guide determination of planning applications. Where applicable, the policies for any larger scale developments, such as significant extensions to existing villages and towns, will be set within a vision that looks further ahead (at least 30 years). This will take into account the likely timescale for their delivery.
- 6.3 Work began on the LPR as a result of Council Minute 44 (July 2017), with early scoping and evidence gathering, within the context of major review of national planning policy and government policy to significantly boost housing delivery. The key stages of the process and the Document Project Plan and the timetable for Local Plan Review including key stages of consultation are set out at 7.4 below.
- 6.4 The Council continues to undertake the Duty to Cooperate with neighbouring planning authorities and on the London Plan, to identify and discuss potential cross boundary issues (which will result in Statements of Common Ground). No intention for joint plan making with other Local Authorities was agreed by

the Council at its Full Council meeting on 15th November 2023 link: [Agenda for Council on Wednesday, 15 November 2023, 7.00 pm \(swale.gov.uk\)](#)

6.5 Community Infrastructure Levy (CIL)

CIL is a mechanism introduced under the Planning Act 2008 with the intention of providing a consistent approach to determining financial contributions from new development towards local infrastructure provision. CIL significantly reduces down the Section 106 agreement process at the planning application stages as Levies will have been determined through a CIL specific examination in public. The Section 106 agreements then are left to focus upon limited matters like Affordable Housing. At this stage in the Local Plan Review due to the Whole Plan viability assessment having not been completed it is unknown whether it will be viable to apply CIL to new development proposed within the Plan. The Council will review the appropriateness of applying CIL and, if required, CIL will be included in a future review of this LDS.

6.6 Neighbourhood Plans

At September 2024, the following areas have designated Neighbourhood Plan areas:

- Minster (designated in 2014)
- Hernhill (designated in 2017 and under preparation)
- Faversham (designated in 2020 and at referendum Autumn 2024)

6.7 Neighbourhood plans, once adopted, form part of the development plan but are not programmed by the local planning authority and are therefore, not included within this LDS timetable. They must be in general conformity with the strategic policies of the adopted local plan and have regard to any emerging local plans. More details for Swale neighbourhood plans can be found at [Local Plans - Neighbourhood planning \(swale.gov.uk\)](#)

6.8 Supplementary Planning Documents

Presently, the Council is not intending to prepare any Supplementary Planning Documents.

7. Conclusion

7.1 The Local Plan Review (LPR) will be produced by the Council's Planning Services, and led by the Planning Policy Team. The importance of the work is recognised and supported with input and expertise from other teams across the Council including the use of outside specialist consultants (where appropriate) and engagement with stakeholders, organisations and the public to help inform and develop the plan.

- 7.2 The Council has an established management and reporting structure to support delivery of the local plan review. This is primarily the Policy and Resources Committee (and Planning and Transportation Policy Working Group that report to it), that subsequently make recommendations to Council for decision. In addition, briefings for senior managers and Members on key pieces of research or new national policy are used.
- 7.3 The LPR Document Project Plan and the timetable for the Review including key stages of consultation are set out below.

Document Project Plan to date	
Subject/Content	<p>Matters to be reviewed include:</p> <p>A vision for the Borough up to 2052</p> <p>A review of development needs for housing, employment and other uses</p> <p>Identification of a development strategy that will meet identified development needs</p> <p>Allocation of land to deliver development needs and maintain supply</p> <p>The need for further sustainable transport measures aimed at encouraging modal shift to reduce congestion and air pollution that will lead to improved health outcomes.</p> <p>How great design and good placemaking can be achieved</p> <p>How best to respond to the challenges of the climate and ecological emergency</p>
Status	Local Plan
Coverage	Borough-wide
Conformity with national policy	Central government policy and guidance, including the National Planning Policy Framework, National Planning Practice Guidance and the Town and Country Planning (Local Planning) (England) Regulations 2012.
Conformity with local policy	Regard to the Council's Plans and Strategies, including the Corporate Plan, Economic Development Improvement Plan and Housing Strategy. Also have regard to the Climate Change and Ecological Emergency Strategy and Action Plan. The LPR will need to take into account the policies within neighbourhood plans and have regard to other local strategies such as those produced by KMEP and KCC
Policies map	To be amended to reflect the policy content of the Local Plan Review
Local plan review commenced (Council Minute 44)	July 2017

Sustainability Appraisal	Relevant appraisals and assessment will be carried out throughout the review of the Swale Borough Local Plan
Evidence gathering	Commenced July 2017
Previous consultations being superseded	
<ul style="list-style-type: none"> • Regulation 18 consultation (Looking Ahead) • Regulation 19 consultation on the LPR • Publication of further Issues & Options (with Preferred Option) consultation document (Reg 18) 	<p>27 April – 8 June 2018</p> <p>February – 30 April 2021</p> <p>October – November 2021</p>
Project Plan going forward	
Publication of Regulation 18 draft Local Plan consultation	April to June 2025
Publication of submission draft local plan review for public Consultation (Reg 19)	October to December 2025
Submission of Plan for Examination (with results of the public consultation) Reg 22	January to March 2026
Examination hearing sessions (Reg 24) *	July to September 2026
Main modifications consultation *	October to December 2026
Adoption, full Council (Regulation 26) *	January to March 2027

* Indicative time frames as finalise of dates will be dependent on the availability of the Planning Inspectorate.

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Policy and Resources Committee	
Meeting Date	27 th November 2024
Report Title	Kent's Local Nature Recovery Strategy (LNRS) – Role of Swale Borough Council as Supporting Authority
EMT Lead	Emma Wiggins, Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officer	Emma Gibson, Planning Officer (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To delegate to the Head of Place, in consultation with the Chair of Policy and Resources Committee, the Chair of the Environment and Climate Change Committee and the Chair of the Planning and Transportation Policy Working Group, to confirm to Kent County Council (KCC) that Swale Borough Council is “content” for the Local Nature Recovery Strategy to be issued for public consultation, and following the agreed process, then for publication. 2. To agree that this approach apply to all subsequent stages and Local Nature Recovery Strategy refreshes.

1 Purpose of Report and Executive Summary

- 1.1 This report sets out Swale Borough Council’s role in the Local Nature Recovery Strategy (LNRS) process, and the associated timescales.
- 1.2 It requests that delegation be given to the Head of Place, in consultation with the Chair, to confirm to Kent County Council (KCC) that Swale Borough Council is “content” for the Local Nature Recovery Strategy to be issued for public consultation, and then for publication. This is not to agree the Council’s response to the consultation itself.
- 1.3 It requests that members agree that this approach apply to all subsequent stages and Local Nature Recovery Strategy refreshes.

2 Background

- 2.1 Local Nature Recovery Strategies were created under the 2021 Environment Act and are a system of spatial strategies for nature and environmental improvement that will underpin England’s Nature Recovery Network. LNRS provides the opportunity to deliver an ecologically coherent and landscape scale, strategic approach to nature recovery. Local nature recovery strategies map nature recovery actions. They target actions in locations where they are most needed and where they provide the best environmental outcomes. The strategies will help to join up national efforts to reverse the decline of biodiversity. The Local Nature Recovery Strategy for Kent and Medway will be one of 48 in total – together

these will cover the whole of England, with no gaps or overlaps, to deliver the government's commitment to ending the decline of nature and supporting its recovery.

2.2 The purpose of LNRS are that:

- Local Planning Authorities will have a duty of regard to LNRS.
- LNRS will have spatial role in Biodiversity Net Gain (BNG).
- LNRS is expected to play role in Environmental Land Management Scheme (ELM) delivery.
- LNRS will help Identify other Nature based solutions (NbS) and potentially direct funding.

2.3 As spatial strategies, LNRS will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits. Secondary legislation and statutory guidance, yet to be published will contain the detail, but what we do know is that at a minimum each LNRS will include:

- Agreed priorities for nature's recovery.
- A map of the most valuable existing areas for nature.
- A map of proposals for creating or improving habitat for nature.
- Inclusion of wider environmental goals.

2.4 The planning role for LNRS will be backed by a specific duty on all public authorities to "have regard" to relevant LNRS and a duty for specified public bodies to report every five years on what action they have taken. Each Strategy will also reflect planned or ongoing nature recovery activity, in order to improve integration between existing efforts to improve the environment.

2.5 Wide engagement with landowners and other stakeholders will be the foundation for LNRS along with mapping and strategy. LNRS will provide a source of evidence for local planning authorities to prepare their Local Plans, helping these authorities understand locations important for conserving and enhancing biodiversity.

2.6 The Strategies will be locally led and developed collaboratively through engagement with a wide breadth of stakeholders, including government agencies, local planning authorities, landowners, charities and non-governmental organisations, community groups, utilities, transport, recreation & access, health, education, businesses and developer sector representatives, to establish shared priorities for nature recovery and wider environmental goals.

2.7 The regulations, in full, can be found at [The Environment \(Local Nature Recovery Strategies\) \(Procedure\) Regulations 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2023/1111/2023-07-27/1-10)

- 2.8 In Kent and Medway, the LNRS is being prepared by KCC, as the “responsible authority”, and its development is run under the banner “Making Space for Nature in Kent and Medway”.
- 2.9 Swale Borough Council has a formal role as a “supporting authority”. The regulations set out that the role of supporting authorities is to review the LNRS before consultation and publication is to “confirm that they are content”.
- 2.10 The Constitution (at 2.8.10.8) delegates authority to all Heads of Service “to respond to consultations on behalf of the Council in consultation with the relevant Committee Chair where appropriate.”
- 2.11 As ‘confirming the authority is content’ is subtly distinct to ‘responding to consultations’, Democratic and Legal Services have advised that Policy and Resources Committee specifically confirm the delegation in relation to the LNRS.
- 2.12 Officers of the Council (Planning Policy Team, Green Spaces Team, Climate and Ecological Emergency Team) have been involved in the LNRS preparation processes to date.
- 2.13 Stages and indicative timescales for the LNRS process are as follows;
- Provision of consultation draft to supporting authorities – 13th November to 11th December
 - Public consultation – 16th January to 12th March
 - Pre-publication approval
 - Publication – looking towards mid-May
- 2.14 The process of Swale confirming that they are “content” for the LNRS to be issued for public consultation, and then for publication, is not a requirement of the supporting authorities and that is not the purpose of the review stages. It is just to confirm the authority is “content” with the LNRS.
- 2.15 The two times that KCC will be required to provide the supporting authorities with 28 days to review and “confirm” they are “content” with the draft are:
1. Prior to public consultation – provision of the draft LNRS public consultation document is currently scheduled for early to mid-November, so that the 28 days is concluded before the Christmas break and public consultation can commence in January 2025.

2. Prior to publication - currently scheduled for April/May 2025 but will be dependent on the outcomes of the public consultation and also any limitations LPAs may have with that scheduling because of local elections in May.

2.16 When KCC request confirmation that the “supporting authorities” are “content” with the documents at the two stages above, the Council will only have a 28-day timeframe to confirm. Therefore, requesting delegation to the Head of Place is a pragmatic solution because of the constraints of the member approvals route as Committee cycles are unlikely to fit with these timeframes.

2.17 Also, there is ‘deemed confirmation’ once the 28 days are up if the Council do not respond as if no objections are received by the end of the 28 day period it is determined that public consultation can go ahead.

2.18 This process is wholly distinct to the adoption processes, which legally sits with KCC.

3 Proposals

3.1 To delegate to the Head of Place, in consultation with the Chair of Policy and Resources Committee, the Chair of the Environment and Climate Change Committee and the Chair of the Planning and Transportation Policy Working Group, to confirm to Kent County Council (KCC) that Swale Borough Council is “content” for the Local Nature Recovery Strategy to be issued for public consultation, and following the agreed process, then for publication.

3.2 To agree that this approach apply to all subsequent stages and Local Nature Recovery Strategy refreshes.

4 Alternative Options Considered and Rejected

4.1 Members could choose not to delegate confirmation to the Head of Place, but to take these decisions to committee. This is not recommended as there is a risk that the Council will not fulfil its role as a supporting authority in terms of providing data and required consultation responses to the responsible authority, in a timely manner.

5 Consultation Undertaken or Proposed

5.1 As Swale Borough Council is a supporting authority, it is the role of KCC, as the responsible authority, to consult with all relevant stakeholders with regards to the LNRS.

5.2 Members have been provided with updates regarding the LNRS and Making Space for Nature, through their weekly email updates. In addition, Officers will request that KCC undertake a member briefing prior to the consultation launch

and Members will be provided with the opportunity to comment on the consultation documents.

6 Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action: <ul style="list-style-type: none"> Environment - To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead.
Financial, Resource and Property	Although KCC is the responsible authority and will therefore be providing the resource to manage the project, resources and input will be required from several departments across the Council. This can be met within existing budgets.
Legal, Statutory and Procurement	Supporting the LNRS ensures that the Council is adhering to the 2021 Environment Act, where Nature Recovery Strategies have been created.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	Ensuring that the Council engages and responds to issues directly affecting nature and environmental improvement.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.

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Planning and Resources Committee	
Meeting Date	27 th November 2024
Report Title	Local Heritage List
EMT Lead	Emma Wiggins - Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Jhilmil Kishore – Principal Heritage Officer
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To agree the schedule of heritage assets proposed to be designated as Local Heritage Assets based on the outcome of the Selection Panel meeting. 2. To note that the schedule of heritage assets proposed to be designated as Local Heritage has been developed in line with best practice guidance published by Historic England and will afford protection to a range of non-designated heritage buildings and structures within the Borough.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to seek the Policy and Resources Committee’s approval of the schedule of heritage assets recommended to be designated as Local Heritage Assets, as set out in **Appendix I**.

2 Background

- 2.1 The Swale Heritage Strategy was adopted in April 2020. Developing a Borough wide Local Heritage List is one of its objectives.
- 2.2 The main purpose of the proposed Swale Borough Local Heritage List is:
- To raise awareness of the borough’s local heritage assets and their importance to local distinctiveness.
 - To inform developers, owners, council officers and members about buildings within the borough boundary that are desirable to retain and protect.
 - To help inform guidance and specialist advice to owners with the objective of protecting the character and setting of those buildings, structures, sites and landscapes.
 - To help the council in its decision making when developing local plan policy and in determining planning applications.
 - To record the nature of the local historic environment more accurately.

3 Proposals

3.1 The recommendation is:

- To agree the schedule of heritage assets proposed to be designated as Local Heritage Assets based on the outcome of the Selection Panel meeting.
- To note that the schedule of heritage assets proposed to be designated as Local Heritage has been developed in line with best practice guidance published by Historic England and will afford protection to a range of non-designated heritage buildings and structures within the Borough.

4 Alternative Options Considered and Rejected

4.1 One option would be to not take this designation work any further. This is not recommended because it would risk the appropriately sensitive and positive management of Swale's heritage assets that are of local significance and would be a poor conclusion to the robust process of determining the list which has been undertaken to date.

4.2 Another possible option would be to suspend the work on Local Heritage Listing until some point in the future. This option would result in wasted officer time and could lead to (a) a number of heritage assets of local significance being lost (b) reputational damage to the Council and/or (c) development and associated infrastructure provision decisions being made for the locality without an appropriate understanding and appreciation of the special qualities of non-designated heritage assets/local heritage.

4.3 To agree an alternative list. Members may choose to remove one or more of the sites recommended for listing.

5 Consultation Undertaken or Proposed

5.1 A public consultation was undertaken from 25th May 2021 to 9th July 2021, based on which Listing Criteria for Local Heritage List was adopted. (Appendix II).

5.2 Parish/Town Councils, local amenity societies and members of the public were invited to nominate assets for the Local Heritage list in summer of 2023, that would meet the criterion as set out in the adopted listing criteria.

Over 200 nominations were received, and officers prepared a supplementary list of approximately 100 assets from the Historic Environment Record (HER).

5.3 On 17th October 2024, a Selection Panel was invited to agree the final list out of the shortlist created from the nominated assets and the HER.

A total of 278 assets were discussed by the Selection Panel and the final list includes 149 heritage assets.

5.4 The Selection Panel comprised of:

Swale Borough Council’s Heritage Officer and Design & Heritage Manager.

Representatives from the following:

1. Historic England: *Jess Jenkinson*
2. Kent Gardens Trust: *Karen Emery*
3. Faversham Society: *Jonathan Carey*
4. Historical research group of Sittingbourne: *Richard Emmette*
5. Sheppey History Society – *Jonathan Fryer*

Members

1. Heritage Champion - *Cllr. Mike Baldock*
2. Area Committee Chair or a representative
 - a. Western Area Committee - *Cllr. Paul Stephen*
 - b. Eastern Area Committee - *Cllr. Hannah Perkin*
 - c. Sheppey Area Committee - *Cllr. Dolley Wooster*
 - d. Sittingbourne Area Committee - *Cllr. Angie Valls*

6 Implications

Issue	Implications
Corporate Plan	The proposed Local Heritage List would support the Economy priority from the Corporate Plan: <i>‘To develop the borough’s second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets.</i>
Financial, Resource and Property	<p>No additional financial implications are envisaged.</p> <p>The current process of designating a Local Heritage List is being managed by the Heritage Officer using in-house resources with no additional funding.</p> <p>Additional in-house support will be needed from the Planning Technical Team to map out the designated Local Heritage List for public access, but this can be accommodated within their work programme.</p>
Legal, Statutory and Procurement	There is a statutory obligation on Local Planning Authorities to consider the preservation and enhancement of conservation areas, listed buildings, and designated heritage assets in determining development proposals
Crime and Disorder	The Borough Council is a founding member of Heritage Watch, which is an affiliation of heritage focussed organisations set up in liaison with the police force to tackle and reduce the growing

	problem of heritage crime (e.g. theft of artefacts and lead roof sheeting from churches). This issue is covered in the Heritage Strategy document. A borough-wide Local Heritage List will further this initiative.
Environment and Climate/Ecological Emergency	One of the three dimensions of sustainable development is its environmental role: contributing to protecting and enhancing our natural, built and historic environment.
Health and Wellbeing	The health and wellbeing aspects of interaction with heritage assets and heritage related projects are referenced in the adopted Heritage Strategy which underpins this review work.
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.


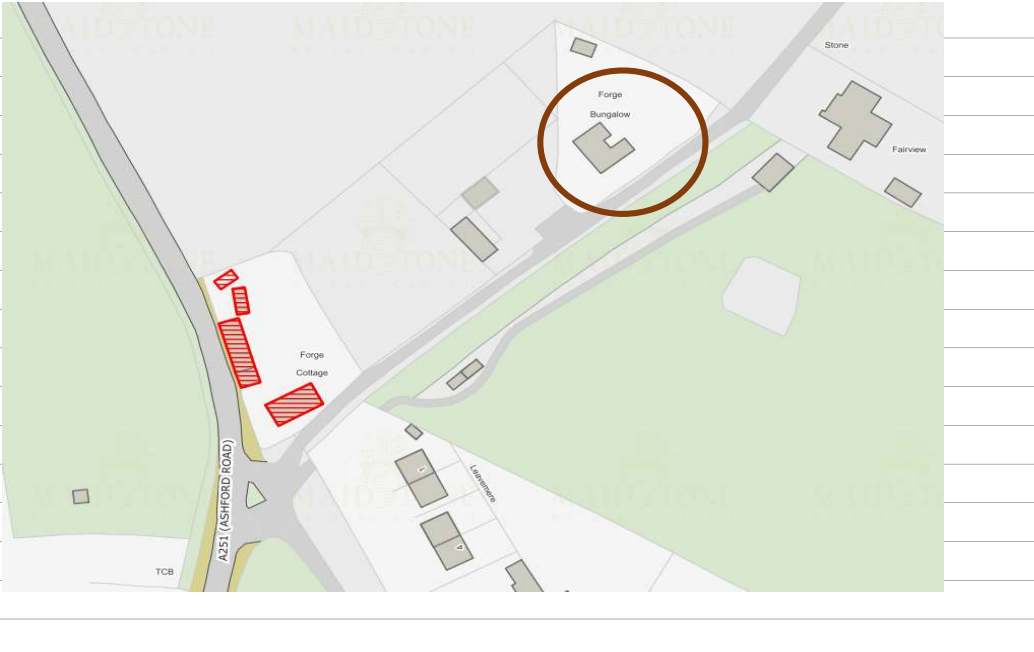
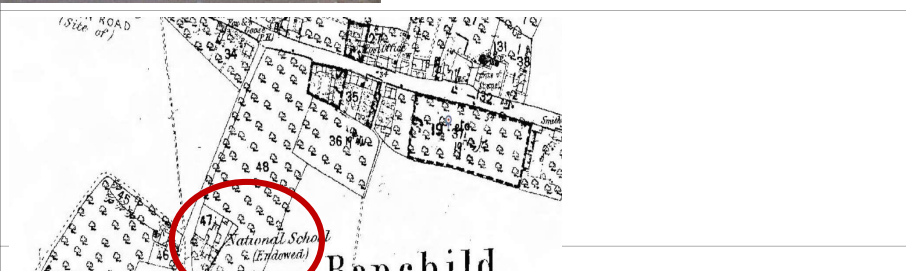
7 Appendices

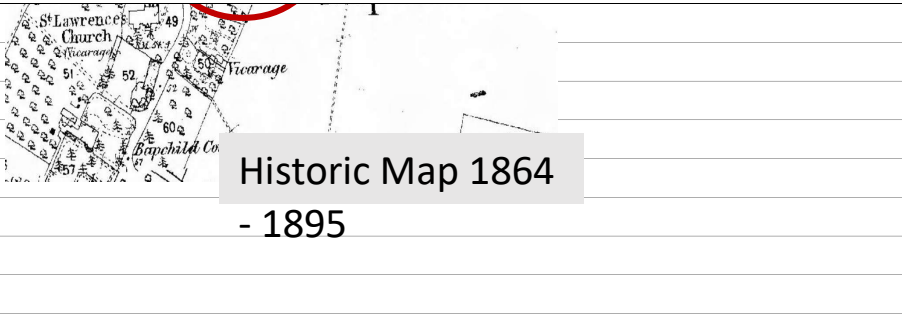

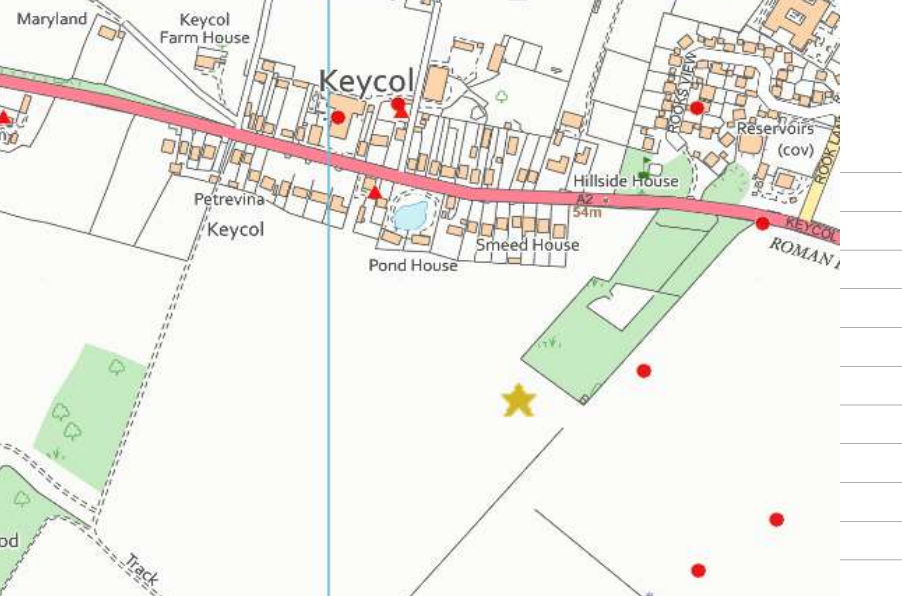
7.1 The following documents are to be published with this report and form part of the report:

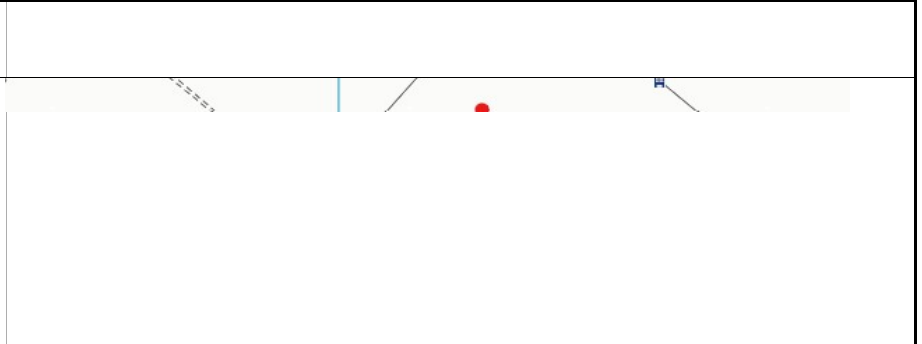



- Appendix I: Proposed Local Heritage List as recommended by the Selection Panel on 17th October 2024.
- Appendix II: Listing Criteria for Local Heritage List adopted in October 2021.




8 Background Papers


A Heritage Strategy for Swale 2020-2032 Adopted March 2020


Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL001	HER	Ashford Road, Leaveland, Badlesmere, Swale, Kent, South East, England, ME13 ONZ	Building	Possible former Post Mill operating since 1695 in Badlesmere Lees. The building is shown as Mill Cottage on KAS Tithe records. It has now been extended and is shown as Forge Bungalow on the current O/S map.	In conservation area, "Badlesmere". Designated 1982/12/14.	
Page 39						
	LHL002	HER	201 Canterbury Road, Bapchild, Kent.	Milestone	Milestone on the A2 (Canterbury Road), Sittingbourne, by no.201 "The Milestone" In Pavement with back set in low stone bounbary wall. Showing 41 miles from London on one of it's faces.	N/A
LHL003	HER	Bapchild And Tonge Primary School, School Lane, Bapchild, Kent, ME9 9NL	School	National school (endowed), School Lane, Bapchild, The building as the National School is shown on the Ordnance Survey map 1862-1875, then as School on the 1897-1952 maps.	N/A	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
						 <p data-bbox="2270 346 2597 430">Historic Map 1864 - 1895</p>
LHL004	HER	Bobbing, Swale, Kent.	Pillbox/Monument	Irregular hexagonal Second World War pillbox with 3 rifle embrasures and access below ground level. In poor condition.	N/A	
LHL005	HER	Bobbing, Swale, Kent.	Tippet Trench South Pill Box/Monument	Near A2 road at Borden, West of Sittingbourne. What seems to be a standard 10 feet by 9 feet square concrete First World War pill box with two embrasures. It seems to have been intended as a strong/anchor point on the south end of Tippet Trench. It formed part of the Chatham Land Front defences. In fair condition.		

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL006	HER	Greenlands, Maidstone Road, Borden, Kent, ME9 7PU	Milestone	Milestone, on wide grass verge, opposite 'Greenlands' Maidstone Road, Borden, South of bus shelter.	N/A	
LHL007	HER	1 School Lane, Borden, Kent, ME9 8JS	School	National school, Limepits Cross, School Lane, Borden. The building as the National School is shown on the Ordnance Survey map 1862-1875, then as School on the 1897-1952 maps.	N/A	
LHL008	HER	Oast Villa, Deans Hill, Bredgar, Sittingbourne, ME9 8BB	House	Single roundel detached oast appears on the 1st ed. OS map (1862 -1875), not known if it was on the earlier Tithe map. Visible on the 1940s ariel photograph. Now converted into domestic use.	N/A	
Page 41 LHL009	HER	Willow Farm House, London Road, Dunkirk, Kent, ME13 9LL	Building	Willow Farm, Dunkirk, unknown if the buildings pre-date the 1st ed. OS map (1862-1875). The building kept a similar footprint through till the 4th ed. OS map (1929-1952) after which it changes to the building as seen on the modern map.	N/A	
LHL010	HER	34 Warden Rd, Eastchurch, Sheerness ME12 4EJ	School	The former Endowed National School for boys and girls in Eastchurch is shown on the 1862 -75 map. The building was extended and continued to be used as a school, as shown on the 1897 -1900, 1907-23, 1929-52 and current O/S maps. It is now Eastchurch C of E Primary School.	N/A	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL011	HER	6 Kettle Hill, Eastling, Faversham, ME13 0BB	House	House. c.1700. Painted brick and plain tiled roof. Two storeys and hipped roof with central hipped dormer and stacks to left and rear right. Two glazing bar sashes on each floor and boarded door with flat hood off centre to left. Hipped extension to right with 1 glazing bar sash on ground floor.	N/A	
LHL012 Page 42	HER	Eastling, Faversham.	Chapel	The former Bible Christian Chapel on Otterden Road, Eastling is shown on the 1897 - 1900 and 1907-23 maps. It has since been converted into a private residence and shown on the current O/S map as Stonefield House. No further information is available	N/A	
LHL013	HER	The Street, Hartlip, Sittingbourne ME9 7TP	Chapel	The Bible Christian Chapel, now the Methodist Church, on The Street, Hartlip was built in 1820. It is shown on the 1862 -75, 1897-1900, 1907-23, 1929-52 and current O/S maps and is still in use.	Hartlip. Designated 1970/07/03.	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL014	HER	The Street, Hartlip, Sittingbourne ME9 7TL	School	Hartlip National School, now Hartlip Endowed C of E Primary School (Voluntary Aided), Hartlip, Swale	Hartlip. Designated 1970/07/03.	
LHL015	HER	Myrtle Farm, Kemsdale Road, Hernhill, Kent, ME13 9JL	Cottage	The first edition Ordnance Survey map of 1862-75 shows two rectangular building in the corner of the field between two roads next to Fostall Farm. One of these buildings has been removed, and replaced with a triangular building in the very edge of the field, between Myrtle Farm and Fostall Farm. The second edition Ordnance Survey (1897 - 1900) also shows two additional buildings along the eastern field boundary. The third edition Ordnance Survey shows an additional L-shaped building in the field's corner and three additional rectangular structures. The aerial survey of the 1940s only shows the buildings in the fields corner, the rest have been demolished. In the 1990 survey only the L-shaped building and the southern most building remain.	HernHill CA	
Page 43 LHL016	HER	Oast Cottages, Plumpudding Lane, Dargate, Kent, ME13 9EY	Oast	Oast built in Dargate in the first half of the nineteenth century - the OS Drawing and the Tithe map of 1840 show a rectangular building. In the middle of the nineteenth century three roundels were added - shown on the OS first, second and third edition maps and also the 1940s aerial photo. The roundels were demolished in the middle of the twentieth century - not visible on the 1990 aerial photo	Dargate. Designated 1999/04/07.	
LHL017	HER	Dargate Road, Hernhill, Kent, ME13 9HB	Chapel	The former Wesleyan Methodist Chapel in Dargate is shown on the 1862 -75, 1897-1900, 1907-23, 1929-52 and current O/S maps. It has now been converted into a private residence.	Dargate. Designated 1999/04/07.	


Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL018	HER	2 Second Avenue, Sheerness, ME12 1YQ	Pillarbox.	A George VI pillar box, Second Avenue / St Georges Avenue. Letter Box Study Group Box Type: 35/1. Dates from 1938 to 1950.	N/A	
LHL019	HER	Isle of Sheppey Holiday Village, Warden Bay Road, Leysdown-on-sea, Sheerness, ME12 4LX	Pillarbox.	A George VI pillar box, Warden Bay Road / Leysdown Road, Leysdown.	N/A	
LHL020	HER	1 London Road, Teynham, Kent, ME9 9QW	Milestone.	Milestone on the London Road (A2) at Teynham, opposite Cellar Hill	Cellar Hill and Greenstreet, Teynham. Designated 2000/11/22.	
LHL021	HER	Nouds Oast, Nouds Lane, Lynsted, Kent, ME9 0ES,	Oast.	Oast SSW of Nouds Farm. First appears on the 1st edition Ordnance Survey map (1862 - 1875) and is still standing. Now known as Nouds Oast.	N/A	
LHL022	HER	Broadoak Farm, Milstead, Swale, Kent	Cottages	House, now 2 cottages. C17 and late C19. Timber framed and clad with red brick and tile hung with plain tiled roof. C17 range with C19 range parallel to rear. Two storeys and basement on plinth and hipped roof with stacks to left, centre right and end right. Five glazing bar sashes with moulded surrounds on first floor, and 3 doubled C19 glazing bar sashes on ground floor, with basement opening to right. Boarded doors to left and to right with rectangular fanlights and pedimented hoods on brackets. Formerly a Grade II listed building. The main construction period was originally thought to be 17th century but a 2018 assessment concluded it was probably late 18th or early 19th century. Delisted in 2019	N/A	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL023	HER	Minster Street Post Office, 4 Chapel Street, Minster on Sea, ME12 3QQ.	Pillarbox	A George V pillar box, PO, Chapel Street, Minster on Sea. Letter Box Study Group Box Type: 27/2. Dates from 1933 to 1936.	N/A	
LHL024	HER	East Minster Post Office, Minster on Sea, ME12 3LR	Pillarbox	A George VI pillar box, PO, Minster Road, East Minster. Letter Box Study Group Box Type: 35/1. Dates from 1938 to 1950.	N/A	
Page 45 LHL025	HER	16 Chapel St, Minster on Sea, Sheerness ME12 3QF	Church.	The Bethel Congregational Church was established in 1801. It is shown on the 1862 - 75, 1897-1900, 1907-23, 1929-52 and current O/S maps and is still in use.	N/A	
LHL026	HER	East Bradbourne Oast, Provender Lane, Faversham, ME13 0ST	Oast	Oast SW of Provender Farm. A building is present on 1st edition Ordnance Survey map (1862 -1875) but it is unclear as to whether it was being used as an Oast, however on 2nd edition OS (1897 -1900) it is clear that it is now an oasthouse as a circular building can be seen. The building is also visible on the Tithe map meaning it was built between 1797 -1838 A building is It is still visible as an oasthouse on current aerial photos.	N/A	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL027	HER	Church Road, Oare, Swale, Kent, South East, England, ME13 0QD	Building	The Watch House, Oare Marshes, was marked in on the 3rd edition of the Ordnance Survey (surveyed 1905-1910).	N/A	
LHL028	HER	Eastling Rd, Painters Forstal, Faversham ME13 0DU	Chapel	The Wesleyan Methodist Chapel in Painter's Forstal is shown on the 1897 -1900, 1929-52 and current O/S maps. No further information is available but it is still in use.	Painters Forstal. 1992/09/16.	
LHL029	HER	50 Water Ln, Ospringe, Faversham ME13 8TX	School	The former National School for boys and girls in Ospringe is shown on the 1862 -75 map. The building was the extended and continued to be used as a school, as shown on the 1897 -1900, 1907-23 and current O/S maps. It is now Ospringe C of E Primary School.	Ospringe. 1971/05/21.	
LHL030	HER	Queenborough Station, Main Road, Queenborough, Kent, ME11 5DY.	Station	Queenborough station built by the Sittingbourne & Sheerness Railway to a one - off design in 1860. Large two storey building with unusual use of highly exaggerated gables and roof lines with paired round headed windows below single large brick arches set into the wall. Also served as junction with the Sheppey Light Railway	Queenborough. Designated 1972/07/28	
LHL031	HER	56 North Road, Queenborough, ME11 5HA	Chapel	The former Congregational Chapel on North Road is shown on the 1907 -23 and 1929-52 maps. It has since been converted into apartments (Bethel Place), as shown on the current O/S map.	Queenborough. Designated 1972/07/28	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL032	HER	Providence Chapel, Rodmersham Green, Rodmersham, Kent, ME9 0PU	Chapel	The former Providence Chapel(Bible Christians) is shown on the 1862 -75, 1897-1900, 1907-23 and 1929-52 maps. It has since been converted into a private residence, Providence on the current O/S map.		
LHL033	HER	Bailiffs Cottage Hogbans Hill, Selling Faversham ME13 9QZ	Cottage	Hop pickers huts South West of Baliffs Cottage. Rectangular structure with small, square, probable toilet block to the east, shown on first edition 1863 -75 Ordnance Survey map. On the second edition 1897-1900 Ordnance Survey map there is an additional rectangular structure on the western field boundary and to the south east of the original building. On the 1940s aerial survey the later structure is no longer present and on the 1990 aerial survey the western structure has been demolished.	Sheldwich. Designated 1982/12/14.	
LHL034	HER	Luton House, The Street, Selling, Kent, ME13 9RQ	Building	Luton House was used as a Canadian Convalescent Hospital from Jul 1915 until Sep 1916. The building is still in use.	N/A.	
LHL035	HER	Selling Rd, Selling, Faversham ME13 9RQ	School	The former National School in Selling, for boys and girls, served the parishes of Selling, Sheldwich, Badlesmere and Throwley. It was endowed by a bequest from Sir Thomas Sondes and is shown on the 1862 -75 map. The building continued to be usewd as a school, as shown on the 1897-1900, and 1907-23 maps. It is now Selling C of E Primary school, as shown on the current O/S map.	Selling. Designated 1973/09/07.	
LHL036	HER	13 Canterbury Road, Sittingbourne, ME10 4SG	Building.	13 Canterbury Road was used as a Voluntary Aid Detachment (VAD) Hospital by Kent/68(privately) from Oct 1914 until Nov 1914. The building is still in use.	N/A	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL037	HER	47 High Street, Sittingbourne ME10 4PB	Chapel	The Wesleyan Methodist Chapel in Sittingbourne is shown on the 1862 -75, 1897-1900, 1907-23, 1929-52 and current O/S maps. It is still in use.	Sittingbourne High Street. Designated 1969/12/12.	
LHL038	HER	82 High Street, Sittingbourne ME10 4AJ	Church	The former Presbyterian Free Church is shown on the 1862 -75 map. On the 1897-1900, 1907-23 and 1929-52 maps it is shown as the Congregational Church and on the current O/S map it is the United Reformed Church. It is still in use.	Sittingbourne High Street. Designated 1969/12/12.	
LHL039	HER	Radfield Oast, London Road, Tonge, Kent, ME9 9PS	Oast.	Two roundel brick built oasthouse east of Radfield House, Radfield. The first roundel appears on the 2nd Ed. OS map (1897-1900), with the second appearing on the 3rd ed. OS map (1907 -1923). The building is extant now converted to residential use.	Tonge. Designated 1987/07/14.	
LHL040	HER	40 High Street, Blue Town, Sheerness, ME12 1RN	Building.	Early C19. 3 storeys stock brick. Stuccoed parapet and moulded eaves cornice. 2 sashes with glazing bars intact. C19 shopfront. Formerly listed building. Main construction periods 1800 to 1899.	Sheerness: Royal Naval Dockyard and Bluetown. Designated, 1972/07/28.	


Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL041	HER	The Water Tower, Trinity Road, Sheerness, Kent, ME12 2PF	Water pumping station.	Water pumping station of 1862 by Sheerness Board of Health. Purpose built municipal water tower. c.1860 in elaborate classical style. Front part is of red brick with terra-cotta dressings. Roof concealed by pediment, 2 storeys and semi casement 3 windows: pediment with modillion cornice and elaborate scrolled cartouche with the initials of the water company. Below this are end giant pilasters with 2 smaller pilasters to 1st floor and projecting large central bay flanked by pilasters to 1st floor. Central bay has to 1st floor a triple round-headed window with elaborate terra-cotta surrounds with keystones and central porch with pediment on pilasters and frieze bearing inscription "Sheerness Local Board of Health". Central round headed doorcase with keystone. Other windows are also round headed with keystones. Side elevation of 2 bays with 2 paired round-headed windows	Sheerness: Mile Town. Designated 1994/06/23.	
LHL042	HER	84 Berridge Road, Sheerness, ME12 2AE	Pillarbox.	A Victorian pillar box, 84 Berridge Road. Letter Box Study Group Box Type: 15/2. Dates from 1893 to 1900.	Sheerness: Mile Town. Designated 1994/06/23.	
LHL043	HER	3 High Street, Sheerness, ME12 1NY	Pillarbox.	A George VI pillar box, High Street / Railway Road. Letter Box Study Group Box Type: 34/1. Dates from 1937 to 1952	Sheerness: Mile Town. Designated 1994/06/23.	






Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area
LHL044	HER	12 First Avenue/76 Victoria Street, Sheerness, ME12 1YF	Pillarbox.	A George VI pillar box, First Avenue / Victoria Street. Letter Box Study Group Box Type: 35/1. Dates from 1938 to 1950	N/A
LHL045	HER	47 High Street, Blue Town, Sheerness, ME12 1RN	Pillarbox.	A George VI pillar box, High Street /Chapel Street. Letter Box Study Group Box Type: 35/2. Dates from 1950 to 1952. Or a Type: 35/1. Dates from 1938 to 1950.	Sheerness: Royal Naval Dockyard and Bluetown. Designated, 1972/07/28.
LHL046	HER	39 Thames Avenue, Sheerness, ME12 1DJ.	Pillarbox.	A George VI pillar box, Thames Avenue / Fleet Avenue. Letter Box Study Group Box Type: 35/3. Dates from 1937 to 1947	N/A


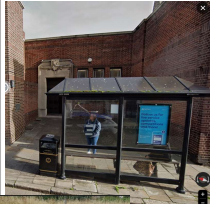




Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area
LHL047	HER	62 High Street, Blue Town, Sheerness, ME12 1RW	Building	In 1995 a summary on the Sheerness docklands was carried out by the RCHME. Number 62 High Street is possibly an 18th century building, and would appear to pre-date the Red Lion public Houyse which ajoinis it. The 1864 OS map shows it to be incorporated into the public house at this time.. Number 62 is a brick and timber framed building. It now no longer part of t he pub but is a shop.	Sheerness: Royal Naval Dockyard and Bluetown. Designated, 1972/07/28.
LHL048	HER	49 Alma Street, Sheerness, Kent, ME12 2AY	Building	Former Hero of the Crimea pub, Alma Street, Sheerness. In the Marinte Town historic core. Plaque survives above the door stating 'Hero of the Crimea Hotel, Shepherd Neame and Cos, Fine Ales'. "The area appears to have been largely designed to accommodate workers for the dockyard and the street naming and facilities provided appear characteristic for such an area. Streets are named principally after patriotic themes, such as monarchs, generals and notable battles, and public houses were spaced regularly throughout the houses. Some of these pubs remain in use, including The Napier and The Heights of Alma, but others, such as The Hero of the Crimea, are now disused and converted residential accommodation."	N/A
LHL049	HER	Heights Of Alma, 1 Alma Street, Sheerness, Kent, ME12 2AX	Building	The Heights of Alma pub, Alma Street, Sheerness. In the Marine Town historic core. Features historic frontage and a sign on the neighbouring property. "The area appears to have been largely designed to accommodate workers for the dockyard and the street naming and facilities provided appear characteristic for such an area. Streets are named principally after patriotic themes, such as monarchs, generals and notable battles, and public houses were spaced regularly throughout the houses. Some of these pubs remain in use, including The Napier and The Heights of Alma, but others, such as The Hero of the Crimea, are now disused and converted residential accommodation."	Sheerness: Marine Town. Designated 1976/06/08.


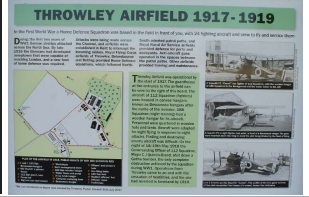



Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL050	HER	Napier Hotel, 1 Alma Road/1 Marine Parade, Sheerness, Kent, ME12 2NZ	Building	The Napier pub, Alma Road, Sheerness. In the Marine Town historic core. "The area appears to have been largely designed to accommodate workers for the dockyard and the street naming and facilities provided appear characteristic for such an area. Streets are named principally after patriotic themes, such as monarchs, generals and notable battles, and public houses were spaced regularly throughout the houses. Some of these pubs remain in use, including The Napier and The Heights of Alma, but others, such as The Hero of the Crimea, are now disused and converted residential accommodation."	N/A	
LHL051	HER	15 High Street, Blue Town, Sheerness, ME12 1RQ	Building	15 High Street, Sheerness is a three-storey Victorian building featuring quoining and decorative mouldings. It is the last remaining historic building in the 'Blue Town Industrial' Historic Character Area and is unlisted.	Sheerness: Royal Naval Dockyard and Bluetown. Designated, 1972/07/28.	
LHL052	HER	The Criterion Blue Town, 69 High Street, Blue Town, Sheerness, ME12 1RW	Building	Blue Town Heritage Centre and Music Hall, High Street, Sheerness. The heritage centre is located in part of a former music hall that has been revived, and also contains a cinema and café.	Sheerness: Marine Town. Designated 1976/06/08.	




Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area
LHL053	HER	20 West Street, Bluetown, Sheerness, Kent, ME12 1SR	Building	In conservation area "Sheerness: Royal Naval Dockyard and Bluetown" The former Crown and Anchor pub, West Street, Sheerness. In the Blue Town historic core. Features coloured external tiling and stucco signage.	N/A
LHL054	HER	1 Meyrick Road, Sheerness, Kent, England ME12 1TP	Chapel	The former Primitive Methodist Chapel on Meyrick Road is shown on the 1897 -1900, 1907-23, 1929-52 and current O/S maps. It is now used as the Sheerness County Youth Club & Activity Centre	Sheerness: Mile Town. Designated 1994/06/23.
LHL055	HER	8 Alexandra Road, Sheerness, Kent, England, ME12 2AS	Chapel	The former Bible Christian Chapel on Alexandra Road was built in 1861. It is shown on the 1862 -75, 1897-1900, 1907-23, 1929-52 and current O/S maps. It has now been converted into a private residence.	Sheerness: Marine Town. Designated 1976/06/08.



Unique Reference Number for GIS	Source	Address	Property Type	Description	Conservation Area	
LHL056	HER	99 Queenborough Rd, Minster on Sea, Sheerness ME12 3DF	Church	The first St Peter's Church, which was built in 1905, was destroyed by fire in 1922. A second church was built on the same site in 1925. This building was converted into a hall and a third church was built on an adjacent site in 1973. This church finally closed in 2015. The churches are shown on the 1907 -23, 1929-52 and current O/S maps.	N/A	
LHL057	HER	Cowstead Farm, Queenborough Road, Halfway	Farmhouse			




Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL058	Nominated	The Pavilion	Pavilion Building	Pavilion building, regenerated and returned to community use as the Island's Tourist Information Centre, an Arts Award Centre of excellence and Community Radio Station for the Island	Sheerness	
LHL059	Nominated	The Odeon Building	Cinema/ Bingo Hall	Art deco Cinema, vacant, c 1920-1930s	Sittingbourne	
LHL060	Nominated	Old Forge War Time House	Shopfront/Shop	brick built, original sash windows and chimneys. Original shop front in 1940's style.	Sittingbourne	
LHL061	Nominated	Davington Cricket Club	Pavilion Building	Davington cricket club, club house and cricket pitch. Wood built building and cricket pitch. Building built in 1960s? Cricket pitch been here for 100+ years	Faversham	
LHL062	Nominated	Burtons Shopfront, Sittingbourne	Shopfront/Shop	Art Deco Shop with a number of surviving Art Deco features	Sittingbourne	






Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL063	Nominated	Faversham Police Station, Church Street	Police Station & Museum	An attractive Edwardian red brick built building, original chimneys, sash windows. It was built between 1900- 1919 (early 20th century), and retains its original features	Faversham	
LHL064	Nominated	78, Milton High Street, Milton Regis, 2AN	Library	Built in 1939 to replace the derelict market buildings, it became the Milton Regis Library and also the site of the town clock. Built in the art deco style of the 30's it remains almost unchanged from it's construction.	Milton Regis	
LHL065	Nominated	The Cairn, Iwade Iwade Nature Park, near The Street/Woodpecker Park, Iwade, ME9	The Cairne	First world war memorial Stone Cairne with bronze memorial plaque	Iwade	
LHL066	Nominated	The junction of Bannister Hill and Borden Lane Borden Kent ME9 8HR	Cast Iron Signpost	Original cast iron signpost directing to locations in Borden. circa early 19th Century	Borden	
LHL067	Nominated	17 The Street Borden Kent ME9 8JN	The Old Post Office Post Box	A historic post-box, located at the former Post Office and village store. It is a wall mounted box, inbuilt with bricks. Originally probably a lamp box but then moved to an in wall post-box; circa 1896	Borden	
LHL068	Nominated	17 The Street Borden Kent ME9 8JN	The Old Post Office Stables	Stabling at the rear of the former Post Office and village store. Until very recently this was used to stable horses. Brick built, wooden stable doors; It is believed to be early 19th century Located at the rear of the former Post Office and village store, which is in a poor state of repair.	Borden	





Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRPAH
LHL069	Nominated	Site of Throwley WW1 Airfield Throwley Road Throwley ME13 0JS	Throwley Airfield		Throwley	 
LHL070	Nominated	177 The Street Boughton under Blean Faversham ME13 9BH	Residential Cottage	White weatherboarded cottage. Original features internally. Adjacent to methodist chapel and churchyard. The Irish author Kate O'Brien lived in this house before her death and burial at a cemetery in Faversham.	Boughton Under Blean	
LHL071	Nominated	Courtenay House	Residential		Dunkirk	
LHL072	Nominated	Firtree Cottages	Residential	1930's cottage	Dunkirk	





Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL073	Nominated	Railings to Biscuit House House and Workshop	House and Workshop Railing	<p>Low brick wall topped with green and yellow decorative painted metal sculpture railings with brick gate piers and painted decorative metal gates. 'The first sound-sculpture project I created at my new workshops was a set of musical gates and railings because my factory originally had no boundary between the pavement and the private ground in front of the building. As it spanned nearly 40 metres, I felt obliged to use this space to create a kind of manifesto for my work, so I composed a 28-bar chord sequence on chime bars embedded in a wrought-iron structure with a score notated in nuts and bolts. Home, creative studio and workshop to the sound sculptor Henry Dagg. An accomplished musician and composer, he's also a self-taught engineer, blacksmith, craftsman, electronics expert and a world-class musical saw player. Single storey house and workshop. Terracotta ridge tiles, grey slate roof and yellow buff brick. Terracotta tile window sills with single glaze painted timber/metal windows. The industrial workshop element includes integrated north lights into a more typical industrial unit design, layout and construction. Predominantly brick.</p> <p>'I then invited Evelyn Glennie to give its public premiere performance and she very sportingly came and improvised on it for 20 minutes in front of a big crowd and cameras from three television channels.'</p>	Faversham	
LHL074	Nominated	Cattle Market wall remains, adjacent to Gordon Square	Wall		Faversham	
LHL075	Nominated	Harold Court	Residential	Edwardian school conversion to housing - unfortunately inadequate enforcement t has resulted in degrading of the conservation value	Faversham	





Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL076	Nominated	two railway structures on north side of line, Lower Road W3W: Amps.attaching.tastings	Railway structures	Two prefabricated reinforced concrete railway maintenance structures of a type that is rapidly disappearing nationally and which would complement Faversham's growing collection of railway heritage	Faversham	
LHL077	Nominated	3-4 Head Hill Road	Residential	Oast Houses converted to houses	Faversham	
LHL078	Nominated	1-2 Poplar Hall Cottages, Head Hill Road	Residential	Late C19th "estate" cottages of simple arts & crafts design	Faversham	





Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL079	Nominated	Oast Houses (Thornfield, Barons and Hobbits), Head Hill Road	Residential			
LHL080	Nominated	Poplar Hall Head Hill Road	Residential	Splendid Victorian House with good quality rubbed brickwork	Faversham	
LHL081	Nominated	Faversham Post Office	Public Building	<p>Built in 1957, Architect GA H Pearce. Later, in 1976 and as Architect to the Ministry of Public Building and Works, Scotland, Pearce oversaw the building of the Category A Listed Greenhouse in the Royal Botanical Gardens, Inverleith.</p> <p>Pevsner (N & E Kent, 2013, p. 355), describes Faversham Post Office as '... pleasant anonymous work ... In a characteristic variety of materials -brick, stone, timber cladding and much glass .. T shaped, with a lower range returned along Newton Road.'</p> <p>The building comprises a number of one and two storey elements - lower parts centre around the two storied, unequal-T shaped, main block. Its long two storey arm extends up Newton Road, fronted by a narrow single storey section. At the rear is a large yard with vehicle access for Post vans etc. Facing south into the yard across the back of the building is a single story glazed roof lean-to. The second two storey section - forming the head of the T - faces south into the yard and north onto East Street.</p> <p>Fronting its two storey north elevation is a further, tall, single storey flat roofed section housing the Post Office counters. This is expressed as a separate element with its own pattern of glazing and use of materials. Next to it is the Post Office's public entrance, via a separately expressed porch.</p> <p>As suggested by Pevsner the building displays a whole series of classic 1950s mannerisms, design solutions and material preferences. The today unusual choice of roof finish - copper sheeting - is typical of the period. The building contributes positively and for Faversham, uniquely to the Conservation Area character as a rare example of successful 1950s low key, low rise, development on a town centre site.</p> <p>The building is set-back from East Street as the result of highway department road widening lines applied post war when large scale highway projects in historic towns were extensively planned. In this case the opportunity for a start to street widening already existed due to localised bomb damage - fortunately, it came to nothing, leaving a small and potentially attractive open space to set-off the</p>	Faversham	





Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL082	Nominated	Brents Industrial Estate: Entry Gate Piers and Security Kiosk		Two early 20th Century gate piers of painted terracotta or artificial stone with domed tops on simple moulded caps and with simple plinths. Disfigurements on the inner faces of the piers reveal the positions of missing gates and hinges. Beside and inside the North pier is an early, pre-fabricated reinforced concrete kiosk of circa 1940. The kiosk comprises 4 side panels with small 'clerestory' window openings on all sides and a door opening on one side: domed concrete roof. The whole assembly, though of 2 dates, forms the last standing remains of the former Pollock's Shipyard, a significant maritime and industrial employer in Faversham from circa 1880-1975.	Faversham	
LHL083	Nominated	Abbeyfields Pumping Station		Pumping Station, Outhouse and Manager's Cottage, built as a single development by the Borough of Faversham in 1911 as part of their improved sewage disposal system for the town. All 3 buildings are constructed of local yellow stock bricks with rubbed red brick arches to doors and windows, artificial stone window cills and corbelled red bricks (some diagonally laid) to eaves details. Highly modelled pitched roofs, covered with peg tiles, betray the functions of the spaces beneath and on the Pump House include a square turret, the sides of which are clad in club pattern tiles. Typically utilitarian but interestingly detailed, early 20th Century joinery to doors, windows, eaves and ventilation panels of the Pump House and Outbuilding. Unfortunately, the doors and windows to the Cottage have been replaced and some eaves brickwork has been rendered over. Attractive, late Art Nouveau inspired iron railings to the 'areas' around the Pump House. This group of buildings is an important relic of the Borough's remarkable programme of urban improvements in the early-mid 20th Century, is contemporary with their Pump House at Town Quay (Listed Grade II) and likely to be by the same designer.	Faversham	
LHL084	Nominated	Abbeyfields Brickworks: Chimney		A late 19th Century, square chimney constructed of local yellow stock bricks and originally serving the extensively rebuilt yellow brick Engine House below. This chimney forms the last, authentic standing remains of the several brickworks and kilns that occupied much of the area between Abbeyfields Road, the Sewage Farm and the Whitstable railway line from the 1840's until the 1920's: much of its production was used in the 19th Century expansion of London. It is therefore a highly significant reminder of the brick industry that was a key employer of local labour in 19th Century Faversham.	Faversham	
LHL085	Nominated	Gunpowder Building and Entry Gates on North Side of Bysing Wood Road, near Bunting Road.		The last standing remains of the entry arrangement to the Oare Gunpowder Works. Located at the South West extremity of the whole site and dating from the late 19th Century, they comprise a freestanding building with a curved and recessed entry gate arrangement and a freestanding perimeter wall. All constructed of local yellow stock brick laid in a garden wall bond, the main building has the segmentally curved, Belfast type roof covered in corrugated iron that was typical of the Gunpowder industry. The entry gates to the South West retain their curved, recessed sides and gate piers but have long lost their joinery. Together with the adjacent perimeter wall they are much overgrown by vegetation and the latter element has recently been severely damaged by falling trees. Although they have become detached from the main body of the Gunpowder Works and its Country Park, these remains form a significant public reminder of the once major Faversham gunpowder industry.	Faversham	
LHL086	Nominated	Shooting Gallery Wall and Cattle Market Railings at Junction of Whitstable Road with Bob Amor Close	Remains of a historic wall	A short length of stock brick wall, constructed in 1940 in anticipation of the German invasion and located to defend the main Eastern entrance into Faversham at its most constricted point – the now demolished railway bridge across the Whitstable Road. On its Western face the wall incorporates the remains of 3 deliberately angled rifle positions, now blocked. This wall is a rare and nationally significant survival of emergency defensive measures undertaken throughout the Southern England, under direction of the Wartime Coalition Government. Nationally, most similar defences have been demolished. It should be noted this wall also retains the last remains of a cast iron pier and railings standards, dating from the early 20th Century, of the Faversham Borough Council's Cattle Market entrance. A second, longer section of the same railings remains nearby, at the West side of the entrance to Bob Amor Close.	Faversham	
LHL087	Nominated	Defensive brick wall at the corner of the A2 with Ospringe Road (i.e. at The Ship Inn).	Remains of a historic wall	A curved length of stock brick wall, constructed in 1940 in anticipation of the German invasion and located to defend the main road leading to Chatham and London at the point where the A2 descends into Ospringe and becomes more vulnerable to rifle fire. The wall masquerades as a boundary wall but incorporates the angled remains of two angled rifle positions. This wall is a rare and nationally significant survival of emergency defensive measures undertaken throughout Southern England, under the direction of the Wartime Coalition Government. Nationally, most similar defences have been demolished.	Faversham	


Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL088	Nominated	Forbes Road: Embankment Wall and Garden below Queen's Hall (Abel's Acre).	Remains of a historic wall	Abel's Acre. A long and tall rockery retaining embankment of locally made yellow brick burrs - bricks distorted and fused together in firing. Built at the time of the construction of Forbes Rd. and the adjoining railway bridge - circa 1896. It is named after Walter Abel, Parks Superintendent of Faversham Borough Council in the 1960s. It makes a valuable contribution to Conservation Area character.	Faversham	
LHL089	Nominated	Central Car Park: low, freestanding brick wall running North/South, in middle of the Car Park. Surviving old part only.	Remains of a historic wall	A low, rebuilt, pale red brick wall with saddle-back coping bricks dividing the town's main car park into two (unequal) halves. freestanding brick wall running North/South, in middle of the Car Park. Though modest in scale the wall enhances local sense of place and security by physically separating the two areas of parking . Lengths of the original 6 foot 6 inch high wall here, with the same brick copings, survive towards Gatefield Lane and around the corner along the north side of the Lane. This section has not been rebuilt and appears 19th century in date.	Faversham	
LHL090	Nominated	Boundary Walls enclosing Cross Lane between South Road and Bank Street. (former ropery line).	Remains of a historic wall	A much varied mixture of red and yellow brick and flint & pebble, single height walls enclosing the North and South sides of the Lane and of mixed late 18th - late 19th Century dates . The walls on both sides incorporate a considerable number of pedestrian gateways, some with brick arches, others with capped piers, and many of which have been bricked up. The brickwork has been laid in various bonds, both regular and irregular. The Lane is significant for Faversham as the manifestation of a late 18th/early 19th Century ropery but the changing pattern of walls, gates and piers also tells much about the historic ownerships, land boundaries and development pattern of this area of Faversham over a 200 year period. The whole collection has important townscape value.	Faversham	
LHL091	Nominated	Stone Boundary Wall on South side of Gatefield Lane, to rear of the Alexander Centre	Remains of a historic wall	A garden and boundary wall on the South side of this ancient pedestrian right of way. Constructed of mixed and randomly coursed Kent Ragstone and Caen stone rubble which ultimately must have been salvaged from the mediaeval Faversham Abbey buildings. The wall is 'framed,' capped and perhaps backed by local later 18th Century red brick so would appear to date from circa 1780-1800. Part of the wall has been covered in a mid-20th Century pebbledash render. The significance of this wall lies in its indirect connection with the Abbey, its townscape value and its marking of an ancient property boundary, pre-dating the building to which it now belongs.	Faversham	
LHL092	Nominated	Brick Boundary Wall on the North side of Gatefield Lane, enclosing the Vicarage Garden.	Remains of a historic wall	A garden and boundary wall on the North side of this ancient pedestrian right of way. Constructed of locally made, mixed red and yellow stock bricks of at least four ages and incorporating a blocked gateway. Laid in an irregular bond, one length of wall is constructed in red bricks of an unusually large size that has not been found elsewhere in Faversham and which must be extremely rare, if not unique. The significance of this wall lies partly in its bricks, partly in its townscape value and partly in its marking of ancient property boundaries and entrances which pre-date the Edwardian house to which it now belongs.	Faversham	





Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL093	Nominated	Brick Boundary Walls Enclosing Gatefield Lane between Newton and St Mary's Roads.	Remains of a historic wall	A remarkable collection of mid – late 19 th Century boundary/garden walls constructed of various lower grades of local yellow brick ranging from clumsy burrs to low-grade, irregularly fired stocks. All laid in varied and mixed informal bonds, including random, garden wall, header, vertical header and stretcher bonds. Much of the significance of these walls lies in their townscape value but they also betray the development pattern of this area of Faversham as it was turned by piecemeal development from orchard to housing between 1860 and 1900. Further, they show how the otherwise un-marketable, low-grade material from the local brickmaking industry was used to good effect by Faversham.	Faversham	
LHL094	Nominated	Brick Boundary Walls enclosing the Alley between Newton and St Mary's Roads.	Remains of a historic wall	Another remarkable collection of mid – late 19th Century boundary/garden walls constructed of various lower grades of local yellow and red brick, interspersed on the East side by a variety of gate openings and some gate piers. On the West side the walls are laid in varied and mixed informal bonds including random, garden wall, header, vertical header and stretcher bonds. On the East side the bricks are of slightly higher quality and the bonds are more regular. Much of the significance of these walls lies in their townscape value but they also betray the development pattern of this area of Faversham as it was turned by piecemeal development from orchard to housing between 1860 and 1900. Further, they show how the otherwise un-marketable, low-grade materials from the local brickmaking industry was used to good effect by Faversham.	Faversham	
LHL095	Nominated	Boundary Wall on South Side of Institute Road.	Remains of a historic wall	A yellow stock brick wall with small band courses of double courses of red brick and terminating at its West end with a curved return and pier onto Newton Road. This wall formed the Northern boundary of the garden to a substantial circa 1870's residence (demolished in the 1970's) and in addition to its townscape value, is a reminder of the original scale, status and character of the Newton Road development.	Faversham	
LHL096	Nominated	Boundary Wall on West Side of Church Road.	Remains of a historic wall	A mixed red brick boundary and retaining wall, running from East Street to the Tesco (former Brewery) building. Constructed piecemeal over a 200 year period, this long and varied wall betrays the evolution of the area from 18th and early 19th Century orchards opening off a country lane, through the later 19th and early 20th Centuries as gated brewery gardens and yards, to the late 20th Century development as a single supermarket car park.	Faversham	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL097	Nominated	Boundary Wall and Entrance Gate at North End of Westgate Road.	Remains of a historic wall	A late 19th Century, recessed-panel wall and gateway piers constructed of local yellow stock brick with band courses and other features in red brick. This substantial wall was constructed to enclose their Works Depot by the old Faversham Borough Council: the enclosure has since been filled with late 20th Century private housing. Some 12 bays of the old wall survive, together with the recessed quadrant gate reveals and a set of gate piers. But the original plinth of the rest of the enclosure also remains in-situ and is visible running South down Westgate Road and returning into Luton Road – so still indicating the full extent of the Works Depot.	Faversham	
LHL098	Nominated	Curved Iron Railings Panel at Corner of East Street and St John's Road.	Historic Iron Railings	A panel of 9 heavy cast iron vertical standards supported on upper and lower curved wrought iron rails. Each standard is inversely spiked at its base and has a moulded plinth, central knob and a cap under the upper rail. Above the rail, each standard has a heavy, moulded circular spike. Smaller, double-ended short spikes are also located in the upper and rails, between the standards. This curved panel is the last survivor of a remarkable and unique railing design that originally enclosed the entire front garden of St John's Villa – one of 4 houses in St John's and St Mary's Roads dating from the late 1850's, all designed by the architect Martin Bulmer (of Maidstone) and all originally given unique sets of railings. This panel is the only survivor	Faversham	
LHL099	Nominated	Iron Railings to Western Entrance of St Mary's Parish Churchyard.	Historic Iron Railings	A mix of 18th and 19th Century wrought and cast iron railings on either side of the paved Western entry from Church Street and also enclosing the North West and South West corners of the churchyard. They comprise a mixture of turned, wrought iron principal members with acorn tops, plain circular and square standards with simple drawn spikes or cast iron fleur-de-lys spikes. The wrought iron horizontal rails incorporate some idiosyncratic turned details and the bases of all standards are leaded into stone plinths. All this ironwork is likely to have been produced locally and provides evidence of the 18th and 19th Century maintenance and management of the churchyard as well as the relative wealth of the parish at that time.	Faversham	
LHL100	Nominated	Painted Sign in Jacob's Yard.	Painted Sign; Historic survival.	A small 19th Century, hand-painted and framed wooden sign for 'Jacob Yard' located on a weatherboarded flank wall on the South side of the entry to Jacob's Yard. A unique, bespoke survival.	Faversham	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL101	Nominated	Gatefield Lane: painted 'Nescafé' advertisement on flank wall of corner cottage.	Painted Sign; Historic	Large painted advertisement dating from the first half of the 20th century. It is on the end-of-terrace gable adjoining the entry to the Fleur back yard off Gatefield Lane. Its paint has recently been 'refreshed' and in this condition it makes a positive contribution to the Conservation Area	Faversham	
LHL102	Nominated	Crescent Road: painted Air Raid Shelter sign on wall of Age Concern building.	Painted Sign; Historic	The 'white painted upper case words 'AIR RAI (D)' are visible, the rest is obscured by two modern notices, to left and right. Should the opportunity arise these should be moved to show it in full. It is important and rare surviving evidence of former times .	Faversham	
LHL103	Nominated	Painted Sign on Flank Wall of House on South Side of Whitstable Road.	Painted Sign; Historic	A circa 1900, cream and brown painted sign at First Floor level on the flank wall of the house next to the railway bridge. Formerly a bakery and shop, the sign advertises Hovis bread and the former business of W.H.Ost. In addition to telling us about a past Faversham business, this is a rare and complete survival of past advertising methods.	Faversham	
LHL104	Nominated	a) Cast Iron Bollard at Junction of Partridge Lane with Court Street	Historic Bollard	A genuine cast iron canon, apparently of early 18 th Century date, used as a bollard. A rare survival and one of only 3 such genuine canon bollards in Faversham.	Faversham	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL105	Nominated	Cast Iron Bollard at Corner of Quay Lane with Court Street.	Historic Bollard	A genuine cast iron canon, apparently of early 18 th Century date, used as a bollard. A rare survival and one of only 3 such genuine canon bollards in Faversham.	Faversham	
LHL106	Nominated	Four Cast Iron Bollards at the Corner of the Mall with the A2.	Historic Bollard	Four late 19 th /early 20 th Century cast iron, circular bollards located at the Western corner of this major Faversham road junction and apparently still in their original location. Of fluted shaft and moulded cap design, they match and are contemporary with the two bollards in Institute Road. Although of known design, these are a rare, genuine bollard survival in Faversham.	Faversham	
LHL107	Nominated	Two Cast Iron Bollards on the South side of Institute Road, at Junction with the Back Alley.	Historic Bollard	Two late 19 th /early 20 th Century cast iron, circular bollards located at the Alley/Road junction and apparently still in their original location. Of fluted shaft and moulded cap design, they match and are contemporary with the four bollards at the South end of The Mall. Although of known design, these are a rare, genuine bollard survival in Faversham.	Faversham	
LHL108	Nominated	Cast Iron Bollard at Junction of Solomon's Lane and West side of Preston Street.	Historic Bollard	A 19 th Century, square a heavy cast iron bollard with a recessed, trefoil-headed Gothic panel to each of the four sides. Chamfered at each corner, the bollard is terminated by a domed top sitting on a projecting, heavily moulded cap. This extraordinary bollard is not only unique in Faversham but may well also be unique to Faversham.	Faversham	



Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL109	Nominated	Iron Bollard at Whitstable Road/Cyprus Road Junction	Historic Bollard	A genuine iron canon, apparently of mid-19th Century pattern and date and used as a bollard. Almost certainly contemporary with the 1860's development of the Cyprus/Westgate/Luton Road Estate immediately to the North. A rare survival and one of only 3 genuine canon survivals in Faversham.	Faversham	
LHL110	Nominated	Stone Milestone on the A2 at Top of Beacon Hill.	Milestone	Watling Street and the A2: all 18th and early 19th century stone milestones that survive between Beacon Hill and Brenley Corner.	Faversham	
LHL111	Nominated	Stone milestone on the A2 in Ospringe Street.	Milestone	A square, early 19th Century milestone erected by the then Turnpike Trust, set diagonally in the North pavement just West of the entrance to Sheerways. Although missing its 2 metal plates and crudely repaired in cement render, it marks the 46 mile distance from London. Of unique historical value.	Faversham	
LHL112	Nominated	Stone Milestone on the A2 at Preston.	Milestone	A square. Early 19 th Century milestone erected by the then Turnpike Trust, set diagonally in the North pavement just East of the entrance to Preston Park. Although missing its 2 metal plates it marks the 47 mile distance from London. Of unique historical value.	Faversham	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL113	Nominated	Granite Water Trough at Junction of the Mall with the A2.	Water Trough	A polished, red granite animal water trough with human drinking fountain at one end and all supported on two plain, grey granite blocks. Erected by subscription and given to the Borough of Faversham in June 1899, its original cast iron cistern by an obscure London ironmonger named S.B. Goslin, remains in place. The trough is simply detailed, with plain chamfers to the granite arises and broad chamfers to its long undersides. The small human fountain is housed behind an ogival upstand, with a corbelled and projecting semi-circular bowl. The trough is unique to Faversham and a highly visible reminder of late 19 th Century social conditions and the attitude to civic munificence.	Faversham	
LHL114	Nominated	Public Clock on 78 Preston Street.	Clock	A black, 19th Century, double-faced circular clock with Roman numerals. Located at First Floor level on No. 78 and supported on two, highly ornate 'Gothic' iron corbel brackets, the main workings are housed inside the building. Provided by the old Faversham Borough Council, this assembly was originally located (until the 1930's) on the First Floor of No. 69 Preston Street. This clock is a rear and important survival which needs returning to working order.	Faversham	
LHL115	Nominated	Post Box at Corner of East Street with St John's Road.	Post Box	A genuine Victorian cast iron post box, set into the curved brick garden wall at the North West corner of the junction. A rare and valued survival in its own right, its presence is a visual reminder of the considerable amount of the new housing that was erected in this part of Faversham between the late 1850's and 1880 and which this post box served.	Faversham	
LHL116	Nominated	Whitstable Road: Gates to the Recreation Ground.	Historic Iron Gates	Two sets of late 19 th /early 20 th Century iron gates and gate posts located at the North West and North East corners of the Recreation Ground. Each set of gates consists of 3 square, cast iron posts, together with a single-leaf, wrought iron pedestrian gate leaf and a similar pair of wrought iron double gate leaves. The posts, from the Baylis foundry in London, are of a light 1890's character. The gate leaves consist of sets of 'wriggling' full height and half-height standards supported by bottom, middle and top rails and with curved & curled finials of an archetypal 1920's feel. Unlike the railings that enclosed the Recreation Ground, these gates luckily survived the 1940 salvage campaign and as a reminder of what was lost, are of much local historic importance. They are also of considerable townscape value.	Faversham	


Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRPAH
LHL117	Nominated	Ordnance Wharf Complex		<p>Ordnance Wharf Complex</p> <ul style="list-style-type: none"> -Docks to each side, -Flood Lane, -Flood Lane bridges, -Stonebridge Pond dam, and Bennett's Mills, -The Purifier Building. Each of these is a non-designated heritage asset in its own right 	Faversham	
LHL118	Nominated			<p>Ordnance Wharf - yellow brick wharf walls, wharf top originally without any upstanding development other than at one point a crane. Intended for the outward shipment of gunpowder made at the adjoining Home Works.</p> <p>First mapped in something like its current form c1815 when the Works was still in State hands. The Works was subsequently sold and continued to operate privately for many years thereafter.</p>	Faversham	
LHL119	Nominated			<p>Docks to each side of Ordnance Wharf - Yellow brick sides. In their current form, these may date to 1830 when the Faversham Gas Works opened on the southwest of town, side of the Creek's head, or to 1843 when the Creek from Ordnance Wharf to the Brents bridge was remodelled to form a lock-gated basin.</p>	Faversham	
LHL120	Nominated	Flood Lane		<p>Flood lane --The historic route across the head of the Creek, immediately below Stonebridge Pond dam. It connects originally 'islanded' Ordnance Wharf (and the related historic main entrance to the Home Works site) to the south-west and north-east sides of the Creek head.</p>	Faversham	





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LHL121	Nominated	Flood Lane bridges		Flood Lane bridges - Shallow red brick arched structures to each side of the head of Ordnance Wharf and carrying Flood Lane. A. Percival dates one to 1803.	Faversham	
LHL122	Nominated	Stonebridge Pond dam, The Stonebridge Allotments, Faversham, ME13 7LE		Stonebridge Pond dam - West of the listed Works wall within the current allotment site. Concealed today but part identifiable by its in situ gunpowder mill bed stones (see below) and the two surviving sluice-drops within it. It seems likely that an historic corn mill stood here before gunpow r manufacture moved to the site.	Faversham	
LHL123	Nominated	ME13 7DH		Lower and Bennetts gunpowder mills - west of the listed Works wall within the current allotment site. The Lower mills are south of the main works entrance from Ordnance Wharf, and Bennetts are to the north of it. Very significant and important evidence survives in the form of bed stones for 9 out of what had been in the C19th a total of 10 mills aligned along the top of the dam. Some of these, or their current sites, are likely to pre-date the c19. Evidence for one breast shot water wheel survives within the current southern pond sluice. Water power was superseded in the later c19 by steam - the base of the engine house survives. A number of runner stones remain distributed about within an area of the allotments close to the main Works entrance.	Faversham	
LHL124	Nominated	The Purifier, Faversham Creek Trust, Flood Lane, ME13 7DY		Purifier building - One of only two Gas Company buildings to survive in the town. A different gas works building stood on this site in 1864. By 1896/97 this had been replaced by the current L-plan two storey yellow brick walled and slate and corrugated iron roofed building.	Faversham	



Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL125	Nominated	Brents Bridge Bridge Rd ME13 7DH		Brents bridge stone abutments, bridge opening machinery and machinery house,two bridge personnel shelters. he extant shared stone and brick bridge, and lock gate, abutments are likely to reflect more than one building and re-building campaign but they have not been professionally examined in detail for this. The first lock gates were erected during the 1842/43 Creek realignment works to contain water within the new Creek Basin. One source notes that prior to 1881 the Brents bridge here was only 3 feet 6 inches between handrails and could be horizontally withdrawn (on four flanged wheels) to allow vessels to pass. The implication of this is that 18.81 saw the later swing bridge installed. Another source writing in 2004 notes that 'hydraulic accumulators and a hand-operated pump of 1878 still provide the means of lifting the (swing) bridge off its seatings '(2004 Conservation Area Appraisal). It is believed that this machinery still survives in the white rendered and slate roofed bridge house at the north east corner of the bridge. Two very small single storey 19th century yellow brick and slate roofed personnel shelters stand to east and west of the bridge on its south side. All the structures and features described, including the bridge control machinery, are of great interest historically and contribute to Conservation Area character.	Faversham	
LHL126	Nominated	Brents Bridge Bridge Rd ME13 7DH		The extant ashlar stone and brick bridge and lock gate abutments are likely to reflect more than one building and re-building campaign but they have not been professionally examined in detail for this . The first lock gates were erected during the 1842/43 Creek realignment works to contain water within the new Creek Basin. It is believed that this machinery still survives in the white rendered and slate roofed bridge house at the north east corner of the bridge; One source notes that prior to 1881 the Brents bridge here was only 3 feet 6 inches between handrails and could be horizontally withdrawn (on four flanged wheels) to allow vessels to pass. The implication of this is that 1881 saw the later swing bridge installed. Another source writing in 2004 notes that 'hydraulic accumulators and a hand operated pump of 1878 still provide the means of lifting the (swing) bridge off its seatings' (2004 Conservation Area Appraisal).	Faversham	
LHL127	Nominated			Two very small single storey 19th century yellow brick and slate roofed personnel shelters stand to east and west of the bridge on its south side. All the structures and features described, including the bridge control machinery, are of great interest historically and contribute to Conservation Area character.	Faversham	
LHL128	Nominated	Creek Basin - including wharf walls on town side.		The current basin was formed in 1843 1 as part of a wider upgrading exercise on the upper reach of the Creek. New lock gates and a moveable bridge (see above) were provided at the lower end of the basin partly to allow access to the creek head for larger vessels and also with the gates as a flushing measure to keep silt moving out of the basin and downstream. Various sections of brick wharf wall survive on the basin's town side, relating to both the Shepherd Neame and Morrison sites. It makes a unique and important contribution to the history and character of the Conservation Area.	Faversham	


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LHL129	Nominated	Creek Creative. Quay Lane/ Abbey St/Belvedere Rd		<p>The building's formal front is to Abbey Street, its flank to Quay lane and its back to Belvedere Rd. Built between 1884 and 1896 it was the beer bottling building for Rigdens/ Whitbread/Fremilns large brewery complex across Abbey St. The two sets of buildings are joined by a (still extant) tunnel under the road. Externally it is largely unaltered. It is in yellow stock brick with to the front a simple pitched roofed gabled facade with red brick dressings. To the rear the width of the building doubles, resulting in two gables and two conventional pitched roofs with a valley between. All roofs are slated. The building retains almost all its original exterior character and is important for its historic and also its townscape contributions to the character of the Conservation Area.</p>	Faversham	
LHL130	Nominated	Former saw mill building, Belvedere Rd.		<p>Belvedere Road from their timber storage sheds on the Quay. (To which it had been delivered by water.) The building exterior is largely unaltered. It is of yellow stock brick with low pitched slated roofs. It makes a valuable contribution to the understanding of historic land uses in the area and is also valuable for its intrinsic character and its contribution to local Conservation Area townscape. NOTE: As part of a wider surviving group of Whittles Timber Yard buildings on the</p>	Faversham	
LHL131	Nominated	WW1 Pill Boxes	1917	<p>The Pill Boxes are in a strategic place and part of the network of defences, Newington has at least four.</p>	Newington	
LHL132	Nominated	Bus shelter	1952	<p>Built to commemorate the coronation of Queen Elizabeth II. There are commemorative plaques either side of the entrance</p>	Newington	

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LHL133	Nominated	Bus shelter	1950s	Built as a twin to the coronation bus stop and on the site of the former meeting place of the Newington Society (amateur dramatics)	Newington	
LHL134	Nominated	Airey House	1945-1955	Airey (concrete) houses were built by the local authority in 1950 creating Playstool Road. Though demolished in 1991, one survives.	Newington	
LHL135	Nominated	Clifton House	House built at the end of 19th century	Donald Potter, a 20th-century sculptor and potter, was born here in 1902. The house retains original features, including an unusual and distinctive turret. Potter's grandfather, Henry Matthews, was head teacher for 40 years at Newington School. Donald Potter joined the Scouts and his 3m high statue of Lord Baden-Powell, founder of the Scouting movement, was unveiled in 1961 outside Baden-Powell House in Queen's Gate, South Kensington, London. Potter worked closely for many years with Eric Gill, one of the 20th century's greatest British artists. Terence Conran, founder of the design store, Habitat, credits Potter as one of his main influences.	Newington	
LHL136	Nominated	Crockfield	c43CE - c250CE	Site of Roman cemetery. The first known record is by the 17th century cleric, Meric Casaubon in 'Notes on Antonine's Meditations'. Hasted (1798) notes ' <i>The great numbers of urns.....have been dispersed among the curious throughout the county' and records associated 'pitchers' that may have held wine used to extinguish the flames of the funeral pyre.</i>	Newington	
LHL137	Nominated	Widows Homes	1863	The houses were built in 1863 and retain original features. Occupied by widowed women receiving "relief" from the Parish during 19th century and first half of the 20th century. The house on the east side was for many years the village Post Office and an original post box remains in the wall facing High Street.	Newington	

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LHL138	Nominated	Police Houses	Historic	The village had its own sergeant and constable, the first house has an original cell.	Newington	
LHL139	Nominated	Watercress beds and willow reed beds	Landscape Historic; 1880s	Victorian or earlier heritage landscape called Wet Meadow but commonly known as The Bogs, spring water flowed down the Libbet Stream into the Wet Meadow. The new watercress was taken to Covent Garden. The watercress beds go down to Lower Halstow. The Libbet sustained a number of separate watercress producers and was an important part of the local economy in the 19th and early 20th centuries. In the early 20th century, the willow reeds were used to make baskets (the fruit picked in Newington was packed in these baskets). Unfortunately, the industry declined due to competition from abroad although the business was revived during WW2. An original pump house survives.	Newington	
LHL140	Nominated	Devil's Stone	19th century	Mentioned in local stories for over 150 years there are many versions of the Devil's Stone legend, but all tell the same basic story. Tradition says the devil was fed up being woken up every Sunday morning by the bells ringing so he took the bells but fell coming down the tower and left his footprint in the stone. As he fell the bells rolled into the Libbet Stream. The stone stood for several hundreds of years on the eastern bend of Church Lane/Iwade Road before being moved across the lane to the corner of Church Lane/School Lane in 1931. It was moved to the entrance of the churchyard in 1935 and, more recently, to a corner of the church car park. A plaque marks the 1936 move.	Newington	
LHL141	Nominated	School Building	Architectural Historic; 1850	The School was built in 1850, following the School Sites Act 1841 which afforded further Facilities for the Conveyance and Endowment of Sites for Schools. The land was gifted to Newington. The school was quickly extended to cater for more children and extended again on the late 1990s. The school extension was opened by HRH the Princess Royal in January 2000 during the school's 150th anniversary. The original part retains original features and you can still see the school hall attached to the masters' house. The following is the text on a plaque in the church vestry <i>Benefactions to the Poor of NEWINGTON</i> <i>Three quarts of wheat from the Parsonage Estate, to be given away yearly on Old Lady Day for ever.</i> <i>Also the rent of a Barn and Land known by the name of Poors Barn Estate, opposite the Parsonage House given by Will by Simon Tamlyn Esq. A.D. 1689 to the Vicar and Church Wardens for ever in trust for the Poor to be expended in Bread in equal proportions and to be distributed every Sunday immediately after Divine Service.</i> <i>Also the rent of three acres of Garden Ground let in allotments to the poor.</i> <i>Dated 1864</i> <i>signed by; W. Ludgater & G. Catt</i> <i>Churchwarden</i>	Newington	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL142	Nominated	Public Air Raid Shelters	Historic; 1939	Donated by Miss Elizabeth Ledger for the protection of rail passengers during WWII. Visible from station alley. The construction is a relatively unusual double shelter. Miss Ledger was part of the family that has farmed at Wormdale for more than 150 years. This shelter is the only one remaining of three that were constructed in the village in WWII	Newington	
LHL143	Nominated	Station, Station House and Surrounds; Station Masters house & Former Legh Arms on LHL; Station is on HER	Architectural Historic; 1862	East Kent Railway (EKR) opened the Chatham to Faversham line in January 1858, but Newington only got its own station four years later, after pressure from residents and after the line had been taken over by the London, Chatham and Dover Railway (LC&DR). The company was willing to provide the buildings but the village would have to arrange access. This led to villagers – led by the local doctor, George Henty – raising a substantial amount of money to buy orchard and meadow land that had been part of the Lucies manor house, which was demolished in 1857. The land enabled a station approach road to be laid from the A2. Nothing remains of the original 1862 station, but the station master's house and the 'station pub' the Legh Arms remain, as private houses.	Newington	
LHL144	Nominated	Watercress pump house	Historic	Last remaining pump house for watercress industry.		
LHL145	Nominated	Watercress company marker stone	Historic	Stone engraved with 'JS 1925'. Evidence of the last watercress company operating here.	Newington	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL146	Nominated	Faversham Pools Leslie Smith Drive Faversham Kent		<p>History of Faversham Pools</p> <p>The very first mention of a pool for Faversham dates back to 1878 when a public meeting was called to discuss the idea. It remained an unrealised dream until in 1957 a public fundraising campaign was launched to finally make the dream a reality.</p> <p>In 1959 the target amount was set at £9,500 and the campaign began. Among several significant financial donations in the early months, the most important was the generous gift of land in Cross Lane by Leslie Smith.</p> <p>As the years progressed the fund swelled, and so too did the town's aspirations. A larger outdoor pool was planned to meet the projected need. A children's pool was added to the design. The Borough Council promised support in the day-to-day running and maintenance of the pool.</p> <p>By 1962 plans became more ambitious and the proposed site was enlarged by the acquisition of part of the adjoining bowling green. The general public's support continued to pour in and donations increased as the financial target stretched.</p> <p>The first brick was laid in 1963. Further improvements to the project were made – including a water heating system. Work on the pools and buildings commenced and a generous grant from the Ministry of Education meant that the total cost of £28,000 was in sight. A Management Committee was formed, to control the management of the pools after the handover from the Appeal Fund.</p> <p>So, after five years of continuous hard work, the outdoor pools and buildings opened on 30 May 1964. The indoor pools followed in 1993 with the generous support of Swale Borough Council.</p>	Faversham	
LHL147	Nominated	Berkeley House Victorian Gardens		<p>The sequoia at Berkeley House and Victorian gardens and pond. These remains from the time that the gardens belonged to Berkeley House built around 1840 and demolished in the 1950s. Architectural and historical significance. Victorian</p>	Dunkirk	
LHL148	Nominated	Trenches & Defence Line Observation Hill Tunnel Hill (Monkey Island)		<p>These all formed part of the Chatham Land Front, a sophisticated line of defences across south east England in WWI. The Front consisted of trenches, barbed wire, gun emplacements and tunnels which were intended to slow down an enemy advance on key military installations further inland. The trenches around Newington were virtually identical to those that saw the worst of the fighting on the Western Front in France and Belgium - clearly they were intended for defence, not training. circa 1914</p> <p>The trenches were infilled by German POWs at the end of the war but evidence of them can still be seen on the landscape around the village.</p>	Newington	

Unique Reference Number for GIS	Source	Address	Property Type	Description	Parish/Village/Town	PHOTOGRAPH
LHL149	Nominated	Avenue of Remembrance	Road		Sittingbourne	

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Proposed Listing Criteria for Local Heritage List

'Local Heritage Lists are a means for stakeholders, the community, and a local planning authority to jointly identify heritage assets that are valued as distinctive elements of the local heritage/identity of a place. It provides clarity on the location of assets and what it is about them that is significant. It can also play a key part in promoting the cultural identity of a place for various purposes, including investment and tourism.' Local Heritage Listing Toolkit, Civic Voice

What is the purpose of a Local Heritage List?

- To raise awareness of an area's local heritage assets and their importance to local distinctiveness.
- To inform developers, owners, council officers and members about buildings within the local authority boundary that are desirable to retain and protect.
- To provide guidance and specialist advice to owners to help protect the character and setting of those buildings, structures, sites and landscapes.
- To help the council in its decision making when discussing proposals and determining planning applications.
- To record the nature of the local historic environment more accurately.

Selection Criteria

The designation of 'local interest' shall apply to buildings/structures/spaces/landscaped areas that meet one or more of the criteria given below provided that its historic form and qualities have not been eroded by unsympathetic alteration or extension. The selection criteria is based on those set out in the Good Practice Guide for Local Heritage Listing by English Heritage in 2012 and reflected in the 2016 edition by Historic England. Heritage assets designated by Historic England and featured on the National Heritage list will not be considered for inclusion on this list.

Types of Heritage in Swale

1. Buildings or structures of local significance
2. Green spaces/ landscapes of local significance
3. Landscape historically associated with war time use – for e.g.: a WW1 shooting range.
4. Industrial heritage - unique to Swale and its history
5. Unlisted Blue plaque buildings
6. Agricultural buildings (Swale is rural, many barns are older than their industrial counterparts. Consider farms and barns.)
7. Clusters of buildings (would they be changed by new/intrusive development which could change a small cluster)
8. The interaction and relationship of small group of buildings – Significant contribution to the townscape or streetscape
9. Archaeological Heritage

Criteria for local listing

The criteria have been developed using national guidance in an attempt to recognise those heritage assets of local importance. The criteria are subject to public consultation before formally adopted.

Heritage assets should be of architectural or historical interest, or both.

They should then fit into one or more of the following General Principles of Selection:

- Age and rarity
- Aesthetic Interest
- Group value
- Archaeological / and or Archival Interest
- Landmark qualities
- Intactness (state of originality)
- Designed Landscape interest
- Social and communal value

Swale Borough Council is proposing to adopt the following criteria for a Local Heritage List within the borough – any one of which may in isolation be considered sufficient:

- Historic interest – buildings/structures/spaces that are of special social, cultural, or economic interest to Swale, and/or have proven affiliation with important local people or events, or other community associations.
- Architectural interest – buildings/structures/spaces that are of special architectural interest to Swale for reasons of their vernacular, aesthetic, type, form, style, plan technology, townscape, unity, or association with important architects.
- Age or rarity – buildings/structures/spaces that are: legibly pre-1700 in interest; of appreciable interest from between 1700–1840; of a high level of interest post-1840; of an outstanding interest and less than 30 years old.

Architectural Interest

1. If the building was built before 1840, does it survive in anything like its original external condition?
2. If it was built between 1840-1899 (Victorian), does it retain its original features? Is it of sufficient quality to distinguish it from other buildings of that period locally?
3. If it was built between 1900-1919 (early 20th century), does it retain its original features? Is it of sufficient quality to distinguish it from other buildings of that period locally?
4. If it was built between 1920-1938, is it an outstanding example of the style of the period?
5. If it was built between 1939-1945, is it a rare surviving example of a wartime structure?
6. If it was built after 1945, is it a building of exceptional quality and design? Does it represent a specific type of building type design from that period.
7. Was the building or structure designed by an architect/craftsperson of national or local importance?
8. Has the building received a national award or recognition?
9. Is it an example of a style of building that is special to Swale?
 - Shipbuilding and the barge trade
 - Brick making
 - Paper making
 - Military installations, including gunpowder production
 - Brewing

- Fruit and hop culture – e.g. with reference to oasts

10. Is it a group of buildings that together are a good surviving example of an historic architectural style, particularly one associated with Kent?

- public houses – including “Roadhouses” built between the World Wars – when the motorcar was becoming popular
- village accommodation once reserved for paupers - Alms Houses
- buildings that have been/ were prominent in the life of the community such as:
 - village halls
 - forges
 - post-offices
 - schools
 - oasts
 - sail-lofts
 - other historic buildings which used to be devoted to local industry.
 - residences or buildings associated with notable public figures, places of worship, Gatehouses.

11. Does the building or structure exhibit important characteristics of design, decoration, or craftsmanship? For example, a mural, or clock or decorative tile work on an otherwise undistinguished building.

12. Is it a good early example of a particular technological innovation in building/structure type and technique? For example, viaduct and similar engineered spans.

Historic Interest

13. Is the building or structure associated with an important national or local historic figure or event?

14. Is it a building, structure or item of street furniture which has an important association with the development of the town or its social or cultural history? For example, schools, churches, public buildings, mileposts, boundary markers and old letter boxes.

15. Is it a building, structure or item of street furniture which has an important association with the history of the area’s local economic development? For example, agricultural, industrial, commercial or transport buildings and structures.

16. If a structure such as a wall, terracing or garden building, is it associated with a historic landscape or is it of identifiable importance to the historic design or development of the area?

Contribution to townscape

17. Is it a significant landmark building, folly or curiosity that makes a positive contribution to the streetscape?

18. Does the building or group of buildings contribute significantly to the townscape, street scene or appearance of the area?

19. Is it a rare surviving example of street furniture that contributes positively to the local area?

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Planning and Resources Committee Meeting	
Meeting Date	27th November 2024
Report Title	Cellar Hill & Greenstreet Conservation Area Review
EMT Lead	Emma Wiggins - Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Jhilmil Kishore – Principal Heritage Officer
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To note the updated Cellar Hill and Greenstreet Conservation Area Character Appraisal and Management Strategy (public consultation draft) and representations made by interested parties, set out in the report appendices. 2. To agree changes to the Character Appraisal and Management Strategy as identified in consultation response table (Appendix I) and adopt this as planning guidance. 3. To amend the boundary of the conservation area as shown in Character Appraisal and Management Strategy document. 4. To redesignate the Cellar Hill & Greenstreet Conservation Area 5. To consider whether No. 8-40 Station Road and London Road westwards from No.190- 224 be included

1 Purpose of Report and Executive Summary

- 1.1 To report the updated Cellar Hill & Greenstreet Conservation Area Character Appraisal and Management Strategy; to outline amendments to the conservation area boundary and recommend that the conservation area be formally re-designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act, 1990. The proposals include a detailed character appraisal and associated management strategy in line with current best practice for the management of conservation areas. It is recommended that the Policy and Resources Committee supports and agrees the changes to the review document set out in **Appendix I**.

2 Background

- 2.1 Cellar Hill Conservation Area was first designated by Swale Borough Council on 22 November 2000. This is the first review of the conservation area since the conservation area was designated. There is a formal requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 for Conservation Areas to be reviewed from ‘time to time’.
- 2.2 The Swale Heritage Strategy, adopted in March 2020, committed the Council to more regular conservation area reviews and to consider designating new conservation areas. The review of Cellar Hill & Greenstreet Conservation Area is part of the work programme of the initial 3-year action plan forming part of the adopted Swale Heritage Strategy 2020 – 2032. The focus on conservation areas in the initial action plan has given priority to those conservation areas in the Borough classified locally and nationally as ‘at risk’ – of which there are 8. Cellar Hill & Greenstreet Conservation Area is one of them. An external consultant (Peter Bell Historic Building Consultancy) was appointed to undertake the review.
- 2.3 The proposal is to re-designate and amend the boundary of the conservation area and to equip it with a detailed character appraisal and a complementary management strategy which will assist with development management and heritage conservation purposes. It will be a matter for the Policy and Resources Committee to decide whether to formally adopt the Cellar Hill & Greenstreet Conservation Area Character Appraisal and Management Strategy (as recommended and set out in **Appendix II**, following consultation feedback, or otherwise).
- 2.4 Part of the review process involved an assessment of whether the area should be extended or reduced in size. In this regard particular consideration was given to extending the conservation area. The changes proposed to the boundary are as follows:
- **Proposed boundary changes A, B, C and D** These boundary changes are proposed to more accurately reflect the current plot boundaries, or because the original boundary has no apparent context on the ground. They involve minor changes where the original designation line no longer has relevance, possibly because of changes since the original designation.
 - **Proposed boundary change E** This boundary change is proposed to include the hedgerow which fronts the west side of Cellar Hill. Hedgerows are identified as an important contributor to the character of Cellar Hill so its inclusion within the conservation area is justified.
 - **Proposed boundary change F** This proposed boundary change is to include numbers 4 and 6 Station Road. The semi-detached pair of houses pre-date the 1896 Ordnance Survey map. They are well constructed in local yellow stock brick and include decorative stone detailing in the bay windows and in the

arches above the door and window openings. Front boundary walls include some original decorative cast iron railings.

- 2.5 In addition to the above, careful consideration was also given to the area of London Road which falls between Station Road and Lynsted Lane to the west of the existing conservation area. In the September 2023 appraisal, although there was a clear case for a detailed review, it was not considered to be added as an extension to Cellar Hill and Greenstreet Conservation Area and was recommended to be designated as a new and separate conservation area for this part of Greenstreet.
- 2.6 However, Historic England in their response recommended that this area of London Road be included in the current Cellar Hill & Greenstreet Conservation Area, due to its proximity. This area includes a cluster of eight listed buildings and many others which characterise the development of Greenstreet from a farming community to a commercial centre during the 18th and 19th centuries.
- 2.7 A revised document was produced (in-house) to include details of this particular stretch of London Road including the proposed extended Conservation Area boundary and was re-consulted on to include the properties affected by the proposed inclusion of Greenstreet. The proposed Greenstreet extension includes upto No 188 London Road (south side)
- 2.8 A number of local residents and parish councillors have suggested that nos 8-40 Station Road and further west extension of London Road be included upto no. 224 London Road.
- 2.9 Both these terraces along Station Road and London Road could potentially be included in the extended Conservation Area, however, these properties have been much altered in the past and therefore are considered (by officers) to be of lesser significance compared to the properties that are proposed to be included. If not included, these terraces would form part of the setting of the conservation which is a material consideration in planning decisions. Additionally, Historic England in their response were very vocal about inclusion of Greenstreet stretch of London Road but have not mentioned including nos. 8-40 Station Road.

The inclusion of Nos 4&6 Station Road is a good exemplar of the rest of the terrace on Station Road and is considered significant enough to be included in the Conservation Area. Similarly, the properties up to No 188 along London Road have retained most original features and are a good example with historic significance to be included in the conservation area. This assessment aligns with guidance provided in National Planning Policy Framework (NPPF).

NPPF para 197 advises, 'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'

- 2.10 On 5th November 2024, a site visit was undertaken by members of the Policy and Resources committee along with the council officers with a view to assess the two above mentioned terraces at Station Road and London Road. Officers recommended that the two terraces be included in the Local Heritage List, thus giving them a status of non-designated heritage asset, which is what they would have if included in the conservation area. However, it was agreed that further consideration should be given at the Committee meeting to the inclusion or otherwise of the two terraces. A third public consultation will need to be undertaken if the committee votes for both the terraces (Nos. 8-40 Station Road & Nos. 190-224 London Road) to be included.

3 Proposals

3.1 The recommendation is:

1. To note the updated Cellar Hill and Greenstreet Conservation Area Character Appraisal and Management Strategy (public consultation draft) and representations made by interested parties, set out in the report appendices.
2. To agree changes to the Character Appraisal and Management Strategy as identified in consultation response table (Appendix I) and adopt this as planning guidance.
3. To amend the boundary of the conservation area as shown in Character Appraisal and Management Strategy document.
4. To redesignate the Cellar Hill & Greenstreet Conservation Area
5. To consider whether No. 8-40 Station Road and London Road westwards from No.190- 224 be included

4 Alternative Options Considered and Rejected

- 4.1 One option would be to not take this review work any further or suspend the work on this review until some point in the future. Whilst this option would not result in wasted officer time, it could still lead to (a) the designation being challenged, (b) reputational damage to the Council and/or (c) development and associated infrastructure provision decisions being made for the locality without an appropriate understanding and appreciation of the special qualities of the Cellar Hill & Greenstreet Conservation Area. This is not recommended because it would risk the justifiable continuation of the designation and/or the appropriately sensitive and positive management of the conservation area and its wider setting moving forward.
- 4.2 A second option would be to disregard some elements, or all of the feedback received, in terms of the suggested boundary change(s). However, whilst it is considered that the appraisal and management plan (to support the redesignation of the conservation area) is essentially sound, the feedback provided from the local community is valuable and to ignore any of this feedback without sound reasons would call the value of the consultation process into question and potentially deliver reputational damage to the Council.

- 4.3 If the members vote to include No 8-40 Station Road and No. 190-224 London Road, then a third public consultation will need to be undertaken.
- 4.4 A fifth possible option would be to adopt the Conservation Area appraisal document upto and including no 196 London Road, add a note within the document to emphasise on contribution of the two terraces on setting of the Conservation Area and nominate no 8-40 Station Road to be designated as Local Heritage. This would provide adequate protection to the two terraces and the Cellar Hill & Greenstreet Conservation Area can be adopted without the need for a third public consultation.

5 Consultation Undertaken or Proposed

- 5.1 The Cellar Hill & Greenstreet Conservation Area review has had two rounds of public consultation. The first 6-week consultation ran from 10th November 2023 until 22nd December 2023 and the second round of 7 weeks public consultation (to cover the summer holidays) ran from 7th July 2024 to 18th September 2024.
- 5.2 All those parties with property within or overlapping the current conservation area boundary were notified in writing of the review and were invited to comment on it, as were key stakeholder organisations including Kent County Council and Historic England.
- 5.3 Hard copies of the review document on both instances, were made available at the Teynham Library and with the Parish Council and were also available to view/download on-line via the Council's website for the duration of the public consultation periods.
- 5.4 A total of 12 consultation responses (from both rounds of consultation) have been received. 1 from Historic England, 2 from Lynsted with Kingsdown Parish Council, 1 from Teynham Parish Council, 1 from Kent County Council Highways and the remaining from local residents. The officer response to this consultation feedback (as summarised) is attached as Appendix I.
- 5.5 Historic England's response to the first consultation (see Appendix I), wherein they recommended to include the London Road stretch as part of the current conservation area extension, necessitated the need for the second public consultation.
- 5.6 Kent County Council in its function as the Highway Authority was consulted on the conservation area review, and their feedback is also included in Appendix I.
- 5.7 A presentation was made at Eastern Area Committee on 20th December 2023, that highlighted the main aspects of the Cellar Hill & Greenstreet Conservation Area Review.

6 Implications

Issue	Implications
Corporate Plan	The proposed re-designation of Cellar Hill & Greenstreet conservation area would support the Economy priority from the Corporate Plan: <i>'To develop the borough's second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets.'</i>
Financial, Resource and Property	<p>Implementing some aspects of the proposed Management Plan may have financial and resource implications for the council, particularly if it is decided to proceed with an Article 4 Direction review or/and Area of Special Control of Advertisement (ASCA) review. These financial impacts will be considered if / when these further reports are brought forward.</p> <p>Note: <i>Article 4 review and designating a borough wide ASCA are being considered within Action Plan 2 (2023-2026) of Heritage Strategy.</i></p>
Legal, Statutory and Procurement	The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on every local planning authority to <i>"determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance"</i> and, from time to time, to review the functioning existing conservation areas.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	One of the three dimensions of sustainable development is its environmental role: contributing to protecting and enhancing our natural, built and historic environment.
Health and Wellbeing	The health and wellbeing aspects of interaction with heritage assets and heritage related projects are referenced in the adopted Heritage Strategy which underpins this review work.
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: Public consultation – table of representations (in summary form), and the council’s response to them.
- Appendix II: Public consultation version of the 2024 draft Cellar Hill & Greenstreet character appraisal and management plan document.

8 Background Papers

A Heritage Strategy for Swale 2020-2032 Adopted March 2020

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APPENDIX I: TABLE OF REPRESENTATIONS, AND THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE ASSESSMENT DOCUMENT IN RELATION TO THEM – FOR RE-DESIGNATING CELLAR HILL & GREENSTREET C.A.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
1.	Lynsted with Kingsdown Parish Council – 1 st Consultation	<p>Firstly, Lynsted with Kingsdown Parish Council would like to thank Senior Conservation & Design Officer Jhilmil Kishore and consultant Peter Bell for their comprehensive report, following proactive engagement with the local community. The document sets out the purpose of conservation areas as being reflective of the origins and purpose of communities and their spatial characteristics (including the hinterland) and not just the preservation of historically important buildings. We particularly welcome the importance attached to the Lynsted Parish Design Statement which has been adopted as Supplementary Planning Guidance by Swale Borough Council. This designates the Lyn Valley as a 'sensitive edge' and a significant characteristic of the lower North Downs. As many material arguments within the document draw on the Lynsted Design Statement and its language, this demonstrates its durability in guiding development. Linear development (one building deep) in the Parish is emphasised as a defining feature to retain and protect. The point is well made that the M2 no longer protects Greenstreet against the heavy burden of modern-day traffic. We are pleased to note that the report highlights the recent planning appeal decision where the Government inspector describes the importance of the gaps between the buildings on Cellar Hill and the valuable contribution they make to the setting of the listed buildings, stating that: "as a surviving parcel of undeveloped land, the site does serve as a reminder of an important aspect of the historic settlement pattern, in terms of the wider and more irregular spacing of the buildings, with productive land surrounding them on one or more sides, and extending up to the lane itself". These gaps between buildings and the views of the countryside, including inter alia glimpses of traditional orchard trees, are important to the character of the conservation area and should be protected.</p> <p>The statements made in section 2.6 reflect the importance of spatial considerations in planning, especially when a conservation area is implicated. In terms of work to be done to mitigate the risk status there is</p>	Noted & welcomed	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>a helpful list of ‘bad’ features that have diluted the historical nature of the conservation area and are all capable of being managed differently. For example, concrete highway kerbs which should be replaced by soft verges; concrete roof tiles that dilute local character and distinctiveness and should be constructed from more traditional materials; excessive overhead telegraph and electricity cables; and uPVC windows that should be wood. We welcome the public realm ‘opportunities for enhancement’ including: an audit of public signage, street furniture and overhead supply lines & poles; as well as replacement of concrete kerbs and planting more highway trees. We strongly support the recommendation that Swale Borough Council invokes an Article 4 Direction to bring certain householder alterations which are currently classed as permitted development under planning control – to ensure that any inappropriate alterations are positively managed through the planning process. When there is an application for extensions and alterations and indeed new building applications it should be noted that these more modern materials are damaging and should be resisted or replaced. This protection must include the safeguarding of trees and the preservation of open spaces and aspects. An essential component of any conservation area management strategy is an effective planning enforcement regime to prioritise heritage conservation. Swale Council must be more robust in taking enforcement action against unauthorised alterations to buildings, particularly where listed building consent has not been obtained. We would request that the above mitigations of risk status, invocation of Article 4 and proactive planning enforcement are implemented – not buried within a worthy report.</p> <p>We support the minor extensions to the current conservation area at A to F. These include taking in the two Victorian cottages in Station Road as they do stand out as unspoilt.</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>However, we would welcome reconsideration of the Victorian terrace from numbers 8 to 40, on the East side of Station Road. It is an attractive range and contains many original features.</p> <p>We agree that the stretch of London Road to the West of the existing CA from Station Road to Lynsted Lane should also be designated as a Conservation Area, although we would argue in favour of extending even further West. There may be fewer listed buildings, but several have been retained with social history explaining their form and changing functions. We note the report states that given its distinctly different character from the existing conservation area and the fact there is a lack of continuity and character, it is not recommended as an extension to the existing CA. We do not entirely agree as some of the buildings in the existing CA such as the former blacksmiths and associated residence relate to the farming activity in the proposed addition. Further, Cellar Hill and Greenstreet already have different economic histories from each other, so we do not believe there is a barrier to adding a third.</p> <p>However, we welcome the report's conclusion that there is a clear case for a more detailed review to consider the designation of a new and separate conservation area for this part of Greenstreet. We particularly agree with section 4.7 which states: "The potential for new development within Cellar Hill and Greenstreet Conservation Area is extremely limited. If proposals for development come forward, they will be considered against local and national planning policies which attach great weight to the conservation of designated heritage assets and their settings. Development affecting the setting of the conservation area is likely to be harmful to its heritage significance. The local planning authority is required to pay special attention to preserving the setting of the conservation area (or the setting of any listed buildings) in any plan making or decision taking". In summary, the report notes the eclectic mix of traditional building styles, forms and</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>vernacular building materials - all of which record the area's history and development. It further notes the historic relationship between the village and the surrounding farmland and orchards. And that visual links to surrounding farmland are an important expression of the farming history of the area. We support the conclusion that Cellar Hill and Greenstreet continues to be an area of special architectural and historic interest - the character and appearance of which should be preserved and enhanced. Cellar Hill and Greenstreet should indeed continue to be a designated Conservation Area of high importance to the Borough of Swale. Once household alterations are brought under control through an Article 4 Direction and planning enforcement is prioritised, we agree that Cellar Hill and Greenstreet should be removed from the Historic England Heritage at Risk Register.</p>		
2	Historic England 1 st Consultation	<p>Thank you for the opportunity to provide comments on the draft appraisal and management plan for the Cellar Hill and Greenstreet Conservation Area. Conservation Areas are designated for their special architectural or historic interest, the character and appearance of which it is desirable to enhance or preserve (Planning (Listed Buildings and Conservation Areas) Act 1990). Under Section 16 of the National Planning Policy Framework (NPPF) they are defined as designated heritage assets and benefit from a presumption in favour of the conservation of their special architectural or historic significance. The designation and management of Conservation Areas is a matter for local determination. However, as the Government's adviser on the historic environment, Historic England is pleased to offer advice in support of local heritage protection, drawing on our national perspective.</p> <p>Historic England Advice Historic England welcomes the Council's production of this document, which should assist the positive management of the local historic environment, whilst ensuring this is integrated with wider planning</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>strategies and policies. We wish to offer the following comments, which in our view would strengthen the draft document and, therefore, we encourage you to address these before the appraised statement is adopted.</p> <p><u>Summary of Special Interest</u> We suggest introducing this paragraph after the ‘Introduction’ to provide clear and immediate information about what is significant about the Conservation Area in terms of history, appearance, character and setting. It would benefit from a succinct format and the use of bullet points for highlighting the key elements which contribute to the special interest of the area. A similar paragraph headed ‘Key Positive Characteristics’ is currently included in the ‘Summary and Conclusions’ section on p. 25.</p> <p><u>The History and Development of Cellar Hill and Greenstreet</u> We recommend introducing this as a separate paragraph preceding the ‘Character Appraisal’, as the latter is informed by and cross-referenced to analysis provided in the former. The historic maps, currently included in Appendix 2, could be located within this section to provide immediate illustration and evidence about the development of the area and be effectively cross-referenced in the narrative.</p> <p><u>Character Appraisal</u> This paragraph opportunely considers the character of the conservation area as a whole, and covers different aspects including spatial analysis, materials and architectural types, shopfronts, public realm, important views and setting. However, you may consider identifying character zones within the Conservation Area. As the character varies across the entirety of the area, this would be useful for providing accurate, distinct descriptions, as well as for managing conservation and change. We suggest also adding an ‘Audit of Heritage Assets’. The draft document has identified designated</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>and non-designated heritage assets which make a positive contribution to the Conservation Area on a relevant map. It would be opportune to provide also a list of non-designated heritage assets and indicate their significance and justification for their inclusion, which would ensure their qualities are fully explained and transparent. It would be also useful to identify buildings that detract from the Conservation Area and describe them in a relevant subparagraph accompanied by an illustrative map. As with positive contributors, the reasons why these buildings are detractors should be clearly identified.</p> <p>With reference to ‘Archaeology’, a map illustrating potentially sensitive areas would help identify where investigation and evaluation would be required to inform planning proposals.</p> <p><u>Management Plan</u> The Management plan is a great opportunity to integrate to the fullest extent Historic England Advice Note 1 (HEAN1): Conservation Area Appraisal, Designation and Management (2019, second edition), which can be viewed online here Conservation Area Appraisal, Designation and Management Historic England. There may be areas of guidance which would add further value to the draft, such as opportunities to address climate change and opportunities for increased community engagement and potential future co-production. We suggest you consider this. It would be beneficial to include weblinks to areas of guidance to enhance the text. In particular, a link to the Local Heritage at Risk register and to detailed design guidance in response to, for example, replacement windows and doors, would be useful.</p> <p><u>Opportunities for Community Engagement</u> It may be of benefit to highlight the positive role a community could have in the future management of the Conservation Area; perhaps for the</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>suggested audit of heritage assets or for setting up Conservation Area Advisory Groups/ Neighbourhood forums.</p> <p><u>Appendix 1 – Proposed Changes to the Boundary of Cellar Hill and Greenstreet Conservation Area</u> We suggest reconsidering extending the Conservation Area’s boundary to include the section of London Road falling between Station Road and Lynsted Lane, which encompasses a cluster of listed buildings of a similar quality to those to the east and within the Conservation Area. In our view, this section could be identified as a separate character zone – following recommendation given in the ‘Character Appraisal’ - within the existing, extended Conservation Area, instead of forming part of a distinct future new designation as suggested in the draft document.</p> <p><u>New Appendix</u> To help with future management of the Conservation Area, we would also encourage the Council to consider the addition of an appendix with a time and role specific action plan for the recommendations set out in the management plan.</p> <p>Recommendation Historic England supports the production of this statement and the associated management plan for the Cellar Hill and Greenstreet Conservation Area. However, we recommend your Council takes the necessary steps to address the points made above to ensure the statement will facilitate sustainable development, as set out in the NPPF. It must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the Appraisal and Management Plan, and which may have adverse effects on the</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		environment. We hope this advice is helpful as you refine the Conservation Area Character Appraisal and Management Plan ahead of adoption. We would be pleased to discuss any of the above points, if helpful		
3	KCC Highways 1 st Consultation	<p>General</p> <ul style="list-style-type: none"> • Our Highways Asset Management and Inspections Team have provided the attached draft version of our Highway Works and Heritage Assets Protocol. They have emphasised that it is only a draft at present, and has yet to be finalised with heritage and conservation officers. However, the Asset Management team are satisfied that it sets out their approach. The following weblink may also be of use: https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/roads-paths-and-transport-policies/road-and-footway-maintenance-guide • The KCC Highway Management Reference Book is not in use as this dates back to when the District Councils operated the Highway Management Units prior to 2005 when the highway functions returned to KCC. <p>Teynham</p> <ul style="list-style-type: none"> • The Parish Council have been pushing quite regularly to get a speed camera installed near the Cellar Hill junction due to their concerns over speeding traffic. However, the survey data collected at that location does not indicate that it would satisfy the criteria for placing a camera site here but the requests to review this are likely to continue. • Planning application 21/502609 for up to 10 houses on land to the east of Lynsted Lane is the subject of an Appeal, and if approved will deliver highway alterations to Lynsted Lane as shown in the attached drawing, 49905/5501/005E. 		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<ul style="list-style-type: none"> • Planning application 18/503697 will shortly be implementing the double yellow lines in Station Road as per drawings H-02 P1 and H-04 P1, and it is expected that the footway crossing point shown on drawing H-03 P1 will be constructed in due course too. • Planning application 16/507689 for the development at Frognal Lane does include highway works to create a loading bay on the A2 opposite Lynsted Lane, as shown in drawings ITL11129-SK012 RB and SK024. The works to the A2 shown on SK012 RB between Station Road and Cellar Hill are only indicative and were actually captured by S106 financial contribution instead, which will be put towards subsidising the scheme recently completed by KCC in this location. • I have also included a document (Teynham Concerns) that has been prepared by the Parish Council as part of a consultation with residents, which lists a number of actions and works they would like to promote. 		
4	Local resident – 1 st Consultation	<p>1.0 INTRODUCTION.</p> <p>1.1. Cellar Hill and Greenstreet Conservation Area.</p> <p>It was fortunate that the CA was on the Historic England Heritage at Risk Register, in that it presumably allowed the CA to benefit from an early appraisal. I agree that, if the proposed Management Strategy of this appraisal is approved, the CA should be removed from the At-Risk list.</p> <p>2.0 CHARACTER APPRAISAL.</p> <p>2.1 History and development of Cellar Hill and Greenstreet.</p> <p>The third paragraph is misleading. There are Roman remains at Bax Farm, but this is one of a series of sites of Roman farmsteads, or villas, in the area. These were deliberately placed at a distance from the road. There are, however, numerous road-side Roman remains in the locality, including</p>	Noted & welcomed	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>those at, Syndale, Ospringe, Radfield and now the important discovery of a mausoleum, statue and burial site in 2023 in Teynham parish itself. The last two sites are closer to Greenstreet than that at Bax Farm.</p> <p>2.10. Para 2. Trees also have a valuable role in shading buildings and thus reducing temperature gradients and the need for heating in winter and air conditioning in summer.</p> <p>Trees also provide colour contrasts when in leaf and soften the edges and outlines of the architecture close-by.</p> <p>2.11. Para 3. Surfaces are extremely important contributors to local character s and the sense of place. This component should be emphasised.</p> <p>3.0 SUMMARY AND CONCLUSIONS.</p> <p>Key Negative characteristics. I suggest adding:</p> <p>The night scene, especially in Cellar Hill, is not helped by the use of lamp standards that spill a yellow intrusive glare. Replacement of the fittings with more direct, contained illumination would be a step forward.</p> <p>4.GREENSTREET AND CELLAR HILL CONSERVATION AREA MANAGEMENT STRATEGY.</p> <p>4.3 Unauthorised alterations. The point about the need for diligent monitoring and effective enforcement is well made. The loss of the main body of the early 19th century house at No 8, together with important Regency contents (fireplaces, stairways etc.) leaving only the front elevation, was a significant loss the Conservation Area. Another tragedy was the sweeping away of ‘Sunnybank’, No 34 Cellar Hill, a rare 1930s modular bungalow. This included the loss of a characterful, ‘cottagey’, garden and burr-brick garden wall. It is important that enforcement management is effective enough to prevent these erosions of Conservation Area character from happening in the future.</p> <p>APPENDIX I Proposed changes to the boundary.</p> <p>I support the proposed extensions A to F.</p>		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>Penultimate para: I regret that the Victorian terrace as a whole, numbers 8 to 40, on the east side of Station Road, is not proposed for inclusion. It is an attractive range and contains many original features.</p> <p>Last para. Contrary to the proposal stated, I would support the idea of including the stretch of London Road between Station Road and Lynsted Lane in the Cellar Hill and Greenstreet Conservation Area. This is on the grounds that some of the buildings in the existing conservation area (former blacksmith's and blacksmith's residence) relate to the farming activity in the proposed addition. Also, Cellar Hill and Greenstreet have different economic histories from each other, so surely there is no barrier to adding a third.</p> <p><u>GENERAL CONCLUSIONS.</u></p> <p>By and large I feel that the Peter Bell Historic Buildings Consultancy has done a very sound job in describing the structure and components of the existing Conservation Area. The selection of pictures and maps fit very well with a clear and concise narrative, and its vision for the future shows a firm and appropriate way forward.</p> <p>With the exception of the proposal not to extend the Area westward to Lynsted Lane and not to include numbers 8 to 40 Station Road, I am happy to support the adoption of this appraisal.</p>		
5	Local Resident 1 st Consultation	<p>In summary, I welcome this important, balanced document and its clarity.</p> <p><u>Looking to the future.</u></p> <p>I fully understand and applaud the minor extensions to the current CA - taking in the two Victorian cottages in Station Road also seems sensible as they do stand out as unspoilt. I do wonder whether a third <u>potential</u> CA, based on industrial village character might be argued for TPC in Barrow Green. I accept this is not a discussion for now but I raise it for your</p>	Noted & welcomed.	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>thoughts and those of the Parish Council and Ward Councillors (and residents of Borough Green if anyone else wishes to champion the idea)? This may be a non-starter.</p> <p>The logic of creating a NEW CA from Station Road to Lynsted Lane should be applauded <u>in principle</u>. Although, if this is put out to consultation, I would argue more strongly in favour of extending further west to include the string of Victorian terraces that have their roots in commercial use (The Co-op used several) and residences for industrial workers (brickmakers and concrete production). There are fewer listed buildings but several buildings that have been retained with social history explaining their form and changing functions. The CA should include the Lynsted Lane homes set back from London Road. This is a distinct community in its development and function. I recognise the irony of that given the recent planning pressure that has resulted in 'back-filling' in conflict with wider principles defined in the Lynsted Parish Design Statement that argues for one-building deep! If SBC does choose to explore this option, no doubt the result would be picked up later in a consultation [ref p35].</p> <p>The document lays out very clearly the technical aspects of legal, policy and planning documents including the Lynsted with Kingsdown Parish Design Statement.</p> <p><u>Working through the document, as presented.</u></p> <p>1) The document very clearly and helpfully states the purpose of CAs and the flexibility that takes us away from just "pretty" buildings to reflect the origins and purpose of the communities, buildings and spatial characteristics (including the hinterland). For us, the 'touchstones' are architectural, spatial, and reflections on rural and commercial evolution. This is well represented in the document.</p> <p>2) Important CA principle of acting only to moving the CA out of its "Heritage at Risk Register" by enhancements and/or SBC Heritage</p>		

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(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>policies. That phrase should be repeated if/when any development is proposed both in the body of the CA and in the hinterland of the CS. In short, Cellar Hill is a community that is characterised by its relationship with agricultural backdrop in which it evolved. This argues against developing behind the CA buildings. Hopefully, SBC will recognise this important principle in avoiding proposed developments behind the Dover Castle – destroying an traditional orchard into the bargain!</p> <p>3) I welcome the importance attached to the democratically founded "Village Design Statement". Ours is a Parish Design Statement that adhered strictly to Planning Policy and the function of VDSs. Especially important to protection of buildings, spatial characteristic/hinterland. Lyn Valley has a "Sensitive Edge" designation in the Parish Design Statement of long and venerable standing! [p5/7] The importance of the Lyn Valley is stressed on p10 as a characteristic of the lower North Downs. The principles of the VDS/PDS also apply to buildings south of London Road.</p> <p>4) <u>Elaboration/correction is needed in this Review regarding the 'lack of proximity' of Roman remains.</u> Clearly, the old road had a community function that brings into question assumptions that "Roman" remains are mostly set back from the old road.</p> <p><i>Page 8, penultimate paragraph.</i> Perhaps elaborate along the lines. "The importance of the Roman road has been reinforced by the recent discovery of a walled Roman mausoleum alongside villas that have so far been discovered at Bax Farm and at the south end of Dully Lane. These significant sites suggest that there may have been a larger local Roman community within the footprint of Greenstreet today. Iron Age remains at Radfield also argue for a much stronger statement of archaeological preservation in this Conservation Area."</p> <p>5) Your Review makes an important point drawing attention to the fact that the M2 no longer protects Greenstreet against a heavy burden of modern-day traffic through Greenstreet. [top of p9]</p>		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>6) Very clear explanation of “Urban grain and spatial character” [p10] – this concept is very significant in making the case for protection against encroaching urban sprawl south of the A2! It equally establishes that Cas are not only about pretty chocolate-box buildings but a much wider idea of community evolution.</p> <p>7) I am not sure on whether it is worth making reference in p12 to the prior land-use opposite the Dover Castle both as wheelwrights, workshops, carpenters serving the local community and carriage traffic? This explains the ‘bracketing’ of modern homes by older homes. <u>[last para, p10 – e.g. “...the modern group at 51-59 that was once the site of wheelwrights, workshops and carpenters serving local communities and the coaching route.”]</u></p> <p>8) The statements made in “2.6 Setting” reflect the importance of spatial considerations in planning, <i>especially when a Conservation Area is implicated</i>. This wording is a very helpful clarification. I welcome the paragraph drawing on the Lynsted Parish Design Statement and the importance of preserving traditional orchards is a helpful statement as a bulwark against development behind the Dover Castle. [p19, last paragraph]</p> <p>Note: As many material arguments here and elsewhere in the CA document draw on the Parish Design Statement (PDS) and its language, this shows how durable and enduring the PDS is for guiding development.</p> <p>9) Linear development (one building deep) in the Parish is emphasised as important features to retain and protect – this is key to the PDS.</p> <p>10) Significant views. Follow the yellow arrows in the map and there is a strong argument against any development infilling between Lynsted Lane and Cellar Hill. If the Lynsted Lane development ever goes to 50-homes (as is the developer’s clear intent), those will occupy higher ground in full view of Cellar Hill. Again, the 50 homes behind Dover Castle will compete with the importance of the CA and its spatial setting.</p>		

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(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>11) Work to do: A useful list of ‘bad’ features that have diluted the historical nature of the CA are all able to be managed differently – e.g. concrete kerbs (should be more ‘soft verges’) and tiles (should be more traditional materials), uPVC windows (should be wooden), etc. Useful reminder when application for extensions, alterations and new building applications that these are damaging and should be resisted/replaced at every opportunity. This leads naturally into Section 4.</p> <p>12) Section 4: Welcome as really important for future engagement if the “At Risk” status is to be managed/improved. Sets out the protections in the Local Plan and SBC policies. Especially “safeguarding” trees and spaces/aspects. This restatement is worth celebrating. I think this clarity can be celebrated as important guidance to the Parish Council and SBC as they each adopt their positions on planning, use of materials, removal of visual clutter, etc.</p> <p>13) Unauthorised alterations. Such as the one on the corner of Station Road, should <u>never</u> have been permitted – I would argue for its restoration – but that horse has bolted. [para 4.3, p28]</p> <p>14) Appendix 2. The collection of maps are superb reminders of just why Lynsted looks like it does today. The heritage feature of a strong relationships between built environment, commercial evolution and the primary use of land reinforces the importance of retaining agriculture on this most versatile land. Historically, agricultural land was too important to allow large or complex developments away from the main thoroughfares. A couple of buildings are new to me and I thought I knew the maps for our bailiwick. Respect!</p>		
6	Local Resident-1 st Consultation	I have read the conservation area character appraisal in detail and with great interest and wish to commend Peter Bell on the production of such an excellent report.	Noted and welcomed.	No change to the assessment document needed.

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		<p>I am in complete agreement with all the proposals made in the report, in particular the boundary alterations D, E and C.</p> <p>I've found the information in the report very useful, particularly relating to property alterations and preservation of trees.</p> <p>In summary no further comments apart from thanks and my support for the proposal to update the boundary changes and removal of overhead power cables.</p>		
7	Local Resident – 1 st Consultation	<p>I am writing in support of the views and comments made by the Lynsted and Kingsdown Pariah Council in reference to the above.</p> <p>I would also like to thank Swale and their Senior Conservation & Design Officer Jhilmil Kishore and consultant Peter Bell for their comprehensive report.</p> <p>It is very important that we work to protect the fabric and history of these areas.</p>	Noted and welcomed.	No change to the assessment document needed.
8	Local Resident – 1 st Consultation	<p>I would like to congratulate the Authors of this report on the quality of this 2023 review.</p> <p>It is important that they have incorporated reference to The Lynsted Parish Design Statement into their review.</p> <p>The terms of this Conservation Area document have been instrumental in rejecting or moderating some planning applications but unfortunately the Planning Department and Enforcement have not been strong enough. There has been building, re-building and alterations to existing structures which should have been stopped or modified by the Planning Department.</p>	Noted and welcomed.	No change to the assessment document needed.

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(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>The most recent and outrageous is the almost complete rebuilding of 65/67 London Road, ME9 9QW. There has been no planning Application submitted and although this was brought to their attention, Swale Planning has taken no action. I am sure that more examples have been mentioned in other responses.</p> <p>I would support the idea of extending this Conservation Area to include some Victorian properties in Station Road and including London Road from Station Road to Lynsted Lane.</p>		
9	Local Resident – 1 st Consultation	<p>I fully endorse and support the views of Lynsted with Kingsdown Parish Council on this comprehensive report and support the recommended extensions to the current Conservation area.</p> <p>The report highlights the gaps between buildings on Cellar Hill and the contribution they make to the setting of listed buildings. These gaps and views of old orchards between buildings are an important part of the character of the area and should be protected. I am particularly pleased to see the points about the need for diligent monitoring and effective enforcement as the area has seen considerable change in the past few years. The loss of the main body and internal Regency features at No 8 London Road was significant as was the demolition of ‘Sunnybank’ in Cellar Hill together with its cottage garden and burr-brick garden walls. Changes to the shop at the top of Station Road would also seem to have been made without appropriate permission.</p> <p>I strongly support the recommendation that SBC invokes an Article 4 Direction to bring certain householder alterations, which are currently classed as permitted development, under planning control. This could help to ensure any appropriate alterations are positively managed and prevent</p>	Noted and welcomed.	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>further damage to the Conservation Area. I do wonder if all residents are fully aware of the restrictions that apply to changes that can be made in a CA. Perhaps SBC could do more to inform residents.</p> <p>Thank you for the opportunity to comment on the protection of this valuable historical area.</p>		
10	Lynsted with Kingsdown Parish Council-2 nd Consultation	<p>Firstly, Lynsted with Kingsdown Parish Council would like to thank Heritage Officer Jhilmil Kishore and consultant Peter Bell for their comprehensive report, following proactive engagement with the local community. The document sets out the purpose of conservation areas as being reflective of the origins and purpose of communities and their spatial characteristics (including the hinterland) and not just the preservation of historically important buildings.</p> <p>We particularly welcome the importance attached to the Lynsted Parish Design Statement which has been adopted as Supplementary Planning Guidance by Swale Borough Council. This designates the Lyn Valley as a ‘sensitive edge’ and a significant characteristic of the lower North Downs. As many material arguments within the document draw on the Lynsted Design Statement and its language, this demonstrates its durability in guiding development. Linear development (one building deep) in the Parish is emphasised as a defining feature to retain and protect. We are pleased to note that the report highlights the recent planning appeal decision where the Government inspector describes the importance of the gaps between the buildings on Cellar Hill and the valuable contribution they make to the setting of the listed buildings, stating that: “as a surviving parcel of undeveloped land, the site does serve as a reminder of an important aspect of the historic settlement pattern, in terms of the wider and more irregular spacing of the buildings, with productive land</p>	Noted and welcomed.	No change to the assessment document needed

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		<p>surrounding them on one or more sides, and extending up to the lane itself”. These gaps between buildings and the views of the countryside, including inter alia glimpses of traditional orchard trees, are important to the character of the conservation area and should be protected. We particularly welcome the importance attached to the ‘significant views’ outlined in section 2.7. The statements made in section 2.6 also reflect the importance of spatial considerations in planning, especially when a conservation area is implicated.</p> <p>2 In terms of work to be done to mitigate the risk status there is a helpful list of ‘bad’ features that have diluted the historical nature of the conservation area and are all capable of being managed differently. For example, concrete highway kerbs which should be replaced by soft verges; concrete roof tiles that dilute local character and distinctiveness and should be constructed from more traditional materials; excessive overhead telegraph and electricity cables; and uPVC windows that should be wood. We welcome the public realm ‘opportunities for enhancement’ including: an audit of public signage, street furniture and overhead supply lines & poles; as well as replacement of concrete kerbs and planting more highway trees.</p> <p>We strongly support the recommendation that Swale Borough Council invokes an Article 4 Direction to bring certain householder alterations which are currently classed as permitted development under planning control – to ensure that any inappropriate alterations are positively managed through the planning process. When there is an application for extensions and alterations and indeed new building applications it should be noted that these more modern materials are damaging and should be resisted or replaced. This protection must include the safeguarding of trees and the preservation of open spaces and aspects. An essential component of any conservation area management strategy is an effective planning</p>		

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		<p>enforcement regime to prioritise heritage conservation. Swale Council must be more robust in taking enforcement action against unauthorised alterations to buildings, particularly where listed building consent has not been obtained. We would request that the above mitigations of risk status, invocation of Article 4 and proactive planning enforcement are implemented – not buried within a worthy report. We support the minor extensions to the current conservation area at A to F.</p> <p>These include taking in the two Victorian cottages in Station Road as they do stand out as unspoilt. We note that consideration was given to extending the CA to include the terraced housing on the east side of Station Road. We would have preferred to see the inclusion of the Victorian terrace as a whole – numbers 8 to 40 – being an attractive range containing many original features.</p> <p>We particularly welcome the addition of Proposed Boundary G, the area to the west of the current CA. We note that the first iteration of this report recommended a more detailed review to consider the designation of a new and separate conservation area for this part of Greenstreet. It stated that, given its different character from the existing conservation area and the fact there is a lack of continuity, it was not recommended as an extension to the existing CA. We did not agree with this view and argued at the time that some of the buildings in the existing CA such as the former blacksmiths and associated residence relate to the farming activity in the proposed addition. We note that Historic England also recommended an extension of the current CA. We therefore fully support the westwards extension to embrace the former Fox public house on the north side. 3 On the south side, it is not entirely clear from the map where the boundary would be, and we would suggest a textual reference for the avoidance of doubt. It would appear to be number 188 London Road. We consider that the inclusion of the Victorian terraced homes to number 194 is an essential</p>	<p>Please see officer’s note at the end of this consultation table. Also included at 3.3 in the P&R report.</p>	

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		<p>part of the story that unfolds along the length of Greenstreet. We therefore consider that the end-of-terrace at number 196 is a logical place for the red line.</p> <p>Arguably, the westernmost extent of Greenstreet should be number 226. Number 222 is dated 1905, completing the archaeological narrative in the same era as the continuous Victorian terraces.</p> <p>This area is in need of protection against further loss of features that link the community to its history. Over recent years there have been regrettable changes to traditional shop fronts and the installation of illuminated bus shelters, advertising hoardings, illuminated shop signs and intrusive street lighting. We particularly agree with section 4.7 which states: “The potential for new development within Cellar Hill and Greenstreet Conservation Area is extremely limited. If proposals for development come forward, they will be considered against local and national planning policies which attach great weight to the conservation of designated heritage assets and their settings. Development affecting the setting of the conservation area is likely to be harmful to its heritage significance. The local planning authority is required to pay special attention to preserving the setting of the conservation area (or the setting of any listed buildings) in any plan making or decision taking”. The report notes the eclectic mix of traditional building styles, forms and vernacular building materials - all of which record the area’s history and development. It further notes the historic relationship between the village and the surrounding farmland and orchards. And that visual links to surrounding farmland are an important expression of the farming history of the area. We note that the report applies the term ‘village’ to Greenstreet.</p> <p>Nineteenth century directories and gazetteers refer to Greenstreet as a ‘hamlet’ which reflects its historical significance and identity both as a</p>		

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(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>service-centre that evolved out of feudal agricultural economies and as a longestablished coaching stop. The use of the term ‘hamlet’ usefully distinguishes Greenstreet from the villages of Teynham and Lynsted. It is important that we celebrate the original hamlet and its relationship with agriculture that determined its linear development, in particular preserving the line of sight into agricultural land on the southern flank of Greenstreet as well as in Cellar Hill and Lynsted Lane.</p> <p>The Lynsted Parish Design Statement also refers to Greenstreet as a hamlet and we would like to see this reference included in the Character Appraisal to embody this historic community. We would also recommend the inclusion of an appendix with a timed action plan, confirming role responsibility to implement the recommendations set out in the management strategy.</p> <p>Finally, there are a number of inaccuracies in the report where the labelling of buildings is incorrect. We are aware that residents have already drawn your attention to these, and we will not therefore repeat them here – but would ask that they are corrected. Further, on page 3, Cllr Baldock is not the cabinet member for planning as SBC no longer operates a cabinet structure.</p> <p>4 We support the conclusion that Cellar Hill and Greenstreet continues to be an area of special architectural and historic interest - the character and appearance of which should be preserved and enhanced. It should indeed continue to be a designated Conservation Area of high importance to the Borough of Swale. We agree that Cellar Hill and Greenstreet should be removed from the Historic England Heritage at Risk Register, although we would emphasise again the importance of household alterations being brought under control through an Article 4 Direction and planning enforcement being prioritised.</p>		<p>Inaccuracies within the document to be</p>

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
				corrected as outlined.
11	Teynham Parish Council- 2 nd Consultation	<p>Teynham Parish Council thanks the Conservation Team for their thorough and insightful review of the Cellar Hill and Greenstreet conservation area.</p> <p>We offer the following feedback:</p> <p>Overview — The parish council supports the general themes raised in the review of the Cellar Hill/Greenstreet. This work helps to protect and preserve the unique heritage of this area.</p> <p>Extension of the conservation area — Teynham PC supports the proposed extension of the conservation area along London Road to Frognal Lane.</p> <p>This section has notable historic and architectural value that complements the current conservation area. Expanding the boundary will ensure that the local area is managed and protected from unsympathetic developments. It will further safeguard the continuity of the area’s historic identity.</p> <p>Benefits of Living/Working in a Conservation Area — It would be helpful to explain the benefits of living in a conservation area from a residents/business owner’s point of view.</p> <p>For example: Living in a conservation area provides residents with the unique advantage of preserving the historical and aesthetic integrity of their neighbourhood. This protection often increases property values due to the area’s maintained character. The controlled development helps prevent unsympathetic changes, ensuring the neighbourhood retains its charm and architectural significance. These regulations foster a strong</p>	Noted and welcomed.	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>community identity, create a visually appealing environment which contributes to the area's long-term appeal and cultural significance.</p> <p>Responsibility when living/working in a conservation area — It appears that the review does not provide a concise summary of what it means to live in a conservation area or clear steps for residents to follow.</p> <p>Clarity required for residents and business owners on practical impact of extended conservation area eg what type of double glazing is acceptable.</p> <p>A suggestion would be: Residents/Business owners in a conservation area enjoy the benefits of preserving the historical and architectural character of their neighbourhood. However, this comes with responsibilities. Any changes to buildings, trees, or boundaries often require special permissions. Residents should consult the local authority before making alterations to ensure the changes align with conservation regulations, helping maintain the area's unique heritage.</p> <p>Enforcement — The review highlighted that some alterations to buildings were made without planning permission, which has affected the area's character. Effective enforcement is critical, and prioritising enforcement actions, particularly related to heritage, is emphasised. In addition communication with updates linked to the enforcement is also important. Enforcement should be applied consistently to all properties in the proposed extended conservation area.</p> <p>We support the proposal to implement Article 4 to control changes such as window replacements, roof changes, or boundary alterations, ensuring they align with the area's character .</p>	<p>Noted and welcomed.</p>	<p>A note to similar effect to be added to the review document as an appendix.</p>

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>Historic England’s High Streets Heritage Action Zones — Consideration should be given to Historic England’s High Streets Heritage Action Zones (HSHAZ) initiative and the sources of external funding. The scheme aims to revitalise historic high streets by improving the design of shop fronts and addressing the impact of poorly executed adaptations.</p> <p>Historic England’s project focuses on improving high street shop fronts that have been poorly adapted or designed over time. The goal is to enhance the aesthetic and historical value of these commercial buildings. This involves reviewing and refreshing shop fronts to ensure they are both visually appealing and in keeping with the historical character of the high street. The project aims to address issues such as unsightly alterations and design mismatches, promoting a more cohesive and attractive high street environment. This could be a significant opportunity for Teynham, Lynsted and Swale as a whole.</p> <p>Communication — Has this consultation been sent to all the property owners in the proposed extension area? One resident indicated that they had not received any communication directly to their address on London Road.</p> <p>Funding — A local resident enquired if there would be any sources of funding available to help support improvements in the extended conservation area.</p> <p>Queen Victoria's Diamond Jubilee Commemorative Pump — The correct name for the pump is “Queen Victoria's Diamond Jubilee Commemorative Pump”. Built at the turn of the 20th Century it was rebuilt in 2008 and again in 2016 after demolitions due to car accidents. The weathervane was extended in 2016 to acknowledge the Diamond Jubilee of Queen Eliabeth II.</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>Greenstreet — If the conservation area is extended, would it be appropriate to create two separate conservation areas?</p> <p>Street furniture — Consideration should be given to the poor-quality street furniture Eg railings, lamp and sign posts and bus shelters. Small changes can create significant positive impacts.</p> <p>Request for update on former barbers — On a related topic, could the Conservation Team please provide an update to the former barber’s shop (on the junction of Station Road and London Road, Teynham). We are very concerned about the impact of the conversion of this property in the conservation area and former shop front.</p>	Enforcement Matter.	
12	Local Resident – 2 nd Consultation	<p>The Cellar Hill and Greenstreet Conservation Area Character Appraisal 2024, is a well considered, comprehensive document, both in its present form, and also when the proposed extension is incorporated. I am generally in agreement with the existing area and the proposed extension, but the document also concerns itself with the management of the area, and I do have some concerns in this respect.</p> <p>As part of the document, you show an old photograph of 65/67 London Road when the building was trading as a garage, and another recent photo shows the building trading as a barbershop. The passage of time has seen the loss of the wonderful old signage, and a change of use, but it is still recognisable as the same building. You also show another photograph of the building undergoing alterations, and although the Victorian shop frontage has already gone, the white rendering has not yet been applied. The hairdresser who was the tenant, was told that they would have to temporarily move out whilst alterations were carried out, but clearly this did not happen.</p>	Noted and welcomed.	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>My point in highlighting this episode, is that when the developer applied for planning permission, no mention was made about converting the shop into a flat, and I believe he applied after the work was completed. This building was part of the conservation area, and the Victorian shop front and the Victorian brickwork have now completely gone. What is the point of a planning process in a conservation area, if the developer is allowed to get away with this? A slap on the wrist and a small fine is an insufficient penalty for such a flagrant disregard of the regulations, and he should be made to restore the building to its former state, or at least incur a heavy financial penalty. Only by doing this will any future developer be deterred from doing the same, to the detriment of our heritage.</p>		
13	Local Resident – 2 nd Consultation	<p>I welcome the Cellar Hill and Greenstreet Conservation Area Character Appraisal and Management Strategy. I have no doubt that the Conservation area defined in 2002 has resulted in the protection of this historic part of Greenstreet and Cellar Hill. Not only has the introduction of this conservation area resulted in development or alterations to properties being in keeping/complementary to the areas heritage, in addition I believe it has educated and encouraged those in the wider area to understanding the importance of protecting our built heritage and how each property fits in.</p> <p>I particularly welcome the recommendation to extend the Conservation Area along Greenstreet to include more historic buildings and buildings that make a positive contribution. However, it is a shame that the entire row of Victorian terraced houses on the south side of London Road are not included. The majority of these properties that housed brickmakers, agricultural workers and artisans, have survived with few changes to</p>	Noted and welcomed.	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>features. This block, as a whole forms a direct link with the evolution of the hamlet of Greenstreet.</p> <p>The section of Greenstreet identified for inclusion in an extended Conservation Area is possibly the area most in need of protection against further loss of features that link the community to its history. In the 26 years Greenstreet has witnessed the gradual changes of traditional shop fronts and installation of illuminated bus shelters, advertising hoarding, intrusive illuminated shop signs and uncomplimentary and intrusive street lighting.</p> <p>The Lynsted Design Statement’s Community Action Plan (Annex 2) under “The Community with Lynsted Parish Council and Swale Borough Council” states:</p> <ul style="list-style-type: none"> · Swale Borough Council to be encouraged to develop policies for Areas of Special Control of Advertisements (ASCAs) with a general presumption against advertising and a complete ban on advertising hoardings, balloon advertising and certain illuminated advertisements in the Parish of Lynsted. <p>I am conscious that suggestions for the extension to the Conservation Area reflect the views expressed by Parishioners of Lynsted as a result of an opinion survey and in discussions at public awareness raising events and workshops. I also welcome the recognition of the importance of the “key views” from the south side of Greenstreet that emphasises the established historic linear development pattern of that part of the Parish. This feature, in particular, proved to be of high importance to the residents of the parish of Lynsted with Kingsdown during the consultations leading to the Lynsted Parish Design Statement in 2001/2.</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>Both the 2008 “Greening of Greenstreet” joint project between Lynsted and Teynham Parish Councils, and the Lynsted Parish Design Statement highlighted the view that there was an appetite for better recognition for “Greenstreet”.</p> <p>The Lynsted Design Statement’s Community Action Plan (Annex 2) under “The Community with Lynsted Parish Council and Swale Borough Council” states:</p> <ul style="list-style-type: none"> · The Parish Council in conjunction with others should pursue the development and adoption of an attractive and distinct Parish Gateway sign employing natural materials for road and path signs. <p>With regards to the loss of the “Greenstreet” identity, foisted upon us by the Post Office, who were responsible for the loss of “Greenstreet” and “Lynsted” on the south side of London Road, I believe that this historic hamlet (not village) with its rich history should most definitely be recognised again at its gateways. The hamlet of Greenstreet has been whitewashed out. As has the populace of Lynsted who live on the south side of London Road.</p> <p>Although probably not relevant to this consultation, I should spotlight the importance of the hamlet of “Greenstreet”. Not surprisingly the highest concentration of the populace of Lynsted was in the hub of Greenstreet. Each poppy of the map below, represents a casualty of the First World War:</p> <p>Of 40 casualties indicated on this map, the majority have no known graves. They remain in the land or sea where they fell. When searching the names of the casualties by name on the Commonwealth War Graves Commission</p>	<p>Noted welcomed</p> <p>and</p>	<p>Map to be included in the Appraisal document</p>

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>web site, they are listed as living in “Greenstreet”. We should not let the place from whence they came to just disappear without a trace as they did. Their loss changed the landscape of Greenstreet.</p>		
14	Local Resident-2 nd Consultation	<p>I fully endorse the overarching principle that the linear pattern of Greenstreet’s development provides a valuable ‘document’ that traces the transition of this part of Swale through Roman occupation, feudal agricultural society, Victorian and modern periods.</p> <p>Section 2.4 usefully explains the linear built environment of this hamlet as a valuable visual record of how the dominance of rich agricultural land has been instrumental in forming the shape and relationship of buildings occupied by workers, businesses, travellers, and landed gentry.</p> <p>The Greenstreet community supported agriculture without competing with it. It was the engine for growth and evolution of agriculture/estates between Sittingbourne and Faversham and beyond, north and south. This is reflected in the built and social characteristics that define “Greenstreet”.</p> <p>As the principle historic settlement for many centuries, the identity of the hamlet of Greenstreet originally included the spurs north in what is today Station Road but was once Teynham Lane leading to the village to the north. On the southern flank of Greenstreet hamlet, the proposed changes include the ‘spurs’ of Lynsted Lane – this is very much welcomed as part of the evolving story of Greenstreet. Each spur adds to the story – reflecting the growth of the ‘middle order’ (for larger homes) under early agricultural economies and the evolving commercial and industrial influences.</p> <p>The key relationship between buildings and valuable productive agricultural land was also retained along these spurs. It is important to the</p>	Noted and welcomed.	No change to the assessment document needed.

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>archaeological and social history encapsulated by the hamlet of Greenstreet, that the pattern of development is not eroded any further.</p> <p>Drafting comments</p> <p>2.1 The history and development of Cellar Hill and Greenstreet.</p> <p>Bob Baxter’s submission/comments on the greater significance of this LOCATION in Roman times is helpful. The location may also have reflected the proximity of Conyer Creek for transit and commerce.</p> <p>Para 4 (p9): That concentration of Roman habitation may also reflect the proximity of Conyer Creek through which goods and produce (fish and oysters) will have passed into/from local communities.</p> <p>Para 4 (p9): perhaps add “...the extensive brick-making and cement industry at Conyer and Teynham.”</p> <p>Para7 (final para of this section): the rural character and its linear relationship derived from the importance of the surrounding valuable and productive land also remains an important feature along the southern edge of Greenstreet hamlet along its length. This led consultees to the Lynsted with Kingsdown Parish Design Statement (2002) to identify that feature of Greenstreet as a “Sensitive Edge” that should be preserved.</p> <p>Community ‘qualifiers’. The CA draft, frequently applies the qualifier “village” to Greenstreet. Written records from the 18th Century into modern times use the more common form of “Greenstreet” alone. This reflected the particular historical significance and identity both as a service-centre that evolved out of feudal agricultural economies and as a long-established</p>	<p>Noted.</p>	<p>Document to be updated to reflect the corrections within text and labels to the images.</p>

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>coaching stop. 19th century Directories and Gazetteers refer to Greenstreet as a “hamlet” both in agricultural and industrial times. The use of the term “hamlet” usefully distinguishes Greenstreet from the villages of Teynham and Lynsted.</p> <p>The identity and historic importance of Greenstreet as a community in its own right has become somewhat confused following the sale of the Honeyball Estate for modern housing behind the northern flank of Greenstreet hamlet. It is important that we celebrate the original hamlet and its relationship with agriculture that determined its linear development. In particular in preserving the line of sight into agricultural land on the southern flank of Greenstreet as well as in Cellar Hill and Lynsted Lane.</p> <p>[Note: On 29th May 1855, the South Eastern Gazette refers, in an auction, to properties “Within five minutes’ walk of the Greenstreet Station of the proposed East Kent Railway.” This further reinforces the distinct community that is today the hamlet of Greenstreet]</p> <p>2.2 Topography, geology and landscape</p> <p>Illustrations</p> <p>Several illustrations are mislabelled. Some attention is needed to ensure the narrative accords with the images. For example,</p> <p>Page 13 Unlabelled, top right, is “Alverley House”</p> <p>The view looking east currently labelled as “1 and 3 London Road” is wrong. That run of homes is “7 to 35”.</p>		

**Appendix I PROPOSED CELLAR HILL & GREENSTREET C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE
(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>[Note: To explain the modern in-filing between these two illustrated buildings, this is the original site of wheelwrights and carriage works as well as market gardening to its rear.]</p> <p>Page 14 The labels are further jumbled.</p> <p>Top left is The Dover Castle. Top right is Old Forge, 4 London Road.</p> <p>Middle right is “8 London Road” (not 18)</p> <p>Bottom left is “The Grange, 18 London Road.”</p> <p>Page 15 “The Walnuts” is an important building at the corner between Cellar Hill and London Road. This mislabelled illustration is actually of The Burrs, 24 Cellar Hill. It may be worth adding an illustration of “The Walnuts” if space allows.</p> <p>Page 16 First row, image 1 is “Tudor Cottage, Cellar Hill”.</p> <p>Second row, image 1 is “Old Thatched Cottage”</p> <p>Page 34, 4.3 Unauthorised alterations</p> <p>The image used is misleading, as the “Barn” is not an example of unauthorised alteration! Far better would be the image from Page 23. The eradication of a very important business premises frontage is an unforgiveable opportunistic ‘change of purpose’ inside the existing Conservation Area but outside formal planning procedures.</p>		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>Page 45 Onwards</p> <p>The proposed extension of the Conservation Area is very welcome as illustrated on this page.</p> <p>The inclusion of the Victorian terraced homes (to No.194) is an essential part of the sweep of the story that unfolds along the length of Greenstreet. Shouldn't the 'end of terrace' at No.196 be the logical place for the red line? To avoid doubt, perhaps there should be a textual reference to 196? Many of those homes were once commercial (including outlying parts of the Co-op Stores).</p> <p>Arguably, the westernmost extent of Greenstreet should take in No.226 London Road. No.222 is dated 1905, completing the archaeological narrative in the same era as the continuous Victorian terraces. Quite why gaps existed, into which more modern homes have been inserted is not obvious. So, that may explain the omission of this run of homes.</p> <p>FURTHER OBSERVATIONS AND IMPLICATIONS FOR FUTURE WORK IN GREENSTREET</p> <p>Completing the picture</p> <p>The identity of "Greenstreet" was originally masked by an administrative declaration by Faversham Post Office in 1911 (not actioned until March 1918) that it wanted to redraw the map to align postal districts with the relatively recent invention of civic parishes (1894). Leading to the renaming of "Greenstreet Post Office" to "Teynham PO", in spite of the reality of the whole of Greenstreet hamlet being distinct from either village of Teynham</p>		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>or Lynsted. Up until then, communities like the Greenstreet hamlet were defined by their form and function.</p> <p>Each spur has its own broadly distinct characteristics, but all contribute to the identity of “Greenstreet”.</p> <ul style="list-style-type: none"> · The south end of Station Road responded to the need for agricultural and industrial workers cottages (brickmaking and cement works to the north of Greenstreet). The frontages have retained many of their original features including iron railings (echoed at the western end of Greenstreet). The open land to the west of Station Road (at that time) was preserved by Newlands House and grounds. <p>Greenstreet identity – a tapestry</p> <p>Greenstreet grew in response to agricultural wealth, declined with the changed patterns of land ownership and the displacement of feudal influences (church and noble), the impact of the Railway, and revived with industrial expansion in and around Teynham and Conyer. The breakup of Newlands estate (1912), followed up by selling Newlands House and Gardens (Col. Honeyball) led to a more urbanising influence, out of scale to Greenstreet.</p> <p>The much more recent decision to fill in the valuable “Green Space” between Station Road and Frogna Lane further erodes the echoes of Greenstreet’s agricultural (and industrial) relationship to the north.</p> <p>However, the essential identity of “Greenstreet” as an entity in its own right has not been lost in its relationship with outlying farmsteads, hamlets, villages, market towns of Sittingbourne and Faversham, and its place on</p>		

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		<p>old coaching routes. Latterly, Directories identified “Greenstreet” as a distinct entity but would add ‘place-markers’ by reference to the parishes of Lynsted and Teynham.</p> <p>Undressing “Greenstreet”.</p> <p>There is a balance to be struck between an historic community being “at risk” and the natural evolution (NOT revolution) of the Greenstreet community. The importance of that evolutionary process is the adherence to fundamental characteristics that define the whole of “Greenstreet”. One building deep, sympathetic restoration and preservation of features as diverse as building material, scale, spatial relationships and agricultural hinterland.</p> <p>Future Options</p> <p>Other areas might benefit by a unifying the identity of Greenstreet. For example,</p> <ul style="list-style-type: none"> · kerbside softening (some has taken place already with planters and isolated trees on Greenstreet Hill). · Hanging planters adjacent to the kerbside; · lower lighting levels and standards (cast iron facsimiles like those on East Street, Sittingbourne), less light pollution; · Colouring road surfaces to reinforce the Greenstreet entity; 		

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(Continued)**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<ul style="list-style-type: none"> · Opening an entrance to the Co-op carpark from the A2 (KCC may object) – exit only to Cherry Gardens; · Reintroduce the Greenstreet hamlet identity on signage at entrances to the community – “Greenstreet historic hamlet” (If that is unpalatable, “Teynham AND Lynsted”, not just “Teynham”); · Remove/manage visual clutter of signage, lamp-posts, bus stops, large illuminated advertising boards, night-time shop lighting. · Boarded-up shops need to be brought back into economic use or more tastefully ‘blanked’. · Use of ‘bays’ (planted up indentations) where pavement widths permit changes along the built-up area. 		
15	<p>Local resident-2nd Consultation</p> <p>Handwritten letter - transcribed in summary form.</p>	<p>We are writing with regards to the above. After reading the new draft Conservation area document in the library, we would like to give our feedback.</p> <p>We would like to agree with the extension of the boundary to the conservation area, even to be extended to the west of Teynham.</p> <p>We are proud to live in Greenstreet, ourselves in a listed building, there was once a shop and a hub for the residents of both Teynham and Lynsted. Also other family members live in Greenstreet.</p> <p>We feel that making sure these areas remain in a conservation area and extended conservation area, will protect the view of the countryside, orchards, houses and the history above and below ground of Teynham and Lynsted will remain safe.</p>	Noted.	No change to the assessment document needed.

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>It will also slow down the development of new buildings, housing estates!! And developers will have to abide by the resources that are given within a conservation area.</p> <p>Greenstreet has not changed for many many decades. Clearly evident from the photos now and then of the shops and houses.</p> <p>The only thing that has changed is the amount of traffic that comes through!!..</p> <p>We would like Teynham and Lynsted to remain as it is for future generations of people who move into the villages and be part of the history of Cellar Hill, Greenstreet and beyond.</p>		
16	Local Resident-2 nd Consultation	<p>The Cellar Hill & Greenstreet Street Conservation Area Review Is a detailed and well researched document. I am in agreement with the proposal to extend the area.</p> <p>Some of the photographs are incorrectly titled or located, for example the photograph of Cellar Hill Barn should not appear in Para 4.3 but belongs in Para 4.4 which deals with important local heritage assets.</p> <p>I support the adoption of the appraisal subject to any identified and suggested alterations.</p>	Noted	No change to the assessment document needed, apart from the inaccuracies to be corrected.
17	Local Resident-2 nd Consultation	<p>I support the extension of the Cellar Hill and Greenstreet Conservation area as there are a number of houses and features worth conserving.</p> <p>In the 'forward' to the document it says 'The aim of conservation area designation is to protect historic places and to assist in positively managing change, so that their special character is safeguarded and sustained.'</p> <p>Unfortunately, Swale Council have completely failed to do this in relation to 65 and 67 London Road, which is on the corner of Station</p>	Noted.	No change to the assessment document needed, apart from the inaccuracies to be corrected

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		<p>Road. Developers have been allowed to destroy the original corner door and shop front and cover over the original yellow brick with a dreadful white render.</p> <p>There seems little point in have a Conservation Area or a review of it, if this extreme change is allowed to happen right under the council's nose.</p> <p>Page 34 of the document says 'An essential component of any conservation area management strategy is an effective planning enforcement strategy which prioritises enforcement action relating to heritage conservation.'</p> <p>Well obviously Swale does not have an 'effective planning enforcement strategy' if they have allowed this to happen! There seems to be no sign, too date, of the council forcing the developers to change this. No.8 London Road was a beautiful Georgian House which has been spoiled by the rebuilding of the original garage and the removal of original railings. This has spoiled a once beautiful house despite many objections. The Co op building which would be in the new extension of the conservation area is currently undergoing renovation. I do hope that the council ensure that the original Art Deco 1920's framing of the frontage is preserved. It appears to me Swale Council writes a lot and says a lot but doesn't actually do anything. A few points to note for whoever put the document together: What appears to be Map 5 is not actually labelled. Maps on page 53 are not labelled. Page 14 a picture of a white house is labelled The Dover Castle when I believe it is No. 8 London Road. Also on the same page there is a picture of The Old Forge which I do not believe it is.</p>		

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		<p>There is also a picture of The Dover Castle, which is labelled Alverley House, 57 London Road.</p> <p>On Page 15 there is a picture of a house labelled The Walnuts, London Road.</p> <p>There is also a picture of a house on P.57 also labelled The Walnuts, London Road.</p> <p>They are two different houses. I am not aware that there are two houses called The Walnuts on London Road.</p>		

Officer's Note:

1. Inaccuracies within the appraisal document.

The officers have taken note of all the inaccuracies and mislabelling or lack of labelling to maps highlighted during the public consultation and shall address appropriately.

Cellar Hill and Greenstreet Conservation Area Character Appraisal and Management Strategy

PUBLIC CONSULTATION DRAFT July 2024



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FOREWORD

“Historic buildings and places add to the quality of people’s lives and help to create a sense of place that we all identify with.

As a community and as a local authority, we have a responsibility to safeguard our historic assets for future generations and to make sure that they are not compromised by unsympathetic alterations or poor-quality developments. Conservation area designation and subsequent management is one way in which this can be achieved.

Conservation areas are not intended to halt progress or to prevent change. Rather, they give the local community and the Borough Council the means to positively manage change and to protect what is special about the area from being harmed or lost altogether.

Swale Borough is fortunate in having such a rich and varied mix of built and natural heritage. The Borough Council wants to see it used positively as a catalyst for sustainable, sensitive regeneration and development, and for creating places where people want to live, work, and make the most of their leisure time. To that end, we have reviewed the Cellar Hill and Greenstreet Conservation Area and the results of that review are set out in this document, which the Borough Council is now seeking constructive feedback on.

This is one of a series of conservation area reviews which the Borough Council is committed to undertaking, following the adoption of the Swale Heritage Strategy 2020 - 2032.”



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

Mike Baldock

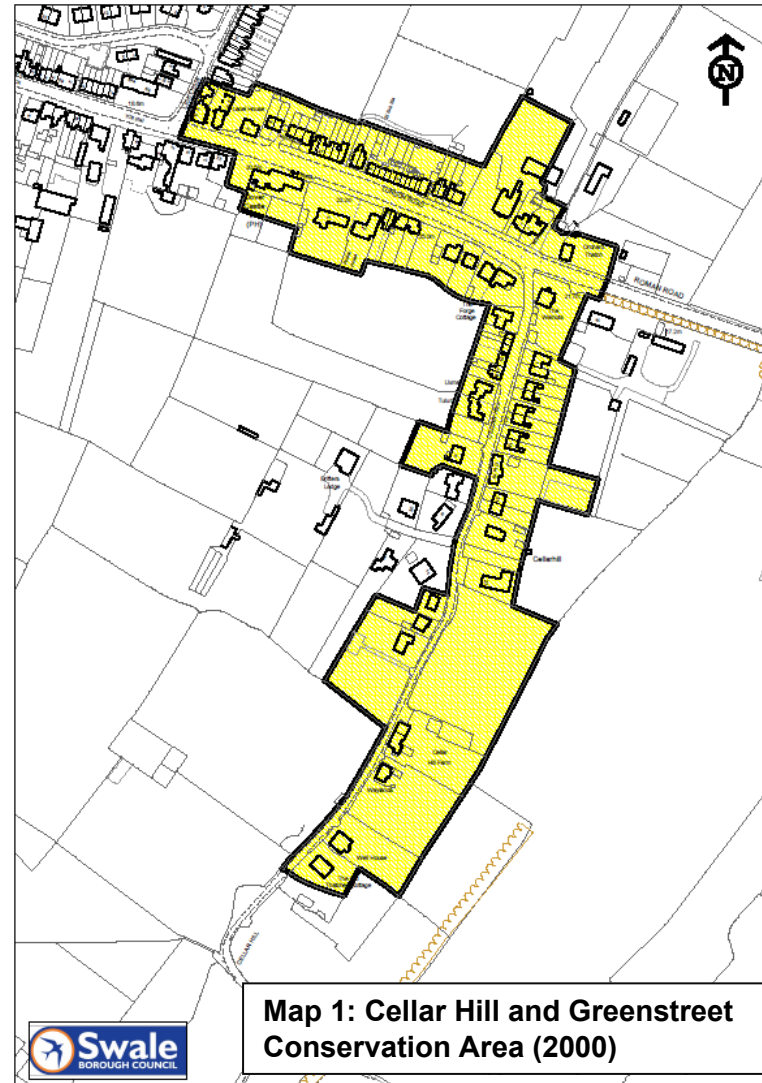
1.0 INTRODUCTION

1.1 Cellar Hill and Greenstreet Conservation Area

Cellar Hill and Greenstreet Conservation Area was originally designated by Swale Borough Council on 22 November 2000. A report to the council's Development Committee included a brief character appraisal describing the area's special architectural and historic character at that time.

Map 1 opposite shows the current extent of the conservation area as it was designated in 2000.

The conservation area was added to the Historic England Heritage at Risk Register in 2013. The register noted its condition as 'poor', its vulnerability as 'low' and its trend as 'deteriorating'. The Management Strategy at section 4 provides the framework for addressing the risks and having the conservation area removed from the Heritage at Risk Register.



1.2 The purpose of conservation areas

Conservation Areas were first introduced in the Civic Amenities Act of 1967. A conservation area is defined as “an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”¹.

It is the responsibility of individual local planning authorities to designate and review conservation areas from time to time using local criteria to determine and assess their special qualities and local distinctiveness².

The origins and development of a place are recorded in its buildings and spaces. In these days of rapid change, it is desirable and in the public interest to conserve the tangible evidence of a location’s history, to serve as a record of the past and to provide a framework for new development and sustainable growth.

The aim of conservation area designation is to protect historic places and to assist in positively managing change, so that their special character is safeguarded and sustained. Areas may be designated for their architecture, historic layout and use of characteristic or local materials, style or landscaping. In practice it is normally a combination of some or all of these special characteristics which merits designation.

Above all, conservation areas should be cohesive areas in which buildings and spaces create unique environments that are of special architectural or historic interest.

Conservation area designation provides extra protection in the following ways:

- Local planning authorities have control over most demolition of buildings.
- Local planning authorities have extra control over householder development.
- All trees in conservation areas are protected.
- When assessing planning applications, the local planning authority is required to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area and its setting.
- Policies in the Local Development Plan and in the National Planning Policy Framework positively encourage development which preserves or enhances the character or appearance of conservation areas.

¹ Section 69 (1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

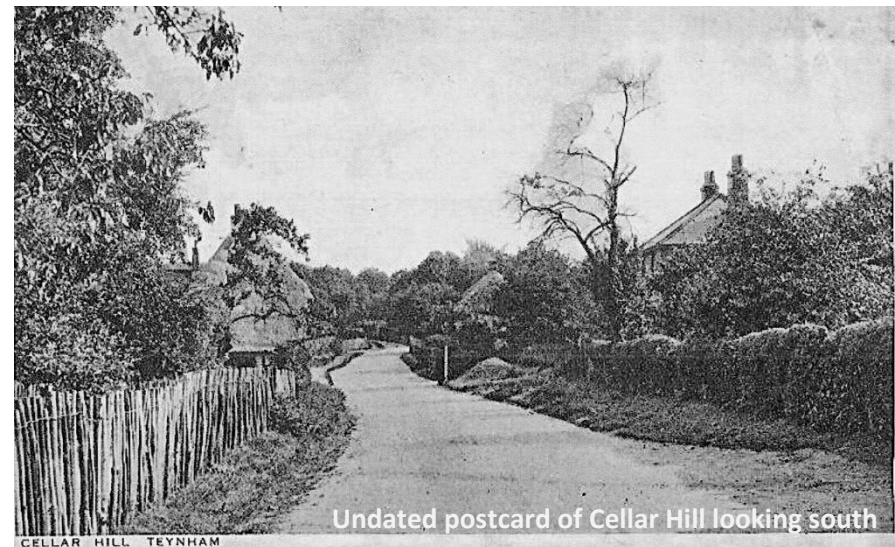
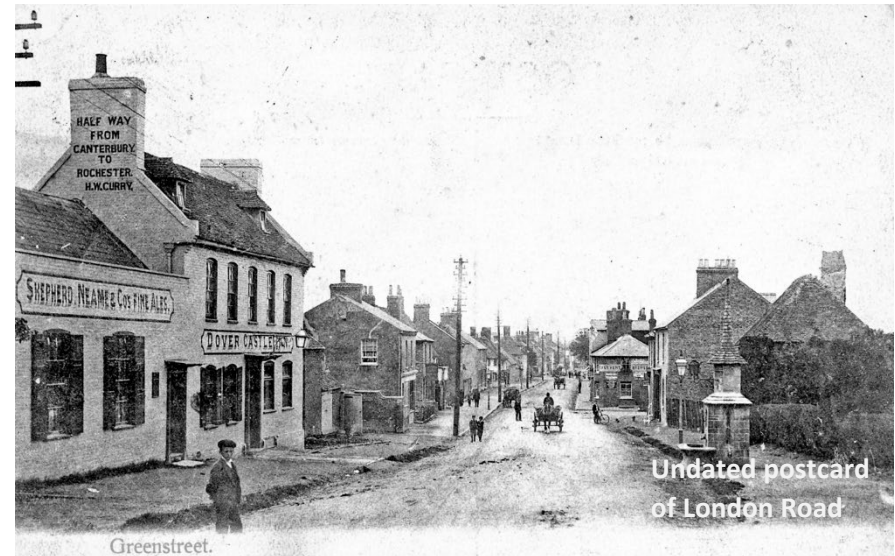
² Section 69 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990

1.3 The purpose and status of this Character Appraisal and Management Strategy

The purpose of this Conservation Area Character Appraisal and Management Strategy is:

- To identify the significance of the heritage asset – i.e. the value that the conservation area has to this and future generations because of its heritage interest – which may be archaeological, architectural, artistic or historic interest.
- To increase public awareness and involvement in the preservation and enhancement of the area.
- To provide a framework for making planning decisions, to guide positive change and regeneration.
- To review the conservation area boundary in accordance with Section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- To highlight particular issues and features which detract from the character or appearance of the conservation area which offer potential for enhancement or improvement through positive change.
- To identify any risks to the conservation area and provide management framework which will see it removed from the Heritage at Risk Register.

A Conservation Area Character Appraisal is an assessment and a record of the special architectural or historic interest which gives rise to the character and appearance of a place. The appraisal is a factual and objective analysis, which seeks to identify the distinctiveness of a place by defining the attributes that contribute to



its special character. It should be noted, however, that the appraisal cannot be all-inclusive, and that the omission of any particular building, feature or space should not be taken to imply that it is not of interest. In some cases, significance may only be fully identified at such time as a feature, a building or site is subject to the more rigorous assessment that an individual planning application necessitates.

An important aspect of this review of Cellar Hill and Greenstreet Conservation Area is to assess whether the area still possesses the special architectural and historic interest which merits its continued designation. It also provides an opportunity to review the effectiveness of the designation over the last 23 years and to consider whether the boundary of the conservation area should be either extended or reduced.

The appraisal includes a management strategy to help the Borough Council and other stakeholders positively manage the conservation area in the future. The management strategy includes positive steps that can be taken to preserve or enhance the conservation area. It identifies potential threats to the character of the area and can, where appropriate, identify buildings at risk or the potential for Article 4 Directions or local heritage listing. The recommendations in the management strategy will be the key to preserving or enhancing the character of Cellar Hill and Greenstreet Conservation Area and to securing its removal from the Historic England Heritage at Risk Register.

An appraisal may serve as the basis for the formulation and evaluation of policies in the Development Plan. It is a material consideration in development management decisions by the local planning authority and by the Planning Inspectorate in determining planning appeals. It can also heighten awareness of the special

character of the place to help inform local Parish Councils in the formulation of Neighbourhood Plans, Village Design Statements and individuals in their design choices.

This Conservation Area Character Appraisal has been compiled in consultation with local organisations, elected representatives and council officials. It is to be the subject of public consultation and is prepared with a view to being formally adopted for development management purposes.

The author would like to thank all those who contributed to the production of this character appraisal, particularly the respective Parish Councils, the Lynsted with Kingsdown Society for permission to reproduce their old photographs, and the KCC Principal Archaeological Officer.



postcard of London Road 1912

2.0 CHARACTER APPRAISAL

2.1 The history and development of Cellar Hill and Greenstreet

Greenstreet is the settlement on London Road extending from Cellar Hill in the east to Claxfield Road in the west, the eastern part of which falls within the conservation area. It takes its name from the Greenstreet family who lived at Claxfield.

The village sits astride the A2 London Road which follows the line of the Roman Watling Street. Historically it formed part of the old Teynham Manor, but today it falls partly in the civil parish of Teynham and partly in the civil parish of Lynsted with Kingsdown. In 1719 Rev. John Harris wrote that "Greenstreet is a considerable village on the London Road, partly in Teynham and partly in Lynsted. A fair was held here for cattle etc. on May 1st annually"³.

The straight alignment of the present-day London Road through Greenstreet clearly owes much to the old Roman Watling Street. The strong linear form of the current-day village might consequently be said to have been strongly influenced by the work of Roman road builders. Despite the proximity of the old Roman road, the nearest discovery of Roman remains was the Roman Villa at Bax Farm some 900m north-west of Greenstreet and very recently the Roman mausoleum to the west of Teynham.

During the 18th and 19th centuries, Greenstreet was strategically placed to provide rest and refreshment for travellers on the London to Dover

³ John Harris, The History of Kent in Five Parts 1719



route. The Dover Castle was one of three coaching inns along this stretch of the road. The settlement grew rapidly during the period with terraced houses filling gaps between the Georgian houses and coaching inns. It became increasingly urbanised, particularly after the railway reached Teynham on 25th January 1858. As well as supporting the surrounding rural settlements, Greenstreet provided housing, services and shops for the extensive brick-making industry at Conyer and Teynham.

The M2 provided relief to traffic on London Road when it opened in 1965 but it is still a busy A road and the effects of traffic are ever-present.

Cellar Hill has always had a distinctly different character to Greenstreet. Historically it formed part of a network of rural lanes which connected the coastal communities and creeks to the downland communities. It is the surviving medieval and post-medieval buildings which provide tangible evidence of the longstanding agricultural prosperity of the area, made possible by the rich soils of the north Kent fruit belt. The reputed site of the country's first cherry orchard lies approximately one kilometre to the north at Osiers Farm, Teynham. Farmhouses and farm buildings continued to be built in the 17th and 18th centuries.

It was not until the 19th and 20th centuries that some of the gaps between the farmhouses were infilled by artisans' cottages and then social housing. However, Cellar Hill still retains an essentially rural character with visual links to the surrounding countryside.



Postcard of the 'Blean Beagles' on London Road 1912



Postcard of Cellar Hill circa 1920

2.2 Topography, geology and landscape

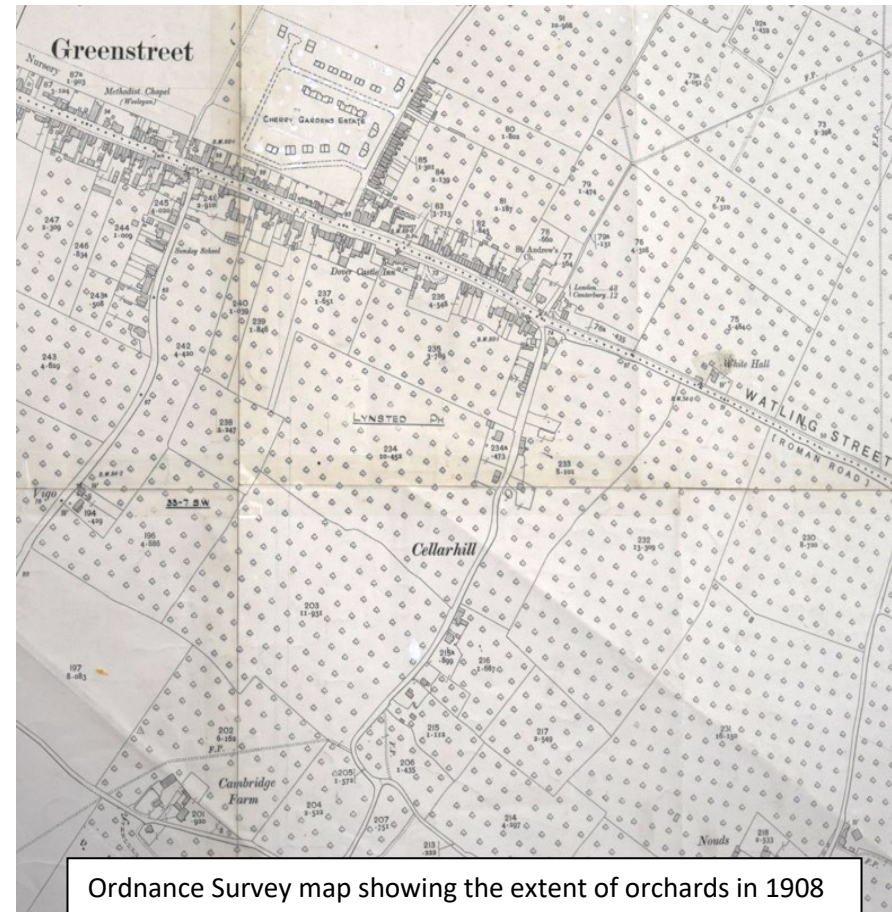
Greenstreet and Cellar Hill are located roughly equidistant between Sittingbourne to the west and Faversham to the east. They sit on the dip slope of the North Downs approximately 25m above ordnance datum on land which slopes gently as it rises from the coastal marshlands of the Thames estuary to the north.

The gently undulating topography with dry valleys is typical of chalk downlands. The attractive Lyn Valley follows the line of Cellar Hill to its east.

The surrounding farmland consists of flinty acid soils which overlie the chalk. The area is renowned historically for apple, pear and cherry orchards from the 16th century as well as hop gardens during the 19th and 20th centuries. In 1797 Edward Hasted described the Hundred of Teynham as follows: "It is situated in a fine level country, the fields of which are large, and the land exceedingly rich and fertile, like that in the neighbouring parishes in this extensive vale, most of it is being what is called in these parts round tilt land, such as has already been described in the adjoining parishes of Bapchild and Tong. It was formerly noted for large plantations of fruit trees; but these are mostly displanted, many of them to make way for hops, of which there are several kindly plantations in different parts of it."

Today the area is identified in the Swale Local Landscape Designation as the 'Lynsted enclosed farmlands'⁴ and described as a good rural landscape. The underlying geology is upper chalk overlain by a belt of rich loamy soils (the Thanet beds) which runs

from Rainham in the west to Thanet in the east. There is an absence of good building stone in north Kent but an abundance of brick earth to the north of London Road.



Ordnance Survey map showing the extent of orchards in 1908

⁴ Swale Local Landscape Designation LUC October 2018 and the Swale Landscape Character and Biodiversity Appraisal, Jacobs 2011

The countryside around Greenstreet and Cellar Hill is still widely renowned for its fruit growing. Ordnance Survey records from the early years of the last century record that Greenstreet and Cellar Hill were encircled by orchards. Fruit growing is now less extensive, but orchards continue to be a feature of the landscape and still contribute to the setting of the conservation area.

2.3 Urban grain and spatial character

Urban grain describes the relationship between the street pattern, block sizes and the pattern of building. It is helpful, particularly in built-up areas, in distilling the character of a place. Fine-grained areas have a large number of different buildings and closely spaced streets.

Greenstreet and Cellar Hill Conservation Area has two distinctly different character areas with very different defining features. The North side of London Road is characterised by largely continuous urban frontages, whereas the south side has a mix of larger houses (and a pub) which are typically set back behind gardens with small gaps between each building. The road and the footways are particularly wide at this point on London Road, possibly because this was the location of the annual cattle market.

By contrast, Cellar Hill is narrower and more winding. Gaps between the buildings become progressively larger towards the south where the countryside becomes more apparent and hedgerows line the lane.



Cellar Hill looking north

In a recent appeal decision (APP/V2255/W/22/3306232) the planning inspector described the importance of the gaps between the buildings on Cellar Hill and the valuable contribution they make to the setting of the listed buildings stating that: “as a surviving parcel of undeveloped land, the site does serve as a reminder of an important aspect of the historic settlement pattern, in terms of the wider and more irregular spacing of the buildings, with productive land surrounding them on one or more sides, and extending up to the lane itself. In addition, the unmanaged nature of the vegetation along the site frontage reinforces the distinctively rural character of this part of the lane itself.”



2.4 Buildings

More than anything else, it is the buildings which define the special architectural and historic character of Cellar Hill and Greenstreet. The mix of building types, styles, dates and materials combine to create a very distinct place which speaks of its locality and its history. Map 2 on page 15 indicates the location of significant buildings which contribute to the character of the conservation area.

London Road (north side)

The north side of London Road, between Station Road and Cellar Hill, has several characteristics which distinguish it from the rest of Greenstreet. Here the carriageway and footways are noticeably wider and buildings, mainly houses, are typically positioned at the back edge of the footway giving good definition to the street. Yellow and red brickwork, weatherboarding and clay roofing tiles contribute to a strong sense of local identity.

The earliest buildings are Orchard Thatch and number 57, Alverley House. Orchard Thatch dates from the 17th century and provides an attractive end to the village. It is unusual in that it sits end on to the road as well as for its thatched roof. Alverley House also dates from the 17th century but what was originally a timber-framed elevation was re-fronted in brick during the 18th century and given sash windows.

Most of the other buildings are Victorian except the modern group at 51 to 59 and Lancel House, a weatherboarded complex designed by Artlab Architects. The Victorian buildings are mainly terraced houses. Despite the number of altered windows and doors, they possess considerable character because of the variety of building materials and architectural styles and the way they step up the hill towards the east. Nos. 43 and 45 stand out for their use of painted weatherboarding and 47 and 49 for their contrasting use of red and yellow brickwork.



Towards the top of the rise are two Victorian villas, Nos.1 and 3 in red brick with polychromatic brick dressings and number 5 in yellow brick. Both are set back from the road behind gardens and attractive burr brick front boundary walls.

The other defining feature on the north side of London Road is the memorial pump, erected in 1896 to commemorate Queen Victoria's diamond jubilee. The skillfully executed design involves a decorative weather vane on a shingle spire which rises from an octagonal stone shaft on a square base. It was restored by Teynham Parish Council in 2016.

London Road (south side)

Development on the south side of London Road is distinctly different with several larger listed buildings separated by Victorian terraced houses and 20th and 21st century infill houses. The larger houses are set behind gardens and front boundary walls or railings whereas the terraced houses front directly onto the wide footway.

Dating from the early to mid-18th century, the Dover Castle Inn serves as a reminder of Greenstreet's historic role in providing for horse-drawn coaching traffic on London Road before the advent of the railway and motor transport. The Old Forge, at the junction with Cellar Hill, would also have provided blacksmithing services for carriages and horses.



Alverley House, 57 London Road



The Grange, 18 London Road



Memorial pump



Dover Castle Inn



Old Forge, 4 London Road



Three fine Georgian houses deserve mention. Collectively, they illustrate the move towards Palladianism, adhering to classical principles of symmetry, order, rhythm and proportion. The Grange has a painted brick elevation with a central porch on Doric columns. The Walnuts dates from 1825 and has a particularly fine fluted Doric porch and a modillion eaves cornice. Number 8, Mount House, is of early 19th-century date and is noteworthy for the refined detailing of its door and window openings.



Cellar Hill

The buildings on Cellar Hill are more rural in character reflecting its agricultural history. Several historic farmhouses are no longer in agricultural use but they still contribute to the area’s rural character.

Number 17, Tudor Cottage, is prominently located by virtue of its position close to the road. Its extravagant use of close-studded timber framing was a sign of wealth and status in the 16th century. It is also noteworthy as one of a cluster of thatched buildings. To its south lies Cellar Hill Cottage which, by contrast, is set back from the road and at right angles to it. It too has a thatched roof but, in this instance, the timber framing is in large panels with distinct up braces, a particularly Kentish feature.

The Old Thatched Cottage also dates from the 16th century. It has a continuous jetty, rendered elevations and a longstraw thatched roof.

Waylands is a good example of a mid-Georgian farmhouse. Its use of grey header-bond brickwork with red brick dressings gives a very pleasing appearance to the near-symmetrical elevation.

Well House is an early Victorian farmhouse which has a double-pile slate roof with bay windows to either side of a central porch.

Other buildings which contribute to the special character of Cellar Hill include the terraced housing at numbers 4-16, although some have been devalued by the loss of original windows and doors, a Victorian villa at 24 The Burrs and Cellar Hill Barn which fronts the road at Waylands and is another reminder of the area’s agricultural history.



Old Thatched Cottage, Cellar Hill



Cellar Hill Cottage





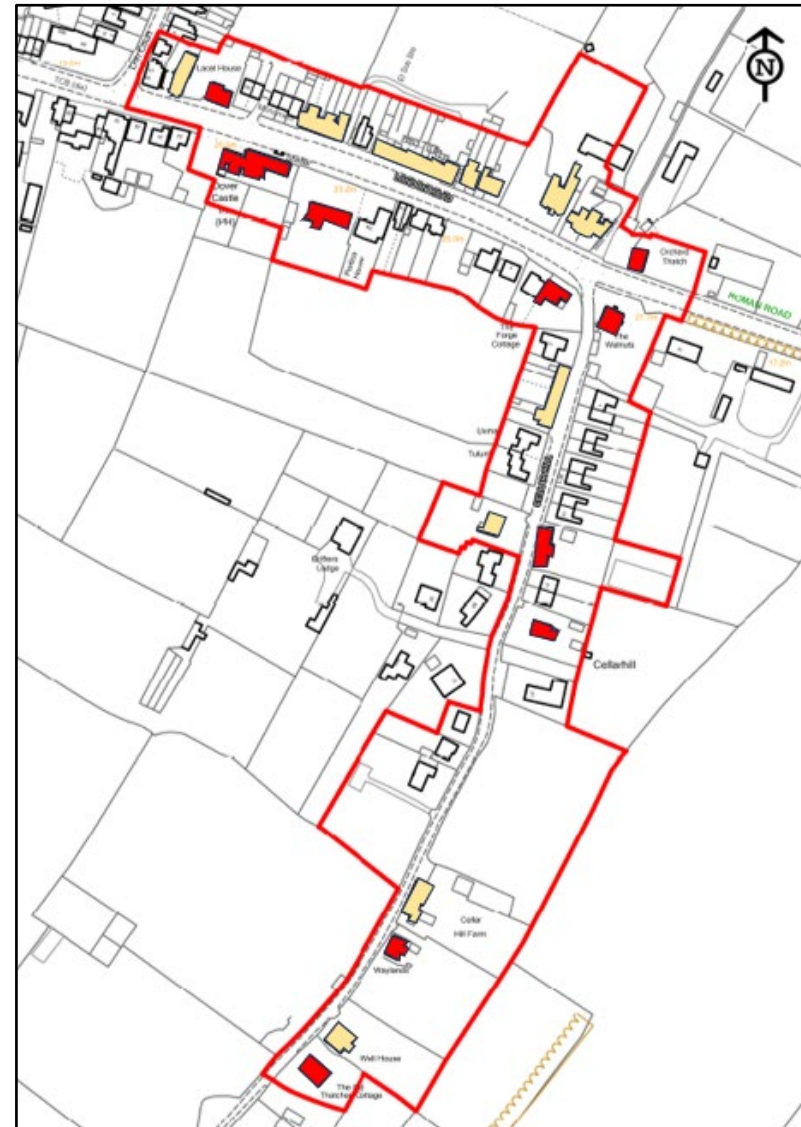
Waylands, Cellar Hill



Tudor Cottage Cellar Hill

Map 2: Significant buildings

-  Listed buildings Grade II
-  Buildings that make a positive contribution



2.5 Building materials

The distinct character of Cellar Hill and Greenstreet Conservation Area owes much to its variety of architectural styles, often expressed through building materials. Until the transport revolution of the mid-19th century, virtually all building materials would have been locally sourced or made. Consequently, they are often a true expression of the locality and its natural resources. They were also used to express architectural aspirations and changing fashions. Even materials that were in common use at the time make a valuable contribution to local character and distinctiveness.

In the medieval period, large parts of north Kent were covered by ancient woodland so it is no surprise that many of the earlier buildings were constructed of timber-framing. As good oak for building became scarcer during the 17th century, brick became universally fashionable. Brick earth was widely available in the area so brick was used extensively for new buildings and to over-clad older buildings to give them a more up-to-date appearance. On the other hand, good building stone is noticeable by its absence in north Kent. Flint is the exception but there is just one isolated example of flint walling in the conservation area.

Thatch and then Kent peg tiles were the preferred choice for roofing but slate became a popular option during the early 19th century, particularly once the railway came to Teynham in 1858.

Timber frame: Oak, elm and chestnut framing were commonly used in building construction during the medieval period when local woodlands offered an ample supply of durable timber for building. Several historic buildings in the conservation area are constructed of timber framing and others have had their frames concealed behind later facades or cladding such as brick, render or



weatherboarding. The timber-framed tradition continued in softwood framing well into the Georgian period and even later in some farm and utility buildings.

Brick: Brick earth was in plentiful supply in North Kent so, not surprisingly, brickwork is a familiar building material in the conservation area. There is a wide variety in the size, colour, bond and character of brickwork, depending on its age, style or function.

17th-century bricks are red, relatively narrow and with thick mortar joints. In the centuries that followed, the shape, size and coursing of brickwork became more regular and standardised. Yellow stock brickwork grew in popularity during the 18th century and was particularly fashionable from the Regency period onwards. The combination of yellow and red brick achieved the polychromatic effect that was popular in the High Victorian era and the Arts and Crafts Movement.

Burr brickwork (over-fired bricks which fused together in the kiln) is an interesting and characterful feature used in garden walls.



Kent peg tiles: The name 'peg tile' refers to a plain clay tile suspended from the top edge of a tiling lath by a peg. Traditionally peg tiles were held in place by a small wooden peg or latterly an



aluminium 'drop', wedged into, or passed through one of the two holes in the head of the tile. Simple firing methods and local clays produced strong, durable and light peg tiles in warm orange/red terracotta colours. Imperfections in the raw clay, combined with the hand-manufacturing process, resulted in a richness and variety in colour and shape. They are renowned for their warm and varied colours and rich texture which cannot be replicated in modern machine-made tiles.

Until the 19th century, locally produced hand-made clay peg tiles were the preferred roof covering for buildings throughout Kent. Tiles continued to be handmade from local clays well into the 20th



century and there are still a handful of manufacturers today. They are a characteristic roofing material in the south-east of England and prominent in the roofs of Cellar Hill and Greenstreet. Kent peg tile roofs are visually prominent because of their steep pitch (typically steeper than 35 degrees). Tiles are also used as vertical cladding to external walls, sometimes with decorative banding.

Slate: Slate roofs rarely appear before the turn of the 19th century. They became more common after rail transport made Welsh slate more readily accessible. Slate gave rise to shallower roof pitches of between 30 and 35 degrees.



Thatch: Thatched roofs are a feature of the conservation area, they add character, variety and visual interest. 'Longstraw' was the indigenous thatching material in Kent. It was a by-product of arable farming which was locally available after the harvest and used to roof farm buildings, farmhouses and cottages. Water reed and combed wheat reed were imported types of thatch used in post-war decades.

Weatherboarding: Painted feather-edged weatherboarding is a traditional walling material in the south-east of England. When used on agricultural buildings weatherboarding was either left natural or tared black, whereas domestic examples tended to be painted white or off-white.



Modern building materials: In recent decades mass-produced building materials such as concrete roof tiles, machine-made bricks and uPVC windows have been used to replace traditional materials but they typically detract from the special character of the conservation area. UPVC windows in particular have been used to replace traditional timber windows and this represents an ongoing risk to the special character of the conservation area.

Because there are gaps between buildings, particularly on Cellar Hill, the surrounding countryside is ever present. Further south on Cellar Hill, fields and hedgerows line the road between the buildings. Throughout the conservation area, even on London Road, gaps between buildings provide glimpses of traditional orchard trees. The gaps between buildings and the views of the countryside are important to the character of the conservation area and should be protected.

The Lynsted and Kingsdown Parish Design Statement emphasises that “The importance of preserving examples of traditional orchards lies in their contribution as touchstones for a unique sense of place, culture and natural environment.” Also, that old orchards, especially to the south of the A2, are valued by the local community and should be safeguarded. It also dwells on the importance of ‘sensitive edges’ and that urban development is characteristically just one building deep with views over open farmland to the rear.

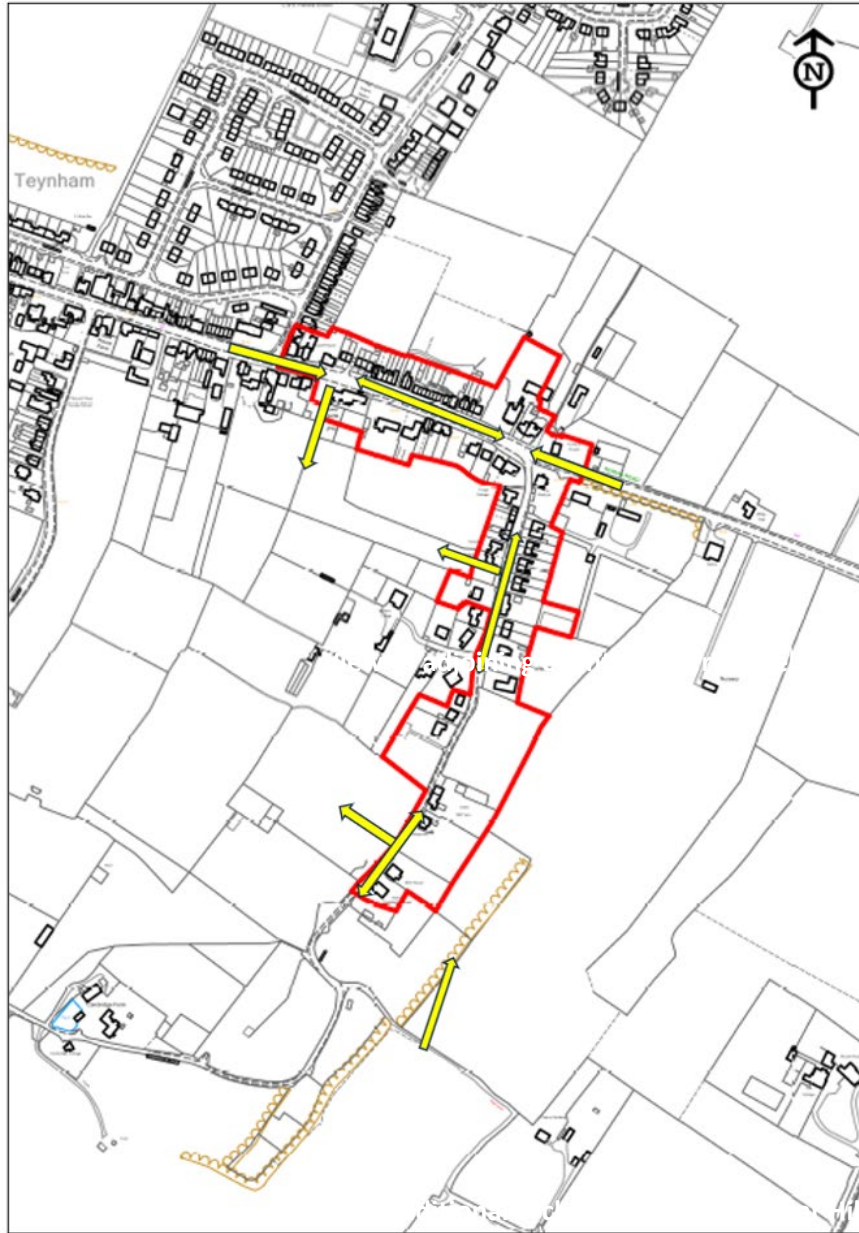
2.6 Setting

The setting of a conservation area frequently contributes to its special character and to the way in which its significance is experienced and enjoyed. Even areas that fall outside of the designated conservation area often contribute to its significance. Where the setting contributes to the significance of a conservation area, its conservation is a material consideration in local authority plan-making and decision-making.

Cellar Hill and Greenstreet are surrounded by attractive countryside. Many of the orchards and hop gardens which survived at the time of the 1975 Ordnance Survey map have been replaced by arable farming but historic field boundaries survive with a good number of hedgerows, tree-lined margins and trees.



Map 3: Significant views



2.7 Significant views

Views contribute to the way in which the character or appearance of a place is experienced, enjoyed and appreciated. Identifying significant views allows the contribution they make to be protected and enables the effective management of development in and around those views. Significant views are annotated on map 3.

Significant views in Cellar Hill and Greenstreet are typically linear, reflecting the linear nature of London Road and Cellar Hill. Those on London Road are typically contained by buildings which step up the hill as they progress eastward. Trees on both sides of the road provide interest and articulation. Views on Cellar Hill are also contained by buildings but hedges and hedgerows feature more prominently particularly as one progresses south. New views and vistas open up as a result of winds in the geometry of the road.



Equally important are views out towards the countryside between gaps in the buildings. They reinforce the strong relationship that the conservation area has with the surrounding fields and orchards.



2.8 Boundary fences, railings and walls

Boundary treatments are an important aspect of the character of Cellar Hill and Greenstreet. Railings, picket fences, post and rail fences and walls all help to define boundaries and differentiate between private and public space. Some walls and railings are of special architectural or historic interest in their own right due to the quality of their craftsmanship, their age or their materials.

Indigenous natural hedges and hedgerows are also important contributors to Cellar Hill. On the other hand, non-indigenous hedges like laurel and leyandii fit less well into the semi-rural environment.



2.9 Archaeology

The conservation area lies in an area of considerable archaeological potential due both to known archaeology within its boundaries and to its location flanking London Road, the route of Roman Watling Street. Although this was the principle Roman road, linking London with Canterbury and the province's ports on the south-east coast, it probably follows routes used since prehistory, along which there have been numerous archaeological finds. It is also located in an area from where creeks and other connecting routes led to the north Kent coast and other routes led south into the North Downs.

The only prehistoric discoveries within the conservation area relate to a collection of worked flints found at 67 London Road in 2013. Further afield other discoveries indicate the potential of the area for further discoveries. A Bronze Age ring-ditch and burial (at TQ 96 SW 1280), a hearth or fire-pit (at TQ 96 SW 233) and a middle to late Bronze Age copper alloy knife were discovered at Claxfield Farm. A possible prehistoric ring-ditch and burial was found at Sandown. Other undated but potentially prehistoric flints and ephemera have been found both north and south of the conservation area. The brickearth and gravel deposits in this area are also known to contain important Palaeolithic assemblages and Quaternary sediments.

There are no known Roman remains from within the Conservation Area although Watling Street runs through the northern section. However, Teynham parish has a rich Roman heritage and has seen numerous and important Roman discoveries. Significant Roman buildings have been found alongside the creeks in the northern area of the parish, a number of which may be villas that took advantage of the transport opportunities of the Swale and the main

Roman road. The Roman road itself is also noted as a focus of Roman activity where a probable roadside settlement has been identified at Radfield. In 2023, following earlier stages of fieldwork, archaeological investigations discovered a mausoleum set in a walled and ditched enclosure just to the north of the main road between Frogna Farm and Orchard View. A spectacular find from the excavations was the unique statue of Triton, one of the finest statues recovered from Roman Britain. Elsewhere, Romano-British cremation urns and horse-bits were found near Teynham in 1882 (at TQ 96 SE 16), Roman pottery was found near Teynham church in 1996 and a Roman ditch containing decorated tweezers was found at Claxfield Farm in 2011/12.

Anglo-Saxon evidence in the area is fairly limited, although there may have been a cemetery in the vicinity of Teynham Station where a Coptic bowl was discovered and is now in Canterbury Museum. A number of Anglo-Saxon burials, including a rare barrow have also been found focused on the Roman mausoleum and its enclosure to the west of the village.

Medieval evidence is more common within the conservation area. Medieval ditches and a pit were found at 67 London Road in 2012, perhaps representing a field system and occupation. Medieval buildings which survive within the conservation area all have the potential for archaeological remains of significance to survive beneath the ground or within their curtilages.



2.10 Trees

Trees make a valuable contribution to the character and the visual amenity of Cellar Hill and Greenstreet Conservation Area. The presence of trees is one of the features which differentiates the conservation area from the western parts of Greenstreet where there are fewer trees.

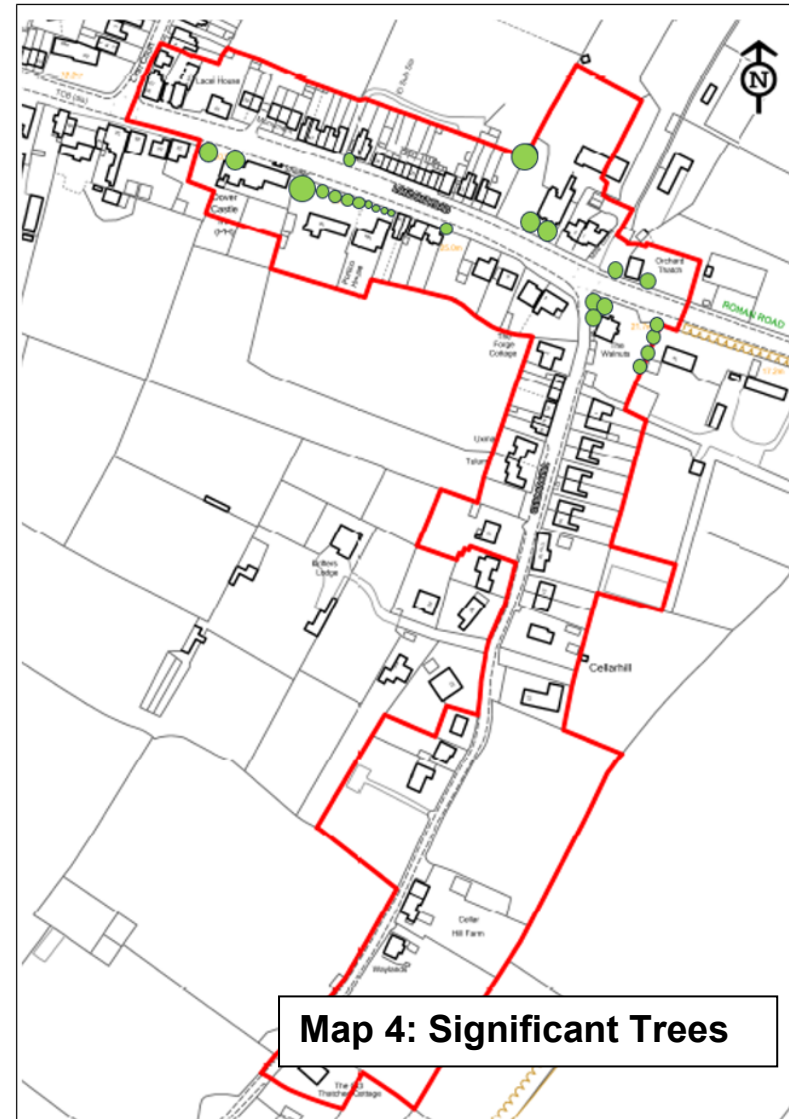
Trees add character to most views within the conservation area, they enhance biodiversity and wildlife opportunities, absorb carbon dioxide and have the potential to reduce traffic pollution and improve air quality.

The predominance of native tree species such as yew, sycamore, ash, holly, field maple and hawthorn brings a strong feeling of the surrounding countryside into the village.

Recently planted highway trees on both sides of London Road are relatively insignificant today but if properly managed will make a significant contribution in years to come.



Significant trees are plotted on the map 4.



Map 4: Significant Trees

2.11 The public realm and the highway

The public realm refers to all those spaces which fall between the buildings and are accessible to the public. London Road and Cellar Hill are important public spaces because they are where most people experience the conservation area.

London Road: The character of London Road is inevitably affected by traffic, by parking, by traffic noise and pollution. Excessive traffic speeds are also perceived to be a problem by local residents.

Wide footways have recently been adapted to accommodate the need for parking with the inclusion of parking bays and much-needed highway trees. Surfaces are typically tarmac, kerbs are concrete and street lighting is utilitarian, all with little concession to their historic surroundings.

The refurbished milestone and the diamond jubilee water trough are positive features of the public realm as they are characterful reminders of the days before motorised transport.



Cellar Hill: Cellar Hill is essentially rural in character, only the northernmost part has a footway, concrete kerbs and occasional streetlights. For the most part, the highway is characterised by grassy verges and roadside hedgerows; kerbs are noticeable by their absence.

Overhead cables and telegraph poles are frequent features on both London Road and Cellar Hill.



Highway signage is generally restrained and reasonably sympathetic.

3.0 SUMMARY AND CONCLUSION

Cellar Hill and Greenstreet Conservation Area is a place with a strong and distinctive identity based on its long history and its development over many centuries. The rich variety of building types and styles and their strong visual and historical connection to the surrounding countryside are a defining feature of the conservation area.

Local building materials are strongly in evidence, including timber framing, brickwork, flint, feather-edged weatherboarding, painted render, thatch, slate and Kent peg tiles. The variety and juxtaposition of these locally distinct materials contributes to the special character and appearance of the conservation area.

The history of the village and its rich mix of buildings results in a special place which merits protection. As such, Cellar Hill and Greenstreet continues to be an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. There is no doubt that it should continue to be a designated conservation area.

The conservation area has served its purpose well since it was first designated 23 years ago. The key characteristics that gave rise to its designation in 2000 appear to have been well managed by local building owners, the Parish Council and the Local Planning Authority. That is not to say that there have not been changes, because there have, but most of them have been made with respect to the distinct character of the place and have integrated well into their context.

Key positive characteristics:

The special character of Cellar Hill and Greenstreet Conservation Area may be summarised as follows:

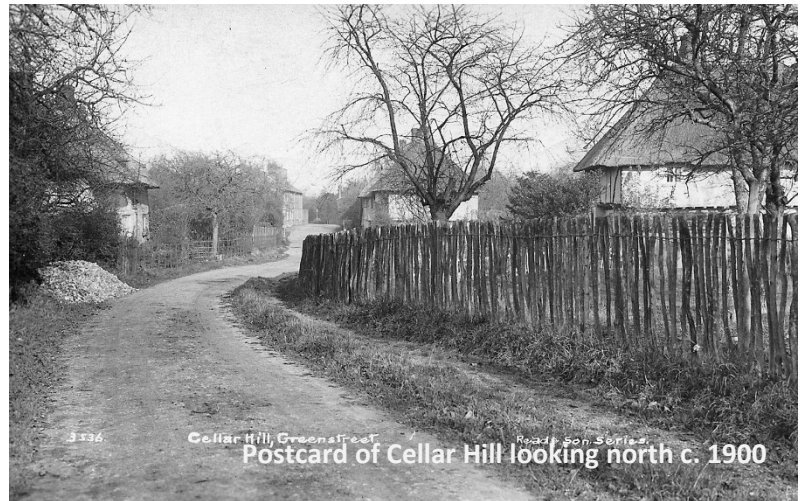
- Its Roman origins are based on Watling Street which was later to become a significant route for pilgrims, for coaching and then for vehicular traffic.
- The evidence it provides of the farming community in the surviving farmhouses dating from the 16th century onwards.
- The architectural contribution made by many historic buildings and structures. The concentration of several medieval thatched farmhouses is particularly noteworthy.
- The eclectic mix of traditional building styles, forms and vernacular building materials, all of which record the history and development of the place.
- Trees and hedgerows make a significant contribution to character and help to reinforce the rural character of the Cellar Hill.
- Boundary walls, fences and railings make a distinct contribution to the special character of the place.
- The historic relationship between the village and the surrounding farmland and orchards. Visual links to surrounding farmland are an important expression of the farming history of the area.

All conservation areas have some negative as well as positive characteristics. Identifying negative characteristics allows those responsible for managing change to focus on improving the area and enhancing its special character.

Key negative characteristics:

- The use of mass-produced non-indigenous building materials such as uPVC windows or concrete roof tiles which tend to dilute local character and distinctiveness.
- Traffic impacts on London Road including noise, pollution and the visual impact of parking.
- The number of telegraph poles and overhead cables some of which are visually intrusive.
- The extensive use of concrete highway kerbs and tarmac surfacing.
- The loss of some original boundaries and their replacement with modern walls/fences.

Part of the review process involved an assessment of whether the conservation area boundaries are correctly drawn and whether the area should be extended or reduced in size. Proposed amendments to the conservation area boundary are described in Appendix 1.



4.0 GREENSTREET AND CELLAR HILL CONSERVATION AREA MANAGEMENT STRATEGY

Conservation Area designation is not an end in itself. It is a way of recognising the special architectural or historic character of an area so that appropriate steps can be taken to preserve or enhance it.

Conservation is not about preventing change: Greenstreet and Cellar Hill are part of a living community where change is needed to sustain and meet its future needs. It is about positively managing change so that what the community cherishes today can be properly looked after and passed on to future generations in good condition.

This management strategy is intended to encourage active involvement in the future management of the conservation area. It provides an opportunity for the Borough Council, the Parish Councils, local amenity groups, Kent Highways, Kent County Council, individual householders and local businesses to take part in positively managing the area.

In the case of Greenstreet and Cellar Hill, the management strategy is also intended to provide a route plan to see the conservation area removed from Historic England's Heritage at Risk Register by providing positive steps which can be taken to improve its condition and remove the risks.

4.1 Statutes, policies and guidance

When a conservation area is designated, there are statutes, planning policies and regulations which govern which types of development require planning permission and the way that the local planning authority undertakes plan-making and decision-making. The statutes and policies that directly affect designated conservation areas are outlined in **appendix 4** below. It is these statutes and policies that provide the formal framework for managing change in conservation areas.

The local planning authority is required to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising all of its planning functions.

A key element of planning policy is the Swale Borough Local Plan which includes policies specifically relating to conservation areas and heritage conservation.

- Protection and enhancement of landmarks and significant views or vistas within and without the conservation area.
- Safeguarding non-designated heritage assets which make a positive contribution to the significance of the area.
- Safeguarding significant spaces.
- Safeguarding significant trees.
- Promoting high-quality design in new development which responds positively to context and the distinct character of the conservation area.
- Continued sensitive management of the public realm.
- Requiring new development to respond positively to the Conservation Area Character Appraisal,

There is also a wealth of published guidance on positively managing change in conservation areas. Swale Borough Council has adopted supplementary planning documents (SPDs) which are listed in **appendix 4**. Historic England has also published a range of guidance and advice notes which are listed in the bibliography.

The Swale Borough Local Plan aims to ensure that the significance of the Cellar Hill and Greenstreet Conservation Area is sustained and enhanced through:

- Preserving or enhancing the area's special character or appearance.
- Preserving or enhancing the setting of the conservation area and other designated heritage assets.
- Safeguarding and better revealing the significance of any archaeology.

4.2 Householder alterations

Where householder alterations are proposed which require planning permission the Council is required to ensure that those alterations enhance the special character and appearance of the conservation area.

However, the Conservation Area Character Appraisal has identified some alterations which have involved the removal of historic features such as traditional sash windows, doors, roof coverings and demolition of chimney stacks. These alterations are harmful to character, particularly when they affect a symmetrical pair or a terrace, where the impact of ill-considered alterations can be more obvious.

Many minor alterations to unlisted residential buildings can be undertaken without the need for planning permission but the cumulative impact on historic and/or traditional properties can have a harmful effect on the character and appearance of the conservation area.

Opportunities to reinstate missing architectural features (such as sash windows, panelled doors or original roof coverings and traditional boundary treatments) will be encouraged by the Council and, where appropriate, may be requested in relation to planning applications for extensions and/or alterations.

In light of the above, Swale Borough Council may consider the use of an Article 4 Direction to bring some householder alterations which are currently classed as permitted development under planning control, to ensure that alterations are positively managed through the planning system.

Householder alterations which could be brought under control by an Article 4 Direction at Cellar Hill and Greenstreet Conservation Area include the following:

- Replacement windows and doors.
- Changes to roof coverings.
- Removal of traditional chimney stacks.
- The installation of solar photovoltaic panels on the front wall or roof slope of buildings.
- Installing rooflights in the front roof slope.
- Alterations to or demolition of fences, railings and boundary walls.
- Adding a front porch.
- Replacing a front garden with a hard surface.

4.3 Unauthorised alterations

The conservation area review also revealed that unauthorised alterations to buildings carried out without planning permission (or listed building consent) pose a significant threat to the character of the conservation area. One very recent example is the unauthorised removal of the historic shopfront on the corner of 65 and 67 London Road which was noted in the 2000 appraisal as a significant feature (shown in the photograph on page 20).

An essential component of any conservation area management strategy is an effective planning enforcement strategy which prioritises enforcement action relating to heritage conservation.



4.4 Swale local heritage list

Arising from Swale's adopted Heritage Strategy 2020-2032, the Borough Council is compiling a Local Heritage List to identify heritage assets which are not formally designated.

The Local Heritage List:

- raises awareness of an area's local heritage assets and their importance to local distinctiveness;
- informs developers, owners, council officers and members about buildings within the local authority boundary that are desirable to retain and protect;
- provides guidance and specialist advice to owners to help protect the character and setting of those buildings, structures, sites and landscapes;
- helps the council in its decision-making when discussing proposals and determining planning applications; and
- records the nature of the local historic environment more accurately.

The impact of any development on a building or site included within the Local Heritage List will be a material consideration when the council considers an application for planning permission.

Several buildings in Cellar Hill and Greenstreet Conservation Area may be eligible for inclusion within the Swale Local Heritage List, including the following:

The Jubilee water pump, London Road
8 London Road
Mile stone outside 1 London Road
Cellar Hill Barn, Cellar Hill

Buildings which are already protected because they fall within the curtilage of a listed building are excluded from the list.



4.5 Public realm

The public realm (that is those areas which fall between the buildings and are accessible to and enjoyed by the public) makes a significant positive contribution to the special character of Cellar Hill and Greenstreet Conservation Area. The highway and footways fall within the public realm.

In conservation areas, it is especially necessary to guard against standard highway ‘improvements’ which do not necessarily respect the special character of the place. The injudicious use of concrete kerbs, street lighting and off-the-shelf road signs all have the potential to detract from the special architectural and historic character.

The retention of soft verges (without concrete kerbs) and roadside banks and hedges is fundamental to the future sensitive management of parts of Cellar Hill.

Restrained use of highway signing and road markings is important throughout the conservation area. Where signs, road markings, street furniture, salt bins, rubbish bins or utility boxes are deemed necessary, they should be located and designed sensitively and in consultation with the local community.

Future highway maintenance, improvements and alterations should be carried out in accordance with *Streets for All*, Historic England (2018) and *Highway Works and Heritage Assets: the Kent Protocol for Highway Works in Relation to Designated Heritage Assets*, KCC and KCOG (2011). Both provide advice on good practice for highway and public realm works in historic places. Early consultation with all stakeholders (including Swale Borough

Council’s Conservation and Design Team and the Parish Councils) will be fundamental to achieving appropriate standards in any future proposed changes.

The KCC Highways Asset Management and Inspections Team has prepared a draft Highway Works and Heritage Assets Protocol which has yet to be finalised and go through consultation.

The conservation area has a good number of overhead cables and telegraph poles. Where possible, opportunities should be taken to investigate the removal of redundant overhead cables, reducing the number of poles and potential undergrounding of services.

Two recently planted highway trees on London Road will make a positive contribution to local character. However, scope exists to plant more so that the effect is enhanced.

The Parish Council, Swale Borough Council and Kent County Council should seek to ensure that the public realm continues to be sensitively managed.

Public realm: opportunities for enhancement

- An audit of public signage (including highway signage) could be undertaken to establish whether all current signage and road markings are necessary, well designed and appropriately located.
- An audit of street furniture (bollards, benches, bins, salt bins, bus stops etc.) could be undertaken to establish whether they are necessary, well-designed and appropriately located.

- An audit of overhead supply lines and poles could be undertaken with the statutory undertakers to establish whether there is any scope to remove any overhead cables or poles or to relocate services underground.
- Consideration could be given to the replacement of concrete highway kerbs with more traditional kerbs.
- Consideration could be given to planting several more highway trees on London Road.
- Consideration could be given to more positive management of surviving orchards, to 'community orchards' or to planting new orchards.

4.6 Trees and hedgerows

Trees and hedgerows play an important role in the special character of Cellar Hill and Greenstreet. They also contribute significantly to wildlife habitat and biodiversity.

The retention and active management of trees and hedgerows should be encouraged and opportunities for new planting should be considered when possible. Planting which contributes to the rural character of Cellar Hill should normally be comprised of native species, although other species now assimilated into the Kentish rural scene may also be appropriate.

All trees within the conservation area are protected. Six weeks' notice must be given to Swale Borough Council in writing before any works are undertaken to trees within conservation areas.

Trees and hedgerows: opportunities for enhancement

- An audit of trees and hedgerows may be undertaken to establish whether there is any scope for better management, additional protection through tree preservation orders, or additional planting.

4.7 New development opportunities

The potential for new development within Cellar Hill and Greenstreet Conservation Area is extremely limited. If proposals for development come forward, they will be considered against local and national planning policies which attach great weight to the conservation of designated heritage assets and their settings. Development affecting the setting of the conservation area is likely to be harmful to its heritage significance. The local planning authority is required to pay special attention to preserving the setting of the conservation area (or the setting of any listed buildings) in any plan making or decision taking.



Recent new development on London Road

4.8 Heritage at risk

Currently there are no buildings in Cellar Hill or Greenstreet on Historic England's or Swale Borough Council's Heritage at Risk Registers. However, the conservation area has been on the Historic England Heritage at Risk Register since 2013. The register noted its condition as 'poor', its vulnerability as 'low' and its trend as 'deteriorating'.

The Heritage at Risk Register and information about Historic England's role, the advice and funding available, and useful publications and guidance are all available on their website. The following information is taken from Historic England's Heritage at Risk Register:

"The Heritage at Risk Register includes historic buildings and sites that are at risk of loss through neglect, decay or development, or are vulnerable to becoming so. It includes all types of designated heritage assets, including Conservation Areas, which are designated by Local Planning Authorities.

"The aim of the Register is to focus attention on those places in greatest need. Historic England in partnership with others, it is able to help tackle heritage at risk. We work with owners, friends' groups, developers and other stakeholders to find imaginative solutions for historic places and sites at risk across England.

"Once a year Historic England asks every local authority in England to consider the state of its conservation areas and fill in (and update as appropriate) risk assessment

questionnaires for those that cause concern or are believed to no longer be at risk.

“Conservation areas that are deteriorating or are in very bad or poor condition and not expected to change significantly in the next three years are defined as being at risk. Categories for condition, vulnerability and trend are included for each conservation area on the Heritage at Risk Register.

“The approach taken to assess conservation areas at risk has been refined since the first survey in 2008/2009. Conservation areas identified as at risk in 2009 but not reassessed since using the revised methodology are included on the Register but with limited information. Conservation area entries are removed from the Register once issues have been identified, plans put in place to address them, and positive progress is being made.”

The first step of ‘identifying the issues’ for Cellar Hill and Greenstreet has been addressed in this conservation area character appraisal. A key reason for carrying out the appraisal is to identify any issues or threats to the conservation area. The second step of ‘putting plans in place to address them’ is the subject of the Management Strategy. The third step, which is fundamental to seeing Greenstreet and Cellar Hill Conservation Area removed from the Heritage at Risk Register is making positive progress towards implementing the recommendations in the Management Strategy.

Historic England’s assessment of the conservation area’s condition as ‘poor’ and ‘deteriorating’ appears a little harsh. The appraisal has identified risks to the character of the conservation area but the buildings and the public areas are generally in reasonable condition

and there are no particularly significant threats to its conservation. The risks that have been identified in the appraisal include:

- The loss of historic features through changes which are carried out as permitted development, particularly the loss of original windows and doors.
- The loss of historic features through unauthorised alterations carried out without the benefit of planning permission or listed building consent.
- The effect of the volume of traffic, traffic speeds and parking on the character of London Road.

Pressure for development within the gaps and on the periphery of the conservation area poses a potential threat but it can be controlled through normal planning processes.

Recommendations to directly address the first two threats are addressed in sections 4.2 and 4.3 above. It is much less likely that anything can be done to reduce the volume of traffic on London Road.

Once proposals to bring householder alterations under control through an Article 4 Direction and to actively prioritise planning enforcement in the conservation area have been put in place, it would be reasonable to expect Cellar Hill and Greenstreet Conservation Area to be removed from the Historic England Heritage at Risk Register.

4.8 Monitoring and review

An important component of any conservation area management strategy is periodic monitoring and review. The Council should periodically review progress on the proposals in the management strategy.

As part of the review process, it is recommended that:

- A photographic record of the buildings and spaces be undertaken.
- A register of enforcement cases be maintained and monitored.
- Statutory list addresses be checked and, where necessary, updated.
- Conservation area boundaries should be checked periodically and, where appropriate updated, to ensure that they are still relevant.

Having completed this Character Appraisal and Management Strategy, any future appraisal should be a relatively routine process so long as monitoring takes place in the intervening period.



APPENDIX 1

Proposed changes to the boundary of Cellar Hill and Greenstreet Conservation Area

Part of the appraisal process involved an assessment of the current conservation area boundary and consideration of whether the boundary is still relevant or whether it should be extended or reduced. Proposed minor changes to the boundary are shown in blue on map 4 and described below:

Proposed boundary changes A, B, C and D

These boundary changes are proposed to more accurately reflect the current plot boundaries, or because the original boundary has no apparent context on the ground. They involve minor changes where the original designation line no longer has relevance, possibly because of changes since the original designation.

Proposed boundary change E

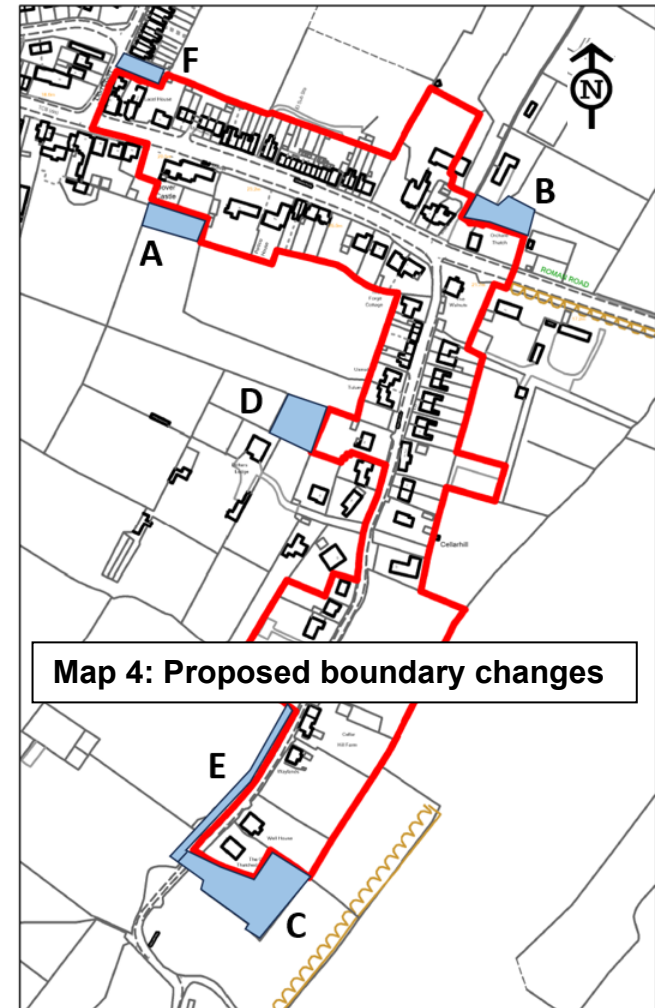
This boundary change is proposed to include the hedgerow which fronts the west side of Cellar Hill. Hedgerows are identified as an important contributor to the character of Cellar Hill so its inclusion within the conservation area is justified.



Proposed boundary change F

This proposed boundary change is to include numbers 4 and 6 Station Road. The semi-detached pair of houses pre-date the 1896 Ordnance Survey map. They are well constructed in local yellow

stock brick and include decorative stone detailing in the bay windows and in the arches above the door and window openings. Front boundary walls include some original decorative cast iron railings.



Map 4: Proposed boundary changes

Consideration was also given to extending the conservation area to include the terraced housing on the east side of Station Road, some of which is well preserved. However, the terrace has had some particularly intrusive alterations so on balance it is not recommended for inclusion in the conservation area.

Proposed Boundary G

Careful consideration was also given to the area of London Road which falls between Station Road and Frogmal Lane to the west of the existing conservation area. This area includes a cluster of eight listed buildings and many others which characterise the development of Greenstreet from a farming community to a commercial centre during the 18th and 19th centuries. **Map 5** shows the proposed properties to be included as an extension to the current Cellar Hill & Greenstreet Conservation Area.

Historic map regression shows "Greenstreet" as a dominant and most populous local community between the towns of Faversham and Sittingbourne.

This historic community grew on the main east/west road between London with Dover - Watling Street in Roman times, London Road or the A2 today.

North/south connections joined Conyer - Teynham Street - Barrow Green - Greenstreet - Lynsted - Doddington.

Greenstreet's expansion took place on the back of industrial-scale brickmaking, nearby world-class brick and cement works (Conyer), and the arrival of the railway (25th January 1858).

Consequently, Greenstreet was the home of many important local trades and commercial services that supported all the surrounding communities. There were three coaching inns - The Dover Castle, The George and The (old) Swan, together with a beer-seller, Teynham Arms and the smaller Fox Inn.

Looking further back, there is ample evidence of Roman and pre-Roman influences scattered along this stretch of Watling Street as it passes between Sittingbourne and Faversham.

The sale of Newgardens allowed further in-filling of the space between railway and the arterial road during the 19th and 20th century. The "new" Teynham became one of the largest "industrial villages" in Kent. This led Post Office administrators at the beginning of the 19th century, to decide on erasing the name of "Greenstreet" for its post-office (on the Teynham side of the A2). This task was completed after World War 1. Remnants of once thriving commercial community along this stretch of London Road (between Frogmal Lane & Station Road) is still visible in its buildings and in the names of some of its businesses. But many of the small shops are now converted to residential use or fallen into disuse. The built environment along London Road between station road and Frogmal Lane is still attractive and retains an identity quite separate from those of the old Lynsted to the south and the Teynham Street community to the north. All of which is reflected in the built environment, materials and the spatial distribution (linear and dense) with very limited intrusion into the rich agricultural land. That openness is strongly represented to the south of Greenstreet which provides a more open aspect in which several important larger homes are set (Claxfield Farmhouse, Jeffries, and the concentration along Cellar Hill – still one building deep).

The identity of “Greenstreet” was originally masked by an administrative declaration by Faversham Post Office in 1911 (actioned after WW1 in March 1918) that it wanted to redraw the map to align postal districts with the relatively recent invention of civic parishes (1894). Leading to the renaming of “Greenstreet Post Office” to “Teynham PO”, in spite of the greater population sitting in Lynsted Parish at that time.

That distinct character was understood historically to encompassed ‘spurs’ both north and south of today’s London Road – taking in Cellar Hill (off Greenstreet Hill), part of Station Road (opposite the home of locally important occupiers of Newlands), the northern built area of Lynsted Lane and along the run of unspoilt Victorian terraces on the southern border of Greenstreet. All generally adhering to historic patterns of development at one-building-deep and densely spaced. In 1855, the newly extended railway included reference to the “Greenstreet Station”.

Each spur has its own broadly distinct characteristics but all contribute to the identity of “Greenstreet”.

- Cellar Hill saw an extension of urban grain in the short run of workers’ cottages after the blacksmith at the corner of Cellar Hill and Greenstreet Hill sold off the frontage along the edge of Cellar Hill. Otherwise, this spur is very different in look and feel in buildings but retaining value of agricultural land in the hinterland.
- Station Road responded to the need for agricultural and industrial workers cottages (brickmaking and cement works to the north of Greenstreet). The frontages have retained many of their original features including iron railings (echoed at the western end of Greenstreet). The open land to the

west of Station Road (at that time) was preserved by Newlands House and grounds.

- Lynsted Lane has larger houses, including school-houses, and Methodist Church. The entrance of Lynsted Lane onto the London Road is defined by two listed buildings (including The George public house and coaching inn (one of three along the south side of Greenstreet)).

The dense run of Victorian terraces along the south side of the London Road met the needs of workers in brick-making and cement works (Conyer) to the north as well as containing several small businesses, including branches of the Co-op Stores. Older photographs show just how much of the frontage of the whole of Greenstreet was “commercial” – e.g. awnings and signs. Some still recognisable by their window configurations. There were also homes that doubled-up as businesses such as beer-sellers set up in front rooms.

Greenstreet grew in response to agricultural wealth, declined with the changed patterns of land ownership the displacement of feudal influences (church and noble), the impact of the Railway, and revived with industrial expansion in and around Teynham and Conyer. The breakup of Newlands estate (1912), followed up by selling Newlands House and Gardens (Col. Honeyball) led to urbanisation of the land between the station and ‘Greenstreet’

The ancient patterns of lanes tell part of the story, the abundance of tracks and paths also tells the story of past communities’ use of ‘Shanks’s pony’. Particularly, for Greenstreet, the “Coffin Path” [0166/ZR259/3] that connects Greenstreet with Lynsted Church and marks the later developments westwards – mostly Victorian

terraces that retain many of their features and character. Many with their original railings having survived the scavenging of WW2.

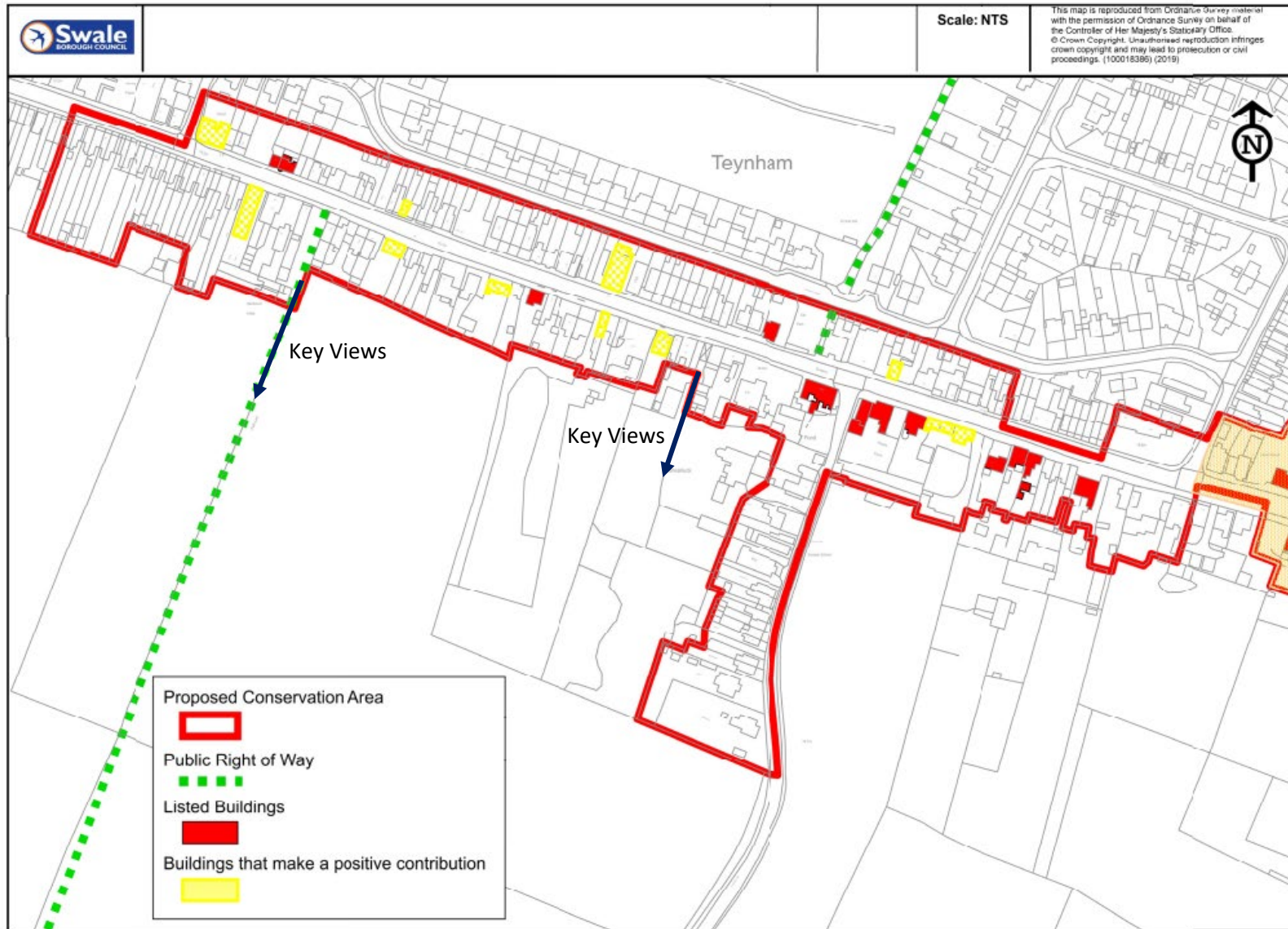
The importance of that evolutionary process is the adherence to fundamental characteristics that define the whole of “Greenstreet”. While modern Teynham extends northwards, the characteristic frontages that help define “Greenstreet” over the years have been preserved in the main.

Other areas might benefit by a unifying the identity of Greenstreet. For example,

- kerbside softening (some has taken place already with planters and isolated trees on Greenstreet Hill);
- Hanging planters adjacent to the kerbside;
- lower lighting levels and standards (cast iron facsimiles like those on East Street, Sittingbourne), less light pollution;
- Colouring road surfaces to reinforce the Greenstreet entity;
- Opening an entrance to the Co-op carpark from the A2 – exit only to Cherry Gardens;
- Reintroduce the Greenstreet village identity on signage at entrances to the community – “Greenstreet historic village”.

- Remove/manage visual clutter of signage, lamp-posts, bus stops, large illuminated advertising boards, night-time shop lighting.
- Boarded-up shops need to be brought back into economic use.
- Use of ‘bays’ (planted up indentations) where pavement widths permit changes along the built-up area.





Buildings that make a positive contribution within the proposed boundary extension G



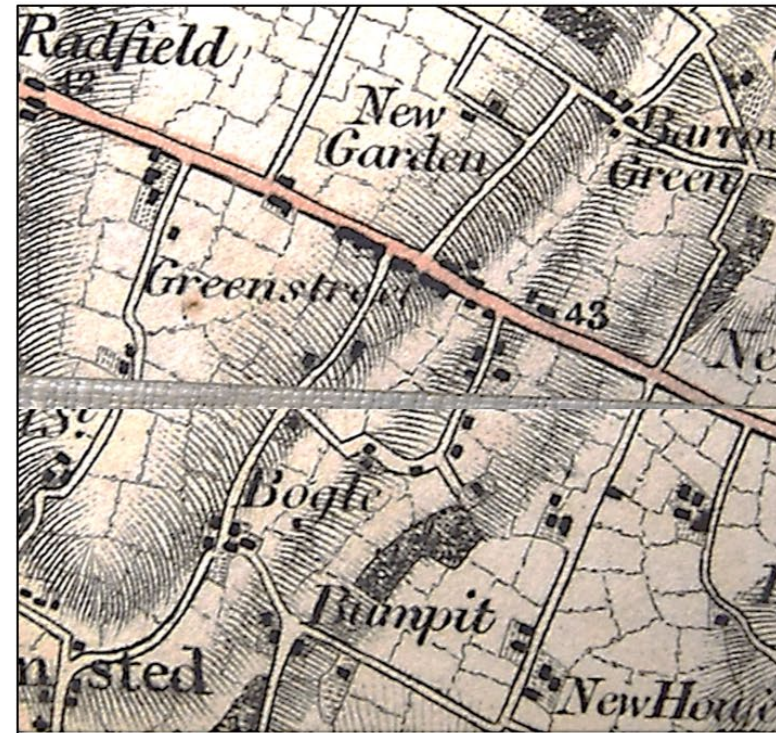




APPENDIX 2: Old maps



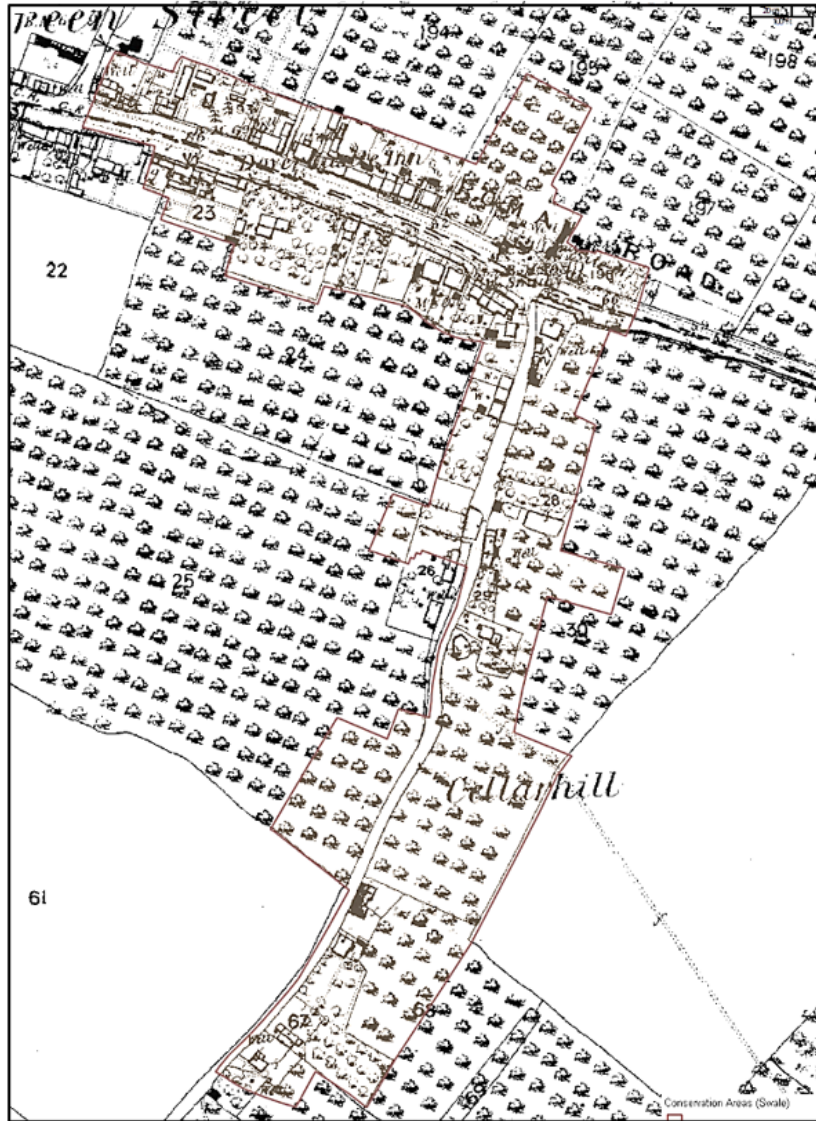
Andrews, Dury and Herbert topographical map of the county of Kent 1769



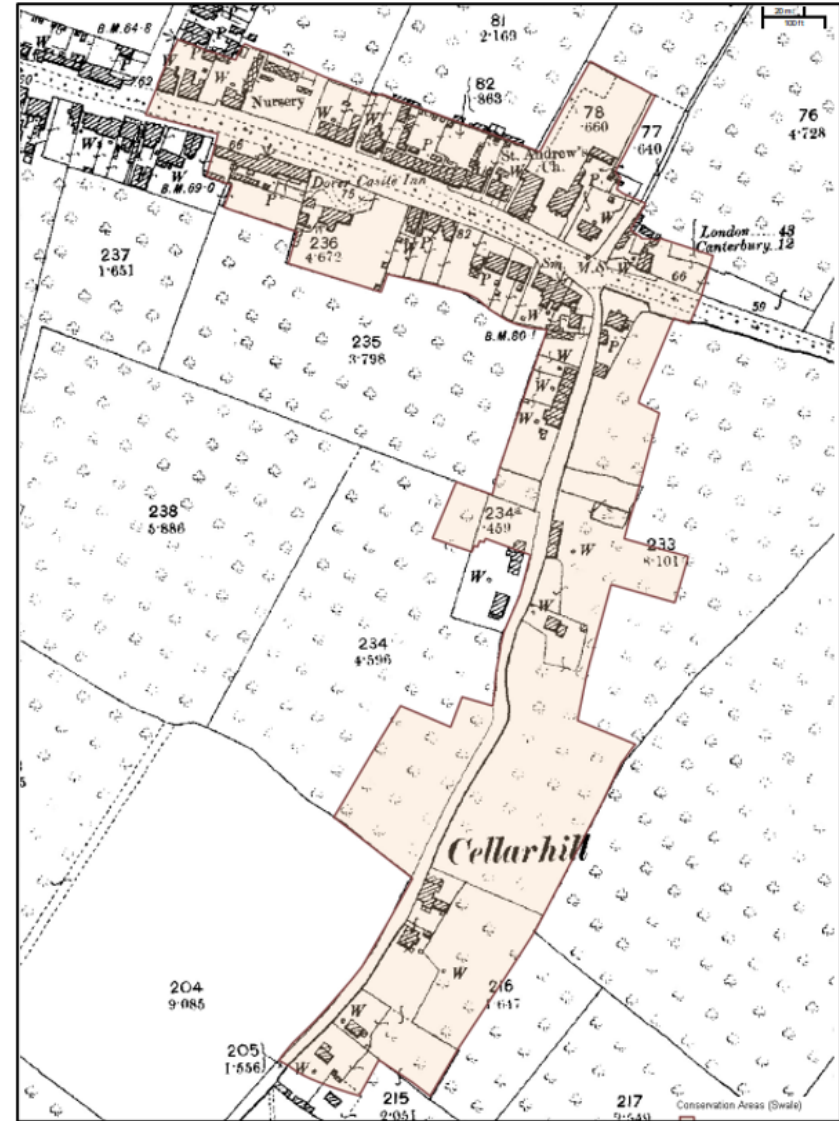
Captain William Mudge's map of Kent 1801



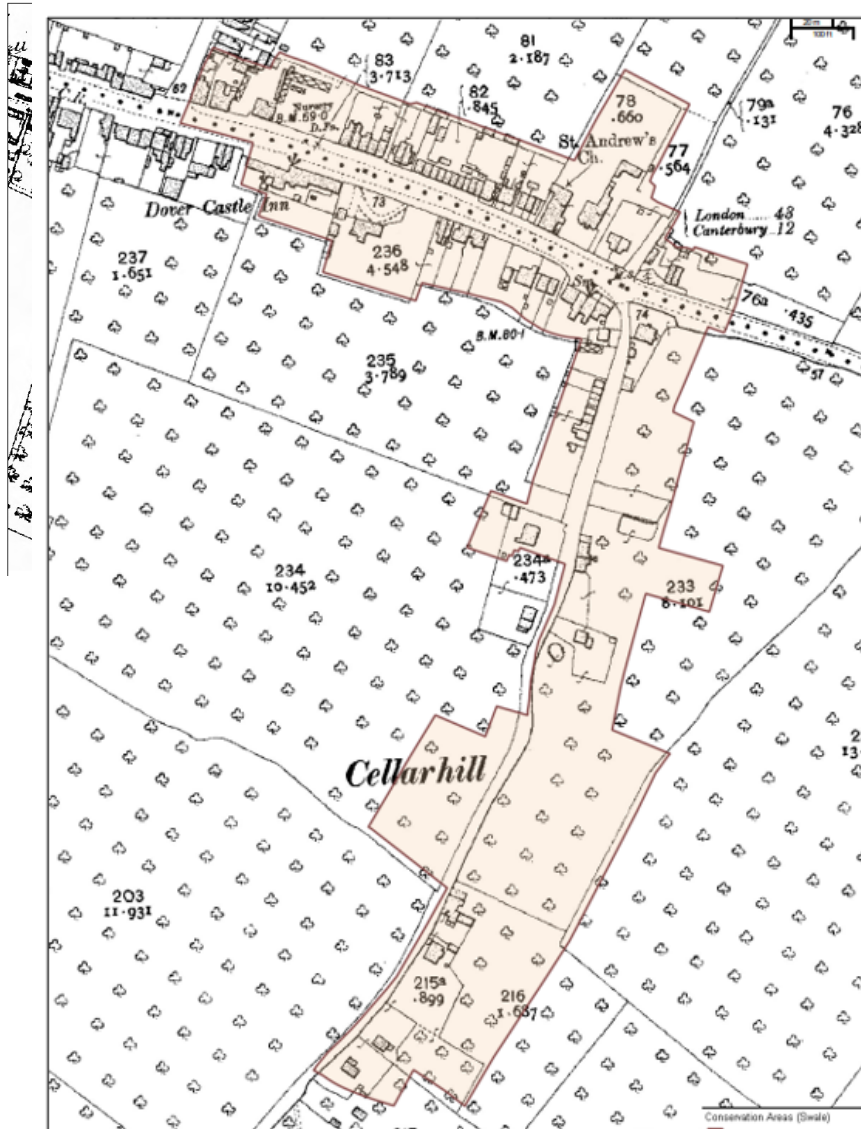
Tithe Commissioners' map 1840



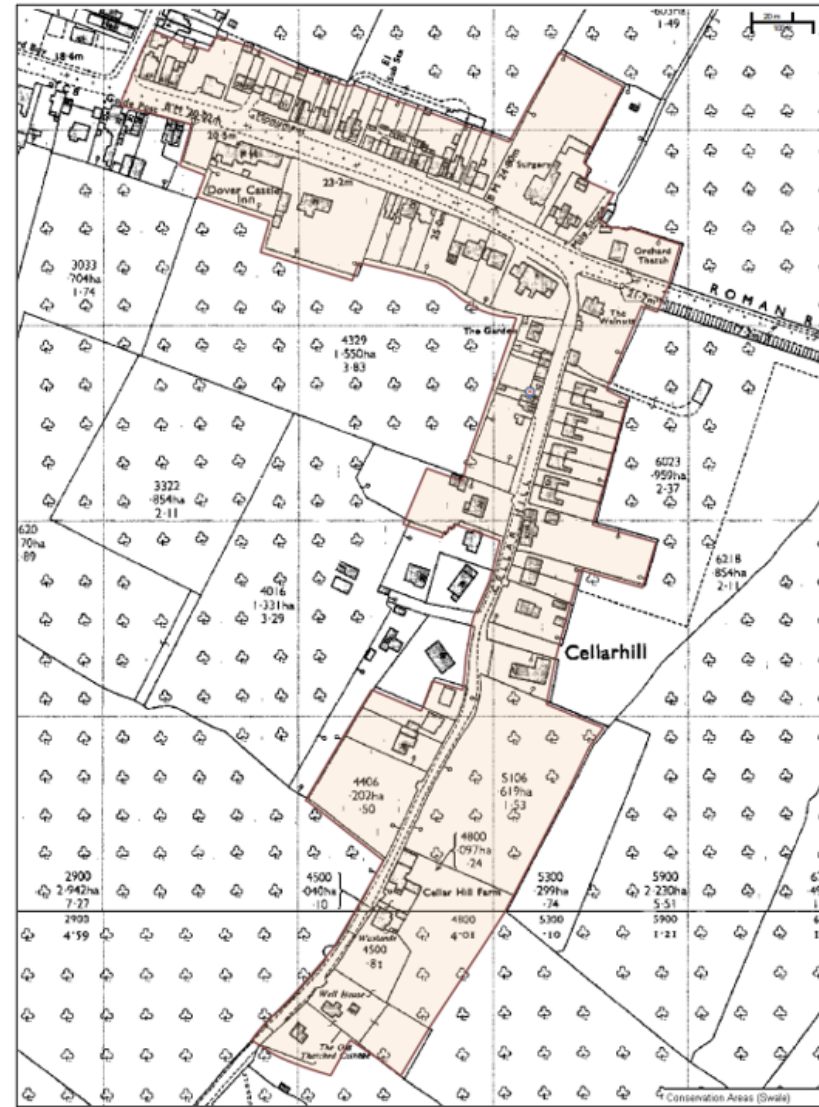
25-inch Ordnance Survey map extract 1864-1895



25-inch Ordnance Survey map extract 1896-1897



25-inch Ordnance Survey map extract 1907-1908



25-inch Ordnance Survey map extract 1957-1986



APPENDIX 3

Extracts from the National Heritage List for England (the Statutory List of Buildings of Special Architectural or Historic Interest)

The statutory list for Cellar Hill and Greenstreet Conservation Area is compiled by the Secretary of State for Digital, Culture, Media and Sport and is altered and amended from time to time as buildings are added or removed from the list. The list descriptions below are taken from the statutory list and were current in September 2021. For more detailed and up-to-date information please refer to the National Heritage List for England at www.historicengland.org.uk/listing/the-list.

Features and structures which are not specifically mentioned in the statutory list are not necessarily excluded from statutory protection which extends to the listed building as well as to any object or structure fixed to the building and to any object or structure within the curtilage of the building which predates July 1948.

The omission of a building from this list should not necessarily be taken to indicate that it is not listed without first referring to the National Heritage List.

TUDOR COTTAGE, CELLAR HILL Grade II

House, sometime 2 cottages. C16. Timber framed, part underbuilt with painted brick and plastered first floor, part exposed and close-studded with plaster infill, with thatched roof. Five framed bays. Two storeys, with continuous jetty to right on dragon posts and returned on right front. Hipped roof with central stacks. Four wood casements and 1 oriel to right on moulded projecting cill on first floor, and 3 wood casements and 1 oriel to right with 8 mullioned lights on ground floor. Central boarded door with four centred arched surround.



CELLAR HILL COTTAGE, CELLAR HILL Grade II

House. C16. Timber framed and clad with weatherboard on ground floor and rendered on first floor, with thatched roof. Two storeys with continuous jetty on dragon post returned on left front, and hipped roof with projecting catslide outshot to right and stack to centre left. One wood casement to each floor, and half-glazed door in left return front. Exposed frame on left return front.



WAYLANDS, CELLAR HILL Grade II

House. Early to mid C18. Grey bricks in header bond with red brick dressings and plain tiled roof. Two storeys and attic on plinth with flush plat band and quoins and moulded eaves cornice to hipped roof with 2 hipped dormers and stacks to centre and end left. Regular fenestration of 3 glazing bar sashes on first floor and 2 on ground floor with segmental heads. Central door of 6 raised and fielded panels in eared surround with pulvinated frieze to pediment.



THE OLD THATCHED COTTAGE, CELLAR HILL Grade II

House. C16. Timber framed and plastered with thatched roof. Two storeys on plinth with continuous jetty on brackets and hipped roof with central stack. Three wood casements on first floor and 2 on ground floor with plank and muntin door to centre right.



ALVERLEY HOUSE, 57 LONDON ROAD Grade II

House. C17 and clad C18. Timber framed and clad with red brick with plain tile roof. Two cell lobby entry plan. Two storeys on plinth and hipped roof with stack to rear centre. Two glazing bar sashes on each floor and central paneled and glazed door.



ORCHARD THATCH, LONDON ROAD Grade II

House. C17. Timber framed and weather boarded, underbuilt with red brick in English bond with thatched roof. Road Front: 3 storeys with plat band, the top storey weather boarded. Return hipped roof and stacks projecting end right and rear left. One wood casement each on first and second floors, 2 on ground floor, with segmental heads. Entry in catslide outshot on left return front.



THE WALNUTS, LONDON ROAD Grade II

House. 1825 for Thomas Pembury, blacksmith. Red brick and slate roof. Two parallel ranges. Two storeys and wood mullion eaves cornice to hipped roof with stacks projecting at left and right ends. Regular fenestration of 3 glazing bar sashes to first floor and 2 on ground floor with gauged heads. Central panelled door with semi-circular fanlight under open pediment on fluted Doric pilasters, at head of flight of 3 steps. (See E. Selby Teyham Manor and Hundred, 1982 ed. p.70).



NO 4 AND OLD FORGE BUILDING ADJOINING, LONDON ROAD Grade II

House, late C17 extended 1825. Painted brick and plain tiled roof. Two storeys on plinth with plat band and roof half-hipped to left. Three wood casements on each floor. Central panelled door in panelled surround with flat hood, with blocked window space to right. Old forge building: adjoining to right, now garage. Timber framed and clad with weatherboard and corrugated iron roof. One storey, with 1 metal casement, 1 glazed and shuttered forge door, half-doors to left, and garage doors to right. The forge building and the end left window bay of the adjoining house built in 1825 for Thomas Pembury, blacksmith. (See E. Selby Teynhm Manor and Hundred, 1982 edn. p.70).



THE GRANGE, 18 LONDON ROAD Grade II

House. C18. Painted brick and plain tiled roof. Rectangular plan with later wings added and recessed to left, slightly projecting to right. Two storeys on plinth with parapet and stacks to left and to right. Central block with regular fenestration of 3 glazing bar sashes on first floor with basket arched heads and moulded and panelled tympana. The windows to left and right are set in recesses in which are also the 2 ground floor windows with moulded panels between ground and first floor windows. Two storey extension to right with 1 wood casement to each floor, 1 storey extension left with 1 glazing bar sash. Central door of 4 panels with rectangular fanlight in Doric columned porch.



THE DOVER CASTLE, 20 LONDON ROAD Grade II

Public house. Early C18 extended early C19. Roughcast and plain tiled roof. Two storeys and basement on plinth with paired moddillioned eaves cornice to roof with kneelered gable ends, 2 hipped dormers and stacks at left and right ends. Regular fenestration of five glazing bar sashes on first floor in moulded segment-headed frames, and 4 segment-headed sashes on ground floor. Central half glazed door in panelled surround with pilasters and flat hood on brackets. One storey extension to left with parapet, 2 glazing bar sashes and 6 panelled door to right. Recessed 2 storey extension to right with 2 wood casements and garage doors.



NO. 42 LONDON ROAD Grade II

House, now house and butcher's shop. C16. Timber framed and rendered with plain tiled roof. Two storeys on plinth with moulded eaves cornice to hipped roof with gablets and central stack and 1 hipped dormer to left. Irregular fenestration of 1 half-size glazing bar sash to right first floor, and 1 large glazing bar sash on ground floor to left. Door of 4 panels to centre right and plate glass shop front under sloping pentice to right.



NO 52 LONDON ROAD Grade II

House. C16. Timber framed and roughcast with plain tiled roof. Two storeys and hipped roof with gablets. Two wood casements on first floor, 2 segmental bay windows on ground floor. Panelled and glazed door with flat hood on brackets to centre left.

NO. 54-56 LONDON ROAD Grade II

House and shop. C17. Rendered with plain tiled roof. Two storeys on plinth. Three wood casements on first floor close under eaves, and 2 segmental bays on ground floor. Half glazed door to left, glazed shop door to right. Included for group value.



NO. 70 LONDON ROAD Grade II

House. Circa 1700 with early C19 range. Painted brick and plain tiled roof. Two-cell lobby entrance plan. Two storeys on plinth, and hipped roof with gablets, central stack and 2 hipped dormers. Two wood casements and central 3 light wood mullion stair window on first floor, and 1 wood casement to left and 1 glazing bar sash to right on ground floor. Entry now by door of 4 panels in 1 storey C19 brick range to left, formerly a shop with half glazed double doors glazing bar windows and moulded fascia over. (See R.C.H.M. Report April 1972).



NO. 72 LONDON ROAD Grade II

House. C18. Red brick and plain tiled roof. Two storeys on plinth, and moulded wooden mullion eaves cornice with parapet to hipped roof with stacks projecting end left and at end right. Regular fenestration of 2 glazing bar sashes in C18bolection moulded surrounds with central blank panel on first floor, and 2 glazing bar sashes with gauged heads on ground floor. Central door of 6 panels and semi-circular traceried fanlight with open pediment on pilasters.



NO. 74 LONDON ROAD Grade II

House. Dated 1775 over entrance. Red brick and plain tiled roof. Entrance front in Lynsted Lane: two storeys and brick dentil cornice to hipped roof with central stack and 1 hipped dormer. Regular fenestration of 2 glazing bar sashes in moulded frames on each floor. with gauged heads on ground floor. Central C20 door of 6 raised and fielded panels in moulded architrave, with gauged semi-circular niche overbearing inscription: T.A Tile hung catslide outshot to right. M.A J.A 1775



THE GEORGE INN Grade II

Public House. C17. Timber framed, underbuilt with painted brick and plastered on first floor, with plain tiled roof. Two storeys on plinth and modillion eaves cornice to roof half-hipped to right, with 1 hipped dormer and stacks to rear centre and projecting end left and end right. Five glazing bar sashes on first floor, and three 6-light C20 mullioned and transomed windows on ground floor, and central ensemble of 2 half glazed doors and 3 light mullioned window and panelled apron, with pilasters and cornice overall. Said to predate 1679 (See E. Selby, Teynham Manor and Hundred, 1982 edn., p.70).



117 LONDON ROAD Grade II

House. Early C19. Red brick and slate roof. Two storeys and projecting wood modillion eaves cornice to hipped roof with stacks to rear left and right. Regular fenestrations of 3 glazing bar sashes on first floor and 2 on ground floor with gauged heads, and central half glazed door with semi-circular fanlight in Doric pilaster surround with raised frieze and pediment. Road front (left return) with 1 glazing bar sash with gauged head to each floor.



118 LONDON ROAD Grade II

House. C18. Timber framed and clad with weatherboard and underbuilt with painted brick, with plain tiled roof. Two storeys and hipped roof with stacks to rear right and projecting end left. Regular fenestration of 3 glazing bar sashes on first floor, 2 on ground floor with central C20 panelled door in moulded architrave.



183 - 185 LONDON ROAD Grade II

House and cottage. C17. Timber framed, the ground floor clad with weather board and pebble-dash to right, the first floor tile hung, with plain tiled roof. Two storeys and garret in half-hipped roof with central stack, the roof to right with lower pitch. Two wood casements and 1 glazing bar sash on first floor, one wood casement, one octagonal bay window and one glazing bar sash on ground floor. Central C20 plank and stud door, and door of four panels with flat hood to right.



APPENDIX 4 Legislation, national policy and local policy

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66 General duty as respects listed buildings in exercise of planning functions:

(1) In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 69 Designation of conservation areas:

(1) Every local planning authority— (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and (b) shall designate those areas as conservation areas.

(2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly.

(3) The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a conservation area is an area of special

architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

(4) The designation of any area as a conservation area shall be a local land charge.

Section 71 Formulation and publication of proposals for preservation and enhancement of conservation areas.

(1) It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.

(2) Proposals under this section shall be submitted for consideration to a public meeting in the area to which they relate.

(3) The local planning authority shall have regard to any views concerning the proposals expressed by persons attending the meeting.

Section 72 General duty as respects conservation areas in exercise of planning functions:

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of] any of the provisions mentioned in subsection

(2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (NPPF)

The NPPF sets out the government’s planning policies and how they should be applied. It provides the national framework for conserving and enhancing the historic environment, including conservation areas.

National Planning Practice Guidance (NPPG)

The NPPG sets out government’s guidance on how the act and national planning policy should be applied.

Adopted Local Plan- Bearing Fruits 2031: The Swale Borough Local Plan (2017)

Relevant objectives and policies within the local plan include:

Policy ST 1 Delivering sustainable development in Swale.
To deliver sustainable development in Swale, all development proposals will, as appropriate:..... 8. Achieve good design through reflecting the best of an area’s defining characteristics; 9. Promote healthy communities through:..... maintaining the individual character, integrity, identities and settings of settlements; 12. Conserve and enhance the historic environment by applying national and local planning policy through the identification, assessment and integration of development with the importance, form and character of heritage assets (including historic landscape

Policy CP 4 Requiring good design.
All development proposals will be of a high quality design that is appropriate to its surroundings. Development proposals will, as appropriate:... 2. Enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and strengthening sense of place; 5. Retain and enhance features which contribute to

local character and distinctiveness;... 8. Be appropriate to the context in respect of materials, scale, height and massing; 9. Make best use of texture, colour, pattern, and durability of materials; 10. Use densities determined by the context and the defining characteristics of the area; 11. Ensure the long-term maintenance and management of buildings, spaces, features and social infrastructure.

Policy DM 32 Development involving listed buildings.
Development proposals, including any change of use, affecting a listed building, and/ or its setting, will be permitted provided that:
1. The building’s special architectural or historic interest, and its setting and any features of special architectural or historic interest which it possesses, are preserved, paying special attention to the:
a. design, including scale, materials, situation and detailing; b. appropriateness of the proposed use of the building; and c. desirability of removing unsightly or negative features or restoring or reinstating historic features.
2. The total or part demolition of a listed building is wholly exceptional, and will only be permitted provided convincing evidence has been submitted showing that: a. All reasonable efforts have been made to sustain existing uses or viable new uses and have failed; b. Preservation in charitable or community ownership is not possible or suitable; and c. The cost of maintaining and repairing the building outweighs its importance and the value derived from its continued use.
3. If as a last resort, the Borough Council is prepared to consider the grant of a listed building consent for demolition, it may, in appropriate circumstances, consider whether the building could be re-erected elsewhere to an appropriate location. When re-location is not possible and demolition is permitted, arrangements will be required to allow access to the building prior to demolition to make

a record of it and to allow for the salvaging of materials and features.

Policy DM 33 Development affecting a conservation area. Development (including changes of use and the demolition of unlisted buildings or other structures) within, affecting the setting of, or views into and out of a conservation area, will preserve or enhance all features that contribute positively to the area's special character or appearance. The Borough Council expects development proposals to:

1. Respond positively to its conservation area appraisals where these have been prepared;
2. Retain the layout, form of streets, spaces, means of enclosure and buildings, and pay special attention to the use of detail and materials, surfaces, landform, vegetation and land use;
3. Remove features that detract from the character of the area and reinstate those that would enhance it; and
4. Retain unlisted buildings or other structures that make, or could make, a positive contribution to the character or appearance of the area.

Policy DM 34 Scheduled Monuments and archaeological sites

1. Development will not be permitted which would adversely affect a Scheduled Monument, and/or its setting, as shown on the Proposals Map, or subsequently designated, or any other monument or archaeological site demonstrated as being of equivalent significance to scheduled monuments. Development that may affect the significance of a non-designated heritage asset of less than national significance will require a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.
2. Whether they are currently known, or discovered during the Plan period, there will be a preference to preserve important

archaeological sites in-situ and to protect their settings.

Development that does not achieve acceptable mitigation of adverse archaeological effects will not be permitted.

3. Where development is permitted and preservation in-situ is not justified, the applicant will be required to ensure that provision will be made for archaeological excavation and recording, in advance of and/or during development, including the necessary post-excavation study and assessment along with the appropriate deposition of any artefacts in an archaeological archive or museum to be approved by the Borough Council.

Swale Borough Council Key Supplementary Planning Guidance

Swale Borough Council Planning and Development Guidelines No 2: Listed Buildings – A Guide for Owners and Occupiers.

Swale Borough Council No 3: The Conservation of Traditional Farm Buildings.

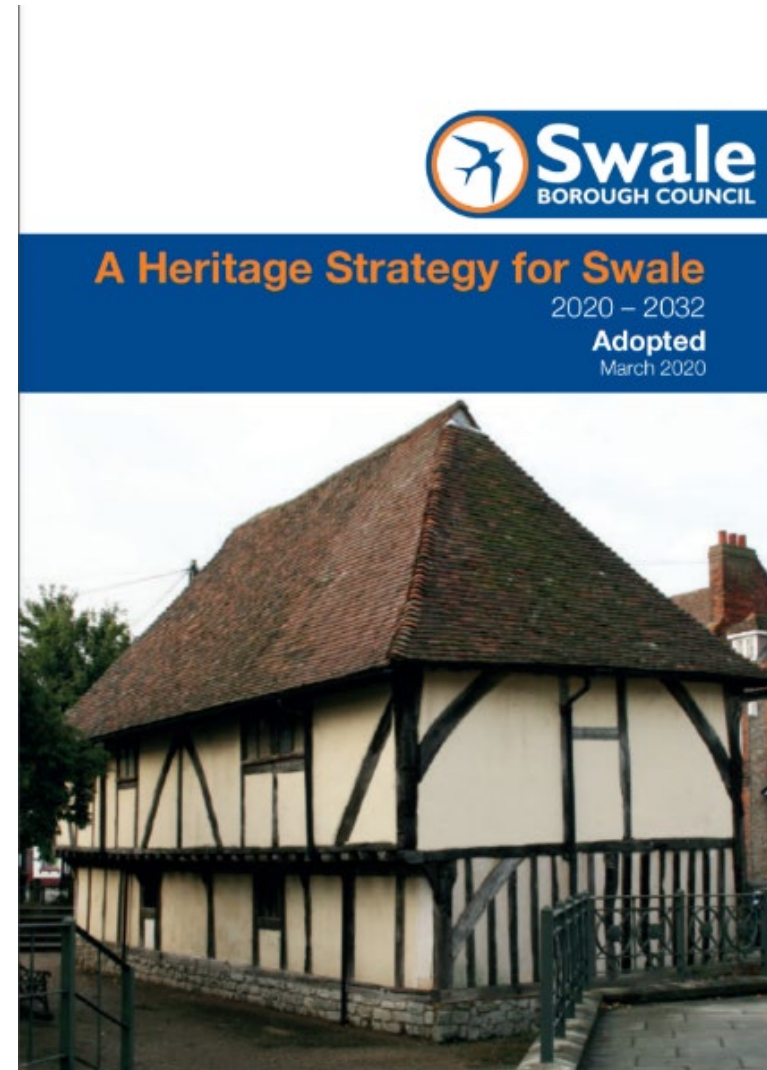
Swale Borough Council Planning and Development Guidelines No 8: Conservation Areas.

Swale Borough Council Heritage Strategy 2020-2032

The Council has developed a borough-wide heritage strategy to help it, along with key stakeholders and other interested parties, to protect and manage the historic environment in Swale in a positive and sustainable way, on a suitably informed basis.

A key element of the strategy is setting out the Council's overall vision and priorities, which it is hoped will align with the vision and priorities of local communities and local amenity societies as far as possible, in order that the strategy can be widely supported.

The strategy sets out a series of proposals in the associated initial 3-year action plan which are aimed at enabling the positive and sustainable management of different elements of the borough's historic environment for the foreseeable future. Priority is given to those parts of the borough's historic environment which are already suffering from, and at risk from negative change, and/or which face significant development pressure, threatening their special character. The proposed set of actions will involve joint project working with amenity societies and/or volunteers from the community wherever this is possible.



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John Newman *The Buildings of England North East and East Kent* (2013)

Kent County Council *South east Archaeological Research Framework* www.kent.gov.uk

Kent County Council *Historic Environment Record* www.kent.gov.uk

Kent County Council and Kent Conservation Officers Group, *Highway Works and Heritage Assets: the Kent Protocol for Highway Works in Relation to Designated Heritage Assets* (2011)

LUC Swale *Local Landscape Designation* (October 2018)

Lynsted Design Statement (2002)

Jacobs Swale *Landscape Character and Biodiversity Appraisal* (2011)

Swale Borough Council and Kent County Council *Rural Lanes Study 1996-97*

Historic England Publications

Historic England Good Practice Advice Notes (GPAs) provide advice on good practice and how national policy and guidance should be applied.

GPA1: *The Historic Environment in Local Plan Making* (March 2015)

GPA2 - *Managing Significance in Decision-Taking in the Historic Environment* (March 2015)

GPA3 – *The Setting of Heritage Assets* (December 2017)

Historic England Advice Notes (HEANs) include detailed, practical advice on how to implement national planning policy and guidance.

HEAN 1: *Conservation Areas: Designation, Appraisal and Management* (Feb 2019)

HEAN 2: *Making Changes to Heritage Assets* (February 2016)

HEAN 9: *The Adaptive Reuse of Traditional Farm Buildings* (October 2017)

HEAN 10: *Listed Buildings and Curtilage* (February 2018)

HEAN 12: *Statements of Heritage Significance* (October 2019)

HEAN 16: *Listed Building Consent* (June 2021)

Streets For All (May 2018)

www.historicengland.org.uk/listing/the-list

For further information contact:

Swale Borough Council Planning Services 01795 417850

www.Swale.gov.uk

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This Conservation Area Character Appraisal was prepared by:

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Policy and Resources Committee Meeting	
Meeting Date	27 th November 2024
Report Title	Adoption of Good Causes Lottery Anti-Money Laundering Policy
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Charlotte Hudson, Head of Housing and Communities
Lead Officer	Stephanie Curtis, Community Services Manager
Classification	Open
Recommendations	1. For Policy and Resources Committee to approve the Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy.

1 Purpose of Report and Executive Summary

- 1.1 This report asks the Policy and Resources Committee to adopt the Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy, to be able to progress the licence with the Gambling Commission to launch the Good Causes Lottery.

2 Background

- 2.1 In July 2024, Policy and Resources Committee agreed the funding for the Swale Good Causes Community Lottery. The project team have been progressing the project and in order to launch the lottery, Swale Borough Council must have in place an Operator's Licence from the Gambling Commission.
- 2.2 As part of our application to the Gambling Commission, a series of policies must be provided to demonstrate the Council's ability to effectively and safely manage the lottery. This includes the need for a Lottery specific Anti-Money Laundering Policy.
- 2.3 The Council currently has in place a Counter-Fraud and Corruption Policy which is being reviewed. Although as part of this review, an anti-money laundering element is to be included, this overall policy is different to what is required specifically by the Gambling Commission for the good causes lottery. Therefore, it is felt that an anti-money laundering policy for the lottery should also be in place.

3 Proposals

- 3.1 For Policy and Resources Committee to approve the Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy.

4 Alternative Options

- 4.1 To not adopt this Lottery Anti-Money Laundering Policy– This option is not recommended as without this Policy being in place, the Good Causes Community Lottery project cannot be progressed.

5 Consultation Undertaken or Proposed

- 5.1 No consultation is currently proposed.

6 Implications

Issue	Implications
Corporate Plan	The adoption of this policy is directly linked to the Community Priority: To support local groups and organisations in Swale through the delivery of the member grants programme and review the funding mechanism of a community lottery scheme
Financial, Resource and Property	There are no financial implications for adoption of this policy. There is an officer resource requirement in ensuring its effective implementation, but this is included within the resources already allocated for the development and then ongoing management of the Good Causes Lottery.
Legal, Statutory and Procurement	This Good Causes Lottery Anti-Money Laundering Policy sets out how the Council (as the lottery operator) will ensure the Lottery is run in a manner that is compliant with the Proceeds of Crime Act 2002; and The Terrorism Act 2000. As part of this policy, there is a need to have a named Money Laundering Reporting Officer. This has been agreed to be
Crime and Disorder	None identified at this stage
Environment and Climate/Ecological Emergency	None identified at this stage
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	There are no specific safeguarding implications for this policy, but this policy along with other measures in place for the Good Causes Lottery will ensure its safe operation and protection of children and vulnerable adults.
Risk Management and Health and Safety	This policy sets out a series of measures to manage the risk linked to the operation of the Good Causes Lottery.

Equality and Diversity	None identified at this stage
Privacy and Data Protection	None identified at this stage

7 Appendices

Appendix 1: Swale Borough Council Good Causes Anti-Money Laundering Policy

8 Background Papers

None

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Swale Good Causes Lottery Anti Money Laundering, Proceeds of Crime and Terrorist Financing Policy

1. Introduction

1.1 Policy Information

Approval date	Replaces version dated	Responsible person	Approved by	Next review date
27/11/24 TBC	N/A	Stephanie Curtis	Policy and Resources Committee	November 25

1.2 Purpose

Swale Borough Council (the **Operator**) is committed to the prevention of opportunities for money laundering activities within its organisation.

The Proceeds of Crime Act 2002 (**POCA**) and the Terrorism Act (**TA 2000**) impose obligations on persons and organisations in both the regulated and unregulated sector in relation to the reporting of money laundering or terrorist financing instances.

In addition, the Operator is required as a licensed lottery operator to comply with the relevant sections of the Licence Conditions & Codes of Practice (**LCCP**) pertaining to money laundering and terrorist financing.

The Operator is also committed to operating within the spirit of the licensing objectives set out in the Gambling Act 2005. The first licensing objective is particularly relevant in the context of this Policy: *“preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime”*.

The Operator has adopted this Policy in order to ensure effective controls and procedures in relation to money laundering, taking into account the risks posed to the Operator.

1.3 Scope

This Policy applies to the Operator and all of its directors, officers, employees, workers and any other personnel working for or on behalf of the Operator involved in the management and operation of the Operator’s lottery.

2.0 Anti Money Laundering Requirements

2.1 The POCA

There are three primary offences contained in the POCA relating to the direct handling of the proceeds of crime.

- to conceal, disguise, convert or transfer the proceeds of crime, or remove the proceeds of crime from the UK¹;
- to enter into, or become concerned in an arrangement, in which the person knows or suspects the retention, use or control of the proceeds of crime²; and
- to acquire, use or possess the proceeds of crime³.

These offences can be committed by any person or organisation.

The POCA also contains offences in relation to the failure to disclose the suspicion of money laundering and 'tipping off', however these offences only apply to organisations within the regulated sector. The Operator is not within the regulated sector for the purposes of the POCA.

2.2 The TA 2000

The offences within the TA 2000 relating to the handling of money or other property intended to be used for the purposes of terrorism are:

- to receive (or invite the receipt of), provide or use any money or other property which is intended to be used, or the person has reasonable cause to suspect that it may be used, for the purpose of terrorism⁴;
- to enter into, or become concerned in an arrangement, in which the person knows or suspects it will be used for the purpose of terrorism⁵; and
- to conceal, transfer or remove from the UK any money or other property which is intended to be used, or the person has reasonable cause to suspect that it may be used, for the purpose of terrorism⁶.

As with the primary offences under POCA, these offences can be committed by any person or organisation.

2.3 The LCCP

The Operator is a licensed lottery operator and therefore is required to comply with the LCCP. The relevant sections of the LCCP pertaining to money laundering and terrorist financing are:

¹ s.327, POCA

² s.328, POCA

³ s.329, POCA

⁴ ss.15-16, TA 2000

⁵ s.17, TA 2000

⁶ s.18, TA 2000

LCCP Condition	LCCP Requirement	How the Operator satisfies this requirement
12.1.1	The Operator must conduct an assessment of the risks of its business being used for money laundering and terrorist financing.	The Operator carries out an annual money laundering risk assessment, as set out in this Policy.
12.1.1	The Operator must have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.	The Operator has implemented this Policy to ensure effective controls and procedures in relation to money laundering.
12.1.1	The Operator must ensure that its policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.	The Operator will review this Policy, together with the controls and procedures hereunder, not less than once per year. An ad hoc review of this Policy may be required from time to time in case of, for example, a change in the law or if new guidance is issued by the Gambling Commission.
15.2.1 (4c)	The Operator is required to report the appointment or change of the person which has overall responsibility for the Operator's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.	The Operator has appointed a Money Laundering Reporting Officer and will notify the Gambling Commission of any change in the person holding this position.
15.2.2 (1d)	The Operator is required to report any actual or potential breaches of the requirements imposed under Parts 7 & 8 of the POCA or Part 3 of the TA 2000.	The Operator has implemented a reporting procedure in this Policy.

3.0 Risk Assessment

3.1 Risk areas

The Operator has identified the money laundering risks posed to its organisation as falling within two key areas:

- Criminal laundering of money through the purchase of tickets on the Operator's lottery website and subsequent winnings from draws to be taken as laundered money.

- False registration and representation of good causes on the Operator's lottery website, where tickets are purchased using illegally acquired funds in order to be extracted through the false pretense of funds raised for a good cause.

3.2 Mitigation

The Operator operates in a way that mitigates the risk of money laundering within its organisation. The controls listed below act as effective mitigation against money laundering:

Risk area	Mitigation
Customer identification	All users must provide their full name, address, email address and date of birth in order to register an account on the Operator's lottery website.
Method of payment	The Operator's accepted payment methods are by direct debit or debit card. Cash payments are not accepted, which eliminates the risk of counterfeit money passing through the Operator.
Lottery draws	To minimise the risk of fraudulent behaviour and demonstrate impartiality, the main lottery draw each week takes the results from an independently drawn lottery. This ensures no fraudulent activity can be taken in the generation of the winning set of numbers for the draw. The smaller local level prizes are generated based on a random ticket selection using the online resource http://www.random.org/who , which is independently verified for its random number generation using atmospheric noise.
Customer prize winnings	<p>Ticket purchases are limited per participating user. This is a restriction placed upon users in the lottery systems, which makes it impossible for a single user to purchase a large amount of tickets. Therefore, a large number of individual user accounts would be needed to attempt money laundering of any significant value, which would be identified in the lottery systems.</p> <p>The maximum return possible from money laundering through the purchase of tickets is extremely low in comparison to other gambling activities.</p>
Legitimacy of good causes	To ensure the legitimacy of good causes registered on the Operator's lottery website, a cause application and approval workflow process is in place whereby the Operator itself has a duty to verify the identity of each good cause prior to approving their inclusion and set up on the Operator's lottery website. This

	workflow is comprehensively tracked and logged on system records.
Security	<p>The lottery software resides on secure servers behind encrypted firewalls, which provide bank level security protocols in the transfer of electronic data. In addition, the servers are located in a secure data centre managed by DBS checked staff.</p> <p>There is a full audit trail of every transaction for the software, including timestamps. This allows full investigation of any suspicious activities.</p>
Personnel	Any suspicion of illegal behaviour by the Operator's personnel will result in a full investigation. For the duration of any such investigation, the person will be suspended from their duties for the protection of customers, the Operator's personnel and the reputation of the organisation.
Service providers	All service providers that provide essential services to the Operator in order to operate its lottery website (such as direct debit bureaux and payment gateways) undergo thorough checks in respect of their suitability, credibility and reputation. This may include financial health checks and references.

3.3 Assessment

The Operator assesses its overall money laundering risk as low for the following reasons:

- The opportunities for money laundering within the Operator's organisation are limited. The low ticket value and restrictions on the number of tickets per user means that criminals would have to set up a large number of accounts to make any money laundering activity worthwhile.
- The setting up of a good cause requires validation from the Operator, which deters criminal activity.
- The overall balance of risk and effort versus reward means that attempted money laundering through the Operator's lottery would require a lot of effort for low return and that the likelihood of discovery would be extremely high.

The Gambling Commission has also assessed the current overall risk rating for Society Lotteries and External Lottery Managers as low. The Gambling Commission risk assessment may be found [here](#).

4.0 Suspicious Activity Reporting

4.1 Money Laundering Reporting Officer

As the Operator is not within the regulated sector, it is not obliged under the POCA or the TA 2000 to appoint a Money Laundering Reporting Officer (**MLRO**). However, in line with guidance from the Gambling Commission, the Operator has decided to appoint a MLRO in order to more effectively satisfy its obligations under the POCA, TA 2000 and the LCCP.

The Operator has appointed **name, title** as its MLRO. The MLRO is responsible for receiving, investigating and (if deemed necessary) acting upon all Suspicious Activity Reports (**SAR**) received from Operator personnel.

4.2 Internal Reporting Procedure

All Operator personnel are expected to be vigilant to the possibility of money laundering occurring within the business and should use their personal judgment to identify suspicious circumstances.

Examples of suspicious circumstances may include (this list is not exhaustive):

- An unexpected material increase in the number of user accounts set up in the Operator's lottery over a short period of time.
- An unexpected material increase in the number of good cause applications in the Operator's lottery over a short period of time.
- An increase in high ticket purchases for individual players.
- Operator personnel requesting access to systems used for a purpose which is outside of their usual responsibilities.

If you are suspicious of money laundering activities occurring within the Operator organisation, you must report it to the MLRO as soon as possible using the SAR Form set out in the Annex to this Policy. It is important that suspicions are reported promptly as it can provide both the Operator and its personnel with protection against prosecution.

If you feel uncomfortable in making a SAR, you may speak with your line manager and complete the SAR Form together. You **must not** discuss your suspicions with anyone who may prejudice any investigation into criminal activity. You also **must not** delete or alter any records which may be relied upon to investigate criminal activity.

4.3 Reporting to Law Enforcement

The MLRO, in consultation with the Operator's Legal Department, is responsible for investigating all SARs received from Operator personnel and deciding whether to make a subsequent SAR to the National Crime Agency (**NCA**) and the Gambling Commission.

4.4 Record-keeping

The MLRO is responsible for keeping adequate records of:

- all SARs received from Operator personnel;
- all documents which relate to the investigation of SARs received from Operator personnel, including but not limited to, financial records, system records, meeting notes and legal advice (whether internal or external);
- all SARs made to the NCA and any subsequent correspondence with the NCA and other law enforcement agencies.

4.5 Training

Operator employees (whether full time or part time) involved in the management or operation of the Operator's lottery will receive annual training on the matters covered in this Policy.

All new employees of Operator involved in the management or operation of the Operator's lottery will receive training on this Policy as soon as practicable after their start date.

Annex: Suspicious Activity Report Form

SUSPICIOUS ACTIVITY REPORT FORM			
Please complete this form and send it by email to the Operator's MLRO and Legal Department.			
Name:		Report date: <i>The date that you are submitting this report.</i>	
Title:		Suspicious activity dates(s): <i>Please be as accurate as possible based on the information currently available.</i>	
Details of suspicious activity <i>Please provide as much information as possible.</i>			
Name(s) of suspected person(s) <i>If you do not know the identity of suspected person(s), please write "Unknown".</i>			
Records relevant to the suspicious activity <i>Please list any records in your possession relevant to the suspicious activity.</i>			

Policy and Resources Committee Meeting	
Meeting Date	27 th November 2024
Report Title	Adoption of Operators Gambling Policy for Swale Borough Council
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Charlotte Hudson, Head of Housing and Communities
Lead Officer	Stephanie Curtis, Community Services Manager
Classification	Open
Recommendations	1. For Policy and Resources Committee to approve the Swale Good Causes Lottery Operator Gambling Policy.

1 Purpose of Report and Executive Summary

- 1.1 This report asks the Policy and Resources Committee to adopt the Operators Gambling Policy, in order to be able to progress the licence with the Gambling Commission to launch the Good Causes Community Lottery.

2 Background

- 2.1 In July 2024, Policy and Resources Committee agreed the funding for the Swale Good Causes Community Lottery. The project team have been progressing the project and in order to launch the lottery, Swale Borough Council must have in place an Operator's Licence from the Gambling Commission.
- 2.2 As part of our application to the Gambling Commission, a series of policies must be provided to demonstrate the Council's ability to effectively and safely manage the lottery. This includes the need for an Operators Gambling Policy.
- 2.3 Although the Council has recently adopted the revised Statement of Principles under the Gambling Act 2005, this policy serves a different purpose and relates to how we as a Council manages licenses issued by us related to Gambling.
- 2.4 The Operators Gambling Policy that is required for the Gambling Commission will need to set out how we as a Council will safely operate the Good Causes Lottery in line with the Gambling Act 2005; and Codes of Practice issued by the Gambling Commission. As this policy does not currently exist for the Council, it is therefore recommended that the policy set out in Appendix 1 is adopted.

3 Proposals

- 3.1 For Policy and Resources Committee to approve the Swale Good Causes Lottery Operator Gambling Policy

4 Alternative Options

- 4.1 To not adopt this Operators Gambling Policy– This option is not recommended as without this Policy being in place, the Good Causes Community Lottery project cannot be progressed.

5 Consultation Undertaken or Proposed

- 5.1 No consultation is currently proposed.

6 Implications

Issue	Implications
Corporate Plan	The adoption of this policy is directly linked to the Community Priority: To support local groups and organisations in Swale through the delivery of the member grants programme and review the funding mechanism of a community lottery scheme
Financial, Resource and Property	There are no financial implications for adoption of this policy. There is an officer resource requirement in ensuring its effective implementation, but this is included within the resources already allocated for the development and then ongoing management of the Good Causes Lottery.
Legal, Statutory and Procurement	This Operators Gambling Policy sets out how the Council (the Operator of the Swale Good Causes Lottery) will ensure the Lottery is run in a manner which is compliant with the Gambling Act 2005 and any Codes of Practice adopted by the Gambling Commission.
Crime and Disorder	None identified at this stage
Environment and Climate/Ecological Emergency	None identified at this stage
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	The policy will ensure that the Good Causes Lottery is operated in a compliant manner with the Gambling Act 2005. Measures as part of this include ensuring that children and other vulnerable people will be protected from being harmed or exploited by gambling, as outlined in section 7 of the Policy.
Risk Management and Health and Safety	This Operators Gambling Policy sets out a series of actions that we as a Council will take to ensure the safe management of the Good Causes Lottery.

Equality and Diversity	None identified at this stage
Privacy and Data Protection	None identified at this stage

7 Appendices

Appendix 1: Swale Borough Council Operators Gambling Policy

8 Background Papers

None

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Swale Borough Council Operator Gambling Policy

1. Introduction

1.1 Policy Information

Approval date	Replaces version dated	Responsible person	Approved by	Next review date
27/11/24 TBC	N/A	Stephanie Curtis	Policy and Resources Committee	November 2025

Swale Borough Council (hereinafter referred to as the **Operator**, or **we, us, our**) is licensed by the UK Gambling Commission (the **Commission**) to promote a lottery under Operating Licence Number TBC.

1.2 Purpose

The purpose of this Gambling Policy (**Policy**) is to set out the means by which the Operator complies with the Gambling Act 2005 (the **Act**) and the Licence Conditions and Codes of Practice adopted by the Commission from time to time (the **LCCP**). This includes, without limitation:

- ensuring that the Operator’s business is protected from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime*;
- ensuring that children and other vulnerable persons will be protected from being harmed or exploited by gambling*;
- ensuring that gambling is conducted in a fair and open way*;
- the promotion of socially responsible gambling;
- cooperation with the Commission and access to premises;
- information and reporting requirements;
- marketing; and
- complaints procedure.

* *The licensing objectives as set out in the Act.*

1.3 Scope of this Policy

This Policy is intended to set out:

- how we comply with the principles and our obligations under the Act and the LCCP; and
- what we will expect to be done by our directors, employees, contractors, agency workers, interns, volunteers and trainees and apprentices involved in the management and operation of Swale Community Lottery (**personnel**).

It is intended that this Policy will help to ensure that personnel understand and are able to comply with the requirements of the Act and the LCCP which they are subject in the course of their work.

Personnel should maintain an awareness of all policies and procedures relating to compliance with the Act and the LCCP.

This Policy will be reviewed and updated annually in order to ensure that we continue to act in accordance with our obligations under the Act and the LCCP. Revised versions will be brought to the attention of all personnel as and when necessary.

1.4 Licensing

The Operator will operate Swale Community Lottery (the **Lottery**) in full compliance with:

- the Act;
- the LCCP; and
- the Remote Gambling and Software Technical Standards adopted by the Commission from time to time (the **RGSTS**).

The Operator operates as a small-scale operator, as defined by the Gambling Act 2005 (Definition of Small-Scale Operator) Regulations 2006, which means that no more than three (3) individuals within the Operator are 'qualifying persons'.

In case of any change to the Operator's key personnel whose details and responsibilities have been notified to the Commission in relation to The Operator's operating licence (i.e. 'qualifying persons' named within each operating licence of the Operator):

- we must notify the change to the Commission as a key event as soon as reasonably practicable, and in any event, no later than five (5) business days after the change has occurred. This notification must be made through the Commission's eServices portal; and
- we must complete the **Application to Vary a Licence Form** (available through the Commission's website) and submit it to the Commission, together with the requisite fee.

If it is intended that an individual will be added to The Operator's operating licenses as a 'qualifying person', that individual must first complete an **Annex A Declaration** (available through the Commission's website). This would usually take place around the same time that the **Application to Vary a Licence Form** is completed.

2. External lottery manager

The Operator has appointed Gatherwell Limited, an external lottery manager licensed by the Commission under account number 36893 (**Gatherwell**) to manage and administer the Lottery on the Operator's behalf.

The Operator remains ultimately responsible for its own compliance with the Act, the LCCP and the RGSTS, however Gatherwell shall assist in all aspects of the Lottery's operation to meet such requirements.

3. General compliance

The Operator will ensure that:

- its game rules and/or terms and conditions under which gambling is offered do not contain provisions which may be regarded as unfair as defined in the Consumer Rights Act 2015;
- the game rules and/or terms and conditions for the Lottery are written in clear and understandable language, and are made available to all prospective and existing customers; and
- weekly lottery members will be notified of any changes to the game rules and/or terms and conditions for the Lottery in advance of the changes coming into effect.

Gatherwell (on our behalf) will ensure that the following notice is displayed prominently on the Lottery website: *"Swale Community Lottery, promoted by Swale Borough Council, a [[Local Authority Lottery OR Society Lottery]] licensed by the Gambling Commission Gambling Commission Account No: NUMBER."* The notice will include a direct link to a specific page on the Commission's website so that the Operator's status can be easily verified.

4. Protection of the Operator's business from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

The Operator will refuse to be associated with any lottery or other gambling activity that may be illegal.

The Operator will refuse to enter into any contract or relationship with suppliers, contractors or agents that are suspected of being associated with any potential or actual criminal activities.

The Operator has adopted an Anti Money Laundering, Proceeds of Crime and Terrorist Financing Policy (**AML Policy**) in order to ensure effective controls and procedures in relation to money laundering, taking into account the risks posed to The Operator. The AML Protocol applies to all personnel involved in the management and operation of the Lottery.

5. Ensuring that children and other vulnerable people will be protected from being harmed or exploited by gambling

Protection of children

The Operator and Gatherwell will ensure that the Lottery rules and any Lottery marketing and promotional literature adequately and effectively advertise the minimum legal age limit.

When a prospective customer registers on the Lottery website, they will be asked to confirm that they are 18 years of age or older. We and Gatherwell may conduct random proof of age checks from time to time to ensure compliance with age restrictions.

The Operator and Gatherwell will review on a regular basis the methodology adopted in order to establish whether or not a prospective or actual customer is at least 18 years old and will implement all reasonable improvements that may become available as technology advances and as information improves.

The Operator will not accept lottery entries from any person who we know or suspect to be under 18 years old. In case of any doubt over whether a person meets the legal minimum age requirement, we (or Gatherwell on our behalf) may ask the person to provide proof of age documentation, such as a drivers licence, passport or other government issued ID.

If a person is unable to prove, on request from the Operator (or Gatherwell on our behalf), that they meet the legal minimum age requirement:

- we will refund any Lottery entries purchased by that person; and
- that person will not be eligible to receive any prize. Jackpot prize winners must provide valid proof of age to Gatherwell (who verify proof of age on our behalf) before any prize will be paid out.

It is a criminal offence to invite or allow a person under 18 years of age to enter a local government lottery. As such:

- any personnel who knowingly or recklessly invites a person under 18 years of age to enter the Lottery will be subject to disciplinary action;
- if any supplier, contractor or agent engaged by the Operator knowingly or recklessly invites a person under 18 years of age to enter the Lottery, we will review our commercial relationship with that supplier, contractor or agent, which includes the likelihood of terminating such relationship.

Problem gambling

If a person known or suspected to be a problem gambler purchases a Lottery entry for or subscribes to the Lottery, or an existing customer is suspected of becoming a problem gambler:

- any requests for additional lottery entries should be politely refused;
- the customer should be tactfully referred to GambleAware by Customer Support; and
- the customer's details should be logged for the purpose of possible exclusion from future participation in lotteries managed by the Operator.

Self exclusion from gambling

Customers will be given the opportunity to self-exclude either by telephone, in writing or by an automated process via the relevant lottery website.

Gatherwell (on our behalf) will ensure that procedures are implemented which are designed to identify separate accounts held by the same person, in order that, if an existing customer opts to self-exclude from gambling, they are excluded from all accounts.

The Operator and Gatherwell will ensure that self-excluders from gambling:

- are given the opportunity either to self-exclude immediately without any cooling off period or to consider self-exclusion further, for example in order to discuss problem gambling with a counseling or support service;
- are removed from any gambling related marketing databases within two (2) days of receiving the self-exclusion request;
- are excluded for a minimum initial period of six (6) months;
- may request an additional self-exclusion period of up to at least five (5) years;
- remain self-excluders at the end of the period chosen by the customer for a minimum of seven (7) years, unless the customer takes positive action to gamble again;
- are given a one (1) day cooling off period before being allowed to begin gambling again during the period following the end of their initial self-exclusion;
- will not receive any future gambling-related marketing materials, unless the customer takes positive action to gamble again and has specifically agreed to accept such materials.

If a person who has self-excluded attempts to purchase a Lottery entry or subscribe to the Lottery:

- the Lottery entry or subscription will be rejected by Customer Support and the self-excluder will be advised in writing of the reasons for the rejection and tactfully referred to GambleAware; and
- the self-excluder will continue to be excluded from all future draws conducted by the Operator.

If an existing customer opts to self-exclude from gambling:

- the Lottery subscription held by the self-excluder should be cancelled as soon as possible;
- all payments in relation to Lottery entry purchases for draws which have not yet taken place should be refunded at the earliest opportunity; and
- the customer will be excluded from all future Lottery draws.

Other vulnerable people

The Operator is committed to ensuring that Lottery entries or subscriptions are not knowingly sold to other vulnerable people, for example those under the influence of alcohol or drugs, or anyone who is incoherent or suffering from a cognitive disability.

6. The promotion of socially responsible gambling

Information on how to gamble responsibly and help for problem gamblers

The Operator and Gatherwell will ensure that information about how to gamble responsibly and how to access support services in respect of problem gambling is available to all prospective and actual customers of the Lottery.

The Lottery website, and marketing and promotional literature promoting the Lottery, will advertise the BeGambleAware logo and the GambleAware website, provided that the Operator is permitted to do so.

We may, from time to time, also signpost to other organisations which provide gambling support or counselling services. For example, GamCare offers advice, support and counselling services in respect of problem gambling.

The following text will be utilised in support of the BeGambleAware logo: *“Always play responsibly, if you need to talk to someone about your gambling please contact Gamble Aware”*.

The Operator is a member of the Lotteries Council. The Lotteries Council financially contributes to GambleAware on the Operator’s behalf. This contribution supports research into the prevention and treatment of gambling related harm, develops harm prevention approaches and identifies and funds treatment to those harmed by gambling.

Account validation, purchase limits and monitoring of possible problem gambling

All customers require validation and set up before a gambling transaction may be processed, which limits the facilitation of instant gambling. For example:

- If the customer opts to pay by direct debit for a weekly lottery product, the Direct Debit Guarantee ensures a time lag between lottery ticket purchase and the first lottery draw.
- If the customer opts to pay by debit card for a weekly lottery product, there will be a minimum one (1) day lag before the customer will be entered into a draw.
- If the customer opts to pay by debit card for a single play raffle product, there is a minimum of one (1) hours’ lag between the purchase and draw time.

In order to promote responsible gambling practices, the Lottery website checkout process (provided by Gatherwell on our behalf) limits customer purchases to twenty (20) lottery entries per transaction. This restricts the ability for customers to gamble beyond their means. Gatherwell will monitor this limitation and may adjust it from time to time, taking into account the number of customers which reach the purchase limit.

Gatherwell produces a monthly report of high ticket customers, which includes any customers who have purchased twenty (20) or more lottery entries (**High Ticket Customers**). Customer Support

should contact all High Ticket Customers to confirm their ticket purchases and, if necessary, make adjustments to the number of tickets purchased.

If during contact with a High Ticket Customer, Customer Support identifies that the High Ticket Customer may be a problem gambler, communications with the High Ticket Customer should be reviewed to decide what action is required. This may include a follow up call to the High Ticket Customer.

If Customer Support holds a reasonable belief that the High Ticket Customer's behaviour may be typical of problem gambling, it may be necessary to cancel the High Ticket Customer's Lottery subscription and prevent the High Ticket Customer from making further purchases of Lottery entries. The relevant High Ticket Customer should be advised of this in writing. All communications should be handled with utmost care and discretion.

All communications with High Ticket Customers and any decisions made are logged by Gatherwell and provided to the Operator on request.

7. Ensuring that gambling is conducted in a fair and open way

The Operator ensures that the Lottery will be conducted on a financially sound basis, given that:

- the financial structure of the Lottery ensures that revenues are received prior to the running of any draw;
- each draw is self-funded in terms of the liabilities that arise (such as prizes and charitable donations);
- no customers' tickets will be included in the draw unless cleared funds have been received;
- the prize fund and charity donations are calculated based on a percentage (%) of the total ticket receipts, which ensures that funds will be in place to support the liabilities of the Lottery.

Gatherwell (on our behalf) ensures that all technical solutions for the Lottery remain in compliance with the Act, the LCCP and the RGSTS. This includes:

- testing procedures for existing, upgraded and new software propositions;
- ensuring that all servers hosting lottery software are located in the United Kingdom;
- software protocols and administrator access is limited to core Gatherwell staff;
- all suppliers, contractors and agents engaged by Gatherwell are advised of its standards before they are allowed to deliver technical support. Access is limited on an 'as needs' basis according to their scope of work and is monitored and logged.

The Lottery will be conducted in accordance with strict game rules, which are drafted by Gatherwell and approved by the Operator. The game rules will be accessible to all prospective and actual customers through the Lottery website. All new customers must accept the game rules at the point of sign up and no new account may be created on the Lottery website without accepting the game rules.

Gatherwell (on our behalf) will notify customers if any changes are made to the game rules. In case of minor changes to the game rules, Gatherwell will notify customers via a pop up on the Lottery website. In case of major changes to the game rules, Gatherwell will additionally provide written notice by email to all registered customers in advance of the effective date of the changes.

The Operator provides a set of Frequently Asked Questions (**FAQs**) which explain to prospective and actual customers how the Lottery operates, including how to play the Lottery, the probability of winning a prize and what happens in the event of a win. The FAQs are published on the Lottery website.

The jackpot draw process is based upon the result of the Australian National Lottery Super66 game, as published on the Lottery West website (www.lotterywest.wa.gov.au). The winning number for each weekly draw will be the six digit number (in the same order) of the Australia National Lottery Super66 draw which takes place on the Saturday night of the same week.

If a local draw is offered, the draw process is based upon the random generation of a winner from the tickets in the local draw. The winner will be selected at random using the online resource <http://www.random.org/>, which is independently verified for its random number generation using atmospheric noise.

Prize winners will be notified by email within two (2) weeks of the date of the draw. The notification will include a link to claim the prize. Gatherwell (on our behalf) may withhold payment of the prize until we are satisfied that the prize winner has fully complied with the game rules, including the minimum legal age and proof of residence in Great Britain.

Jumbo Interactive Group employees and members of their immediate family and/or household are prohibited from purchasing Lottery entries and are not eligible for any prize in the Lottery.

8. Cooperation with the Gambling Commission and access to premises

The Operator will ensure that all personnel are aware that:

- they must cooperate with the Commission's enforcement officers in the proper performance of their compliance functions;
- the Commission's enforcement officers have rights of entry to business premises, as specified in Part 15 of the Act;
- they must immediately inform the Operator's key personnel in the event of a visit from the Commission's enforcement officer(s).

9. Information and reporting

The Operator will make reasonable efforts to ensure that the Commission is provided with any information that relates to or is suspected to relate to an offence under the Act, including an offence resulting from a breach of the LCCP.

All key events specified under the LCCP will be notified to the Commission as soon as reasonably practicable, and in any event, no later than five (5) business days after we become aware of the event. This notification must be made through the Commission's eServices portal. Key events may relate to:

- operator status
- relevant persons and positions;
- financial events;
- legal or regulatory proceedings or reports;
- gambling facilities.

The Operator will complete and submit Regulatory Returns within 42 days of the end of the Operator's annual period.

10. Marketing

The Operator will ensure that any incentive, reward scheme, or other arrangement under which a customer may receive money, goods, services or other advantage is proportionate to the type and level of the customer's gambling and is designed in such a way that:

- The circumstances and conditions to which the benefit is available are clearly described and readily accessible to the customers being offered the potential benefit;
- Neither the receipt nor the value or amount of the benefit is dependent upon the customer gambling for a predetermined length of time or frequency and the amount of the benefit is not altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered;
- If the value of the benefit increases with the amount the customer spends, it does so at a rate no greater than that at which the amount spent increases;
- If the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms which it is offered are not directly related to the level of the customer's prospective gambling.

When producing marketing materials or running marketing campaigns, the Operator will comply with the advertising codes of practice adopted by the Advertising Standards Authority from time to time, including:

- the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (**CAP Code**);
and

- the UK Code of Broadcast Advertising (**BCAP Code**).

The Operator will ensure that gambling and lottery advertising must not be of strong appeal to children or young persons, especially by reflecting or being associated with youth culture.

If the Operator engages a third party (other than Gatherwell) for the provision of any aspect of the Operator's licensed activities, the Operator will ensure that its terms with such third parties:

- require the third party to conduct themselves in so far as they carry out activities on behalf of the Operator as if they were bound by the same licence conditions and subject to the same codes of practice as the Operator;
- oblige the third party to provide such information to the Operator as they may reasonably require in order to enable the Operator to comply with its information reporting and other obligations to the Commission;
- enable the Operator, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the Operator's reasonable opinion, the third party is in breach of contract (including a breach of the LCCP) or has otherwise acted in a manner which is inconsistent with the licensing objectives of the Act, including for affiliates where they have breached a relevant advertising code of practice.

The Operator will not place digital advertisements on websites which provide unauthorised access to copyrighted content.

The Operator will ensure that clear, transparent and easily accessible information is made available to prospective customers to enable them to make an informed choice prior to participating in the Lottery. This includes, without limitation, details of how Lottery proceeds are distributed, the likelihood of winning a prize and how prizes are allocated.

The Operator will use reasonable endeavours to comply with industry codes of practice in respect of its licensed activities.

The Operator will only conduct direct marketing to customers who have provided their informed and specific consent to the receipt of direct marketing communications.

11. Complaints and disputes

Gatherwell (on our behalf) will publish a Complaints Procedure on the Lottery website.

The Operator will ensure that an independent adjudication provider will handle any disputes that arise between us and our customers, after the customer has completed our own internal dispute procedure and where a deadlock still exists.

12. Records

The Operator will keep records of customer communications and complaints for a minimum period of three (3) years.

13. Protection of customer funds

Lottery proceeds are initially paid into Gatherwell's ordinary trading bank account. Gatherwell transfers the Operator's share of proceeds from this account within fourteen (14) business days of receipt into a separate client account (having trust status) on behalf of the Operator. Funds held by Gatherwell on behalf of Operator are transferred to the Operator and our affiliated good causes on a regular basis.

Funds allocated to the provision of prizes are also held by Gatherwell in the separate client account to protect customers against an insolvency event. These funds are used as follows:

- Cash prizes are paid directly out of the client account to prize winners.
- A portion of the funds allocated to the provision of prizes is transferred back to Gatherwell's ordinary trading bank account in consideration of Gatherwell covering the risk of jackpot prize payouts.

14. Training

Key personnel involved in the management and operation of the lottery on a day-to-day basis will receive training on all matters covered in this Policy no less than once per year. A training record will be kept and those requiring training will be regularly monitored.

15. Failure to comply

We regard compliance with this Policy as an extremely serious matter. Failure to comply may expose the Operator to regulatory sanctions, including financial penalties and, in extreme circumstances, the loss of its operating licence.

Due to the importance of this Policy, any failure to comply with the provisions set out herein by any personnel will be taken seriously and may lead to disciplinary action being taken under our usual disciplinary procedure. Breaches may result in dismissal for gross misconduct and immediate contract termination for non-employees.

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Policy and Resources Committee Meeting	
Meeting Date	27 November 2024
Report Title	Performance Monitoring Report Mid-Year Report 2024/2025 (end Q2)
Head of Service	Lisa Fillery, Director of Resources
Lead Officer	Tony Potter, Information and Business Improvement Manager
Recommendation	That Members <i>note</i> the Corporate Performance Management Headlines Report at Appendix I (see §3.1)

1 Purpose of Report and Executive Summary

1.1 This report presents the corporate performance management headlines report as at the end of the second quarter of 2024/2025 (Jul – Sep), attached as Appendix I

2 Background

2.1 Following previous discussions, it was agreed that mid-year (Quarter 2) and year-end (Quarter 4) performance reports will be presented to IAM and the P&R committee.

2.2 Appendix I details the performance report summarising corporate performance for the first six months of the current financial year, as reported to SMT on 24 October 2024 and IAM on 11 November 2024

2.3 Members are asked to note, as previously requested by EMT, additional monthly trend data is now being displayed in Table 4 in Appendix I, for the two indicators impacted by the waste contract changes.

2.4 Additionally, Members are asked to note that waste figures are reported one month in arrears due the time taken to gather the information from KCC, and this report has been updated accordingly with September waste figures.

3 Proposal

3.1 Members are asked to *note* the Performance Management Headlines Report for 2024/2025 Q2, as attached at Appendix I.

4 Appendices

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

- Appendix I: Corporate Performance Management Headlines Report: Quarter 2

Corporate Performance Management Headlines Report

Appendix I

Period: 2023/2024 – Q2 (July - Sept)

Lead Officer: Tony Potter

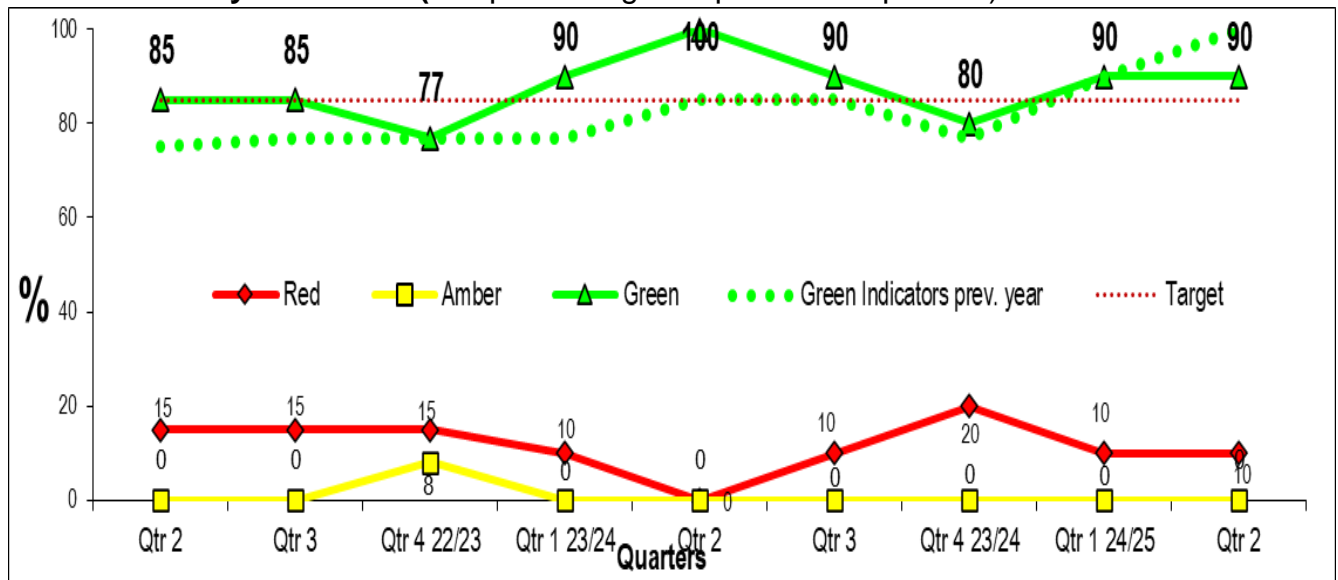
Action: Note only

1. Performance summary:

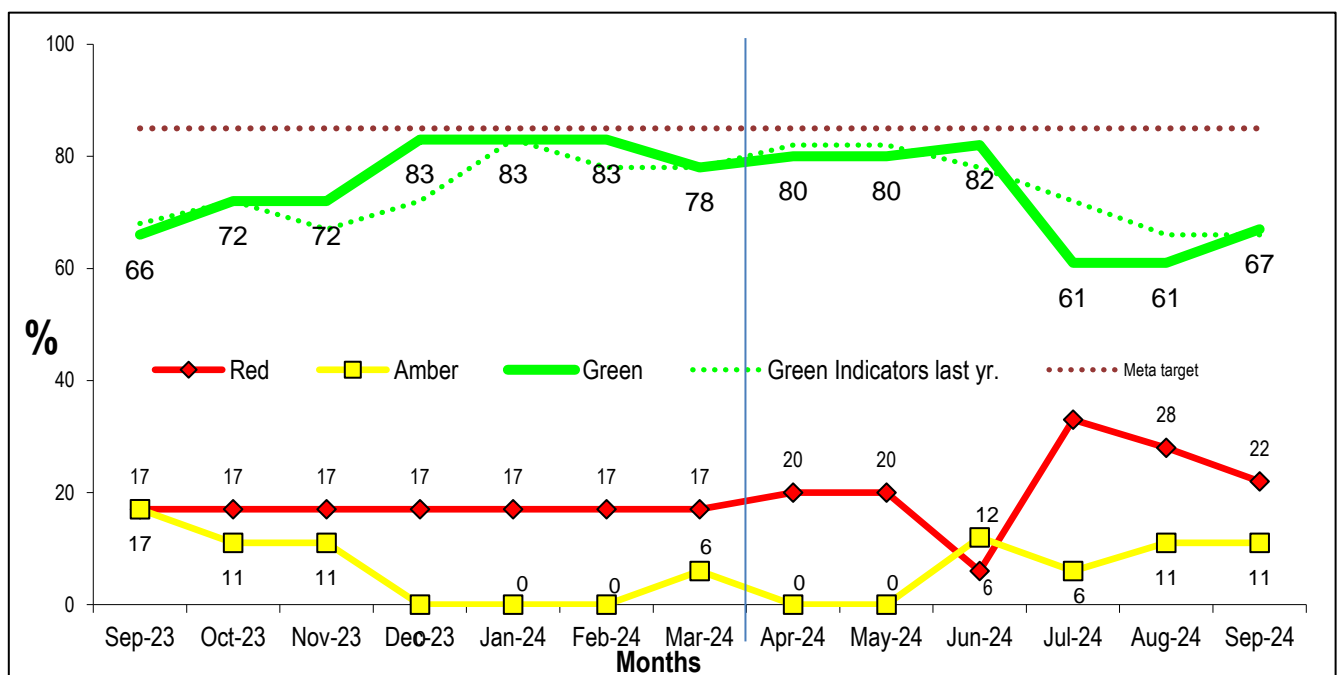
Combined result of 18 monthly and 10 quarterly indicators

Performance Status	No. indicators	Percentage
Red	5	18%
Amber	2	7%
Green	21	75%











a. Quarterly indicators (comparison against previous 8 quarters)









b. Monthly indicators (comparison against previous 12 months)



2. Red Indicators this period

This month	Last month	Ref	Description	YTD	2024-25 target
		NI 191	Residual domestic waste per household	258.7 kgs	237 kgs
Further increase in rejected recycling loads at Church Marshes has resulted in an increase in residual waste tonnages. In addition to this, ongoing high levels of missed collections are resulting in excess waste being presented. Current service levels are having an impact on any recycling campaigns which we hope we will be able to run when the service improves.					
		LI/CC/01	Number of reported missed bins per annum	8,644	875 ytd
The new contract year started with ongoing issues with routes and rounds within Swale, leading to high levels of missed bins being reported. Officers worked hard and closely with Suez on a major re-route of the borough's rounds, allowing crews more time to complete their rounds. Re-routing began on 16 September, resulting in an improvement to the reported missed collections as can be seen in Table 5					
		LI/IC/CSC /002	Percentage of abandoned calls	21.5%	8.5%
Performance was back on target in September (out-turn 7.7%). However, it is unlikely that the ytd performance will get back to target levels given the impact that the new waste contract issues had during the previous months, creating high volumes of calls each month, and despite our attempts to handle each as quickly as possible.					
		BV78b	Speed of processing - changes of circumstances for HB/CTB claims	9.8 days	9 days
Performance was back on target in September (out-turn 6.4%). Year-to-date was impacted over the previous two months, primarily due to the changeover of staff to Mid Kent and the required alignment of processes, but should be back within target by the end of the year.					
		LI/CSC/03	Complaints responded to within 10 working days	79.5 %	90 %
Two complaints out of 13 not signed off on time. Chase emails sent to remind service areas that it is their responsibility to ensure complaints are signed off within target.					

3. Amber indicators this period

YTD Status	This month	Last month	Ref	Description	YTD	2024/25 target	Variance
			LI/DC/DCE/007	Planning Enforcement - Informing complainant within 21 days	94.94%	95%	0.6% of target
			BV 109a	Processing of planning apps: Major Applications (within 13 weeks)	84.62%	89%	4.9% of target

4. Year to Date overview of all KPIs

N.B. Where the monthly result differs to the cumulative year-to-date result, the monthly performance is indicated by either *A (Amber) or *G (Green), or if Red, then the monthly value

Monthly Performance Indicators CUMMULATIVE YEAR TO DATE RESULT		24/25 Target (monthly)	Apr 24	May 24	Jun 24	July 24	Aug 24	Sep 24	Oct 24	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	2023/24 Outcome		
BV8	Percentage of invoices paid on time (within 30 days)	91%													98.97 %		
SZ BV9	Percentage of Council Tax collected	95%													95.40 %		
SZ BV10	Percentage of Non-domestic Rates collected	96%													97.90 %		
BV12b	Short-term working days lost due to sickness absence (FTE)	1.6 ytd		0.57	*G	1.19									2.09 days		
BV78a	Speed of processing – new Housing /Council Tax Benefit claims	22 days		*A	*A	*R							*A		20.3 days		
BV78b	Speed of processing - changes of circumstances for HB/CTB claims	9 days			*A	10	10.5	*G	*G		*A		*G		9.4 days		
BV109a	Processing of planning apps: Major Applications (within 13 weeks)	89%	83.3	75.0	*G	80	81.3	*G	84.4	*R					90.63 %		
BV109b	Processing of planning apps: Minor Applications (within 8 weeks)	82%	76.5												99.37 %		
BV109c	Processing of planning apps: Other Applications (within 8 weeks)	91%													97.58 %		
BV218a	Abandoned vehicles - % investigated within 10 working days	95%								*G					95.11 %		
LI/DC/DCE/004	Percentage of delegated decisions (Officers)	86.5%													91.74 %		
LI/DC/DCE/007	Planning Enforcement - Informing complainant within 21 days	95%				*A	*R	*G		*A			*G	*G	85.83 %		
LI/IC/CSC/002	Percentage of abandoned calls	8.5%	23.4	24.7	26.2	24.8	23.4	21.5	19.7					*R	3.7 %		
	<i>Abandoned calls monthly value</i>	8.5%	23.4	26.1	29.1	21.0	16.2	7.7	6.3								
LI/LS/LCC01	Percentage of all Local Land Searches completed in 10 working days	95%													99.8 %		
LI/CC/01	Number of reported missed bins per annum	3500				3162	7134	8644	10141						1869		
	<i>Reported missed bins monthly value</i>	(292)	N/A	N/A	N/A	3162	3972	1510	1497								
LI/TBC/02	Proportion of Major Planning Applications overturned at appeal	10%				*R				*R					7.81 %		
NI 191	Residual domestic waste per household	475 kgs (40)	43.1	45.4	*G	45.3	43.7	44.4				*R			453 kgs		
NI 192	Percentage of household waste sent for reuse, recycling and comp	38%					*R	*R							37.66 %		
MONTHLY INDICATOR RESULTS (x 18)			YEAR TO DATE Monthly Total			12G	12G	14G	11G	11G	12G	11G	13G	15G	15G	15G	14G
						0A	0A	2A	1A	2A	2A	2A	2A	0A	0A	0A	1A
						3R	3R	1R	6R	5R	4R	3R	3R	3R	3R	3R	3R

Quarterly Performance Indicators CUMMULATIVE YEAR TO DATE RESULT		24/25 Target	Q1	Q2	Q3	Q4	2023/24 Outcome		
LI/ICT/0006	Website availability	99%					99.7 %		
BV79b(j)	Percentage of Recoverable Overpayments Recovered (HB) that are recovered during period	80%		*A	*R		92.4%		
LI/CSC/003	Complaints responded to within 10 working days	90%	72.1%	79.5%			82.4%		
NI188	Planning to Adapt to Climate Change	3					3		
LI/EH/001	Percentage of Planning consultations responded to in 21 days	80%					98.9 %		
LI/EH/002	Food Hygiene – The percentage of food inspections completed that were due.	90%					99.1 %		
LI/IA/004	Audit recommendations implemented	95%				*G	71.7%		
LI/CEL/002	Percentage of beach huts occupied	90%					100 %		
LI/PAR/003	Percentage of disabled parking bay applications processed within 3 months	95%					100 %		
LI/PAR/001	Civil enforcement officer accuracy rate	98%					99.1 %		
QUARTERLY INDICATORS (x10)			YEAR TO DATE Quarterly Total			9G	9G	9G	8G
						0A	0A	0A	0A
						1R	1R	1R	2R

COMBINED INDICATOR RESULTS (x28) (Monthly + Quarterly KPIs)		YEAR TO DATE (Monthly + Quarterly Totals)		23G	21G	24G	22G
				2A	2A	0A	1A
				2R	5R	4R	5R

Monthly MPIs – <u>Monitored</u> Performance Indicators (no targets / performance not managed)		23/24 Month Ave.	Q1 (Apr, May, Jun)			Q2 (Jul, Aug, Sep)			Q3 (Oct, Nov, Dec)			Q4 (Jan, Feb, Mar)			24/25 Month Ave
NI 156	Number of households living in temporary accommodation	317	303	295	281	279	296	285	307	301	304	314	313	305	290
BV12a	Long-term working days lost due to sickness absence (YTD)	0.32	0.16	0.42	0.74	1.13	1.56	2.11	2.99	3.23	3.63	3.52	3.74	3.79	0.35
LI/CC/MON16	% of fly-tipping incidents attended to within 10 working days	89.6%	98%	100%	100%	100%	96.1%	100%	100%	100%	85%	100%	100%	100%	99.0%
LI/EC/MON10	Swale Means Business – Website analytics	75	393	490	81	162	45	1001	66	56	48	67	70	36	362
LI/EC/MON28	Swale VCS – Number of enquiries received	11	3	7	24	27	28	7	18	25	9	9	27	2	16
LI/HO/MON9	Rough Sleepers in Accommodation	27	21	18	22	16	16	20	22	26	31	27	27	22	19
LI/DC/DCE/006	Refused Planning Applications	12.04%	20%	15.6%	10.3%	9.46%	10.3%	11.7%	23.26%	12.33%	12.28%	15.69%	9.62%	15.09%	12.9%

Quarterly MPIs – <u>Monitored</u> Performance Indicators (no targets / performance not managed)		23/24 Qtr. Ave.	Q1	Q2	Q3	Q4	24/25 Qtr. Ave.
NI155	Number of affordable homes delivered (total year to date)	72	69	107	210	289	54
LI/CSC/006	Proportion of complaints escalating from Stage 1 (Service Unit) to Stage 2 (Chief Executive)	5.25%	7%	15%	1%	9%	11%
CSP1819/0006	All crime per 1000 population	98.9	96.1	93	98.5	97.5	94.5
LI/HO/MON7	Percentage of households who secured accommodation for 6+ months when prev. duty ended	70%	75%	76%	67%	69%	75.5%
LI/HO/MON8	Percentage of households who secured accommodation at the end of relief duty	30%	26%	30%	28%	33%	28%
LI/EC/MON33	Safeguarding training (% of training modules completed)	85.3%	82.7%	81.1%	86.46%	81.10%	81.9%
LI/CEL/001	No. of visits to Council owned or supported leisure centres	187,796	154,894	137,380	136,687	169,495	146,137
LI/CSC/001	% of contacts transacted digitally compared to other methods of contact to Customer Services	56%	70%	68%	59%	54%	69%

23/24

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Policy and Resources Committee Meeting	
Meeting Date	27 November 2024
Report Title	Update of the Commissioning and Procurement Policy
EMT Lead	Lisa Fillery, Director of Resources
Head of Service	Claire Stanbury, Head of Finance and Procurement
Lead Officer	Charlotte Knowles, Commissioning Manager
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To adopt the updated Commissioning and Procurement Policy on 24 February 2025. 2. To delegate authority for the approval of any future legislative and / or governance updates to the Monitoring Officer in consultation with the Leader.

1 Purpose of Report and Executive Summary

- 1.1 The intention is to adopt the updated Commissioning and Procurement Policy on 24th February to take account of the changes being implemented by the new Procurement Act.

2 Background

- 2.1 The current Commissioning and Procurement Policy was implemented in December 2021. The policy includes the Council’s principles on commissioning decisions and the procurement processes for buying goods, works and services, ensuring they meet the Coalition’s priorities. It sits alongside the technical ‘Contract Standing Orders’ (CSO’s) for Swale that are contained within the Constitution and set our procedural rules.
- 2.2 Following the exit from the EU, the government released the green paper ‘Transforming Public Procurement’ in 2020. The government’s goal was to speed up and simplify our procurement processes, place value for money at their heart, and unleash opportunities for small businesses, charities and social enterprises to innovate in public service delivery. Multiple consultations were carried out on the proposals and The Procurement Act 2023, which will reform the existing Procurement Rules, received Royal Assent on 26th October 2023 and will come into force on 24th February 2025. The Act was due to come into force on the 28th October but has been delayed. The Procurement Regulations 2024 will underpin and provide further detail on the Act.
- 2.3 The current regime, the Public Contract Regulations 2015, will continue to apply to the management of contracts that were procured prior to 24th February.

2.4 CSOs will be updated under the delegations of the Monitoring Officer and all procurement templates will be updated by the Commissioning Manager and Commissioning Support Officer to comply with the new regime.

3 Proposals

3.1 The following paragraphs set out the proposed changes to the policy.

3.2 There is an updated National Procurement Policy Statement so paragraph 1 of the policy has been updated to reflect this.

3.3 Paragraph 3 of the policy has been updated to reflect the new Corporate Plan.

3.4 Paragraphs 10, 14 and 53 have been updated to reference the Procurement Act 2023 and other relevant legislation.

3.5 Paragraphs 15, 23, 32, 44, 61 and 73 have been updated to comply with the requirement to include VAT in contract estimates.

3.6 Paragraphs 19 and 56 have been updated to comply with the Procurement Act move from awarding a public contract to the supplier that submits the Most Economically Advantageous Tender (MEAT) in a competitive tendering procedure to the Most Advantageous Tender (MAT). This is to provide greater reassurance to contracting authorities that it is possible to take a broader view of what can be included in the evaluation of tenders in assessing value for money.

3.7 Paragraphs 20, 21 and 22 have been updated to reflect the move to a committee system.

4 Alternative Options Considered and Rejected

4.1 Do nothing and keep the existing policy. This option is not recommended as the policy will be out of date following the implementation of the Procurement Act.

5 Consultation Undertaken or Proposed

5.1 Mid Kent Legal Services have been consulted on the proposals.

6 Implications

Issue	Implications
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Corporate Plan	The policy supports the priority: Running the Council - Working within our resources to proactively engage with communities and outside bodies to deliver in a transparent and efficient way.
Financial, Resource and Property	There are no direct financial implications of amending the Commissioning & Procurement Policy. The Council will make decisions about the purchasing or delivery of services on the basis of value for money. As such each commissioning process should look at the requirements of the service and business case into each of the options.
Legal, Statutory and Procurement	The Procurement Act 2023 and the Procurement Regulations 2024 will apply from 24 th February 2025. The Public Contracts Regulations 2015 will continue to apply to contracts procured prior to this.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The policy contains a section on sustainable procurement and references the Climate and Ecological Emergency Action Plan.
Health and Wellbeing	The draft policy contains a section on Social Value.
Safeguarding of Children, Young People and Vulnerable Adults	The policy has a specific section on Safeguarding. The council sets different requirements for Safeguarding depending upon the contract type. There are strict criteria of what contractors are required to demonstrate for each level.
Risk Management and Health and Safety	The policy requires officers and Members to assess the risk of each commissioning process.
Equality and Diversity	There are no differential equality issues raised by the proposals in this report.
Privacy and Data Protection	The standard terms and conditions that are used for contracts include privacy and data protection clauses.

7 Appendices

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

- Appendix I: Commissioning & Procurement Policy

8 Background Papers

None.

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SWALE BOROUGH COUNCIL COMMISSIONING & PROCUREMENT POLICY

INTRODUCTION

Background

1. Swale Borough Council is continuously exploring the best way to deliver its responsibilities and to procure works, goods and services for its community, to meet the funding challenges it has and where practicable to meet the aspirations of the National Procurement Strategy for Local Government. The Council will also have regard for the National Procurement Policy Statement which states that contracting authorities should consider the following national priority outcomes alongside any additional local priorities in their procurement activities:
 - Value for money
 - Social Value
 - Small and Medium-sized Enterprises
 - Commercial and procurement delivery
 - Skills and capability for procurement
2. The Council has a track record of improving its procurement approach and processes. These include:
 - utilising specialist procurement support in procuring major long-term contracts, for example, on leisure, grounds maintenance and waste;
 - utilising a category spend approach across the Council to identify further opportunities for efficiency savings;
 - working collaboratively with other authorities to procure works goods and services where beneficial;
 - engaging with other Procurement practitioners in the County to deliver best practice; and,
 - engaging with local businesses to increase the number of Small and Medium Enterprises (SMEs) bidding for works.
3. This Policy aims to set a clear framework for commissioning and procurement which reflects the Council's Corporate Plan 2023 – 2027 and its priorities. The policy focuses on the commissioning stages and stands alongside Contract Standing Orders (CSOs) contained within the Council's Constitution.

Working definitions

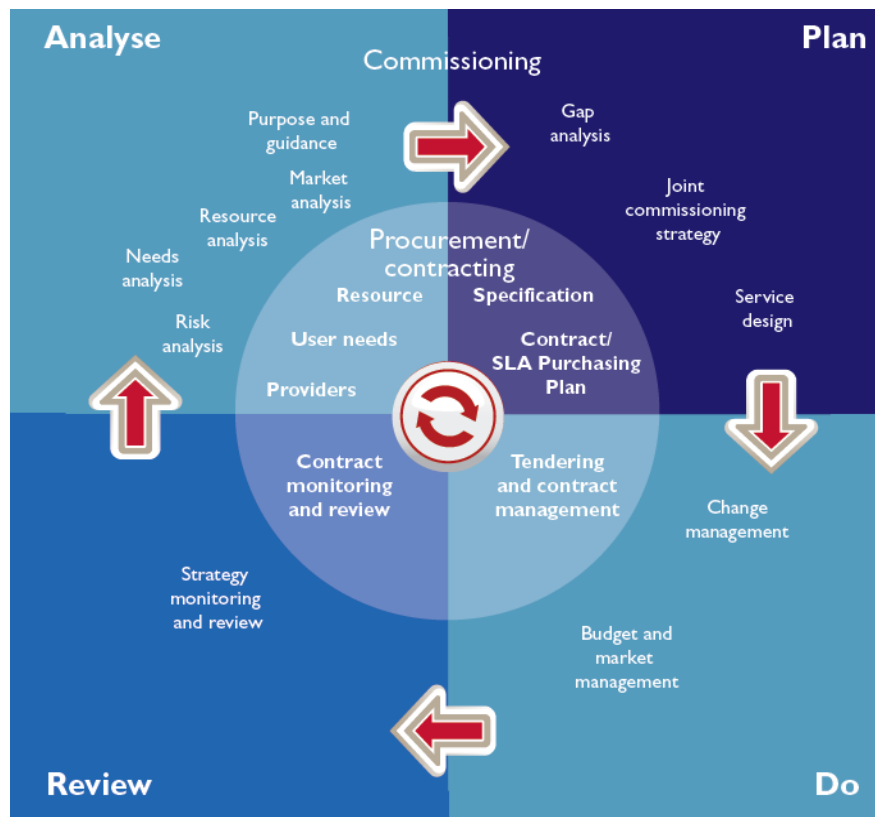
4. **Commissioning** is the process the Council carries out to decide how to spend its money to get the most appropriate services and secure the best outcomes for the local community. Commissioning is a decision-making process, and the outcome of those decisions may result in undertaking an external procurement process or providing in-house or alternative delivery models. As applicable, it should be informed by consultation (which will comply with the relevant policy /

strategy) with service users and research with suppliers and the market more generally about what is both possible, and appropriate to provide. Commissioning decisions therefore balance the needs and aspirations of service users with the opportunities of the market and the budgets that are available.

5. **Procurement** is the way the Council obtains works, goods and services from external sources. This ranges for example from everyday supplies of office stationery to whole service area provision and major construction projects. The way in which procurement takes place is subject to statutory provisions and case law, as well as our own Contract Standing Orders, that form part of the Council's Constitution.
6. **Soft Market testing** is an exercise designed to test commercial markets' capabilities of meeting a set of requirements. The outcome of market testing may result in the service being commissioned from an internal or an external service provider. The Council actively encourages market testing and market engagement.
7. **Outsourcing** is the award of a contract to an external service provider without any in-house bid being involved.
8. **Partnerships** have many variations. They include the provision of shared services; for example, through Mid Kent Services, which includes Swale, Maidstone and Tunbridge Wells Borough Councils. They may provide an opportunity to develop an approach to service delivery that moves away from a contractual relationship to an agreement based potentially on shared objectives, shared risk, mutual learning, joint investment and sharing of reward.
9. In delivering a modern approach to good commissioning and procurement practice the essentials include:
 - ensuring that all procurements over the value of £6,000 (including VAT) or more are added to the Commissioning Forward Plan;
 - starting the process early, allowing sufficient time for a thorough assessment of the need and options available prior to tendering. Councillor involvement at this stage is important; and,
 - adopting a proportionate approach built around recognition of the commissioning and procurement cycle and the four stages:
 - **Analyse** - 'Analyse' is the first stage of the Commissioning Cycle. It involves reviewing the current service by engaging with employees, managers, Councillors and relevant partners to gain a greater understanding of the service and reviewing the needs of service users. It will also involve looking at national strategy / policy, comparable situations nationally, and any new services that may be available in the market.
 - **Plan** - Based on the outcome of the 'Analyse' stage, the 'Plan' stage will identify whether there are any duplications or gaps in

service provision. It will identify which resources are available, and which are required to deliver identified needs. Decisions can then be taken on the allocation of resources in line with priorities and the move towards the design of an appropriate service. Certain contracts will require robust project management planning.

- **Do** - The 'Do' stage involves ensuring that services are delivered efficiently, effectively and as planned. For in-house services, it is still important that project plans or procedures/delivery guidelines are created. If external involvement will be necessary, a procurement process or a 'transparent competitive' process will be carried out and a suitable provider will be secured.
- **Review** - The 'Review' stage involves monitoring the service and its impact and analysing whether the service is achieving the intended outcome. This involves analysing data on finance, activity and outcomes, and consulting with service users. Performance management for in-house services or contract management for external suppliers is key. An evaluation will then be completed.



CORE PRINCIPLES

Ethical behaviour

10. The highest standards of professional behaviour are expected from all Councillors and officers in their dealings with partners and suppliers. Officers will comply fully with the requirements of the [Bribery Act 2010](#) and the Council expects our suppliers to comply also. We will act with integrity and, openness in accordance with the Procurement Act 2023, Public Contracts Regulations 2015 or other relevant legislation when we undertake procurement, and we will embrace the requirements for transparency. Any conflicts of interest in the procurement process will be documented and managed in line with our constitution. All decisions will be communicated clearly.
11. All officers involved in the commissioning and procurement process will act fairly with our suppliers in all matters, including ensuring prompt payment in accordance with agreed terms. Should disputes arise we will seek to resolve them promptly. There will be no favouritism or bias shown towards one supplier over another. Our actions will, therefore, be underpinned by our values:
 - **Fairness** - being objective to balance the needs of all those in our community
 - **Integrity** - being open, honest and taking responsibility
 - **Respect** - embracing and valuing the diversity of others
 - **Service** - delivering high quality, cost effective public service
 - **Trust** - delivering on our promises to each other, customers and our partners.
12. The Council is committed to ensuring that its contractors are good employers and expects them to hold the following principles:
 - Safe working conditions
 - Promotion of good health
 - Employment is freely chosen
 - Non-excessive working hours (in line with the Working Time Directive)
 - Training is provided
 - Non discrimination
 - Diversity, equality and good workforce practices are encouraged
 - Elimination of child labour
 - Elimination of inhumane treatment
 - Environmental awareness (more details from paragraph 38 – Sustainable Procurement)
13. In July 2019, the Council made a commitment to paying the [Real Living Wage](#) for its directly employed staff and a commitment to review its application to the Council's contracts. For contracts, this applies to those contracted staff who work two or more hours a week, for eight or more consecutive weeks a year.

The Real Living Wage does not apply to contractors that supply the Council with products e.g. stationery suppliers. Best endeavours should be made to paying the Real Living Wage where applicable in all contracts as they come up for renewal, but we recognise this may not be possible in all contracts, particularly contracts shared with other authorities.

Effective practice

14. The Council will fulfil its statutory duties meeting the requirements of the Procurement Act, Public Contracts Regulations, other relevant legislation and taking account of case law that emerges. We will also ensure that we follow our own Contract Standing Orders, Constitution, internal audit and other best practice requirements.
15. No one individual shall be empowered to authorise all stages of the tender process. There should be a minimum of three tender evaluators. Contract awards will be approved either by the relevant Head of Service where the value of the contract is less than £120,000 (including VAT) or by the relevant committee where the value is over £120,000 (including VAT). There are also other controls in place such as invoice approval limits.
16. As part of the commissioning and procurement planning process, the length and type of supplier relationship will be decided that is appropriate to what is being purchased having undertaken market analysis where appropriate. Supplier relationships will incorporate the principles of continuous improvement and seek to obtain targeted improvements in delivery, quality and price.

Decision Making

17. Examples of when Commissioning and Procurement processes may be taken include:
 - as part of the Council's annual service planning and budgeting process;
 - prior to the expiry of an existing contract;
 - following a fundamental service review as a matter of urgency if a service / contract is failing; and,
 - when a new priority or project emerges.
18. Decisions on service delivery must be based on clear and justifiable evidence. They must also be transparent and have an audit trail which can be scrutinised.
19. The lowest price will not be the sole criteria for establishing value but will be an important factor to secure cashable efficiency savings for the Council. Criteria will be established prior to tender exercises to enable a balanced assessment to be made which considers quality, deliverability and fitness for purpose as appropriate. Such criteria will be shared with potential suppliers and will usually be the Most Advantageous Tender (MAT).

The role of Councillors in Commissioning and Procurement

20. Councillors are a key part of any commissioning process as detailed in the Local Government Association's 2019 publication 'A Councillor's guide to procurement'. Policy & Resources Committee adopts the corporate commissioning and procurement policy to make sure it aligns with the corporate priorities.
21. Councillors have a role in setting the strategic direction of contract requirements. Where legislation allows and as appropriate under the members code of conduct, this can include working with officers at the early stages of service delivery decisions, to assisting with setting the specifications. Members may not take part in evaluation of bids. Committees are responsible at the contract approval point in accordance with CSOs, to ensure that the procurement has delivered the outcomes intended at the start.
22. Following award of contract, Lead officers / Heads of Service should provide Councillors with regular contract monitoring information to enable them to review performance of strategic suppliers and take prompt action as appropriate.

Risk Management

23. The Council will make sure that any risks to the authority or the community it serves are properly recognised in all its commissioning and procurement activity. It will identify risks, evaluate their potential consequences, and effectively manage those risks accordingly at every stage of the process. Risk logs will be created for all procurements over £120,000 (including VAT) over the life of the contract including any extension period/s. However, there may be low value procurements that are high risk that may also require risk logs.
24. The standard risk management process e.g. corporate and operational risk registers should assess the risks of contracts when they have been commissioned and throughout their lifetime. This is a lead officer function and overseen by Heads of Service.

Supporting Local Businesses and Small and Medium Enterprises

25. We will work with local businesses and community organisations, as well as micro, small and medium enterprises (SMEs), as far as the legal framework and Contract Standing Orders allow and as appropriate to the contract.
26. As part of its encouragement of partnerships, the Council will continue to support the development of capacity within the Voluntary and Community Sector (VCS) through providing guidance and adhering to the principles of the Kent Compact.
27. From 1 January 2021, councils may reserve contracts below the relevant UK thresholds under the Regulations, to the UK or Kent County area and by SME / VCS under Procurement Policy Note (PPN) 11/20.

28. Where possible, the Council will package procurement works in a way that enables small local business to demonstrate their competitive advantage.
29. The Council will ensure that procurement processes are appropriate to the scale and risk involved so that they are not unduly onerous especially for local and small suppliers.

The Public Services (Social Value) Act 2012

30. The Public Services (Social Value) Act 2012 places a requirement on commissioners to consider the economic, environmental, and social benefits of their approaches to procurement before the process starts. They also must consider whether they should consult on these issues.
31. When considering how a procurement process might improve the social, economic, and environmental well-being of a relevant area the Council will only consider those matters that are relevant and proportionate to the proposed procurement and will take those matters into account.
32. As a minimum, the Council will consider Social Value in all tenders over £120,000 (including VAT), however, it should also be considered for any relevant contracts below this threshold.
33. Social value will include any demonstrable contribution that each bidder intends to make towards the elements set out in Table 1 below. Additional elements specific to individual procurement exercises may be identified through the pre-procurement 'market testing' commissioning phase of the process.

Table 1: Examples of Social Value

Economic	Environmental	Social
Numbers of local jobs created and sustained	Contributing to climate change mitigation targets	Increasing volunteering opportunities
Number of apprentice positions	Championing and using environmentally friendly goods and services	Enabling community development and engagement
Number of work placement schemes for school age residents	Reducing carbon footprint and food miles	Encouraging social integration and community cohesion (social capital)
Number of people taken out of 'out of work' benefits	Protecting biodiversity	Enhancing and celebrating local culture and heritage
Number of training opportunities	Waste minimisation, reuse and recycling	Contributing to health improvement programme and addressing health inequalities
Ensuring fair working conditions and payment	Reduced pollution	

Ensuring ethical supply (e.g. Fair Trade)	Water use minimisation and energy efficiency	
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- 34. Officers should consider adding social value factors into specifications and the assessment of social value shall also be included as a separately identifiable and scored component of the 'quality' element. This shall comprise 20% of the quality element. Therefore, if the cost-quality balance is 60%:40%, the social value component of the whole assessment exercise will be 8%.
- 35. Assessment of Social Value will be undertaken in the same way as the 'quality' element of all tenders – with tenderers setting out their proposals against our broadly defined preferred 'social value' aspirations and these being scored through the assessment process.

Sustainable Procurement

- 36. Swale Borough Council declared a climate and ecological emergency on 26 June 2019 and has adopted a Climate and Ecological Emergency Action Plan. Best endeavours should be made to applying its principles to procurement policies and processes covering goods and works as well as services. However, we recognise this may not be possible in all contracts as there may be a need to balance the cost of these with the cost of other priorities.
- 37. The Action Plan identifies seven focus areas:
 - Council operations - The majority of the Council's carbon footprint comes from procured services. As contracts come up for renewal and further technology becomes more mainstream, there is an opportunity to secure services that have a lower carbon footprint. For example, the Council have replaced its fleet vehicles with electric vehicles. The Council also aims to eliminate single-use plastics from Council operations wherever possible.
 - Buildings and energy efficiency – The Council aims to improve energy efficiency of the homes in Swale and has contracted a fuel and water poverty outreach service to help vulnerable residents reduce utility bills and energy consumption.
 - Transport and air quality – The Council are seeking to make sustainable transport more attractive to improve air quality and reduce carbon emissions. It is committed to installing more EV charging points across the borough.
 - Resource consumption and waste – The Council aims to reduce the amount of waste and to maximise the proportion that is recycled or composted.
 - Ecology and biodiversity - Ecology, biodiversity and green space are vital to mitigating climate change. The Council aims to increase tree planting

on Council land and minimise contractors' use of fertilizers, pesticides and weed killers.

- Energy generation and storage - Renewable energy is a key component of how Swale will achieve zero net carbon emissions. Our utility supply contract now supplies green electricity and green gas.
- Resilience, adaption and offsetting – The Council aims to ensure that the borough is robustly prepared for a changing climate and that robust adaptation measures are implemented to ensure resilience for all.

38. It is recognised that procurement has a vital role in furthering sustainable development, through our procurement of goods, services and works. Therefore, all procurement decisions should consider and where possible embed the climate and ecological emergency. The Council will strive to achieve the following:

People, education and awareness

- Educate, train and encourage staff to review their consumption of goods and services, reduce usage and adopt usage of more environmentally friendly products.
- Communicate our approach to sustainable procurement to all staff, suppliers and stakeholders.

Procurement strategy, policy and process

- Promote and embed best practice for sustainable procurement.
- Where appropriate, work in partnership with other public bodies and councils to maximise sustainable procurement gains through collaboration and information sharing.

Environmental products

- Consider the costs and benefits of environmentally-friendly goods and services including minimising 'procurement miles' to help reduce the Council's carbon footprint.
- Where such exact specification is not possible, enable suppliers to submit offers for environmentally friendly alternatives.
- Continue to improve the levels of recycling, reduced usage, bulk delivery and better packaging.

Engaging suppliers

- Communicate our sustainability objectives to our contractors and suppliers.
- Encourage and persuade our contractors and suppliers to adopt environmentally friendly processes and supply environmentally friendly

goods and services as part of the Climate and Ecological Emergency agenda.

- Use sustainability criteria, part of the Social Value supplier evaluation process, in the award of contracts.

Measurements and results

- Comply with all legislation relevant to sustainability.
- Officers will be required to regularly monitor sustainability outcomes throughout the delivery of the contract which will be included within the contract management guidance.

Equalities and Diversity

39. The Council's commitment to equal opportunities as regards service users and potential service users, contractor staffing and relationships with our own staff, will be built into procurement considerations.
40. We will seek to reflect the diversity, profile and nature of our community as part our approach to commissioning.
41. We will have regard to appropriate workforce strategies in the contractual process.
42. We will build equality into how we commission, procure and deliver services in accordance with the Council's Equalities Scheme. We will include a proportionate assessment of tenderers' approaches to equalities and diversity as part of our evaluation criteria as appropriate.

TUPE

43. If an in-house service is being outsourced, employees affected by the procurement process will be consulted and those who may transfer as a consequence of a procurement decision will be protected under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE). TUPE legislation protects employee rights when the business or undertaking for which they work transfers to a new employer. The Council will ensure that legislation is observed in all applicable contract opportunities let by the Council where staff may be transferred from an incumbent contractor to a new supplier.

Category management

44. Where multiple departments purchase similar products or services, a category management approach should be considered. Nominated lead officers for individual categories of cumulative expenditure of £120,000 (including VAT) or more, over a four-year period are responsible for reviewing opportunities to

make further improvement in value for money, in conjunction with the Head of Service with responsibility for commissioning. Current categories include:

Category	Current Responsible Officer
Fleet Vehicles	Commissioning Manager
Stationery	Head of Property
ICT equipment and software	IT Business Manager
Agency Staff	HR Manager
Utilities	Head of Place
Legal Fees	Head of Legal Partnership
Advertising, printing and graphics	Communications Manager
Recruitment and training	HR Manager
Building maintenance	Head of Place

New categories will be periodically added through the analysis of spend undertaken by the commissioning team.

Appraisal of alternative service delivery options

45. When considering commissioning services, a range of delivery options should be considered. Each service should be assessed on its merits, considering all the pros and cons, having regard to benchmarking and the cost of the procurement process balanced against the risks and cost-benefit of the options for service delivery.
46. When considering commissioning and procurement the options include:
 - consider whether the service is still required or whether it should be de-commissioned
 - collaborate with partners
 - provide services in-house
 - outsource those services; or
 - Re-commission to revised specification.
47. Council services will be regularly reviewed to ensure they are being delivered in the most cost-effective manner.

Types of contract

48. We will use the most appropriate contracting arrangement available for any given circumstance. For some contracts, there will be a straightforward contractual relationship, whereby we place an order and make payment once it is delivered. However, for other goods and services, particularly those that are delivered over a long period of time, there is much less certainty for both parties, and it may therefore be appropriate to enter into longer contracts whereby the relationship between the client and the contractor is a more open and transparent one, sharing both risks and returns. The Council will

continually review its standard contract terms and conditions which will be used in the majority of cases. Any deviations will be agreed by the relevant officers stated in the Contracted Standing Orders.

49. We will ensure that contracts build in efficiency improvement expectations. Where risks are shared and where there are opportunities for 'profit sharing' arrangements, open book accounting will be considered.
50. For contracts with a duration of 5+ years, the Council should consider including an inflationary mechanism. Currently, the Council's preferred method is the Consumer Price Index (CPI). For more specialist and complex contracts, a basket of indices may be considered.

Minimising the transactions cost of procurement

51. We will aim to minimise the 'transactional' costs of conducting procurement activities. There are two key methods for doing this. One way is to use Framework agreements wherever appropriate to expedite the procurement process. Framework agreements are a form of procurement used to create an "umbrella" agreement with suppliers. They set out the terms and conditions under which works, goods, or services can be purchased throughout the period of the agreement, including price, quality, quantities, and timescales. Frameworks are beneficial as they can save the need to issue repeated tenders for the same or similar requirements. There are many Frameworks available to Local Authorities that are managed by other buying authorities or by specialist organisations such as Yorkshire Purchasing Organisation (YPO), Eastern Shires Purchasing Organisation (ESPO) or the Crown Commercial Service. The use of Frameworks can lead to economies of scale, reduced administrative burden and consequent savings. However, this should be balanced with the use of local suppliers who are not normally listed on national Frameworks.
52. The second way of minimising the transaction cost of procurement would be to undertake joint procurement processes with other authorities to share tendering costs.

Tendering

53. The procurement process will follow the Council's statutory duties meeting the Procurement Act, Public Contracts Regulations, or other relevant legislation and taking account of case law that emerges. We will also ensure that we follow our own Contract Standing Orders, Constitution and internal audit and other best practice requirements.
54. The tendering process will be monitored independently via our corporate Commissioning team and relevant Head of Service. Any complaints or queries regarding a tendering process will also be dealt with independently via Internal Audit in the first instance.

Evaluation techniques

55. **The Standard Differential Model (SDM):** based on price and quality. SDM awards the lowest price/cost (excluding abnormally low bids) maximum points, and the other tenderers scores are reduced in proportion with their price. (Lowest tender price / by tender price x price weighting e.g. 60) For example:

Financial scoring:

Tender Company	Price Submitted £	Points Awarded
A	50,000	60.00
B	55,000	54.54
C	57,000	52.63
D	67,000	44.78

56. The quality/non-price score is then added to the price score and the contract is awarded to the tender/s with the highest points. This is known as the Most Advantageous Tender (MAT).
57. SDM is the most widely used evaluation method but has a substantial emphasis on price, if there is more than a 40% weighting on price, it is likely that the lowest price will win.

Price / Quality Evaluation

58. The Council will make decisions about the purchasing or delivery of services on the basis of value for money; that is to say the best balance of price and quality, and **not** simply on the basis of the lowest cost.
59. The Council will adopt an assumed default of 60% cost and 40% quality for the purposes of assessing both formal tenders and Expressions of Interest.
60. Deviations from this default will be permitted, though these will require justification and approval in advance by the Director or Head of Service for the relevant area and the Commissioning Manager. Justifications will be determined on their merits, and the precedents that are set as a result. Examples of when deviations may be permitted include:
- consultancy work where there is a higher weighting on quality or technical assessment;
 - construction or demolition work (which is more regulated and quantifiable) may be weighted more toward price;
 - s106 contributions; and,
 - externally funded projects/goods/services.
61. However, deviation will not normally be permitted beyond a maximum of 80% for either cost or quality – in other words, there will be at least 20% of the assessment based on either cost or quality unless:
- The duration of the contract will not exceed 4 weeks and

- the nature of the goods or services being provided is such that there is no ability for the suppliers/contractors to offer a difference in terms of quality (e.g. demolition) and
 - the value of the contract will not exceed £120,000 (including VAT).
62. Where relevant, the assessment of Health & Safety shall be included as a separately identifiable and scored component of the 'quality' element as appropriate.
63. Where tenders appear to be abnormally low, bidders must be given the opportunity to explain the price or costs proposed in their tender. The lead officer (in conjunction with Mid Kent Legal Services) must then assess the information provided by consulting the tenderer. The tender may, not must, be rejected if the evidence supplied does not satisfactorily account for the low level of price or costs proposed.
64. Where stated within the procurement documentation, submissions that fail to meet the minimum quality score (i.e. less than 50%) may be excluded whether or not other points awarded to the bidder are higher than those awarded to the successful supplier.

Alternative Evaluation Models

65. The Standard Differential Model may not be the best model for all procurements. There are around 27 different evaluation models, some of the most well-known and commonly used are listed below. Through this new policy each procurement exercise will be determined on its merits to identify the most appropriate method for each at the early commissioning stages.
66. Use of alternative evaluation models should be approved by the relevant Director or Head of Service and the Commissioning Manager.
67. **Ratio evaluation:** The basic principle to calculate a tender's value for money is to divide, quite literally, value by money (Quality score divided by price = Quality/Price score). For example:

Tender	Quality Score	Price	Quality/Price Score
A	50	£10	5.0
B	66	£12	5.5
C	60	£15	4.0
D	75	£15	5.0

68. **Kuiper 2:** This is a variation on the Ratio Evaluation and turns the calculation around, so that you divide the price by the quality score, but in this method, the contract is awarded to the lowest score not the highest. Example:

Tender	Price	Quality Score	Quality/Price Score
A	£10	50	0.20

B	£12	66	0.18
C	£15	60	0.25
D	£15	75	0.20

69. **Telgen:** To use this method, a price range must be set, defining the maximum and minimum prices. The price calculation is then defined by subtracting the individual bid price from the maximum price and dividing that score by the score defined by subtracting the minimum price from the maximum price:

$$(\text{Max Price} - \text{Bid price}) \div (\text{Max Price} - \text{Min Price}) = \text{Weight of the price}$$

Min price	Max price	Bid price	Weight of the Price
£8	£30	£10	0.91
£8	£30	£12	0.82
£8	£30	£15	0.68

70. The Weighted Price score is then added to the Weighted Quality score to identify the winning bid.

Insurance Levels

71. The standard levels of insurance cover that contractors / suppliers should hold are:

- Employer Liability minimum £10 million
- Public Liability minimum £5 million
- Professional Indemnity £2 million (if applicable)
- Product Liability £2million (if applicable)

72. Lower levels may be accepted by the Head of Finance & Procurement in certain circumstances such as if there is no potential for financial loss to the Council.

Safeguarding

73. All contracts over £30,000 (including VAT) will have a Safeguarding Level assigned, either Nil, Bronze, Silver or Gold. However, there may be additional contracts regardless of value that require a safeguarding level set. The relevant service manager will be responsible for considering this for contracts with a value of less than £30,000 (including VAT). Suppliers will need to meet the required standard of the assigned levels:

Safeguarding Level	Description
Nil	Contract irrelevant to safeguarding No contact with children/young people/vulnerable adults and/or parents/carers

Bronze	Limited contact with children/young people/vulnerable adults and/or parents/carers
Silver	Regular contact with children/young people/vulnerable adults and/or parents/carers Not direct service to vulnerable people but regular contact within delivery of services
Gold	Regular contact with children/young people/vulnerable adults and/or parents/carers or any unsupervised contact Direct service to vulnerable people, safeguarding essential to service

Contract Management

74. All contracts (including partnering arrangements etc) will include standard terms and conditions and performance measures based on the outcomes set out in the specification. These will clearly set out what information needs to be collected and submitted (including clear definitions), how often, in what format etc. It will be a requirement that the winning tenderer agrees to comply with all Council policies and statutory requirements, for example the Data Quality policy.
75. Each officer responsible for the management of a contract will have regular (at least quarterly is recommended) meetings with contractors as appropriate to the contract to discuss Key Performance Indicators, and how the service can be delivered more efficiently and/or effectively to secure continuous improvement.
76. Lead officers should monitor contracts to ensure that any added value (including Social Value and Climate Emergency commitments) which were proposed in the tender over and above the original specification is achieved.
77. Any contract changes must be fully documented. Material changes must be by formal contract variation in consultation with Mid Kent Legal Services and Commissioning.
78. Where there are emerging service delivery failures, an action plan will be agreed with the contractor to restore performance to that specified. The Council will be clear about the ladder of escalation up to and including contract termination, including the use of financial penalties if specified in the contract.
79. Where there are contract disputes the Council will seek to resolve them swiftly, using the methodology provided in the contracts themselves, such as mediation. If the process has to be escalated, then Mid Kent Legal Services can assist with either terminating the contract or advising on litigation strategy.

Annex I

Other Policies / Strategies linked to Commissioning & Procurement

- [Corporate Plan 2023 - 2027](#)
- [Local First Policy](#)
- [Corporate Equality Scheme 2024 - 2028](#)
- [Budget and Medium Term Financial Strategy 2024/25 – 2027/28](#)
- [Community Asset Transfer Policy](#)
- [Service Improvement and Value for Money Strategy](#)
- [Risk Management](#)
- [Kent Environment Strategy](#)
- [Climate Change and Ecological Emergency Action Plan](#)
- [Contract Management Guidance](#)
- [Protected Disclosure Policy \(Whistleblowing\)](#)
- [Bribery Act Policy](#)
- [Swale Borough Council Constitution](#)
- [Safeguarding Policy](#)
- [The Kent Compact](#)
- [PPN 11/20 - Reserving Below Threshold Procurements](#)
- [National Procurement Policy Statement](#)
- [National Procurement Strategy for Local Government](#)
- [LGA A councillor's guide to procurement](#)
- [Data Quality Standard](#)

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Policy & Resources Committee		Agenda Item:
Meeting Date	27 November 2024	
Report Title	Financial Management Report – Mid Year 2024/25	
EMT Lead	Lisa Fillery, Director of Resources	
Head of Service	Claire Stanbury, Head of Finance & Procurement	
Lead Officer	Caroline Frampton, Principal Accountant	
Classification	Open	
Recommendations	<ol style="list-style-type: none"> 1. To note the projected revenue position, which is balanced through a reduction of £27,000 in the amount to be taken from reserves. 2. To note the capital expenditure of £5.633m against the budget as detailed in Table 2 and Appendix II. 3. To approve the transfer of contract penalty payments to reserve at the end of the financial year, to support ongoing environmental services contract provision. 	

1. Purpose of Report and Executive Summary

- 1.1 This report sets out the quarter 2 revenue and capital budget monitoring forecast for 2024/25. The report is based on service activity for April – September 2024 and is collated from monitoring returns from budget managers.
- 1.2 The purpose of the report is to forecast the estimated outturn position for 2024/25 compared to the budget approved at Council in February 2024 and subsequently amended by virements, made under delegated authority during the year.
- 1.3 The headline figures are:
 - revenue underspend on services of £27,000 which will reduce the value of reserves used in year to balance the finances – Table 1;
 - capital expenditure of £5.633m – Table 2 and Appendix II.
- 1.4 In a world of continuous improvement, the review of forecasts has changed this year, with more check and challenge taking place by Finance staff. The Head of Finance and Procurement would like to express her thanks to budget managers and Heads of Service for the way in which they have all adapted to this change. It is hoped that this will provide robust forecasting, and help to reduce large movement from one quarter to another.

2. Background

- 2.1 The Council operates a budget monitoring process at Head of Service level, with regular reports to the Policy and Resources Committee and the Executive Management Team.
- 2.2 Departments work alongside their Finance colleagues to produce the forecasts, using information within last year's outturn position and actual income and expenditure within the year as a guide.

3. Proposals Revenue Outturn

Table 1 - Variance by Service

	Working Budget £'000	Projected Outturn £'000	Projected Variance £'000
Chief Executive	778	754	(24)
Communications & Policy	358	349	(9)
Elections, Democratic Services & Information Governance	1,143	1,133	(10)
Housing & Community	5,300	5,268	(32)
Planning	424	998	575
Environment & Leisure	9,219	9,254	35
Regeneration & Economic Development	(380)	(386)	(6)
Finance & Procurement	763	706	(57)
Revenues & Benefits	96	337	241
Environmental Health	614	618	4
Information Technology	1,339	1,343	3
Internal Audit	158	159	1
Human Resources	472	459	(12)
Legal	678	729	50
Drainage Board Levy	1,000	1,001	1
Corporate Overheads & Capital Financing	3,744	2,971	(773)
NET REVENUE SERVICE EXPENDITURE	25,706	25,693	(12)
Finance by:			
Budget Contingency Reserve	(1,588)	(1,561)	27
Revenue Support Grant	(338)	(338)	(0)
Funding Guarantee Grant	(1,276)	(1,276)	0
Services Grant	(30)	(30)	0
Business Rates	(11,736)	(11,736)	0
New Homes Bonus	(674)	(674)	0
Collection Fund Surplus	45	31	(14)
Council Tax Requirement	(10,109)	(10,109)	0
TOTAL FINANCING	(25,706)	(25,693)	12
NET EXPENDITURE (Contribution (to)/from General Fund)	0	0	0

- 3.1 Table 1 shows the forecast position at service level, with a further breakdown provided at Appendix I.
- 3.2 The variances with brackets are underspends, i.e. income received was greater than the budget or the spend was less than budget; variances with no brackets are overspends, i.e. the income was less than the budget, or the spend was more than budget.
- 3.3 Significant variances from budget (£20,000 or more) are explained below.
- 3.4 **Chief Executive £24,000 projected underspend**
A post within the team was filled part way through the year. This has therefore produced an underspend against budget for this year only.
- 3.5 **Elections, Democratic Services and Information Governance £10,000 projected underspend**
Electoral Services £26,000 projected overspend
Although running at an underspend in most areas, the yearly contribution to reserves required to pay for Local Elections in 2027 of £50,000 makes this an overspend position.
- Democratic Services – Members £25,000 projected underspend
The underspend is a result of Special Responsibility allowances and National Insurance on allowances being underspent. This is primarily due to having sufficient budget for all roles with special responsibility, but having some members filling more than one role.
- 3.6 **Housing & Community Services £32,000 projected underspend**
Private Sector Housing £26,000 projected underspend
This is a result of vacancies within the team during the year, and is not expected to be a long-term situation.
- 3.7 **Planning £575,000 projected overspend**
MKS Planning £70,000 projected overspend
Income is still forecast to be below the budget level, as has been the case in previous years. Although there has been an amendment to the budget, a further growth item has been added to the proposed budget for 2025/26, as this position is expected to continue.
- Appeals £127,000 projected overspend
This overspend is as a result of expected appeals anticipated in relation to large planning applications, as well as a forecast for court costs awarded against the council.
- Planning £380,000 projected overspend
The service continues to use agency costs to fill vacant posts, with recruitment continuing to try to attract permanent staff. The cost of the agency staff outstrips the savings from the vacancies. Further costs are expected this year to support the Local Plan work, but this will be met from reserves. Overall, planning income is expected to be slightly above the budget level.

3.8 **Environment & Leisure £35,000 projected overspend**

Environmental Services £124,000 projected underspend

The garden waste scheme has continued to be popular, resulting in the fee increase from last year providing £86,000 of income above the budget level. There are some salary savings due to vacancies and a saving of £18,000 in public conveniences due to less contractor attendance than previous year.

As is expected with a contract of this type and size, we anticipate receiving penalty payments in relation to the waste contract. However, we seek approval to transfer these payments to reserve at the end of the financial year to support the ongoing environmental services contract provision.

Leisure Services £142,000 projected overspend.

Tariff increases for utilities are affecting many service areas, especially Leisure services with a predicted £91,000 overspend. A further £21,000 overspend predicted for repairs in local play areas following inspections and a reduction in beach hut income due to the delay with phase 1. The lower level of beach hut income will be addressed by a growth item in the proposed 2025/26 budget.

3.9 **Regeneration & Economic Development £6,000 projected underspend**

Swale House Operations £55,000 projected underspend

There is currently an underspend on Swale House support staff, as a vacancy is being carried whilst we understand the ongoing need once the building is tenanted. Income is also projected to be above the current budget due to rental income. This increase in rental income is being built into the budget for 2025/26.

Buildings Maintenance £31,000 projected overspend

There are some minor underspends projected for maintenance of some buildings, but costs have been incurred in the demolition of Fountain Street, which overall push this into an overspend position.

Asset Management £94,000 projected overspend

There is an overspend within the Asset Management team due to the use of external support as a result of recruitment difficulties. Recruitment for key posts continues to be difficult, so growth has been included in the draft budget for 2025/26 to continue the use of some external support in the short term. There is also currently a shortfall in rental income not reaching budget levels at a number of locations, mainly due to vacant units.

Economic Development £75,000 projected underspend

£30,000 of this relates to administration grant received for the UK Shared Prosperity Fund grants. There are also temporary reductions in staff costs due to vacancies and a reduction in payments in relation to Learning & Skills, which has been put forward as a permanent saving within the draft budget for 2025/26.

3.10 **Finance & Procurement £57,000 projected underspend**

Accountancy £34,000 projected underspend

This underspend is partly from part year vacancies within the team, which have now been filled, and also an underspend on fees and services which have been put forward as a permanent saving in the 2025/26 draft budget.

Financial Services £21,000 projected underspend

This is due to salary savings within the team resulting from staff vacancies following a restructure, and maternity leave which has not been covered by replacement staff. This underspend is not expected to be a permanent position.

3.11 Revenues & Benefits £241,000 projected overspend

Housing Benefits £257,000 projected overspend

There is a projected overspend of £187,000 due to an increase in Housing Benefits claims in non-charity supported accommodation, which is not funded in full. Plus, a reduction in the amount collected of £70,000 from overpaid Housing Benefit, due to the ongoing transition of the case load moving to Universal Credit. This will potentially be an ongoing budget pressure.

3.12 Information Technology £3,000 projected overspend

IT Maintenance & Licences £49,000 projected overspend

Projected overspend is due to inflation and Microsoft increases. This will be separately reviewed to ensure that budgets are appropriate, as well as a contribution to reserve being reintroduced in future years.

IT Service £46,000 projected underspend

This is due to vacant posts being held within ICT Development, Network and Support and GIS teams.

3.13 Legal £50,000 projected overspend

This is due to the use of agency staff to fill permanent positions due to recruitment difficulties. Some of the overspend arising from the use of agency staff is expected to be offset by higher levels of income.

3.14 Corporate Overheads & Capital Financing £773,000 projected underspend

Interest and Capital Financing £274,000 projected underspend

This is arising due to interest rates remaining relatively high, and our treasury position meaning that overall we benefit from such a position. However, with interest rates falling, this should be considered as a windfall.

Non Distributed Pension Costs £223,000 projected underspend

Negotiations with the pension fund actuaries have resulted in a reduction in our contribution to the pension backfunding position. This is being put forward as a saving in the draft budget for 2025/26.

Corporate Overheads £120,000 projected underspend

This is primarily a result of a further saving from the insurance contract that was retendered. Having had the new contract for a year, a further saving is now being proposed as an ongoing reduction within the draft budget.

Corporate Costs/Provisions £157,000 projected underspend

Following a piece of work to rebase salary budgets to ensure they are in line with agreed structures, combined savings have been identified. Any amounts that are ongoing are being offered as a saving within the draft budget for 2025/26.

Capital Expenditure

3.15 This section of the report details actual capital expenditure to end of quarter 2 and highlights any variations between the 2024/25 capital budget and the projected outturn. The revised budget includes the 2023/24 roll forwards as agreed by the Policy and Resources Committee 15 July 2024.

3.16 Further breakdown is provided in Appendix II to this report.

3.17 Actual expenditure is £5.633m which is 23.83% of the budget. A summary is set out in Table 2 below and further details are shown in Appendix II. Some projects are currently showing negative spend this year, as we are awaiting invoices to clear year end adjustments.

Table 2 – Capital Expenditure to end of September 2024

	Net Budget £'000	Actuals April to Sept £'000	2024-25 Forecast £'000	Future Year Forecast £'000	Projected Variance £'000
Housing & Community Services	22,199	4,473	9,603	12,596	0
Regeneration & Economic Development	221	1,166	233	0	12
Environment & Leisure	1,219	(65)	817	402	0
Information Technology	0	58	0	0	0
Total Capital Programme	23,639	5,633	10,653	12,998	12

4. Alternative Options

4.1 None identified – this report is largely for information.

5. Consultation Undertaken or Proposed

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

6. Implications

Issue	Implications
Corporate Plan	Good financial management is key to supporting the Corporate Plan objectives.
Financial, Resource and Property	As detailed in the report. Budget holders will need to review the current forecast position to identify savings to address the forecast overspend.
Legal, Statutory and Procurement	The monitoring report is not a statutory requirement, but it is a requirement of the Council's Financial Regulations.
Crime and Disorder	None identified at this stage.
Environment and Climate/ Ecological Emergency	The report identifies a wide range of expenditure headings which support the Council's Climate and Emergency Action Plan.

Issue	Implications
Health & 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	The Council's overall financial position is a key risk in the Council's Corporate Risk Register.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

7. Appendices

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

- Appendix I: Detailed revenue monitoring position
- Appendix II: Detailed capital monitoring position

8. Background Papers

- Council Meeting 21 February 2024
- Policy & Resources Committee 7 February 2024

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Revenue Forecast Position Quarter 2 2024/25				
	Budget	Actuals YTD	Forecast	Variance
Strategic Management Team	711,490	356,891	688,459	(23,031)
Mayoral Activities	66,290	30,972	65,413	(877)
Chief Executive	777,780	387,864	753,872	(23,908)
Communications & Policy	357,640	168,263	348,800	(8,840)
Electoral Services	244,540	75,362	270,451	25,911
Transformation	79,700	0	79,700	0
Information Governance	169,060	81,731	162,994	(6,066)
Democratic Services - Team	193,220	91,431	188,401	(4,819)
Democratic Services - Members	456,880	220,834	431,788	(25,092)
Elections, Democratic Services & Information Governance	1,143,400	469,359	1,133,334	(10,066)
Private Sector Housing	252,390	182,294	225,895	(26,495)
Customer Services	768,320	381,668	760,765	(7,555)
Homelessness	3,224,740	500,447	3,238,614	13,874
Housing Development	73,400	73,914	70,157	(3,243)
Licensing	(71,500)	(30,536)	(78,903)	(7,403)
Resilience	98,180	48,551	97,910	(270)
Community Services	954,810	712,717	953,852	(958)
Housing & Community	5,300,340	1,869,056	5,268,290	(32,050)
Building Control	82,610	75,601	80,613	(1,997)
MKS Planning	48,000	128,011	118,178	70,178
Appeals	23,600	67,026	150,120	126,520
Planning	269,320	444,338	649,465	380,145
Planning	423,530	714,977	998,376	574,846
Environmental Services	7,464,590	1,247,944	7,340,437	(124,153)
Parking & Highways	(1,874,930)	(903,584)	(1,872,082)	2,848
Climate Change	163,300	60,258	178,353	15,053
Leisure Services	3,466,130	1,792,208	3,607,722	141,592
Environment & Leisure	9,219,090	2,196,826	9,254,430	35,340
Swale House Operations	752,745	490,144	697,542	(55,203)
Buildings Maintenance	240,500	181,179	271,230	30,730
Asset Management	(1,527,650)	(695,699)	(1,433,813)	93,837
Economic Development	153,980	(161,874)	78,772	(75,208)
Regeneration & Economic Development	(380,425)	(186,250)	(386,270)	(5,845)
Procurement	79,230	37,953	76,598	(2,632)
Accountancy	482,170	223,059	448,412	(33,758)
Financial Services	201,440	95,884	180,686	(20,754)
Finance & Procurement	762,840	356,896	705,696	(57,144)
Housing Benefits	(196,850)	14,046,953	60,000	256,850
Revenues & Benefits Administration	293,200	(317,232)	277,464	(15,736)
Revenues & Benefits	96,350	13,729,721	337,464	241,114
Environmental Health	613,610	163,202	617,894	4,284
IT Service	684,550	154,859	638,677	(45,873)
IT Maintenance & Licences	654,800	482,595	704,085	49,285
Information Technology	1,339,350	637,454	1,342,762	3,412
Internal Audit	158,430	119,148	159,070	640
HR Service	332,810	160,165	320,278	(12,532)
Corporate Training	51,700	20,729	71,420	19,720
Apprenticeships	87,070	25,635	67,690	(19,380)
Human Resources	471,580	206,529	459,388	(12,192)
Legal	678,230	1,017,080	728,664	50,434
Drainage Board Levy	1,000,000	500,277	1,000,724	724
Interest & Capital Financing	1,603,740	1,065,740	1,329,408	(274,332)
Contributions to Reserves	15,000	15,000	15,000	0

Non Distributed Pension Costs	1,282,620	52,092	1,060,000	(222,620)
Corporate Overheads	667,670	196,211	548,115	(119,555)
Corporate Costs/Provisions	175,175	18,475	18,475	(156,700)
Corporate Overheads & Capital Financing	3,744,205	1,347,518	2,970,998	(773,207)
TOTAL	25,705,950	23,697,919	25,693,493	(12,457)
Use of Reserves	(1,587,830)	(1,610,055)	(1,561,055)	26,775
Revenue Support Grant	(337,990)	(338,376)	(338,376)	(386)
Funding Guarantee Grant	(1,276,300)	(638,154)	(1,276,300)	0
Services Grant	(30,000)	(14,977)	(30,000)	0
Business Rates	(11,736,000)	(23,444,478)	(11,735,996)	4
New Homes Bonus	(674,000)	(336,962)	(674,000)	0
Other Grants	0	0	0	0
Collection Fund Surplus	45,000	31,096	31,096	(13,904)
Council Tax Requirement	(10,108,830)	(10,108,827)	(10,108,827)	3
	(25,705,950)	(36,460,733)	(25,693,458)	12,492
	0	(12,762,814)	35	35

	Working Budget			Actuals YTD			Forecast			Future Years	Projected Variance
	Expenditure £	Income £	Net £	Expenditure £	Income £	Net £	Expenditure £	Income £	Net £	Net £	£
Disabled Facilities Grants	7,283,400	(7,283,400)	0	500,212	0	500,212	2,725,000	(2,725,000)	0	0	0
Housing Renovation Grants	0	0	0	21,536	0	21,536	21,536	(21,536)	0	0	0
Local Housing Company	13,262,660	(718,750)	12,543,910	12,879	0	12,879	25,000	(25,000)	0	12,543,910	0
Temporary Accommodation	10,040,490	(437,040)	9,603,450	3,938,789	0	3,938,789	10,040,490	(437,040)	9,603,450	0	0
Dolphin Barge Museum & Skatepark	52,060	0	52,060	0	0	0	0	0	0	52,060	0
Local Authority Housing Fund Bridging Element	325,000	(325,000)	0	0	0	0	325,000	(325,000)	0	0	0
Housing & Community Services	30,963,610	(8,764,190)	22,199,420	4,473,416	0	4,473,416	13,137,026	(3,533,576)	9,603,450	12,595,970	0
Faversham Creek Basin	200,000	0	200,000	0	0	0	200,000	0	200,000	0	0
Swale House Refurbishment	20,670	0	20,670	(8,676)	0	(8,676)	20,670	0	20,670	0	0
Master's House Redevelopment	0	0	0	12,008	0	12,008	12,008	0	12,008	0	12,008
High Streets	57,000	(57,000)	0	0	0	0	57,000	(57,000)	0	0	0
Wayfinding Signage Project - Faversham	0	0	0	(2,004)	0	(2,004)	0	0	0	0	0
Rural England Prosperity Fund	377,000	(377,000)	0	17,000	0	17,000	391,530	(391,530)	0	0	0
UK SPF	149,000	(149,000)	0	9,687	0	9,687	275,120	(275,120)	0	0	0
Levelling Up Scheme	19,415,670	(19,415,670)	0	1,138,126	0	1,138,126	6,006,000	(6,006,000)	0	0	0
Regeneration & Economic Development	20,219,340	(19,998,670)	220,670	1,166,141	0	1,166,141	6,962,328	(6,729,650)	232,678	0	12,008
Gunpowder Works Oare	29,890	(29,890)	0	0	0	0	29,890	(29,890)	0	0	0
Beach Huts	143,000	0	143,000	0	0	0	143,000	0	143,000	0	0
Play Areas & Improvements	338,000	(338,000)	0	0	0	0	(338,000)	338,000	0	0	0
Tennis Court Improvements	18,970	(18,970)	0	16,056	0	16,056	18,970	(18,970)	0	0	0
Leisure Centre Contingency	287,180	0	287,180	0	0	0	0	0	0	287,180	0
Changing Places Toilets	0	0	0	(22,010)	0	(22,010)	0	0	0	0	0
Waste Vehicles	788,500	0	788,500	(60,413)	0	(60,413)	674,000	0	674,000	114,500	0
Barton's Point Drainage Project	51,640	(51,640)	0	1,445	0	1,445	51,643	(51,643)	0	0	0
Environment & Leisure	1,657,180	(438,500)	1,218,680	(64,921)	0	(64,921)	579,503	237,497	817,000	401,680	0
Finance & Procurement	70,000	(70,000)	0	14,800	0	14,800	59,200	(59,200)	0	0	0
Information Technology	112,000	(112,000)	0	43,243	0	43,243	138,000	(138,000)	0	0	0
Resources	182,000	(182,000)	0	58,043	0	58,043	197,200	(197,200)	0	0	0
	53,022,130	(29,383,360)	23,638,770	5,632,679	0	5,632,679	20,876,057	(10,222,929)	10,653,128	12,997,650	12,008

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Policy and Resources Committee	
Meeting Date	27 November 2024
Report Title	Update of Sundry Debt Policy
EMT Lead	Lisa Fillery, Director of Resources
Head of Service	Claire Stanbury, Head of Finance and Procurement
Lead Officer	Claire Stanbury, Head of Finance and Procurement
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. Agree the Sundry Debt Policy. 2. Delegate to the Deputy Head of Legal changes resulting from changes to legislation or the constitution.

1 Purpose of Report and Executive Summary

- 1.1 This report sets out the proposal for an updated sundry debt policy, which requires adoption by this committee.

2 Background

- 2.1 The council raises invoices for a number of services, where payment is not made in advance or at the point of service. The sundry debt function covers all such invoicing that is not in relation to Council Tax, Business Rates or Housing Benefit overpayments.
- 2.2 The majority of invoices are paid without the need for any intervention, but for various reasons there can be a need for action to be taken in order for payment to be made. This can range from a simple reminder, through to court action and placing charges on owned property.
- 2.3 By its very nature, sundry debt varies greatly in size. Invoices may be for relatively low value printing works, through to large S106 agreements. Actions taken to recover the monies therefore need to be proportionate to the debt being chased. This proportionality needs to consider the size of the debt, but also any legal agreements and precedents.
- 2.4 The sundry debt policy was last updated in 2019, and is therefore due to be reviewed. There have been advances in technology in that time, and also changes to the resources used for this work. It is therefore important to ensure that the policy allows us to work in an efficient way.

3 Proposals

- 3.1 The policy is being amended to automate initial reminder processes where debt is unpaid. This will be by issuing standard letters/emails and should require minimal

staff input. If the invoice remains unpaid after those reminders, then officers will be directly involved in contacting the customer. The policy retains an element of discretion, allowing officers to intervene at an earlier stage where it is felt appropriate to the debt.

- 3.2 The policy sets out the standard actions that will be carried out by the Finance Support Team, but also sets out the requirements on service departments. Again, the policy allows for discretion as to how involved service departments are, recognising that the relationship and involvement will differ depending on the type of debt.
- 3.3 The previous policy cancelled any debts under query that were not dealt with within 28 days. The revised policy no longer cancels these debts, but escalates cases to the Head of Finance and Procurement to ensure that work is undertaken to resolve the query at the earliest opportunity and allow the collection of the debt to happen expediently.

4 Alternative Options

- 4.1 To not adopt the revised sundry debt policy. The current policy does not make the best use of resources in a modern way, and therefore this is not recommended.
- 4.2 Not to provide delegation to the Deputy Head of Legal for changes resulting from legislative or constitution changes. This would result in the policy coming back through the committee cycle for what could be very minor changes, or where there is no choice regarding the changes. Any major changes resulting from changes to legislation would still be reported to committee for noting.

5 Consultation Undertaken or Proposed

- 5.1 No consultation has taken place, or is proposed.

6 Implications

Issue	Implications
Corporate Plan	This updated policy supports the running of the council, and making it fit for the future.
Financial, Resource and Property	There are no direct implications. However, efficient and robust debt collection processes are required to ensure that money owed to the council is recovered in a timely fashion and debt write offs are minimised.
Legal, Statutory and Procurement	None identified at this stage

Crime and Disorder	None identified at this stage
Environment and Climate/Ecological Emergency	None identified at this stage
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 The following documents are to be published with this report and form part of the report:

- Appendix I: Sundry Debt Policy

8 Background Papers

- None

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DEBT POLICY for

SUNDRY DEBTS

Swale Borough Council

November 2024

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Sundry Debt Policy 2024

1. The Purpose of the Sundry Debt Recovery Policy

The purpose of this policy is to provide clear guidance for all Council officers on the recording, reporting, recovery and monitoring of income for sundry debts.

All service areas must follow this procedure to ensure that the Council maximises the collection of debts and income by using a co-ordinated approach but having due regard to the customer's ability to pay. The purpose should be to maximise income to the Council. Debt recovery must adhere to relevant regulations. The overall principal of recovery should be efficient and effective recovery of income owed.

This Policy only applies to sundry debts which are defined as all debts owing to the Council not including those for council tax, business rates, overpaid housing benefit, parking charges and environmental health fines.

2. Debt Recovery

A debt is something that is owed, in this case, money. A debtor is a person who owes the debt who has an obligation or liability to pay.

Debt recovery is the act of obtaining or collecting the debt which is owed.

The purpose of the Sundry Debt Recovery Policy is to establish guidelines for the recovery of sundry debts owed to the Council.

Sundry debt recovery is undertaken by the Finance Support Team to obtain/collect payment from a person, company or agent who has received goods or services from the Council.

The Debt Recovery Policy for Sundry Debts is based on best practice with consistent and effective processes to maximise the income and manage the Council's debt.

On a day to day basis, sundry debt recovery is undertaken by the Finance Support Officers (FSOs). This is to ensure a proactive approach to debt collection, as the Council recognises that it is essential to make early contact with debtors, and to allow a timely recovery of the sums owed.

The responsibility for the invoicing, collection and recovery of sundry debts is held by the Chief Financial Officer (s151 officer).

The minimum value of any invoice is £50.00 (excluding printing and advertising invoices).

No invoice should be raised unless they are valid and legally enforceable.

3. The Objective of Sundry Debt Recovery

The Council's objectives in relation to debt are

- to maximise income for the provision of services, the Council will collect all sundry debt owing to it promptly, effectively and efficiently;
- to provide an approach to the billing, recovery and collection of debt that is fair, consistent, and accountable;
- to use cost effective and fair collection and recovery practises ensuring that those with the means to pay do pay; and,

Sundry Debt Policy 2024

- to ensure that the Council treats individuals equally, consistently and fairly, regardless of age, gender, disability and sexual orientation and to ensure that individual's rights under the Data Protection and Human Rights legislation are protected.

4. Invoice Types

Invoices are produced by request for a number of the Service Units within Swale Borough Council, including:

- Property Rents and Licences
- Water/ Electricity/ Insurance/ Waste Collection recharges
- Animal Establishment/ Grazing Licences
- S106 Contributions
- Ex-employee Car loans
- Grounds Maintenance
- Water Testing
- Training Fees
- Legal Shared Service costs
- Printing and Advertising
- Invoices on behalf of the Housing Unit to recover monies paid out to assist the homeless
- Housing Act 2004 Civil Penalties
- Charges applied to property, from works undertaken in default. (A notice will have been served prior to works being undertaken. Should the property owner fail to carry out remedial works the Council has a duty to do this and re charge the property owner. This type of debt is recorded on the Land Registry and interest is charge at 2% above base rate.

All invoice requests are processed though Accounts Receivables using the Council's main finance system.

Prior to submitting the invoice request the invoice requestor will need to check that the customer is set up within the finance system. If no customer has been set up, then a New AR Customer Request form is to be fully completed and emailed to the Finance Support Team.

When first engaging with a debtor, agreement should be made that the service of documents, including court documents, can be through electronic means.

5. Invoice Request Requirements

Service departments can raise a sundry debtor either:

- online on the Agresso finance system, or
- complete the invoice request form.

All regular users should raise sundry debtors online. If you are not yet set up to do this, please contact the Finance Support Team.

All sundry debtor requests must:

- have an "Invoice Requestor" shown as "Contact Officer" recorded. This is the person any queries will be directed to and not necessarily the person who completes the form.
- be completed with a full description, with no abbreviations.

Sundry Debt Policy 2024

- carry sufficient detail, including relevant dates that apply, within the description to ensure we have clear and concise information related to the goods or service supplied, this ensures the customer fully understands the invoice.
- show a purchase order number (where applicable).
- have the correct cost centres and account (income) codes along with the correct VAT code.
- include the value of the goods/ services.
- be sent by email to customers wherever possible.
- state if the invoice is to be attached to other documentation, e.g. letters, contracts, etc, and these must be provided in electronic format (e.g. scanned image) wherever possible to the FSOs.

Please also note the following:

- It is vital that all the information provided at the start of the process is correct.
- It is the responsibility of the relevant budget manager for the service to ensure the validity of their invoices.
- All relevant information relating to an invoice (otherwise known as proof of debt) should be kept until at least six years after it is first issued. If at the end of that six-year period, the invoice remains unpaid, but payments are being made the supporting documentation should be retained until final settlement or write off.
- It is good practice to establish, precisely, the nature of any legal entity of the customer as there is a world of difference between a sole trader and a limited company. This is described in more detail below.

Legal Entities of Debtor:

All invoices must be raised to a correctly named legal entity. In the event of non-payment, legal action cannot be taken against a non-legal entity. Legal entities are:

- **Individuals** - This is usually someone living at a residential address. When a request is received for a service the person's full name (title, forename(s) and surname) must be obtained and stated. Initials are not sufficient. If the request is made on behalf of more than one person then the full name of each person must be obtained and stated. The full correct postal address, including the postcode, must be stated.
- **Sole Traders** - Where an individual is trading in their own name the full name of the individuals as well as the business name must be obtained e.g. Mr John Brown, trading as Browns Painters. Evidence of the name of the business could be in the form of a request for services on a business letterhead. The individuals full postal address must also be requested.
- **Partnerships** - **"LLP"** must be added where applicable otherwise the full names of one, two, or more must be stated, by following the "trading as" (as above). If LLP is applicable the full correct business address, including postcode, must be stated, otherwise the full correct postal address(es) including postcode of the partner(s) should be stated.
- **Limited Companies** – The name must include "Ltd" or "Plc". Invoices can be addressed to either the current registered office or to a place of business of the company. Evidence of their Limited Company Status and registered office must be obtained by requiring confirmation of the service request on their official letterhead, including their company registration number.

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- **Charities limited by guarantee** - Charities which are charitable and limited by guarantee can be exempted from using the term "Ltd" so, for example "Oxfam" is the correct name. Evidence of their charitable status must be obtained by requiring confirmation of the service request on their official letterhead, including their charity registration number.
- **Clubs run by a committee** – The full name(s) and address(es) of the treasurer and /or the secretary, or the trustees must be stated.
- **Trustees** - The full name(s) and address(es) of the trustee(s) and the full name of the trust must be stated.
- **Executors or Personal Representatives** – Must be addressed e.g. Mr John Brown, Executor of Jacqueline Smith Deceased or Personal representatives of Jacqueline Smith Deceased. The Full postal address(es) of the executors/personal representatives must be stated.

6. Payment Methods

Sundry debts can be paid using the following methods:

- **Online** at our website www.swale.gov.uk/doitonline by debit/credit cards. Maestro, Delta, Solo, Visa Debit/Credit, MasterCard and Electron are acceptable. No charge is made to use any cards. The invoice number is quoted as the reference number
- **Telephone – by calling our Automated Telephone Service – 0330 088 1702** - available 7 days a week/ 24 hours a day by debit/credit cards. Maestro, Delta, Solo, Visa Debit/Credit, MasterCard and Electron are acceptable. No charge is made to use any cards. The invoice number is quoted as the reference number
- **Bacs/ internet banking direct to our bank account**
 - Name: Swale Borough Council
 - Account Number: 1683611
 - Sort Code: 30-00-02
 - Bank Name: Lloyds
 - The invoice number is quoted as the reference number.
- **Pay Point** by taking the invoice to any Pay Point outlet. Pay Point cards are available for Sundry Accounts. These cards can be supplied when the debtor has more than one invoice or is paying weekly or monthly against one invoice. They can be used at any Pay Point outlet or Post Office.
- **Standing Order**

Arrangements can be made to set up a standing order or internet banking payment by sending payments to

Bank	Lloyds
Sort Code	30-00-02
Account Number	01683611
Reference	Customer ID number shown on Invoice
- **Cheques**

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Cheques should be made payable to Swale Borough Council and posted to Financial Services Unit, Swale House, East Street, Sittingbourne, Kent, ME10 3HS quoting the invoice number on the back.

In all cases the invoice number will be required.

Currently it is not possible to pay sundry debtor invoices by Direct Debit.

7. Payment Terms

The standard payment terms for sundry debtor invoices is 30 days from the invoice date. The exceptions to this are:

- property rents, which are paid on 10 days from the date of the invoice (or in accordance with the property lease/ licence);
- invoices that have been raised for payments made in error to an individual or organisation will have to be repaid to the Council on immediate terms.

There are a number of debts for enforcement costs following “works in default” registered against properties that will incur interest of 2% above the current base rate.

Certain customers may be unable to pay the debt in full, in these instances their case will be assessed according to the type of debt and the ability to pay.

The Council will consider a payment plan to allow mutually agreeable payments to be made. All requests from customers to enter into payment arrangements must be referred to the FSOs regardless of the amount owed. The FSOs will set up and monitor all payment agreements.

8. Monitoring of Debts

The Debt recovery process will:

- be cost efficient and effective, ensuring that where people have the means, they fulfil their obligations by paying their debts;
- acknowledge the debtors' obligations to their dependants;
- identify problems as early as possible, with appropriate action taken in a timely manner;
- consider all avenues for recovery and use them appropriately to secure the Council's income;
- ensure that the outstanding debt is kept to a minimum and all the debts are reviewed in line with the recovery process detailed below, wherever possible;
- review all debts over 30 days overdue.

Once an invoice is overdue the FSOs will then follow the steps below:

1st Action – Invoice not paid by due date

A standard reminder letter will be produced and sent to the customer. This will remind the customer of the outstanding debt, and prompt them to make payment through any of the usual methods.

2nd Action – 14 calendar days after 1st action

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A second, stronger, standard reminder letter will be produced, informing the customer of potential consequences if payment is not received. The customer will be asked to make immediate payment.

3rd Action – 14 calendar days after 2nd action

A FSO will contact the customer by telephone to request payment is made, or to agree a payment plan if necessary. If the customer is agreeable, they can be transferred to the automated telephone payment service to make payment.

If a payment plan is requested, the FSO can agree instalment payments as appropriate. Once the agreement is made, customers are expected to comply with the arrangement. A letter will be sent to the customer detailing the agreed payment plan, and notes will be made against the invoice and customer within the system. Payment arrangements will be monitored on a monthly basis.

If no telephone number is held for the customer, the FSO will email the customer and ask them to make contact immediately.

Other Actions

Throughout the full debt recovery process, service departments can be involved to provide assistance. If a service department has an ongoing relationship with the customer, this should be utilised, so that the service department reminds the customer of the need to make payment.

If the Finance Support Team are unable to make contact with a customer, information will first be requested from the service department. If no further information is available from the service department, other resources will be used. This could include remittance advices received, checking for information in other systems such as Accounts Payable or other Council services, Companies House, or similar. Checking social media is an option of last resort, but must be carried out through an official Council profile, and only after liaising with the Council's RIPA Co-ordinating Officer.

If payment is not forthcoming after the actions laid out above, the FSO will consider further actions. Any actions that will incur costs will be discussed with the service department before progressing, and will only be used if proportionate to the debt. These actions could include:

- use of a tracing agent;
- recovery through the Small Claims Court;
- referral to Legal Services, who could take further action;
- referral to enforcement agent to recover outstanding amounts.

The Finance Support Team will continue to monitor all debt, regardless of age, to ensure that the current recovery process is appropriate, and to escalate for further action or write off where appropriate.

The actions taken by the FSO are adapted to the debt, so if a customer has responded, has been making payments, but then suddenly stops, the FSO then re-starts the process of engaging the debtor.

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9. Enforcement Action

It is inevitable that for a variety of reasons some money due to the Council will not be paid as requested. In all cases, the Council will follow the relevant statutory or civil process to enforce payment.

It is the responsibility of all senior managers to assist with appropriate recovery action in conjunction with the Head of Finance and Procurement, including legal action where necessary, for debts not paid promptly, by providing any further information requested by the debtor, and in pursuing the matter on the Council's behalf.

The Council recognises that prompt recovery action is essential in managing its debt and maximising income. The Council aims to:

- regularly monitor the level and age of debt;
- regularly review irrecoverable debts for write off;
- monitor the age profile of debt.

The general principles of enforcement action are:

- invoices are produced and dispatched in accordance with legal requirements and comply with the published timetable;
- there are clear written guidelines for all staff involved in enforcement action. Also, clear information for debtors and advice agencies;
- advice and information are available for debtors at every stage of the recovery process, including early referral to debt and benefit advice agencies, especially for those who are vulnerable.

Officers dealing with the recovery of debt should ensure that detailed records of actions are recorded within the relevant accounts receivable system so that a clear audit trail is provided.

10. Supplying Services to Debtors in Arrears

The Financial Support Team will upload monthly reports per Head of Service showing the status of debts raised by that service department. They will also contact the service department:

- before taking court action against the debtor;
- employing enforcement agents to recover the debt;
- requesting that the debt be written off.

It is the responsibility of the service department to determine how to supply services to a debtor who is in arrears. However, prior to a Council service being withdrawn completely from a debtor, the service department must identify if the service can be legally stopped and then contact the customer to explain the action to be taken and the reasons behind it.

11. Write Offs

The Council recognises that where a debt is irrecoverable, prompt and regular write off of such debts is good practice.

Sundry Debt Policy 2024

The Council will seek to minimise the cost of write offs by taking all necessary action to recover what is due. All debts will be subject to the full recovery, collection and legal procedures as outlined in this Debt Policy.

Before any debt can be written off, it needs to be demonstrated that all reasonable attempts have been made to collect the debt and that it is no longer economic to do so. Any debts presented for write-off must be supported by sufficient evidence of recovery action taken. A standard debt write off form must be completed. A copy of the form is included at Appendix I.

Reasons for Write Off

It is not possible to list every scenario which would make a debt suitable for write off, however the following reasons capture the main reasons why debts become irrecoverable:

- **Absconded / No Trace** -The debtor has left the address listed on the invoice and all reasonable attempts, including use of tracing agents, to find the debtor have failed.
- **Deceased** – The debtor has passed away and there is evidence of insufficient or no funds in the deceased persons estate to pay the amount outstanding.
- **Statute Barred** – Where the debt is “out of time”, for debts over six years old, and where no contact has been made and no payments received.
- **Small Debts and Debts Uneconomical to Pursue** - When all standard debt recovery processes have been tried or considered and where the cost of proceeding to recover would be cost prohibitive to the Council and its taxpayers.
- **Debts subject to a Relief Order** - Where debts owed to the Council are subject to and included in a Debt Relief Order and cannot be recovered.
- **Bankruptcy** – The debtor is declared bankrupt and sums due before the date of the bankruptcy cannot be recovered.
- **Companies in Liquidation / Wound Up / Dissolved / Struck Off** – The company is a Limited Company registered with Companies House and no longer exists and there is no means of recovering the debt.

Dependent on the type of debt, any proposed write off needs also to identify the budget implications, including whether there is a bad debt provision to cover the write off or not.

The Head of Service then signs the write offs and return them to the Finance Support Team.

Under the Financial Regulations, the Director of Resources has delegated authority to write off debts up to £5,000; debts above that value to £10,000 go to Strategic Management Team for approval to write off; and debts in excess of £10,000 are authorised for write off by the Policy and Resources Committee.

As VAT cannot be reclaimed for written off debts that are over 4.5 years old, it is important to consider the write off of debts within this time frame.

The debt will be written off the Accounts Receivable system, by the FSO. The Financial Regulations includes the following on the recovery of debt:

D5.8 Once raised, no bona fide debt may be cancelled, except by full payment or by its formal writing off, unless the debt has a factual inaccuracy or administrative error in the calculation or other administrative error. In all cases the reason for cancellation shall be documented.

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D5.9 Once raised, no bona fide debt or part of the debt may be written off, unless the reason for write off is fully documented and approved by the Director of Resources.

(a) all debts arising from bankruptcies and liquidations, which are not covered by distributions from liquidators, receivers or administrators; and

(b) any other single amount due to the Council up to £5,000 or with Strategic Management Team approval £10,000. Any outstanding debt in excess of this amount can only be written off with the consent of the Policy and Resources Committee.

D5.10 It is the responsibility of all senior managers to assist with appropriate recovery action in conjunction with the Director of Resources, including legal action where necessary, for debts not paid promptly, by providing any further information requested by the debtor, and in pursuing the matter on the Council's behalf.

12. Credit Notes

There is a clear distinction between raising a credit note and writing off a debt.

A credit note to cancel or reduce a charge must only be issued to:

- correct a factually incorrect or administrative error in the raising of the original invoice;
- adjust the amount of debt due;
- cancel an invoice where a dispute has led to agreement that the invoice should not have been raised;
- cancel an invoice where the service is unable to provide sufficient documentary evidence to support the recovery of an outstanding invoice.

All credit notes must be supported by evidence that validates the reason for reducing or cancelling the invoice.

To raise a credit note, the service that raised the invoice, must ensure that all information is fully completed, in the same way as invoices are raised, including:

- an agreed reduction in value and be issued within one month of the agreement;
- description of supply;
- rate and amount of VAT charged;
- total charge;
- the invoice number and date the original VAT invoice should be shown on the credit note.

13. Data Protection

All staff within the Council are aware of the guidelines of the General Data Protection Regulation (GDPR). However, we must be mindful when sharing information between departments to trace and recover the debts that we are working within the guidelines of the GDPR.

14. VAT

Appropriate accounting procedures will be put in place to ensure that the Council reclaims VAT from HMRC on a bad debt if:

- goods/ services have been supplied and VAT has been accounted for and paid to HMRC (as output tax), but no payment (or only a part payment) has been received, and

Sundry Debt Policy 2024

- the amount has, or is about to be written off in the accounts, and
- six months have elapsed from the supply date and the time when payment was due, and
- the reclaim of VAT is made within three years and six months of the date the payment was due and payable of the date of the supply.

HMRC regulations state that VAT cannot be reclaimed on debts written off after 4.5 years.

15. Heads of Services' Responsibilities

This section sets out the responsibility of Heads of Service in relation to the raising and the collection of sundry debt: To ensure that the Council identifies debts which require recovery action and such action is taken promptly they must regularly review their monthly monitoring reports of outstanding debts. It is an important responsibility of the Heads of Service to ensure that the Council recovers its debts.

The Financial Regulations state that:

D5.10 It is the responsibility of all senior managers to assist with appropriate recovery action in conjunction with the Director of Resources, including legal action where necessary, for debts not paid promptly, by providing any further information requested on the debtor, and in pursuing the matter on the Council's behalf.

D5.11 Each senior manager shall as soon as possible after 31st March notify the Director of Resources of all uncollected income on accounts not rendered relating to the previous financial year (i.e. Goods and services delivered by 31st March but not yet paid for, known as "Reserved Debtors").

All Heads of Service should ensure that those officers responsible for authorising invoice requests:

- Keep adequate records to fully support the amount to be invoiced.
- Know of the maximum amount that they can approve and of the need to keep within their limit. These are held by the Finance Support Team in the Finance Department.
- Complete Invoice requests to the standard required by Financial Services including a clear description of the reason for the debt.
- Forward all sundry debtor requests to the Finance Support Team promptly.
- Do not raise invoices for debts less than £50. Where amounts of below £25 are required, more cost-effective procedures for payment should be considered i.e. obtain payment up front.
- Regularly review their levels of debt and work with Finance to take action to recover it.

16. Queries and Disputes

Where a customer disputes an invoice with the service, the service must notify the Finance Support Team immediately to prevent the recovery process continuing. Equally, where a customer contacts the Finance Support Team rather than the service to dispute the invoice, the matter will be referred to the service responsible for raising the invoice, and recovery will be held.

Full notes and reasons for the dispute must be added to the customer's invoice/account.

Sundry Debt Policy 2024

To ensure the efficiency of debt collection and good customer service, all disputes must be resolved by the service responsible for raising the invoice within 28 days of the dispute being raised. The FSO must be notified of the outcome of the dispute.

A dispute is not resolved unless it meets one of the following criteria:

- customer is correct and receives a full credit;
- customer is partly correct, gets a partial credit and accepts revisions;
- customer is not correct and accepts the charge;
- customer is not correct but does not accept the decision of the service and the service is prepared to support the commencement or continuation of recovery proceedings.

Where disputes are not resolved within 28 days of the dispute being raised, the Finance Support Team will contact the service department to request an update. If no update is provided this will be escalated to the Head of Finance and Procurement and any hold on the account may be removed, resulting in debt recovery action restarting.

17. Time Constraints on Collection

There are time constraints on the action that can be taken to collect debts.

Judgements should be enforced within six years whenever possible. Whilst it is possible to enforce beyond that period, it is only possible with permission of the Court. This action will add time and costs to the recovery procedure, so enforcement should take place within six years whenever possible.

Sundry Debt Policy 2024

Appendix I – Debt Write Off Form

Request to Write Off Sundry Debt

Department	
Head of Service	
Customer Reference & Name	
Outstanding Debt (Total)	
VAT Amount	
Invoice Number(s) & Date(s)	
Is there bad debt provision?	
Reason for Write Off	
Actions Taken	
Signed By (HoS)	
Date	
Agreed by Directors & CX (over £5k) Date	
Agreed by P&R Committee (over £10k) Date	

Policy and Resources Committee	
Meeting date	27 November 2024
Report Title	Budget 2025/26 and Medium Term Financial Strategy (MTFS) Forecasts
EMT Lead	Lisa Fillery, Director of Resources
Head of Service	Claire Stanbury, Head of Finance and Procurement
Lead Officer	Claire Stanbury, Head of Finance and Procurement
Classification	Open
Recommendations	The Policy and Resources Committee is asked to; <ol style="list-style-type: none"> 1. Note the draft 2025/26 revenue and capital budget forecasts; 2. Note the Medium Term Financial Strategy (MTFS) projections; 3. Note the proposals for the fees and charges increases; 4. Approve the proposed budget consultation.

1. Purpose of Report and Executive Summary

1.1 This report sets out the draft 2025/26 revenue and capital budgets and the draft Medium Term Financial Strategy (MTFS). The MTFS is a strategic document, supporting delivery of the Corporate Plan outcomes and helping to ensure a focus on the Council's medium term budget position. It establishes how the Council's priorities will be achieved by setting out the framework within which resources are available over the medium term and the financial challenges facing the Council in terms of funding gaps. The context within which these budget forecasts remains complex with continuing pressure around the Net Zero agenda, the ongoing service pressures the ongoing cost-of-living crisis, new political leadership nationally, conflict in Ukraine and the Middle East and an uncertain future for local government funding, all of which make forecasting challenging.

1.2 The updated high level funding forecasts in this strategy build on previous figures from the 2024/25 budget setting exercise, which were forecasting future year deficits in the region of £1.5m in 2026/27 (excluding the uncertainty around government grant funding of £1.9m). The updated budget gap now differs from this peaking at £5.4m (again excluding government grants) in 2028/29, in the main this is due to economic inflationary pressures, delays to funding reviews and some key service pressures, all of which are impacting on the medium term projections (Appendix I).

Updated funding forecasts	2024/25	2025/26	2026/27	2027/28	2028/29
	£'000	£'000	£'000	£'000	£'000
Internal Drainage Board Levy	1,000	1,049	1,101	1,101	1,101
Base budget & reserve contributions	24,751	26,277	27,525	28,400	29,700
Revenue Support Grant (RSG)	(338)	(345)	(352)	(359)	(359)
Business Rates	(11,736)	(12,104)	(12,379)	(12,379)	(12,379)
New Homes Bonus	(674)	(674)	0	0	0
Services Grant	(30)	0	0	0	0
Funding Guarantee Grant	(1,276)	(1,276)	0	0	0
Uncertain Government Grants	0	(27)	(27)	(27)	(27)
Kent Pool Growth Fund (Business Rates)	(855)	(855)	(855)	(855)	(855)
Planned use of reserves	0	0	0	0	0
Council Tax	(10,109)	(10,512)	(10,932)	(11,368)	(11,822)
(Surplus)/deficit	733	1,533	4,082	4,513	5,359

- 1.3 A detailed budget review has taken place over previous months to identify efficiencies and additional income to help support frontline services and to balance the Council's financial position. For next year this totals around £2.5m (Appendix 2) and is supported by various increases to fees and charges (Appendix 4), service reviews, and savings agreed in previous years' Medium Term Financial Plans. There is also a plan to continue to use Business Rate income within the Kent Pool Growth Fund, to recharge costs that meet the criteria of the pooled fund. Based on current forecasts this still leaves a deficit of £1.533m which will need to be supported from reserves if further savings cannot be identified. Based on the projections above and the spending estimates and use of reserves in the current year the earmarked reserves are forecast to be insufficient to address any budget gap after 2027/28.
- 1.4 The capital spending projections for future years (Appendix IV) are included and assume borrowing of £34m between 2024/25 and 2028/29. The main borrowing will be in relation to Rainbow homes and purchase of properties to use for temporary accommodation. However, with the recent instability of the financial markets and increases to borrowing costs it will be necessary to fundamentally review schemes with borrowing requirements to ensure they remain affordable and still deliver the anticipated benefits. In summary the key messages are as follows;
- Estimated budget gap of £1.533m for 2025/26 even with current savings and fee increases
 - We can deliver our statutory services with current income levels but nothing more
 - To fund non-statutory services we need to find more income/savings/reserves
 - Our reserves will help set a balanced budget for the next 3 years but not after 2027/28
 - Funding from reserves is not a sustainable way to manage our budget
 - We need to identify more efficiencies and income to make the budget sustainable
 - The current projections are based on a number of assumptions which can and do change.

2. Proposals

- 2.1 Given the timing of this report this is an interim step in the development of fully balanced budget proposals. The updated Medium Term Financial Strategy (MTFS) is attached at Appendix I. It currently shows a gap of £1.533m which needs to be addressed to balance the 2025/26 budget. To reduce the gap to this level, it is currently proposed to use £855k from Business Rates Growth Fund reserve as was agreed at part of the 2024/25 MTFS.
- 2.2 The savings, efficiencies and increases to income totalling £2.5m that the Council has identified to help support the 2025/26 budget can be found within Appendix II, (£1.5m of these savings were agreed as part of the budget process for 2024/25). The draft capital budget is included within Appendix IV while the fees and charges proposals for next year are covered by Appendix V. Appendix VI includes a risk assessment for next year's budget.
- 2.3 The MTFS and budget forecasts include the latest information available. It should however be noted that some of the assumptions that have currently been made will not be confirmed until the Provisional Settlement is announced, the date of which is currently anticipated to be during the week commencing 16 December 2024. This includes whether there will be any changes to the level of increase in Council Tax is allowed for district councils.
- 2.4 The MTFS assumes that the increase in National Insurance contributions for employers that was announced as part of the October budget will not impact on council's budget position as the government proposal included an allowance for NI

increase for directly employed public sector workers. This position will be updated if required, when details of the funding for local authorities is announced.

- 2.5 The government are also working on the roll out of the Extended Producer Responsibility initiative that aims to transfer the cost of collecting and disposing of recycling waste to the organisations that are responsible for producing it. Local authority payments were due to start in 2024/25 but this has been delayed until 2025/26. The methodology for payments or the requirements of local authorities has not yet been confirmed and so this report does not include any assumptions for the funding that is due to Swale. However, given that the funding is to support the delivery of our waste collection service which has required significant growth to the base budget this funding will help cover those costs and help address the significant budget gap.

3. Alternative Options

- 3.1 Do nothing – This is not recommended as the Council is legally required to set a balanced budget. A further budget report will be submitted to Policy & Resources and Council in February 2025.

4. Consultation undertaken or proposed

- 4.1 Formal consultation of the proposed budget will be undertaken. The Budget proposals contained in this report will be made available for comment on the Council’s website from 28 November to 8 January.

5. Implications

Issue	Implications
Corporate Plan	The budget proposals support the achievement of the Council's corporate priorities, and contribute directly to the running of the Council.
Financial, Resource and Property	The report sets out the Council's resourcing position.
Legal, Statutory and Procurement	The Council is required to set a Council tax and a balanced budget.
Crime and Disorder	Any potential implications will be addressed by service managers in their budget proposals.
Environment and Climate/Ecological Emergency	The proposals support the Climate Change and Ecological motion previously agreed.
Health and Wellbeing	Any potential implications will be addressed by service managers in their budget proposals.
Safeguarding of Children, Young People and Vulnerable Adults	Any potential implications will be addressed by service managers in their budget proposals.
Risk Management and Health and Safety	Any potential implications will be addressed by service managers in their budget proposals.
Equality and Diversity	Any potential implications will be addressed by service managers in their budget proposals.
Privacy and Data Protection	Any potential implications will be addressed by service managers in their budget proposals.

6. Appendices

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

- Appendix I: Medium Term Financial Strategy (MTFS) – General Fund Summary Forecasts 2025/26
- Appendix II: Detailed Budget Position 2025/26
- Appendix III: Budget Change Summary 2025/26
- Appendix IV: Capital Programme 2025/26
- Appendix V: Fees and Charges 2025/26
- Appendix VI: Risk Assessment 2025/26

7. Background papers

7.1 None.

Budget and Medium Term Financial Strategy 2025/26 to 2028/29

Swale Borough Council

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1. Medium Term Financial Strategy (MTFS)
2. Corporate Plan
3. Context
4. Global and national Pressures
5. Local Pressures
6. Inflation
7. Funding changes
8. Income
9. Links to other strategies
10. Looking forward
11. Closing the budget gap
12. Risk assessment
13. Conclusions

Tables and Charts

Chart 1: Inflation Forecasts November 2024

Chart 2: Council Tax Shares

Chart 3: Reserve Balance Projections

Chart 4: Capital Programme 2025/26

Chart 5: Capital Programme Funding 2025/26

Chart 6: Capital Programme Forecast 2024/25 to 2028/29

Table 1: Projected Council Tax Income Growth

Table 2: Deficit Forecasts as per 2023/24 Budget

Table 3: Updated Deficit Forecasts Based on Updated Settlement Assumptions

1. Medium Term Financial Strategy (MTFS)

The document that guides the Council's strategic financial planning and forecasting

1.1 Swale Borough Council's Medium Term Financial Strategy (MTFS) is a strategic document that supports the delivery of the Corporate Plan outcomes and helps ensure a focus on the Council's medium term budget position. The MTFS establishes how the Council's priorities will be achieved by setting out the framework within which resources are available over the medium term and the financial challenges facing the Council in terms of future funding gaps. It is the method by which the Council translates its long-term goals into action by considering;

- Where the Council is now
- Where the Council wants to be
- What the Council's plans are to get there

1.2 The MTFS helps to ensure that the Council is 'doing the right thing' while taking account of internal strengths/weaknesses and external threats/opportunities. It also provides a link between the Council's long-term service objectives and its financial capacity, which effectively asks the question 'can the strategic objectives be achieved within the available financial envelope?' The aim should be to provide a framework to support and inform the medium-term planning considerations and the budget setting process. Essentially the MTFS should include consideration of a broad range of factors that influence the Council's long-term financial success.

The MTFS Aims to:

- Provide a high-level assessment of the resources available to support the Corporate Plan outcomes, outlining the high-level funding projections for the following four financial years (beyond the current year);
- Explore the financial context in which the Council operates, considering a number of local and national factors. These will include known spending pressures and commitments, along with forecast future funding reductions and the impact of the national economic outlook;
- Explore the demands on the capital programme both in terms of ambition and resources along with the impact on the revenue account and reserve levels held by the Council;
- Highlight how the Strategy links in with and supports other Council strategies and policies;
- Assess the risks on which the Plan is based;
- Provide preparatory work for the following year's budget;
- Address the sustainability of the Council's financial position.

1.3 The MTFS is fundamentally linked to the Corporate Plan 2023-2027 that was adopted by full council on 4 April 2024.

1.4 The Council is currently projecting a deficit position from 2024/25 onwards. Forecasting the deficit highlights the growing gap between the Council's expenditure requirements and the income that can be generated. The future year projections can be found within Appendix I.

2. Corporate Plan 2023 - 2027

'Learning from the past, focusing on the future'

2.1 The corporate plan was adopted in April 2024, following consideration by service and area committees and a public consultation exercise. The plan states the vision of the council to learn from the past and focus on the future. It showcases the achievements of the council over the past few years and documents the priorities for the period to 2027.

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

2.3 Our leadership qualities

In order to deliver our priorities and objectives the Council needs strong, positive leadership and this is embodied within our leadership qualities as follows;

- Leadership at all levels
- Performance
- Ambition
- Customer Care
- Teamwork

2.3 Our Values

Our values represent the beliefs and expected behaviour of everyone working for Swale. There is currently a project to refresh our values, which aim to support quality services, our current values are;

- **Fairness** - being objective to balance the needs of all those in our community
- **Integrity** - being open, honest and taking responsibility
- **Respect** - embracing and valuing the diversity of others
- **Service** - delivering high quality, cost effective public service
- **Trust** - delivering on our promises to each other, customers and our partners

2.4 'One Team' Team Approach

In order to deliver high quality services, we need to have excellent teams to deliver them. We recognise that our staff are our most important resource at the heart of the services we provide. We are committed to investing in staff and their development so that we have well trained and supported employees, providing professional services and who are happy and motivated in their work. The One Team approach also includes Members to ensure we work closely together to deliver our priority outcomes

and that their training needs are also met as part of their ongoing development. We are developing a member/officer protocol to improve levels of collaboration, mutual understanding and tone of communication between members and staff.

3. Context

Demographic and landscape issues that set the scene for the budget and financial strategy

- 3.1 For such a relatively small area, the borough is a remarkably diverse place, including the historic market town of Faversham, the traditional seaside resort of Sheerness and the more industrial market town of Sittingbourne. In recent years Sittingbourne has been the focus of major council-led redevelopment, with current schemes the Levelling Up Fund project, being focused on Sheerness. The Council's urban centres are connected both physically and culturally by the borough's extensive and important rural areas, accounting for around a quarter of the population, which take in several protected wildlife habitats and part of the Kent Downs area of outstanding natural beauty.
- 3.2 Swale's demographic make-up is no less diverse than its geography, including a mix of affluent and less affluent communities, but in general the area is less well-off than is typical for the south-east, and there are some concentrated pockets of severe socioeconomic disadvantage to be found in locations across the borough. While the causes of this are deep-rooted and complex, the outcome is that a proportion of our residents suffer from entrenched inequality and a lack of opportunities which the council needs to do what it can to address.
- 3.3 The indices of multiple deprivation are calculated by government based on a range of measures of poverty and associated disadvantage. The latest data we have on deprivation is from the 2021 census. Previously published data from 2019 reported that the borough was the 69th most disadvantaged of 317 shire districts in England, and the second most disadvantaged in Kent. The 2021 census data shows no change to that position.
- 3.4 Over recent decades, Swale has seen a successful diversification of its economy, which now has key strengths in manufacturing and distribution, as well as high-skilled activities including cutting-edge technology and life sciences. However, it remains the case that much of the borough's employment, including employment created in the last few years, is at the lower end of the skills spectrum.

4. Global and National Pressures

Some financial pressures are driven nationally and indeed globally and are beyond the control of the Council. Some of these which impact Swale are shown below

Global issues

- 4.1 The Net Zero agenda represents a significant global issue, not just a national or local one and at the present time some of the emerging green technologies, which are undoubtedly the way to go for the future, can be significantly more expensive to deliver at the current time. Energy prices remain high, and this continues to impact on costs for some of our service areas.

Political

4.2 The general election in July resulted in election of the first Labour lead government since 2010. To date there has been no further clarification of the position of local government funding have no more clarity in terms of local government funding and business rates retention. The October budget position announced by the Treasury provided headline information only and no details on the position for local government other than a recognition of the need for longer term settlements to assist with medium term financial planning.

Central Government Funding

- 4.3 We were hoping this year for a multi-year settlement, but following the summer general election it is likely that we will get a 2 year settlement as a maximum as the new government develops its policies for change to local government funding. While there has been no further update on the reform of local government funding, it is unlikely that this will be delivered for 2025/26 .
- 4.4 The business rates reset is still to be implemented and the position on any possible future reset remains unclear. A rollover settlement for 2025-26 is anticipated, with the funding reforms expected to be taking place in 2026-27 or later.

Inflation

- 4.5 Inflation has reduced significantly over the last year with the September 2024 CPI position falling to 1.7%, however wage inflation remains higher in comparison. Many of the Council’s contracts are linked to inflation indices, so we are having to pay more just to stand still. Given that contracts costs are reviewed annually, it also means there is a lag before the increases are applied. This means that there is a delay in terms of cost increases, but also a delay in seeing the effects of falling inflation.
- 4.6 This Medium-Term Financial Plan assumes inflation increases at between 2 and 3% for the coming financial year, remaining at 3% from 2026/27. Future year assumptions will be updated annually as part of the review of our plan over the medium term.
- 4.7 Inflation is difficult to predict in the current situation, and the table below demonstrates the impact that changes in these assumptions for contracts and staffing costs could have on the budget assumptions.

Year	-1%	Estimated increase	+1%
2025/26	1,287,470	1,300,092	1,312,715
2026/27	1,322,094	1,333,095	1,344,096
2027/28	1,344,536	1,367,088	1,389,860
2028/19	1,367,427	1,402,101	1,437,454

Interest Rates

- 4.8 After a period of increasing interest rates, these are now starting to decrease, albeit at a much slower rate, with forecasts suggesting that rates will continue to fall slowly throughout 2025.
- 4.9 The current level of interest rates is having a positive impact on the council’s treasury management position, with interest receipts on cash holdings being higher than the cost of the current borrowing position.

- 4.10 However, the downside to the higher interest rates is that it has meant assumptions on the cost of financing our capital programme have increased, and we need to keep this position under review to ensure that capital schemes remain affordable. Any changes that impact on the budget framework will be reported to committee for further decisions to be taken on whether to continue with the current scheme.

5 Local Pressures

These arise from local circumstances and demand for services. The financial effects of these must be dealt with by the Council, as there is often no external funding

Local Economic changes

- 5.1 Swale derives significant sums of income from fees and charges for services such as car parking and planning. These will be affected by factors outside the Council's control, such as consumer confidence, the general health of the economy and the cost-of-living crisis.

Waste Management

- 5.2 As Members will be aware the new waste contract started in March 2024. The budget position includes provision for the new contract price and the capital financing of the vehicle fleet.
- 5.3 The government are preparing for the roll out of the Extended Producer Responsibility initiative that aims to transfer the cost of collecting and disposing of recycling waste to the organisations that are responsible for producing it. Local authority payments were due to start in 2024/25 but this has been delayed until 2025/26. At the time of writing, the methodology for payments or the requirements of local authorities has not yet been confirmed and so this report does not include any assumptions for the funding that is due to Swale. However, given that the funding is to support the delivery of our waste collection service which has required significant growth to the base budget this funding will help cover those costs and help address the significant budget gap.

Temporary accommodation

- 5.4 The council has a duty to provide emergency/temporary accommodation (TA) for homeless households whilst assessing their case and/or ahead of securing more permanent accommodation. A range of accommodation is currently used to cover this duty: some units owned by Swale, some units owned by housing associations, nightly let self-contained and shared accommodation and rooms in hotels/bed and breakfast accommodation.
- 5.5 Whilst some of the costs of this accommodation are covered by housing benefit this is only payable up to 90% of the Local Housing Allowance (LHA) which is the amount set by government that can be covered by housing benefit. The difference between the actual cost and housing benefit levels is borne by the council. This has been increasing over recent years, with growth having been built into the current budget assumptions. Officers are working hard to reduce the requirement for temporary accommodation with the number of households in TA as at the end of October 2024 being 287 compared to 307 at the same time last year. Despite the success of the team in reducing the number of households in TA the impact of higher interest rates is being seen in significant price increases from landlords.

- 5.6 As well as the costs to Swale, demand for TA in Kent is exceptionally high and often there are limited options, placements regularly occur outside the Borough. Many of the current TA options are not ideal for what are vulnerable households, accommodation that is not self-contained, not within Borough and is used for increasingly lengthy periods (we currently have 62 households that have been in TA for over 2 years).
- 5.7 Members agreed a project for the Council to purchase a number of properties that can be used to house those in need of TA. This will help to control the spiraling costs, although it is not a panacea for this problem. The project has been progressing well, with 27 properties now purchased, and a further 18 going through the purchasing process.

Supported Accommodation

- 5.8 A further pressure to the budget position is the loss of housing benefit subsidy on placements in certain types of supported accommodation. Where the placement is not made to a landlord that is not a registered charity or a registered social landlord, the council is only able to reclaim 60% of the housing subsidy awarded to tenants. The growing number of placements in this type of accommodation is adding significant pressure to the budget.

Local Council Tax Support Schemes (LCTS)

- 5.9 The LCTS scheme was implemented in April 2013 as a replacement to Council Tax Benefit. This change was part of wider welfare reforms to reduce expenditure, giving responsibility of the replacement scheme to Local Councils. LCTS schemes should encourage people into work and be based on the ability to pay. Previously the Council Tax Benefit scheme was 100% funded through subsidy paid to the Council from the Department for Work and Pensions (DWP).
- 5.10 From April 2013 each billing authority was given the discretion to set their own scheme, although at the outset the government did stipulate that the scheme would not change the 100% maximum support for low-income pensioners i.e. they would receive the same level of support as they did under the system of Council Tax Benefit. Funding for LCTS is no longer received as a separate subsidy grant but is now within the overall Local Government Funding system as non ring-fenced funding within the Revenue Support Grant (RSG) and baseline funding level. The local scheme (for Swale) has changed several times since the introduction of LCTS in 2013/14.
- 5.11 In April 2023 the Council introduced a banded council tax reduction scheme which aimed to simplify the understanding and processing of the previous scheme. Full council are due to approve the scheme for 2025/26 in due course.

Lower Medway Internal Drainage Board Precept

- 5.12 The Internal Drainage Board Levy has been proposed for 2025/26 with an increase of 3%, plus a property adjustment. The levy position is just over £1m for Swale, and the Council has no control over the setting of this levy. Following significant lobbying from local government colleagues, the impact on increases to internal drainage board levies was acknowledged by the Government in 2023/24 with the introduction of the Internal Drainage Board Levies grant. This grant was awarded to 15 local authorities to provide additional and exceptional one-off funding to councils most affected by increases in Internal Drainage Board Levies. Swale received £40k of this grant in 2023/24. A further one-year grant was announced for 2024/25, but Swale were not awarded an allocation from this round of funding.

- 5.13 Government is now recognising that the pressure these levies apply to collection authorities is an ongoing issue and MHCLG will work with DEFRA and the local government sector to implement a long-term solution, although no plans have yet been released. The Leader and the Director of Resources are representing Swale on a LGA Special Interest Group that are hoping to change the way that the current drainage board levy precept process impacts on local government financial position.

Workforce

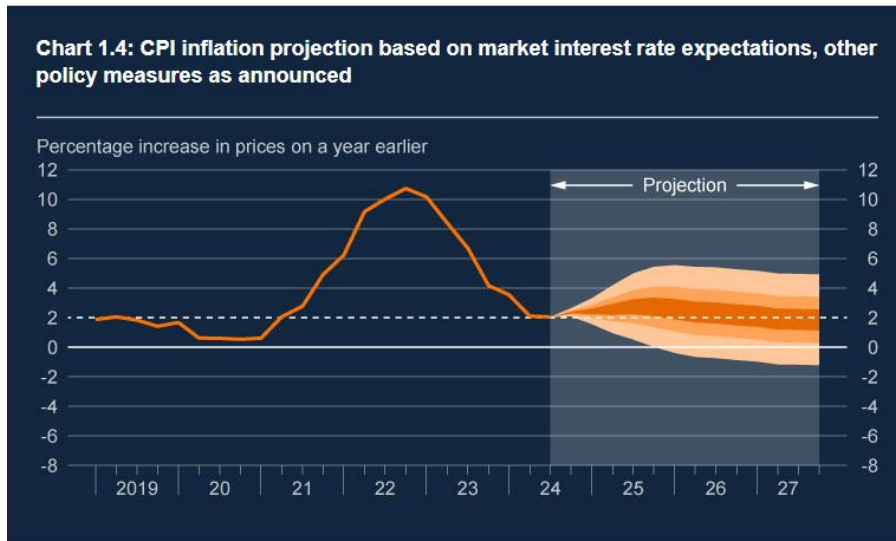
- 5.14 We recognise that our staff are our most important resource at the heart of the services we provide. We currently have around 255 full time equivalent posts and 300 actual members of staff. Our pay bill is our most significant area of direct spend and stands at £13.9m including pension contributions of £2.9m as per the 2024/25 budget. The pension fund is administered by Kent County Council (KCC), employee contribution rates are set by Government and range from 5.5% to 12.5%. The fund actuary Barnett Waddingham sets the employer contribution rate, currently 20.5%, plus an annual fixed sum.
- 5.15 The Fund is valued once every three years and the valuation as at 31 March 2022 disclosed a net deficit of £8.46m on Swale's share of the fund, a reduction of £7m from the 2019 valuation deficit of £15.5m due largely to increases in annual investment returns. The change in contribution rates because of the March 2022 valuation took effect from 1 April 2023. The contribution rate increased from 18.5% to 20.5% but the back funding element decreased.
- 5.16 The chancellor's budget announced increases to National Insurance contributions for employers, however the announcement also included an offset for public service organisations indicating that this increase will be covered by funding from central government. Therefore this budget does not include any additional costs for the increases in National Insurance.

6. Inflation

Inflation is the rate prices for goods and services that the Council buys are expected to rise.

- 6.1 Inflation is significantly eroding the Council's spending power. Although inflation has fallen, reaching a low of 1.7% at the end of September 2024, there is a long-lasting impact from the high levels of inflation experienced over the last two years.
- 6.2 The Bank of England's Monetary Policy Committee (MPC) are slowly reducing the bank base rate of interest as inflation falls and stabilises, but the reduction in interest is slow in order to monitor the impact of other shocks to the economy or increases in energy or import prices.
- 6.3 The Council assumes in this financial strategy that inflation will broadly follow the pattern in the graph below as outlined by the Bank of England with general price increases being assumed at around 2-3% for 2025/26. There are also some areas and contracts, such as the waste contract, which use different indices to calculate annual increases, and these are taken account of where appropriate.

Chart 1 – MPC Forecasts November 2024



Source: Bank of England Monetary Policy Report November 2024

- 6.4 **Staff Pay** – The Council is not part of a National Joint Council (NJC) national pay agreement, so any increases are set and agreed locally in negotiation with the Union. The current financial plan makes provision for a pay award next financial year and pay negotiation discussions with the union commenced in October 2024. The budget also includes provision for turnover savings (for staff leaving and temporarily vacant posts etc) of 2%. As a guide a 1% increase equates to approximately £126,000 annually.
- 6.5 **Income (fees and charges)** – As in the previous year, increases in the fees and charges for 2025/26 are being recommended for an increase in line with our inflationary and cost of living increases.

7 Funding changes

Local Government is currently going through a significant period of change in terms of the way it is funded and the way the funding elements are to be calculated for the future

Local Government Funding Settlement Funding – last year’s forecasts

- 7.1 The settlement is issued by the Ministry of Housing, Communities and Local Government (MHCLG) and for Swale comprises several elements including Revenue Support Grant (RSG), New Homes Bonus (NHB), Baseline Funding Level (via the Business Rates Retention Scheme) and Council Tax (through the setting of referendum principles) but has more recently also included the Services Grant and a Funding Guarantee Grant. The Settlement confirmed some additional one-off grant funding for 2024/25, and a further year’s allocation of New Homes Bonus. Unfortunately, the settlement was once again for one year only, despite some indications that there would be a return to multiyear settlement. RSG is an un ring-fenced grant which can be spent on services at Swale’s discretion.

Settlement Funding

- 7.2 The Chancellor delivered her Autumn Statement on 30 October 2024. The Autumn Statement responds to the OBR forecasts and sets out the medium-term path for public

finances. A number of announcements were made in relation to taxation plans, social care funding, and changes to National Insurance contributions for employers. The key issues for Swale and district authorities in general centered around changes to business rate relief for the retail, hospitality and leisure sector and freezing the business rate multiplier for small businesses. This section will be updated when details of the provisional settlement are announced.

- 7.3 This budget assumes a rollover position for the total grant funding received for Swale remaining the same for 2025/26 as received in 2024/25. This presents a risk to the budget if there are changes made by the new government to how funding is allocated to local authorities.

District Council Band D Increases

- 7.3 The previous settlement saw the Chancellor use council tax increases to help manage the funding gap within local government which brought in changes to increase the core Band D threshold from 1.99% to 2.99%. This applies to all classes of authority and has been extended for another year to 2024/25. Announcements made to date are that the £5 cash threshold will also still apply, although this is now lower than the 2.99% increase allowed for most authorities.

- 7.4 The forecasts within this MTFP assume council tax increase of 2.96% for modelling purposes and coupled with growth forecasts in the tax base resulted in income projections of around £10.512m for 2025/26, which is growth of £403k based on the 2024/25 position. This charge equates £206.64 for an average Band D property, which is an increase of just over 11p a week for Swale's element of the council tax. It should be noted that, while this information would be used at this point for modelling purposes now, the council tax will not actually be agreed and set until the Full Council budget setting meeting in February 2025.

- 7.5 While the statement last year allowed the additional 1% increase the £5 cash limit looks unlikely to increase. Lower tier councils are highlighting the need to increase the cash limit, as the £5 increase is now lower than the percentage increase for almost all authorities, and as such is becoming irrelevant.

- 7.6 If the cap was increased to 5% or £10, the following additional income could be generated;

Band D increase	£ increase	Additional Council Tax Estimate	Increased Estimate
2.96%	5.94	403,313	
3.99%	8.01	508,570	105,257
4.98%	9.99	609,295	100,726

- 7.7 Just for information a £10 increase would equate to 19p a week or 2.7p a day and it is recommended that the Council consult on potentially higher increases (up to £10) in case this turns out to be an option.

- 7.8 The provisional settlement is currently expected to be published by 20 December 2024. Until the Settlement figures are finally confirmed the figures are still provisional and subject to change, but this is the best information we have at the present time. Projections are still therefore based on estimates which have not yet been finalised and could potentially be impacted significantly by changes in Government spending plans and

fiscal policy.

8 Income

The Council derives a limited amount of funding from Central Government, the main sources of income are locally raised taxes, fees and charges and specific grants. This section focuses on how the Council is funded and how this will continue to change over the coming years

Business Rates Retention

- 8.1 Since the 2013/14 financial year, local government has been able to retain 50% of the growth in the local business rates income to support services. As part of a manifesto commitment, the Government pledged to allow Councils more control locally over their finances, and as part of this began to plan for an eventual system of 100% local retention of business rates growth. In exchange for this, Councils would have to forgo certain grants received from Central Government. Following the snap General Election in 2017 and a period of uncertainty around the new Business Rates Retention Scheme, MHCLG had previously confirmed a local 75% share from April 2020, however these potential changes continue to slip, and we are still no closer to having a revised scheme.
- 8.2 The income from the current system is shared based on 50% being returned to Central Government, 40% being retained by Swale with 10% going to the County. However, while technically Swale's share is projected to be around £24m after the tariff and levy payments are made the net income to Swale reduces to around £11.7m for 2024/25 and just over £12.1m for 2025/26. Business Rates growth has now been built into the base budget, creating this increase, but this does create a greater risk when Business Rates reset finally takes place.
- 8.3 The budget position for 2025/26 includes the proposal to maximise the use of the Business Rates Growth Fund element of the business rates pool as the annual contributions from this element of the pool can be used to support existing council expenditure.
- 8.4 We still do not know the timing of the business rates reset, and while we anticipate this will have a negative impact for Swale, we would expect some form of transitional grant relief which again at the current stage is unknown, so this issue continues to be monitored until we have greater clarity.

Kent Business Rates Pooling Arrangements

- 8.5 Local authorities can enter arrangements with other Councils to pool their business rates. Legislation allows councils to voluntarily enter a business rates retention pool. Councils within a pool are treated as a single entity with tariffs and top ups netted off and a single levy rate applied. In two tier areas this creates the potential for the levy paid by Borough Councils being reduced thus retaining more resources in the local area. Swale has been a member of the Kent Business Rates Pool since 2015/16, the pool must reapply to MHCLG each year for the arrangements to continue. There is still an option for the pool not to proceed up to 28 days after the Local Government Finance Settlement is received. At the Policy and Resources Committee meeting held on 28 September 2022 delegation was given to the Leader and the Director of Resources in consultation with the opposition group leaders to continue membership of the pool unless there was a significant change in circumstances. On this basis Swale is continuing to remain in the Kent Pool.

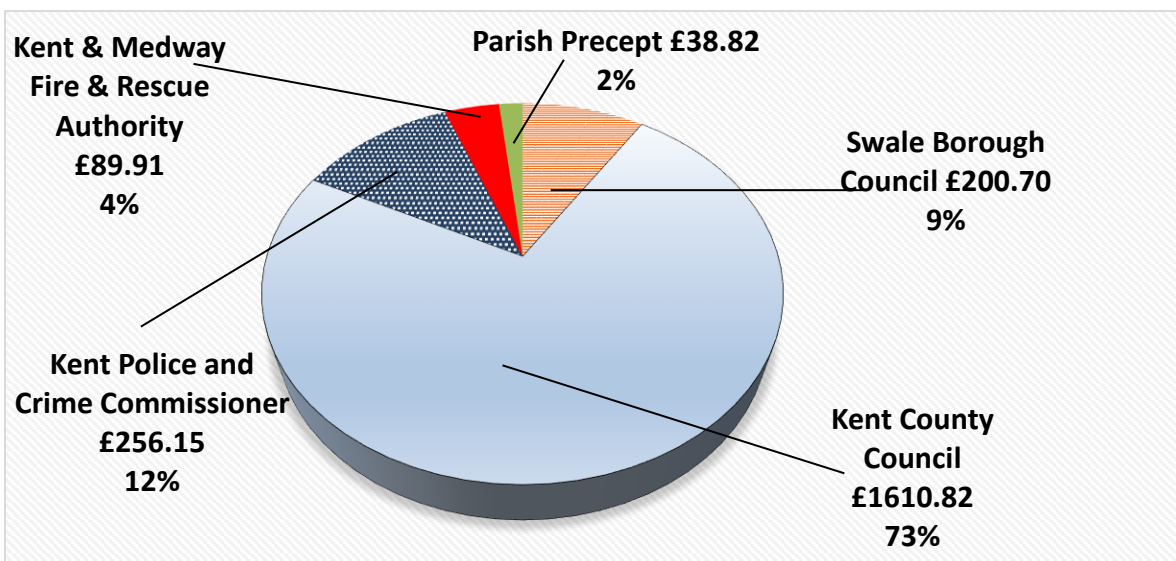
New Homes Bonus (NHB)

- 8.6 The New Homes Bonus was introduced in 2011/12 to incentivise and reward Councils and Communities that build new homes in their area. The bonus was originally paid as an un-ringfenced grant for six years and was paid based on the net additional homes plus an additional supplement of £350 per affordable dwelling. The payment is then split between local authority tiers: 80% to lower tier (Swale) and 20% to upper tier (KCC).
- 8.7 Since its initial introduction the payment mechanism has undergone two fundamental changes which have significantly impacted on the income received by Swale. The first was the transition from payments rolled up over a 6-year period up to 2016/17 (for which the Council received £12.3m) to 5 years in 2017/18 to the new ‘floor’ of 4 years from 2018/19 onwards. The second was in 2017/18 when a national baseline of 0.4% (based on borough property numbers) was introduced which attracted no bonus funding. The allocation of New Homes Bonus Grant for 2025/26 is still uncertain as last year’s settlement confirmed an additional one year agreement only for 2024/25. No further announcements were made in relation to the New Homes Bonus in the Chancellor’s autumn budget statement. The current budget assumes that the grant will be awarded at the same level for 2025/26, however this imposes a risk of an increase to the budget gap of £674k if that is not the case.

Council Tax

- 8.8 Swale is the billing authority for the borough, this means that Swale send out the Council Tax bills to residents and collect the Council Tax, but most of this is then distributed to the County Council and Kent Police Authority with a further element then going to town and parishes councils. The relative splits are shown within the chart below.
- 8.9 The charge on a Band D property which is retained by Swale is currently £200.70 (£194.94 2023/24) based on a tax base of 50,367.85 (49,673.46 2023/24). Any increases on this amount are restricted by a cap put in place by the Government, but as discussed above this amount is 3% or £5, whichever is the greater, without undertaking a referendum on the proposals. This generates an extra £403k (including tax base growth assumptions) over the 2024/25 income levels.

8.10 *Chart 2 – Council Tax split 2024/25*



8.11 Within the MTFs, it is assumed that Swale will increase its precept by 2.96% annually from next year. This table highlights the impact of the assumed increases within the charts below.

Table 1 – Projected council tax income growth

Council Tax	2025/26	2026/27	2027/28	2028/29
Tax Base	50,871.53	51,380.25	51,894.05	52,412.99
Band D Council Tax	£ 206.64	£ 212.76	£ 219.06	£ 225.55
Council Tax	£10.512m	£10.932m	£11.368m	£11.822m

Fees and charges

8.12 The Council has limited means to charge for some of the services it provides. Some of these charges are set by central government, but the Council has discretion over the levels of others. Of the c£12.5m gross income budgeted for 2024/25, the most significant areas include waste and recycling (£1.6m) which includes things such as garden bins and bulky waste collection, car parking income (£3.5m), commercial rents (£2.1m) and planning and building control income (£2.4m). It should however be noted that there are also significant costs associated with generating some of this income, such as the car park maintenance and enforcement, the waste contract etc.

8.13 As part of the Council's drive to close the budget gap fees and charges have been reviewed. Where feasible, and within our control, inflationary increases have been applied. However, where it is felt that market forces allow, there are some above inflation increases proposed. A more comprehensive review will take place to ensure that we are covering our costs where possible.

8.14 It is important that the fees and charges are structured in such a way that they support the sustainability of the budget position in the medium to long term, and protect the vital frontline services.

9 Links to other strategies

The MTFs is fundamentally linked to and underpins several the Council's key strategy and policy documents

9.1 The most significant linkage with the MTFs is with the Council's Corporate Plan and this is discussed in detail above. There are however several other strategies and policies supported by the MTFs.

Capital Strategy

9.2 The Capital Strategy sets out the Council's approach and process to the deployment of capital resources in meeting the Council's overall aims and objectives. It also provides a strategic framework for the effective management and monitoring of the capital programme, within which the Council will work in formulating the strategies for individual services. It is a primary document for all capital decision making, together with the Corporate Plan and other strategies.

9.3 The Strategy is reviewed on an annual basis to reflect the changing needs and priorities of the Council including residents, businesses and places. The aim of the

Strategy is to provide a framework within which the Council's capital investment plans will be prioritised and delivered. The Strategy is the foundation of proper long-term planning of capital investment and how it is to be delivered.

- 9.4 The Strategy's principal objective is to deliver an affordable programme that is consistent with the Council's priorities and objectives. This Strategy is intended to be used by all stakeholders to show how the Council prioritises and makes decisions on capital investment and how this investment supports the Council's priorities and ambitions.
- 9.5 The capital programme approved by Full Council in February 2024 included £33.2m investment in 2023/24 with £31.5m in 2024/25 and £10.6m 2025/26. This is funded through a mixture of capital receipts and reserves, internal/external borrowing and s106 contributions and other grants. The timing of projects will be monitored, and the budget reprofiled as appropriate at the end of each financial year.
- 9.6 The capital programme for 2024/25 includes the Sheerness Revival project which is being primarily funded by the Levelling Up Fund, and the purchase of properties to use for temporary accommodation. Any revenue implications of these are already included in the MTFs assumptions for 2024/25 and future years as appropriate.

The key principles of the Strategy are;

- Investing in sustainable, affordable and social housing to increase overall supply,
- Using the ability to borrow at low rates of interest for the benefit of the physical and social infrastructure of the borough and for broader social value, and
- Ensuring that the costs of borrowing are manageable long term within the Revenue budget.

Treasury Management Strategy Statement 2024/25

- 9.7 The Council's Treasury Management Strategy Statement is intrinsically linked with the Capital Strategy and the capital programme, the latest report can be accessed on the Council's website [here](#). The strategy manages the Council's investments, cash flows, banking, money market and capital market transactions.
- 9.8 The treasury management budget supports the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations and understands the revenue implications of all capital decisions.
- 9.9 This management of longer-term cash may involve arranging long or short-term loans or using longer-term cash flow surpluses. When it is prudent and economic, any debt previously incurred may be restructured to meet the Council's risk or cost objectives.
- 9.10 The Council receives and approves reports throughout the year;
- Before the start of the financial year, the updated Treasury Management Strategy Statement which includes the Minimum Revenue Provision (MRP) policy statement; how investments and borrowings are to be organised (including prudential indicators); and an Investment Strategy;
 - Quarterly treasury management assurance reports to update Council with the progress of the capital position; adherence to the treasury management strategy and whether any policies require revision and;

- At the end of the financial year, a treasury management outturn report to provide details of actual indicators compared to the estimates within the strategy.

Property Asset Strategy

- 9.11 The Property Asset Strategy is set within the wider context on the Council's strategic priorities and seeks to align and review the asset base with the Council's corporate goals and objectives. The current Strategy was approved by Regeneration and Property Committee on 14 November 2023. The strategy can be found [here \(agenda item 5 page 5\)](#).
- 9.12 The Strategy provides the framework that will guide the Council's future strategic property decisions and ensure there is a consistent way of managing the Council's land and assets. The Strategy is likely to make recommendations regarding the rationalisation of the property portfolio, and to secure additional investment income from the let estate and property investments, and future budgets will reflect this.

Commissioning and Procurement Policy

- 9.13 The Commissioning and Procurement Policy establishes the Council's strategic approach to procurement. The Policy should be read in conjunction with the Finance Code of Practice, Contract Procedure Rules and Scheme of Delegation within the Council's Constitution. It emphasises the increasing importance of using procurement to support wider social, economic and environmental objectives, in ways that offer real long term benefit.
- 9.14 The Council recognises the importance of a strong and vibrant local economy and the role it can play in stimulating local markets. The website has been developed to provide potential suppliers with a host of information in relation to the Council's procurement processes, which includes a portal advertising all current tender opportunities. To deliver an agile service the Council uses an electronic tendering system.
- 9.15 The strategy provides a corporate focus for procurement, embracing the Council's commitment to strategic procurement and its alignment with corporate objectives and values. The document is not intended to be a "user manual", although the principles contained within the strategy should be applied to all facets of procurement activity. Additional detail regarding the Council's procurement processes can be found within the Contract Procedure Rules and there are user guides available on the intranet.
- 9.16 Social value is the positive impact an organisation has further to the activities it carries out. These can be economic, social and environmental impacts. The Council recognises that Social Value can significantly help it in meeting its priorities and aspirations for the borough by supporting good jobs, better incomes and wellbeing, increased skill levels, higher value economy and higher productivity levels. The Commissioning and Procurement Policy is one of the underpinning strategies that supports the Council's priorities.
- 9.17 The Commissioning and Procurement policy is being updated to reflect the new Procurement Act, which becomes law in February 2025. The new policy is being brought before the Policy and Resources committee for approval in November 2024.

10 Looking forward

In the context of these pressures and reduced funding, the Council has produced a forecast for spend for Capital and Revenue purposes and anticipated use of Reserves

- 10.1 The resources position has been updated with the best information currently available against the previous budget forecasts below. The business rates and Fair Funding reviews have been further delayed and the Council is experiencing significant spending pressures in future years which is further compounded with the uncertainty around central government funding.

Table 2 – Deficit forecasts as per the 2024/25 budget

Funding forecasts Feb 2024	2024/25	2025/26	2026/27	2027/28
	£'000	£'000	£'000	£'000
Base budget & reserve contributions	25,572	25,879	27,492	27,867
Revenue Support Grant (RSG)	(338)	(345)	(352)	(359)
Business Rates	(11,736)	(12,004)	(12,279)	(12,279)
New Homes Bonus	(674)	0	0	0
Services Grant	(27)	0	0	0
Kent Pool Growth Fund (Business Rates)	(855)	(855)	(855)	(855)
Council Tax	(10,109)	(10,410)	(10,828)	(11,262)
Uncertain government grants	0	(27)	(27)	(27)
Funding Guarantee	(1,100)	0	0	0
Projected use of reserves/savings	733	2,238	3,151	3,085

- 10.2 Following the updates to the current MTFP, the table below has been updated to show the revised funding position, with the future year's deficit peaking at £5.4m in 2028/29. If the business rates reset takes place, this deficit could increase significantly.

Table 3 – Updated deficit forecasts based on updated assumptions for 2025/26

Updated funding forecasts	2024/25	2025/26	2026/27	2027/28	2028/29
November 2024	£'000	£'000	£'000	£'000	£'000
Internal Drainage Board Levy	1,000	1,049	1,101	1,101	1,101
Base budget & reserve contributions	24,751	26,277	27,525	28,400	29,700
Revenue Support Grant (RSG)	(338)	(345)	(352)	(359)	(359)
Business Rates	(11,736)	(12,104)	(12,379)	(12,379)	(12,379)
New Homes Bonus	(674)	(674)	0	0	0
Services Grant	(30)	0	0	0	0
Funding Guarantee Grant	(1,276)	(1,276)	0	0	0
Uncertain Government Grants	0	(27)	(27)	(27)	(27)
Kent Pool Growth Fund (Business Rates)	(855)	(855)	(855)	(855)	(855)
Planned use of reserves	(733)	0	0	0	0
Council Tax	(10,109)	(10,512)	(10,932)	(11,368)	(11,822)
Forecast Deficit	0	1,533	4,082	4,513	5,359

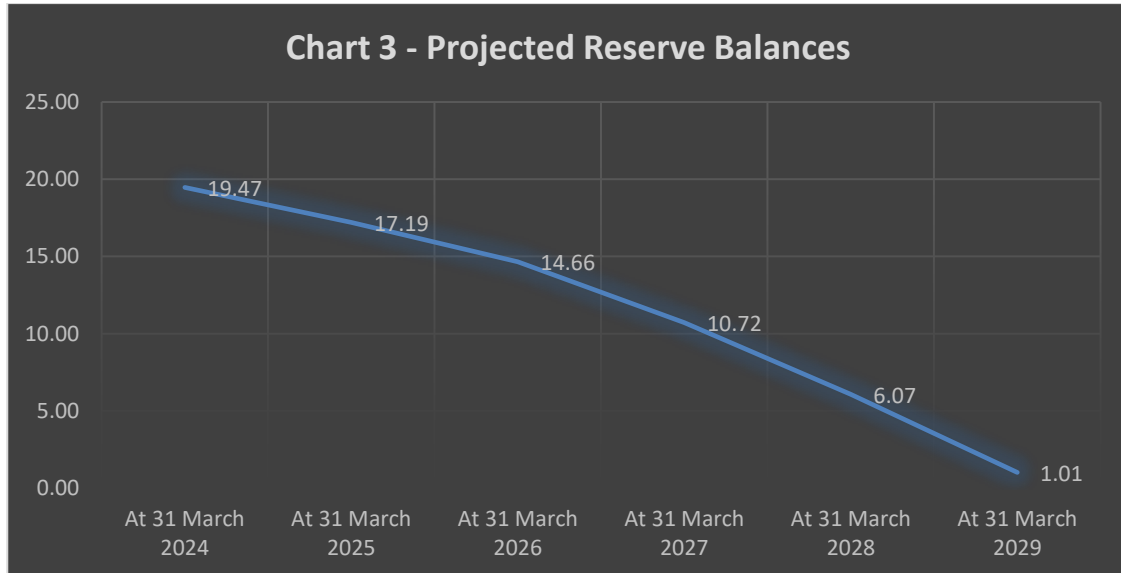
- 10.3 The additional cost pressures in 2025/26 relate mainly to inflationary pressures on pay and contracts, as well as Planning related costs. This is partly offset through savings proposals, increased income forecasts, assumptions on the continuation of central government funding, use of reserves and the use of the Kent Growth Fund business rates to support the base budget. The savings breakdown can be found within Appendix III.
- 10.4 It should be noted that the grant projections for 2024/25 are still subject to final agreement so there is still an element of risk around these, but it is the best information currently available.
- 10.5 Officers have previously undertaken high level analysis of the cost of the statutory and non-statutory functions which the Council undertakes. Statutory functions include things such as waste collection and the payment of benefits, non-statutory areas include things such as the provision of public conveniences and leisure facilities. Very roughly the cost of statutory services is matched by the Council's grants and income from business rates, council tax etc.

Reserves

- 10.6 The Council holds several 'usable' reserves both for revenue and capital purposes which fall within one of the following categories:
- General Reserve
 - Earmarked Reserves
 - Ringfenced Reserves
 - Capital Receipts Reserve
- 10.7 The *General Reserve* is held for two main purposes:
- to provide a working balance to help cushion the impact of uneven cashflows and avoid temporary borrowing and;
 - a contingency to help cushion the impact of unexpected events or emergencies.
- 10.8 As part of setting the budget each year the adequacy of all reserves is assessed along with the optimum level of General Reserve that we should hold. The optimum level of the General Reserve considers a risk assessment of the budget and the context within which it has been prepared.
- 10.9 *Earmarked Reserves* provide a means of building up funds to meet known or predicted liabilities and are typically used to set aside sums for major schemes, such as capital developments or asset purchases, or to fund restructuring. A number of contingency reserves are also held by the Council to reduce the impact on Council Tax payers of future uncertain events such as business rate appeals or claw back of benefit subsidy.
- 10.10 *Ringfenced Reserves* are reserves where funding is allocated for a specific or technical accounting purpose and can only be spent in line with the purpose of that funding and cannot be used to support wider council expenditure unlike our earmarked reserves.
- 10.11 All reserves, general and earmarked, are reviewed and balances rationalised as part of setting the budget. The review of reserve balances is an ongoing process as reserve funded projects are progressed.
- 10.12 Use of reserves to balance a budget provides only a short-term solution as the funds can only be used once. They can however be used to smooth the impact of funding gaps over the short to medium term and to allow for planning and implementing projects and work streams that will deliver a longer-term financial benefit through reduced costs

and/or additional income.

10.13 The available earmarked reserves balance, including the General Fund, as at 1 April 2024 stood at £19.5m, the planned use of reserves for the 2024/25 financial year is £2.3m which leaves a forecast balance as at 1 April 2025 of £17.2m. Based on the current medium term budget projections the Council will not have sufficient reserves to help address the budget gap after 2027/28.



Capital

10.14 The capital programme (Appendix IV) shows what the Council intends to spend on purchasing new assets and improving its existing ones over the next four years. As capital expenditure is incurred, a source of finance must be identified through capital receipts, grants and other revenue resources or alternatively through borrowing.

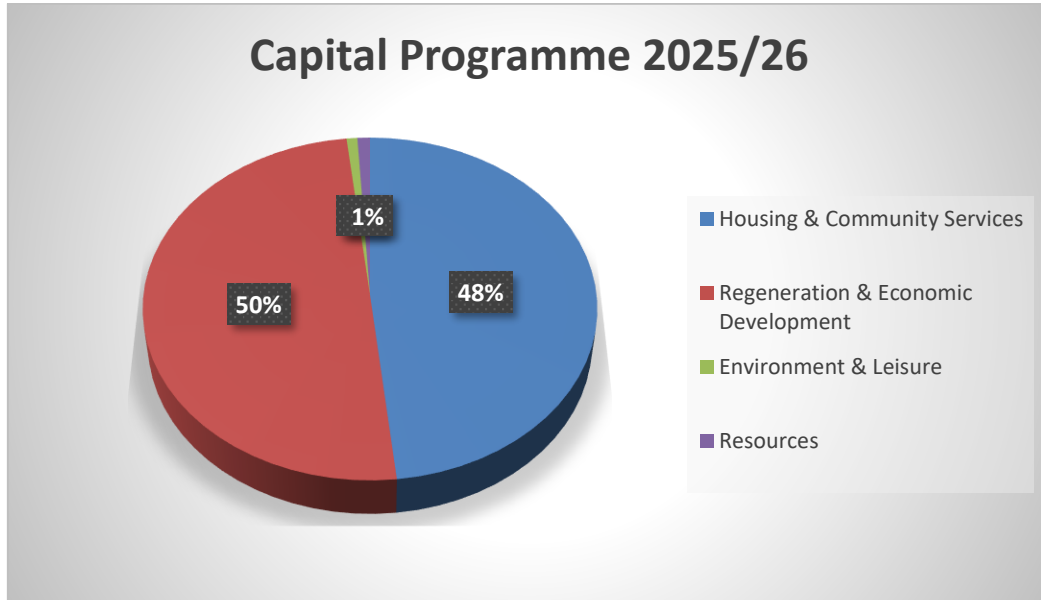
10.15 Any expenditure that is financed through borrowing increases the Council’s ‘Capital Financing Requirement’ (CFR). Each year a revenue charge called the Minimum Revenue Provision (MRP) is made to reflect the funding of the CFR by the taxpayer, it is required to be set aside to cover the repayment of debt caused by the need to borrow for capital purposes. As the need to borrow increases, the CFR and MRP also increase. If the Council has sufficient cash resources to meet the expenditure, it will not be necessary to borrow externally, and cash balances can be used to cover the expenditure. This is referred to as ‘internal borrowing’ and attracts an MRP charge in the same way that external borrowing does.

10.16 New projects, which are included in the programme in the future, will need to be financed by MRP if no capital resources such as capital grants or capital receipts from future asset sales are available. Alternatively existing revenue reserves could be used to finance these projects through a revenue contribution to capital (RCCO) which would avoid the need to make an MRP charge.

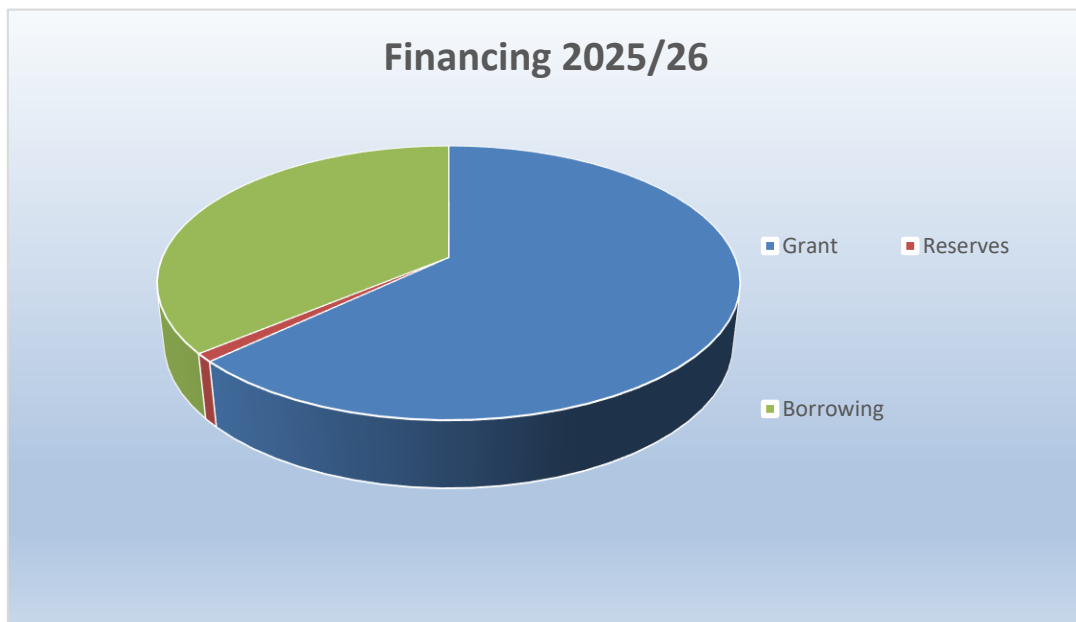
10.17 External borrowing is assumed to finance a portion of the waste vehicle fleet purchase and also the funding for the Rainbow Homes housing provision. The cost of borrowing has increased significantly over the past two years, and although the position has stabilised recently and started to slowly reduce, borrowing rates remain high and are forecast to only reduce slowly and to a higher level than recent years. What this does mean is that any business cases which include borrowing will need to be fundamentally

reviewed before any borrowing takes place to ensure the schemes remain affordable and still deliver the anticipated benefits. This includes schemes that have previously been assessed as affordable based on earlier costs of borrowing. Next year's budget is shown below (£21.6m) along with the forecasts to 2028/29.

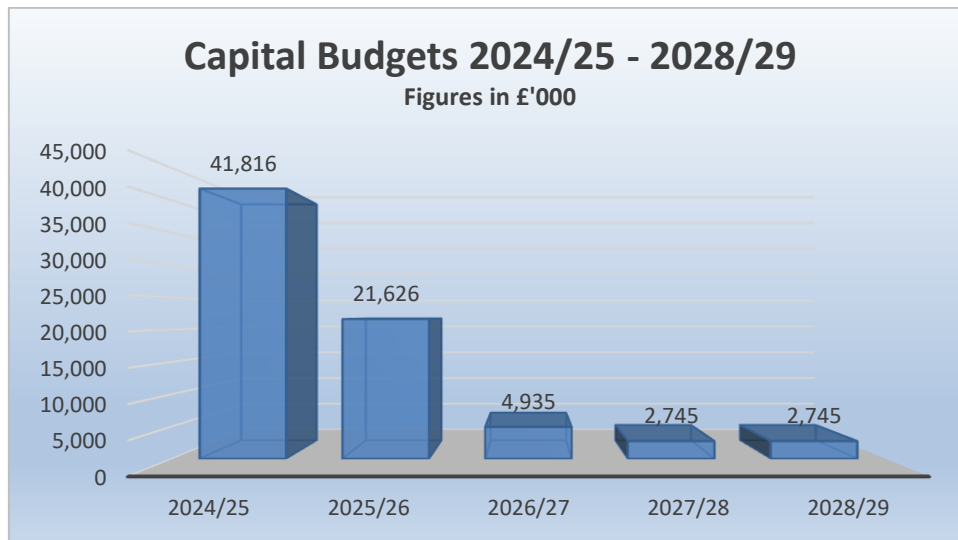
10.18 Chart 4 – Capital Programme 2025/26



10.19 Chart 5 – Capital Programme Funding 2025/26



10.20 Chart 6 – Capital Programme Forecast 2024/25 to 2028/29



11. Closing the Budget gap

The Council's strategy for reducing the budget gap covers several work streams as outlined below.

11.1 Due to the budget pressures being experienced for not only the 2025/26 financial year but also the years following, the Council has had to fundamentally review what services it provides and how they are provided to try and identify savings to help achieve a balanced sustainable budget in future years. The main workstream areas are summarised below.

Efficiency Review

11.2 As part of the production of these forecasts a detailed budget review has taken place over the summer and autumn to identify efficiencies and additional income to help support frontline services and to balance the Council's financial position. For next year these savings and additional income total around £2.6m (Appendix III), however based on current forecast growth as well, this still leaves a total deficit of £1.533m which will need to be supported from reserves. An Equality Impact Assessment (EQIA) will be undertaken on the proposals where relevant and the council will be consulted on the draft budget proposals throughout December 2024.

11.3 Once the budget position is approved, work will commence on delivering savings proposals at the earliest opportunity.

11.4 The efficiencies and savings identified have come from a number of areas and include the following;

- Additional income from increased annual demand – car parks, planning etc
- Increased fees and charges
- A freeze in Members allowances
- Reductions in some 3rd party grants
- Review of pension and establishment costs to identify savings across service areas
- Continued use of Kent Growth Fund to support base budget

- Reduction in the number of public conveniences
- Alternative funding methods for service delivery
- Service review of historic budgets
- Review of allowance previously included for contract inflation
- Various operational savings – minor budget lines

Fees & Charges Review

- 11.5 A full review of the existing fees and charges was carried out as part of the budget build process for 2024/25. As detailed above this strategy is recommending an inflationary increase as a minimum in line with the increase in costs that the council is experiencing.
- 11.6 During 2023/24 the council produced a Parking Policy. This was subject to public consultation, and final proposals recommend by the Community Committee on 6 March 2024 were agreed by Policy and Resources on 20 March 2024. The Policy agreed the principles under which the parking service will operate with fees and charges continuing to be reviewed annually as part of the budget setting process. Proposed changes included in the policy were a review of the evening charging policy and a 10p increase in the hourly rates. The current budget allows for a further 10p increase in the hourly rate and an introduction of a 3 hour tariff within the short stay car parks for 2025/26.
- 11.7 Proposals for higher increases to some fees and charges have been included where the underlying cost to the council has significantly increased; where previous charges have been below the statutory maximum charge and where market conditions indicate a higher charge. The proposed fees and charges for 2025/26 can be found within Appendix V.

Financial sustainability

- 11.8 Financial sustainability and reducing reliance on central government grants is one of the four key themes within the existing Corporate Plan (Running the Council) and is fundamental to this strategy and setting balanced budgets in future years. One of the initiatives will include a review of the way we currently budget for fees and charges structures to ensure we are fully covering our costs. The aspiration is to have a balanced medium-term budget which does not rely on reserves to balance the position.

Our investment approach

- 11.9 There is an ever increasing need for Councils to take a more commercial and business-like approach to all elements of their business. A more commercial approach will directly support the Council's objective of becoming financially sustainable for the future. Part of the strategy development process will involve the identification and prioritisation of a number of internal and external projects which will consider income generation, efficiency and doing things differently. The focus will be on making every pound count for our residents, improving efficiency, investment and increasing social value.
- 11.10 The Local Government Association (LGA) are encouraging Councils to move towards a more commercial culture as a way of developing sustainable self-funding streams that reflect Council's individual priorities and place shaping aspirations. Consequently, the Council needs to think about how it can maximise revenue and efficiencies moving forwards. Swale can already evidence its commercial approach through the delivery of the Bourne Place development and will continue to develop these opportunities.

Property Investment and New Ways of Working

- 11.11 Opportunities for investment in property, whether direct or indirect, continue to be considered to achieve either a direct income stream from the asset or improved returns

on investment. A programme of asset valuations and condition surveys has taken place and the results will help us better understand the challenges faced in terms of maintaining and improving our asset base over the medium to long term to ensure that it remains fit for purpose, delivering income for the Council where appropriate.

- 11.12 Opportunities for the most efficient utilisation of the Council's assets and maximising returns where appropriate are vital. Indirect property investments via treasury instruments, such as the purchase of pooled property funds, can potentially provide a return in terms of a regular income and growth in the value of the investment. Under the Treasury Management Strategy, the Council has made the LAMIT Pooled Property Fund, which invests exclusively in various property assets with the aim of achieving a regular income and growth in the value of the investment.
- 11.13 The Council can choose to use its capital resources to finance a programme of asset investment which aims to deliver long-term revenue streams for the Council and work on an ongoing basis is required to identify the most appropriate projects. This strategy of direct property investment can ensure a secondary benefit to the district as it is possible to generate an economic growth benefit when the investment is located within the borough. This is, however, more resource intensive to manage than externalising these investments.
- 11.14. With the development of hybrid working, we have taken the opportunity to rationalise office space. Work is ongoing to rent out our surplus office space and work with other partner organisations and indeed the private sector. There may also maybe opportunities to work with other partners under the government's [One Public Estate](#) agenda.

Digital Transformation

- 11.15 The Council needs to consider how digital transformation can support the business in the future and deliver more for our residents, identifying changes to service delivery from the implementation of new technology and changes to business processes. It is anticipated that the overall programme will be delivered over a number of years and as projects are rolled out there will be changes to working practices which will help to deliver efficiencies.
- 11.16 The key to this work in the future should really focus on 'putting our customers at the heart of everything we do'. This will undoubtedly lead to efficiencies and potential cashable savings but the direction of travel should be to improve our services for our customers first and foremost because that's the right thing to do. It will also mean that staff can spend longer prioritising 'added value activities' rather than getting bogged down with inefficient paper-based processes.

Shared Services, collaboration and selling services

- 11.17 Creating efficiencies through shared services or joint working continues to be a priority. Identifying such opportunities must therefore continue at a local level, ensuring that realistic and deliverable benefits can be achieved. Again this is an avenue which Swale is already heavily involved in, including activities like the joint waste procurement but could involve a range of other joint procurement opportunities. The council is now working with Maidstone on a shared Emergency Planning resource which provides significant resilience to this vital area of work.
- 11.18 Identifying opportunities to work alongside other public sector partners and organisations to deliver services, such as through our successful Mid Kent Services shared service arrangements, will continue to form an important part of our efficiency strategy.

Opportunities for further sharing arrangements continue to be developed with recent transfer of the Revenues and Benefits Service to MKS.

Growing Business Rates and New Homes Bonus

- 11.19 Under the previous allocation method of New Homes Bonus (NHB) there was a direct financial benefit to the Council from growth in homes through the NHB funding and through increasing the council tax base and additional income generated from council tax. Whilst new housing growth has had an impact on the demand for local services, there will still be a net gain in terms of overall income for delivery while the NHB remains. We do however know that the NHB system is due to be replaced although at the present time it is not clear what with or when it will be introduced so the life of any ongoing funding from NHB remains unclear.
- 11.20 For similar reasons growing the business rates base will have a direct impact on the level of business rates income retained locally. Equally, maintaining existing business rates remains a priority in that decline in business rates will reduce the amount of income retained. However, as with the NHB the reform and any localisation of business rates continues to be delayed along with the Fair Funding review.

Council Tax

- 11.21 The increased flexibilities around council tax discounts and increases following the removal of the tax freeze grant in 2016/17 provides a further potential income stream. Further review of the current level of discounts can also provide additional income, recommendations on the level of council tax discounts will be reported for approval as part of the budget reports for 2025/26.

New opportunities

- 11.22 Given the current uncertainties around the cost-of-living crisis, global events and the economy in general, as well as the current landscape of local councils reporting financial difficulties, Local Government funding and funding mechanisms are overdue for review and the outcome from this remains a significant risk for the Council's medium term financial assumptions. It will be essential to identify new opportunities to either increase income, increase efficiency through the redesign of services, explore new partnership models for service delivery etc and this will be one of the main challenges over the medium term.
- 11.23 While the Council's reserves do provide some level of comfort over the short term and could be used to address budget deficits this is not a sustainable financial strategy for the medium to long term. As mentioned earlier within the report the reserves are forecast to be fully depleted by the end of 2027/28 so this would not even be an option.

Lobbying and consultation

- 11.24 The Council will continue to lobby central government in terms of increased funding allocations and continued relaxation/increased flexibility in terms of the council tax referendum principles which will be one of the things required if income raising and decision making is ever to be truly local. We will also continue to respond to all relevant consultations and surveys, in particular in relation to the business rates and Fair Funding reviews.
- 11.25 Members will need to support the efficiency agenda in future years and support officers to deliver a balanced budget position over the medium term as use of one-off reserves to balance the budget deficit is not sustainable.

12. Conclusions

How will this help shape our future budget and financial projections?

- 12.1 While the Council's reserves do provide some level of comfort over the short term and could be used to address budget deficits this is not a sustainable financial strategy for the medium to long term, and as mentioned earlier within the report the earmarked reserves will be fully depleted in 2027/28 if ongoing savings are not found for the base budget.
- 12.2 Previous budget forecasts made back in February 2024 were made at a time of significant uncertainty in terms of future Government finances due to the Fair Funding and Business Rates Review. This uncertainty remains for 2025/26 along with additional levels of complexity in terms of future inflation forecasts and potential impacts on the economy, suppliers, and contracts. Although multi-year settlements are expected, that is likely to be from 2026/27 onwards.
- 12.3 The updated high level funding forecasts within the strategy build on previous figures from the 2024/25 Budget setting exercise in February which were made within this context, at which time we were forecasting future year deficits which were increasing year on year to around £5.4m by 2028/29.
- 12.4 The MTFs and budget forecasts include the latest information available and it should however be noted that some of the assumptions that have currently been made cannot be updated until the Provisional Settlement is announced, the date of which is currently anticipated to be the week commencing 16 December 2024.
- 12.5 The funding estimates for next year in terms of the central government grants are far from certain and this represents a potential income risk of around £1.8m if the grants are removed. We will not have any further clarity on these until the Provisional Settlement is announced week commencing 16 December 2024.
- 12.6 As part of the production of these forecasts a detailed budget review has taken place over previous months to identify efficiencies and additional income to help support frontline services and to balance the Council's financial position. For next year these total around £2.6m (Appendix III), and are supported by a number of increases to fees and charges (Appendix V), however based on current forecasts this still leaves a deficit of £1.533m which will need to be supported from reserves.
- 12.7 The Council is still projecting a deficit position from 2025/26 onwards but due to the funding changes, forecasting the future years deficits remains difficult. Use of reserves does however allow the Council time to plan mitigating actions more effectively, meaning we are more likely to be successful.
- 12.8 A comprehensive financial risk assessment is undertaken for the revenue and capital budget setting process to ensure that all risks and uncertainties affecting the Council's financial position are identified as far as is reasonably practical. These are reviewed each year as part of the refresh of the MTFs and future year's budget forecasts and are included within Appendix VI.
- 12.9 At the current time the key messages are as follows;
- Estimated budget gap of £1.533m for 2025/26 even with current savings and fee increases

- We can deliver our statutory services with current income levels but nothing more
- To fund non-statutory services we need to find more income/savings/reserves
- Our reserves will help set a balanced budget for the next 3 years but not after 2027/28
- Funding from reserves is not a sustainable way to manage our budget
- We need to identify more efficiencies and income to make the budget sustainable
- The current projections are based on a number of assumptions which can and do change

12.10 In conclusion, it is still not clear how the various reviews and the ongoing economic pressures will impact on local government funding, but officers will continue working on the forecasts between now and the point at which the council tax is set in February 2025, by which time the Settlement figures will have been finalised.

Appendix I - Medium Term Financial Strategy (MTFS) – General Fund Summary Forecasts				
Service	2024/25	2025/26	2026/27	2027/28
	£'000	£'000	£'000	£'000
Chief Executive	782	782	782	782
Communications & Policy	358	394	394	394
Elections, Democratic Services & Information Governance	1,146	1,214	1,214	1,214
Housing & Community	5,328	5,301	5,301	5,301
Planning	409	1,034	441	381
Environment & Leisure	9,225	9,629	10,174	9,709
Regeneration & Economic Development	(382)	(547)	(598)	(598)
Finance & Procurement	764	754	829	829
MKS Revenues & Benefits	153	353	353	353
MKS Environmental Health	614	633	656	656
MKS Information Technology	1,339	1,429	1,584	1,584
MKS Internal Audit	158	165	172	172
MKS Human Resources	472	492	513	513
MKS Legal	678	700	723	723
Corporate Overheads & Capital Financing	3,648	3,287	3,281	3,281
Collection Fund Surplus/Deficit	45	45	45	45
Pay & Inflation	0	747	1,755	3,155
Fees & Charges	0	(151)	(151)	(151)
Sub Total Base Budget	24,736	26,262	27,469	28,344
Drainage Board	1,000	1,049	1,101	1,101
Contribution to Reserves	15	15	56	56
Uncertain Government Grants	0	(27)	(27)	(27)
Use of Business Rates Pool Reserve	(855)	(855)	(855)	(855)
Cumulative Savings Required	(733)	(1,533)	(4,082)	(4,513)
Grants				
Revenue Support Grant	(338)	(345)	(352)	(359)
Business Rates - Gross	(11,736)	(12,104)	(12,379)	(12,379)
New Homes Bonus	(674)	(674)	0	0
Services Grant	(30)	0	0	0
Funding Guarantee Grant	(1,276)	(1,276)	0	0
Council Tax requirement	10,109	10,512	10,932	11,368

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Detailed Revenue Budget Proposals

Service	2024/25	Growth	Savings	Income Changes	2025/26	2026/27	2027/28	2028/29
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Chief Executive	782	0	0	0	782	782	782	782
Communications & Policy	358	50	0	(13)	394	394	394	394
Elections, Democratic Services & Information Governance	1,146	68	0	0	1,214	1,214	1,214	1,214
Housing & Community	5,328	83	(55)	(56)	5,301	5,301	5,301	5,301
Planning	409	776	(30)	(120)	1,034	441	381	381
Environment & Leisure	9,225	1,321	(472)	(445)	9,629	10,174	9,709	9,509
Regeneration & Economic Development	(382)	82	(30)	(216)	(547)	(598)	(598)	(598)
Finance & Procurement	764	0	(10)	0	754	829	829	829
MKS Revenues & Benefits	153	200	0	0	353	353	353	353
MKS Environmental Health	614	22	0	(3)	633	656	656	656
MKS Information Technology	1,339	90	0	0	1,429	1,584	1,584	1,584
MKS Internal Audit	158	7	0	0	165	172	172	172
MKS Human Resources	472	20	0	0	492	513	513	513
MKS Legal	678	22	0	0	700	723	723	723
Corporate Overheads & Capital Financing	3,648	79	(440)	0	3,287	3,281	3,281	3,281
Collection Fund Surplus/Deficit	45	0	0	0	45	45	45	45
Pay Inflation	0	997	(250)	0	747	1,755	3,155	4,655
Fees & Charges	0	0	0	(151)	(151)	(151)	(151)	(151)
Sub Total Base Budget	24,736	3,816	(1,287)	(1,003)	26,262	27,469	28,344	29,644
Other								
Drainage Board	1,000	49	0	0	1,049	1,101	1,101	1,101
Contribution to Reserves	15	0	0	0	15	56	56	56
Contribution from Reserves	0	0	0	0	0	0	0	0
Uncertain Government Grants	0	0	0	(27)	(27)	(27)	(27)	(27)
Use of Business Rates Pool Reserve	(855)	0	0	0	(855)	(855)	(855)	(855)
Cumulative Savings Required	(733)	(3,865)	1,287	1,778	(1,533)	(4,082)	(4,513)	(5,359)
Grants								
Revenue Support Grant	(338)	0	0	(7)	(345)	(352)	(359)	(359)
Business Rates - Gross	(11,736)	0	0	(368)	(12,104)	(12,379)	(12,379)	(12,379)
Services Grant	(30)	0	0	30	0	0	0	0
New Homes Bonus	(674)	0	0	0	(674)	0	0	0
Funding Guarantee Grant	(1,276)	0	0	0	(1,276)	0	0	0
Council Tax requirement	10,109	0	(0)	403	10,512	10,932	11,368	11,822

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Growth assumptions 2025/26	2025/26	2026/27	2027/28	2028/29
Growth assumptions previously agreed	1,764,000	1,924,000	700,000	0
Contract cost increases	495,000	(55,000)	(55,000)	0
Increased cost of services	213,240			
Increased capital cost of LUF	75,000			
Local Plan costs	258,000	(258,000)	0	0
Unachievable income targets	144,000	0	0	0
Inflation Assumptions	0	0	700,000	800,000
Staffing increases	111,700	0	0	0
Planning appeal cost increases	340,000	(300,000)	0	0
Contribution to reserve	70,000			
Loneliness Project	36,000			
Additional edition of Inside Swale	13,100			
Car Park running costs	144,600			
Supported Housing Subsidy costs	200,000			
Total Growth	3,864,640	1,311,000	1,345,000	800,000

Savings Assumptions 2025/26	2025/26	2026/27	2027/28	2028/29
Agreed Feb 2024	(930,000)	(200,000)	(265,000)	0
Unachievable saving (homelessness)	200,000	200,000	0	0
Contract savings delayed/rejected	520,000	0	(145,000)	(200,000)
Efficiency and Service Review	(291,200)	25,000	0	0
Use of reserves	(13,000)			
External grant review	(48,000)			
Public Convenience Reduction	(33,500)			
Climate change project costs	(30,000)			
Disposal of Greenspaces Asset	(11,000)			
Pension and Establishment review	(380,000)			
Contract inflation review	(250,000)			
Total savings	(1,266,700)	25,000	(410,000)	(200,000)

Income assumptions 2025/26	2025/26	2026/27	2027/28	2028/29
Income assumptions agreed Feb 24	(597,260)	(392,895)	(67,033)	0
Central gov grant assumptions	3,300	1,950,000	0	0
Additional Fees & Charges	(619,825)	0	0	0
Property rent assumptions	(48,000)			
Business Rates Growth	(100,000)			
Use of Reserves	(13,100)			
Total income	(1,374,885)	1,557,105	(67,033)	0

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Scheme	Funding Source	Scheme			2024/25 Budget			2025/26 Budget		
		Spend £'000	Income £'000	Net £'000	Spend £'000	Income £'000	Net £'000	Spend £'000	Income £'000	Net £'000
CCTV Replacement	Reserves	60	(60)	0	0	0	0	0	0	0
Disabled Facilities Grants	Grant	Ongoing programme			7,283	(7,283)	0	2,725	(2,725)	0
Local Housing Company	Borrowing/reserves	23,250	(1,373)	21,877	13,263	(250)	13,013	7,800	(250)	7,550
Dolphin Barge Museum & Skatepark	Capital receipts	104	(104)	0	0	0	0	0	0	0
Purchase of Temporary Accommodation	Borrowing/grant	11,000	(437)	10,563	10,180	(306)	9,874	0	0	0
Local Authority Housing Fund (Bridging)	Grant	464	(464)	0	325	(325)	0	0	0	0
Housing & Community Services		34,878	(2,439)	32,440	31,051	(8,164)	22,887	10,525	(2,975)	7,550
Faversham Creek Basin Regeneration	Capital receipts	200	(200)	0	200	0	200	0	0	0
High Streets	Reserves	584	(584)	0	57	(57)	0	0	0	0
Swale House Refurbishment	Borrowing	2,100	0	2,100	21	0	21	0	0	0
Rural England Prosperity Projects	Grant	503	(503)	0	377	(377)	0	0	0	0
UKSPF	Grant	186	(186)	0	149	(149)	0	0	0	0
Levelling Up Scheme	Grant/reserves	20,509	(20,445)	64	8,117	(8,117)	0	10,891	(10,891)	0
Wayfinding Signage - Faversham	Reserves	49	(49)	0	4	(4)	0	0	0	0
Regeneration & Economic Development		24,131	(21,967)	2,164	8,925	(8,704)	221	10,891	(10,891)	0
Beach Huts	Capital receipts	143	(143)	0	143	(143)	0	0	0	0
Waste Vehicle Fleet	Borrowing/capital receipts	7,035	(2,000)	5,035	789	0	789	0	0	0
Gunpowder Works Oare Faversham	s106/reserves	30	(30)	0	30	(30)	0	0	0	0
Leisure Centre Improvements	Borrowing	287	0	287	287	0	287	0	0	0
Barton's point drainage	Reserves	52	(52)	0	52	(52)	0	0	0	0
Play Area Improvements	s106/reserves	Ongoing programme			338	(338)	0	181	(181)	0
Milton Rec Tennis Courts	Grant/reserves	26	(26)	0	19	(19)	0	0	0	0
Environment & Leisure		7,573	(2,251)	5,322	1,658	(582)	1,076	181	(181)	0
ICT Replacement	Reserves	Ongoing programme			112	(112)	0	100	(100)	0
Finance System Upgrades	Reserves	180	(180)	0	70	(70)	0	110	(110)	0
Resources Total		180	(180)	0	182	(182)	0	210	(210)	0
Grand Total		66,762	(26,836)	39,926	41,816	(17,632)	24,184	21,807	(14,257)	7,550

Scheme	2026/27 Budget			2027/28 Budget			2028/29 Budget		
	Spend £'000	Income £'000	Net £'000	Spend £'000	Income £'000	Net £'000	Spend £'000	Income £'000	Net £'000
CCTV Replacement	60	(60)	0	0	0	0	0	0	0
Disabled Facilities Grants	2,725	(2,725)	0	2,725	(2,725)	0	2,725	(2,725)	0
Local Housing Company	2,000	(250)	1,750	0	0	0	0	0	0
Dolphin Barge Museum & Skatepark	0	0	0	0	0	0	0	0	0
Purchase of Temporary Accommodation	0	0	0	0	0	0	0	0	0
Local Authority Housing Fund (Bridging)	0	0	0	0	0	0	0	0	0
Housing & Community Services	4,785	(3,035)	1,750	2,725	(2,725)	0	2,725	(2,725)	0
Faversham Creek Basin Regeneration	0	0	0	0	0	0	0	0	0
High Streets	0	0	0	0	0	0	0	0	0
Swale House Refurbishment	0	0	0	0	0	0	0	0	0
Rural England Prosperity Projects	0	0	0	0	0	0	0	0	0
UKSPF	0	0	0	0	0	0	0	0	0
Levelling Up Scheme	0	0	0	0	0	0	0	0	0
Wayfinding Signage - Faversham	0	0	0	0	0	0	0	0	0
Regeneration & Economic Development	0	0	0	0	0	0	0	0	0
Beach Huts	0	0	0	0	0	0	0	0	0
Waste Vehicle Fleet	0	0	0	0	0	0	0	0	0
Gunpowder Works Oare Faversham	0	0	0	0	0	0	0	0	0
Leisure Centre Improvements	0	0	0	0	0	0	0	0	0
Barton's point drainage	0	0	0	0	0	0	0	0	0
Play Area Improvements	65	(65)	0	0	0	0	0	0	0
Milton Rec Tennis Courts	0	0	0	0	0	0	0	0	0
Environment & Leisure	65	(65)	0	0	0	0	0	0	0
ICT Replacement	150	(150)	0	20	(20)	0	20	(20)	0
Finance System Upgrades	0	0	0	0	0	0	0	0	0
Resources Total	150	(150)	0	20	(20)	0	20	(20)	0
Grand Total	5,000	(3,250)	1,750	2,745	(2,745)	0	2,745	(2,745)	0

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Housing Services								
Home Inspection for Immigration Application Fee								
Requests received to inspect and provide report on suitability of proposed home in connection with immigration applications	147.08	29.42	176.50	150.33	30.07	180.40	2.21%	Market rate
Staying Put Handyperson Rates								
Hourly rate for a handyperson	14.29	2.86	17.15	14.63	2.93	17.55	2.34%	Market rate
Subsidised hourly rate for a handyperson – client in receipt of benefits	5.29	1.06	6.35	5.42	1.08	6.50	2.39%	Market rate
Private disabled works (household not eligible for Disabled Facilities Grant)	158.70	0.00	158.70	135.17	27.03	162.20	2.21%	Market rate
Disabled Facilities Grant (DFG) fee (statutory % charge)	12.50%			12.50%				Externally set
Alleygate Key								
Fee	19.42	3.88	23.30	19.83	3.97	23.80	2.13%	Market rate
Town Centre Licence								
Licence for large events of 10,000 people or more	582.00	0.00	582.00	495.83	99.17	595.00	2.23%	Market rate
Planning								
Planning Performance Agreements (PPA)								
Central government encourages the use of planning performance agreements (PPA's) for large or complex planning proposals. These are voluntary agreements between us and the applicants which helps to: <ul style="list-style-type: none"> •bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process •ensure complex proposals progress through the process to mutually-agreed timescales •ensure appropriate resources and expertise are provided to advise on complex proposals •provide greater opportunity for dialogue through the planning process and help deliver high-quality development The cost of the PPA will be calculated based on the complexity and size of the scheme using the relevant officer day rates. Please contact the Planning Department to discuss your requirements and obtain an estimate.								Market rate
Pre Application Advice								
Large major (50+ houses or flats, or commercial over 10,000sqm)	4,370.42	874.08	5,244.50	4,495.83	899.17	5,395.00	2.87%	Cost recovery
Major (10-49 houses or flats)	2,871.25	574.25	3,445.50	2,954.17	590.83	3,545.00	2.89%	Cost recovery
Minor	801.67	160.33	962.00	824.58	164.92	989.50	2.86%	Cost recovery
Householder	291.67	58.33	350.00	300.00	60.00	360.00	2.86%	Cost recovery
Heritage & urban design attendance at meeting per hour	208.33	41.67	250.00	214.17	42.83	257.00	2.80%	Cost recovery
Listed building (householder) - written advice only	100.00	20.00	120.00	102.92	20.58	123.50	2.92%	Cost recovery
Local not-for-profit charities	0.00	0.00	0.00	0.00	0.00	0.00		Cost recovery
Others not in categories above, charged at an hourly rate	Price on application			Price on application				Cost recovery
* Parish Councils, voluntary organisations, national charities or charities that are not 'not-for-profit' will be charged based on development size.								
Complaints made under the High Hedges Legislation								
Standard fee	600.00	0.00	600.00	511.00	102.20	613.20	2.20%	Cost recovery
Planning Portal								
The Planning Portal will be charging a £20 (£16.67 + VAT) service charge payable by applicants on any planning application that attracts a fee. Applications that do not attract a fee will not incur this service charge.								

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Local Land Charges								
Official Searches								
LLC1 only	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Externally set
LLC1 only - additional parcel	4.80	0.00	4.80	4.80	0.00	4.80	0.00%	Externally set
Con 29	143.50	28.70	172.20	150.67	30.13	180.80	4.99%	Cost recovery
Con 29 - additional parcel	21.00	4.20	25.20	22.04	4.41	26.45	4.96%	Cost recovery
Standard search (LLC1 & Con29)*	158.50	28.70	187.20	165.67	30.13	195.80	4.59%	Cost recovery
Standard search (LLC1 & Con29) - additional parcel*	25.80	4.20	30.00	26.84	4.41	31.25	4.17%	Cost recovery
Part II enquiry - Con29 questions 4-21	14.17	2.83	17.00	14.88	2.98	17.85	4.98%	Cost recovery
Part II enquiry - Con29 question 22	26.25	5.25	31.50	27.58	5.52	33.10	5.08%	Cost recovery
Additional questions	19.96	3.99	23.95	21.00	4.20	25.20	5.21%	Cost recovery
*VAT applicable only to the Con29 part of the charge.								
Personal Searches								
Enhanced Personal Search								
1.1 (a-l) (Planning)	7.33	1.47	8.80	7.71	1.54	9.25	5.16%	Cost recovery
1.1 (J, K, L) (Building Regulations)	7.33	1.47	8.80	7.71	1.54	9.25	5.16%	Cost recovery
2.1 (b-d)	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.1 Land for public purpose	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.3 Drainage matters	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.5 Railway schemes	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.7 Outstanding Notices	10.50	2.10	12.60	11.04	2.21	13.25	5.16%	Cost recovery
3.8 Building Regulations Contravention	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.9 Enforcement	7.33	1.47	8.80	7.71	1.54	9.25	5.16%	Cost recovery
3.10 CILs	5.00	1.00	6.00	5.25	1.05	6.30	5.00%	Cost recovery
3.12 Compulsory purchase	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.13b Contaminated land	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery
3.13c Contaminated land	3.67	0.73	4.40	3.83	0.77	4.60	4.45%	Cost recovery

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Environment and Leisure								
Car Parks and Season Tickets (Subject to car park policy review)								
<i>Short Stay (maximum stay 4 hours). Chargeable hours subject to the parking policy.</i>								
Faversham: Central car park (season tickets for business only), Institute Road car park (no season tickets)								
Sittingbourne: Albany Road, Central Avenue, Crown Quay Lane, Milton High Street, The Forum, The Swallows, Swale House (weekends only), The Forum (season tickets business only)								
Sheerness (no season tickets): Rose Street (including land adjacent to Wood Street), Trinity Place, Beachfields								
Up to 30 minutes	0.58	0.12	0.70	0.67	0.13	0.80	14.94%	Market rate
Up to 1 hour	1.17	0.23	1.40	1.25	0.25	1.50	6.84%	Market rate
Up to 2 hours	2.33	0.47	2.80	2.50	0.50	3.00	7.30%	Market rate
Up to 3 hours	N/A	N/A	N/A	3.75	0.75	4.50	N/A	Market rate
Up to 4 hours	4.67	0.93	5.60	5.00	1.00	6.00	7.07%	Market rate
Season ticket per quarter (for business only Central car park, Faversham/ Forum, Sittingbourne)	241.67	48.33	290.00	258.33	51.67	310.00	6.90%	Market rate
Electric vehicle parking/charging per kilowatt hour (kWh)	variable	variable	variable	variable	variable	variable		Market rate
Sittingbourne: East Street car park, Albany Service Road car park								
Maximum stay 1 hour (cashless transactions only)	1.17	0.23	1.40	1.25	0.25	1.50	6.84%	Market rate
Bourne Place Multi-Storey Car Park								
The charge is for ALL parking bays including disabled and parent/child bays between 6am and midnight.								
Patrons of Light Cinema will have free parking all day on Sundays and after 6pm Mon-Sat. Ticket must be validated at the Light before payment at car park machine								
Up to 30 minutes	0.58	0.12	0.70	0.67	0.13	0.80	14.94%	Market rate
Up to 1 hour	1.17	0.23	1.40	1.25	0.25	1.50	6.84%	Market rate
Up to 2 hours	2.33	0.47	2.80	2.50	0.50	3.00	7.30%	Market rate
Up to 3 hours	3.50	0.70	4.20	3.75	0.75	4.50	7.14%	Market rate
Up to 4 hours	4.67	0.93	5.60	5.00	1.00	6.00	7.07%	Market rate
Up to 5 hours	5.83	1.17	7.00	6.25	1.25	7.50	7.20%	Market rate
Up to a maximum of 6 hours	7.00	1.40	8.40	7.50	1.50	9.00	7.14%	Market rate
Over 6 hours (in one calendar day)	8.17	1.63	9.80	8.75	1.75	10.50	7.10%	Market rate
Lost ticket	8.17	1.63	9.80	8.75	1.75	10.50	7.10%	Market rate
Season ticket per quarter (subject to a maximum capacity)	241.67	48.33	290.00	258.33	51.67	310.00	6.90%	Market rate
Replacement for lost, stolen or destroyed season tickets	10.00	2.00	12.00	10.83	2.17	13.00	8.33%	Market rate
Travelodge (Preferential rate for hotel guests (for 24 hours))	2.50	0.50	3.00	2.67	0.53	3.20	6.67%	Market rate

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Long Stay Car Parks								
Standard tariff 7am - 10pm								
Faversham: Partridge Lane, Queens Hall								
Sittingbourne: Spring Street, Bell Road, Cockleshell Walk								
Sheerness: Albion Place, Beach Street, Bridge Road, Cross Street, Trinity Road								
Ship on Shore (9am to 7pm only no evening fee).								
Up to 30 minutes	0.58	0.12	0.70	0.67	0.13	0.80	14.94%	Market rate
Up to 1 hour	1.17	0.23	1.40	1.25	0.25	1.50	6.84%	Market rate
Up to 2 hours	2.33	0.47	2.80	2.50	0.50	3.00	7.30%	Market rate
Up to 4 hours	4.67	0.93	5.60	5.00	1.00	6.00	7.07%	Market rate
Over 4 hours	5.92	1.18	7.10	6.25	1.25	7.50	5.57%	Market rate
Season ticket per month (long stay car park)	90.83	18.17	109.00	97.50	19.50	117.00	7.34%	Market rate
Season ticket per quarter (long stay car park)	241.67	48.33	290.00	258.33	51.67	310.00	6.90%	Market rate
Seasonal Car parks								
Leysdown: Promenade (all day between 1 March and 31 October)								
Up to 1 hour	1.17	0.23	1.40	1.25	0.25	1.50	6.84%	Market rate
Up to 2 hours	2.33	0.47	2.80	2.50	0.50	3.00	7.30%	Market rate
Up to 4 hours	4.67	0.93	5.60	5.00	1.00	6.00	7.07%	Market rate
All day	5.92	1.18	7.10	6.25	1.25	7.50	5.57%	Market rate
Season tickets (to be used at any long stay car park throughout the Borough - excluding Bourne Place MSCP)								
Season per quarter	257.50	51.50	309.00	275.00	55.00	330.00	6.80%	Market rate
Replacement for lost, stolen or destroyed season tickets	10.00	2.00	12.00	10.83	2.17	13.00	8.33%	Market rate
All pay and display car parks – closure of parking bays through events or other activities	Price on application dependent on car park location, type of event (commercial – enthusiast – voluntary/community) and local impact			Price on application dependent on car park location, type of event (commercial – enthusiast – voluntary/community) and local impact			n/a	Market rate

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Residents Only Parking Permits (off street) (5pm-9am evenings, weekends and bank holidays)								
Faversham: Central car park (residents of Cross Lane and Bank Street), Queens Hall (residents of Victoria Place and Dorset Place)								
Sheerness: Albion Place (residents of Harris Road, Portland Terrace and Albion Place), Cross Street (Sheerness town centre residents), Trinity Road (residents of Trinity Road only)								
Per quarter	20.63	4.13	24.75	21.08	4.22	25.30	2.20%	Market rate
Sheerness: Delamark Road car park (residents only).								
Per quarter	15.58	3.12	18.70	15.92	3.18	19.10	2.16%	Market rate
Residents' Parking Permits (on street)								
Per annum (administration charge - no refund)	45.00	0.00	45.00	46.00	0.00	46.00	2.22%	Cost recovery
Visitors permit book (10 days) - for resident permit holders only	11.00	0.00	11.00	11.25	0.00	11.25	2.27%	Cost recovery
Visitors parking permits (per day) - for resident permit holders only	1.10	0.00	1.10	1.10	0.00	1.10	0.00%	Cost recovery
Hourly scratchcards (per hour) - for all others	1.10	0.00	1.10	1.10	0.00	1.10	0.00%	Cost recovery
Hourly scratchcards (per book of 10 hours) - for all others	10.00	0.00	10.00	10.20	0.00	10.20	2.00%	Cost recovery
Business per annum (administration charge - no refund)	45.00	0.00	45.00	46.00	0.00	46.00	2.22%	Cost recovery
Nativity Close (exemption permit concession admin fee - no refund)	30.00	0.00	30.00	30.65	0.00	30.65	2.17%	Cost recovery
Residents/Business/Exemption permit concessions. Replacement permit for lost, stolen or destroyed permits	10.00	0.00	10.00	10.20	0.00	10.20	2.00%	Cost recovery
Dispensation / Waivers								
Maximum 1 day	12.00	0.00	12.00	12.25	0.00	12.25	2.08%	Cost recovery
Maximum 1 week	36.00	0.00	36.00	36.80	0.00	36.80	2.22%	Cost recovery
Maximum 2 weeks	45.00	0.00	45.00	46.00	0.00	46.00	2.22%	Cost recovery
Maximum 1 month	60.00	0.00	60.00	61.30	0.00	61.30	2.17%	Cost recovery
Over 1 month (to a maximum of 3 months) - per month (or part month)	50.00	0.00	50.00	51.10	0.00	51.10	2.20%	Cost recovery
Suspension admin fee	100.00	0.00	100.00	102.20	0.00	102.20	2.20%	Cost recovery

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Sports Facilities								
Tennis Courts								
Unlit court (hourly rate)	5.00	1.00	6.00	5.17	1.03	6.20	3.33%	Market rate
Court with floodlighting (hourly rate)	7.50	1.50	9.00	7.75	1.55	9.30	3.33%	Market rate
Season ticket (3 court bookings of up to 2 hours per session per week)	33.33	6.67	40.00	34.58	6.92	41.50	3.76%	Market rate
With changing facilities and showers								
- Senior	72.00	14.40	86.40	73.58	14.72	88.30	2.20%	Market rate
- Under 18s	24.00	4.80	28.80	24.54	4.91	29.45	2.26%	Market rate
- Under 16s & mini soccer	18.00	3.60	21.60	18.42	3.68	22.10	2.31%	Market rate
With changing facilities only								
- Senior	60.00	12.00	72.00	61.33	12.27	73.60	2.22%	Market rate
- Under 18s	20.00	4.00	24.00	20.46	4.09	24.55	2.29%	Market rate
- Under 16s & mini soccer	16.75	3.35	20.10	17.13	3.43	20.55	2.24%	Market rate
With no facilities								
- Senior	41.00	8.20	49.20	41.92	8.38	50.30	2.24%	Market rate
- Under 18s	17.80	3.56	21.36	18.21	3.64	21.85	2.29%	Market rate
- Under 16s & mini soccer	11.00	2.20	13.20	11.25	2.25	13.50	2.27%	Market rate
If your booking meets all of the rules below, you can choose to save money and not pay VAT on the booking.								
VAT exemption rules								
The booking consists of 10 or more dates.								
Each booking is for the same sport.								
Each booking is in the same place. This condition is still met where a different pitch, court or lane is used (or a different number of pitches, courts or								
The gap between each session is at least 1 day but not more than 14 days (for a gap to be at least 1 day, 24 hours must elapse between the start of each								
The booking is to be paid for as a whole and there is written evidence to the fact. This must include evidence that payment is to be made in full whether or								
The facilities are booked out to a school, club, association or an organisation representing affiliated clubs or constituent associations, such as a local								
The person to whom the facilities are booked has exclusive use of them during the bookings.								
If you want your booking to be VAT exempt, you must make sure that it meets all of the rules above. Because the rules are given to us by the government, we cannot change them.								
All bookings must be paid for in full before the start of the booking. You cannot change VAT exempt bookings once they have been paid for, so you must make sure the dates and times are right for you.								
Allotments								
Plots of 10 rods & pro rata	70.00	0.00	70.00	71.55	0.00	71.55	2.21%	Market rate
Plots of 10 rods & pro rata (OAPs/Disabled)	35.00	0.00	35.00	35.75	0.00	35.75	2.14%	Market rate
Refundable keys deposit	5.00	0.00	5.00	5.10	0.00	5.10	2.00%	Market rate
King George's Pavilion & Faversham Rec Community Room								
Main hall/tea room (hourly rate) (minimum hire 1 hour)								
Mon-Sun (9am-midnight)	12.00	0.00	12.00	12.25	0.00	12.25	2.08%	Market rate
Playgroups (per morning)	30.00	0.00	30.00	30.65	0.00	30.65	2.17%	Market rate
Tea room (for children's parties only) & Faversham Rec Ground Community Room (per hour) minimum 1 hour hire	10.00	0.00	10.00	10.20	0.00	10.20	2.00%	Market rate
Caretaking services – set up and clear away: standard tables and/or chairs	12.46	0.00	12.46	12.75	0.00	12.75	2.33%	Market rate
Refundable deposits	0.00	0.00	0.00	0.00	0.00	0.00	0.00%	Market rate
Bank Holidays, New Year's Eve	Double the standard rate			Double the standard rate			n/a	Market rate

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Cemeteries Burial Fees								
<i>Includes Exclusive Right of Burial for 50 years, Interment, Memorial & Re-inscription Permits</i>								
1 st Burial Sittingbourne, Faversham & Murston	2,700.00	0.00	2,700.00	2,760.00	0.00	2,760.00	2.22%	Market rate
1 st Burial Sheppey and Iwade	2,475.00	0.00	2,475.00	2,530.00	0.00	2,530.00	2.22%	Market rate
1 st Burial if no use of previously purchased grave Sittingbourne, Faversham & Murston	1,350.00	0.00	1,350.00	1,380.00	0.00	1,380.00	2.22%	Market rate
1 st Burial if no use of previously purchased grave Sheppey	1,080.00	0.00	1,080.00	1,110.00	0.00	1,110.00	2.78%	Market rate
2 nd Burial Sittingbourne, Faversham & Murston	1,080.00	0.00	1,080.00	1,110.00	0.00	1,110.00	2.78%	Market rate
2 nd Burial Sheppey and Iwade	900.00	0.00	900.00	920.00	0.00	920.00	2.22%	Market rate
3 rd Burial Sittingbourne, Faversham & Murston	900.00	0.00	900.00	920.00	0.00	920.00	2.22%	Market rate
Extended right of burial extension – 10 years	270.00	0.00	270.00	280.00	0.00	280.00	3.70%	Market rate
Extended right of burial extension – 20 years	540.00	0.00	540.00	560.00	0.00	560.00	3.70%	Market rate
Extended right of burial extension – 30 years	815.00	0.00	815.00	840.00	0.00	840.00	3.07%	Market rate
Extended right of burial extension – 40 years	1,080.00	0.00	1,080.00	1,110.00	0.00	1,110.00	2.78%	Market rate
Cremated Remains (all sites)								
<i>(includes Exclusive Rights to Burial for 50 years, Interment, Memorial & Re-inscription Permit)</i>								
1 st Burial	730.00	0.00	730.00	745.00	0.00	745.00	2.05%	Market rate
1 st Burial (where no use has been made of previously purchased grave)	265.00	0.00	265.00	275.00	0.00	275.00	3.77%	Market rate
2 nd Burial	265.00	0.00	265.00	275.00	0.00	275.00	3.77%	Market rate
3 rd Burial	265.00	0.00	265.00	275.00	0.00	275.00	3.77%	Market rate
4 th Burial	265.00	0.00	265.00	275.00	0.00	275.00	3.77%	Market rate
Burial of loose ashes	135.00	0.00	135.00	140.00	0.00	140.00	3.70%	Market rate
Extended right of burial extension – 10 years	95.00	0.00	95.00	98.00	0.00	98.00	3.16%	Market rate
Extended right of burial extension – 20 years	185.00	0.00	185.00	190.00	0.00	190.00	2.70%	Market rate
Extended right of burial extension – 30 years	280.00	0.00	280.00	290.00	0.00	290.00	3.57%	Market rate
Extended right of burial extension – 40 years	370.00	0.00	370.00	380.00	0.00	380.00	2.70%	Market rate

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Child Burial								
Under 18 years of age	Covered by Children's Funeral Fund for England. Subject to criteria.			Covered by Children's Funeral Fund for England. Subject to criteria.				
Ancillary Services								
Issue of letter of confirmation where deed is lost	75.00	0.00	75.00	77.00	0.00	77.00	2.67%	Market rate
Use of chapel in Sittingbourne	105.00	0.00	105.00	110.00	0.00	110.00	4.76%	Market rate
Use of chapel in Faversham	145.00	0.00	145.00	150.00	0.00	150.00	3.45%	Market rate
Turfed grave	At cost			At cost			n/a	Market rate
Transfer of deed ownership	75.00	0.00	75.00	77.00	0.00	77.00	2.67%	Market rate
Record search & certificate (each grave)	38.00	0.00	38.00	39.00	0.00	39.00	2.63%	Market rate
Extra cost of large coffin or casket (measuring 30 inches or more)	100.00	0.00	100.00	104.00	0.00	104.00	4.00%	Market rate
Exhumation of coffin	2,800.00	0.00	2,800.00	2,860.00	0.00	2,860.00	2.14%	Market rate
Exhumation of cremated remains	375.00	0.00	375.00	385.00	0.00	385.00	2.67%	Market rate
Other services (vatable)	At cost			At cost			n/a	Market rate
Non-residents of Swale (not living in Swale at time of death or have not been a resident of Swale for at least 15 consecutive years) required to pay double the costs set out above (except child burials)								
Memorial Bench (Seafrosts & Green Space, Excludes Cemeteries)								
Memorial bench with basic installation	975.00	195.00	1,170.00	995.83	199.17	1,195.00	2.14%	Market rate
Memorial bench with concrete installation	1,220.00	244.00	1,464.00	1,245.83	249.17	1,495.00	2.12%	Market rate

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Travelling Fairs								
Pitch premium for days open to the public only (per day)	1,100.00	0.00	1,100.00	1,125.00	0.00	1,125.00	2.27%	Market rate
Pitch premium for days open to the public only (per day) Local Operator	365.00	0.00	365.00	375.00	0.00	375.00	2.74%	Market rate
Use of Council Land – Travelling Fairs								
On site fee payable whether or not open to the public (including arrival and departure days)	72.50	0.00	72.50	74.00	0.00	74.00	2.07%	Market rate
On site fee payable whether or not open to the public (including arrival and departure days) Local Operator	24.00	0.00	24.00	24.50	0.00	24.50	2.08%	Market rate
Refundable deposit	735.00	0.00	735.00	751.00	0.00	751.00	2.18%	Market rate
Use of Council Land – Travelling Shows								
On site fee for days open to the public	245.00	0.00	245.00	250.50	0.00	250.50	2.24%	Market rate
On site fee payable when not open to the public (including arrival and departure days)	70.00	0.00	70.00	74.00	0.00	74.00	5.71%	Market rate
Refundable deposit	735.00	0.00	735.00	751.00	0.00	751.00	2.18%	Market rate
Use of Council Land – Events								
On site fee for small commercial events – day usage of open space	250.00	0.00	250.00	255.50	0.00	255.50	2.20%	Market rate
On site fee for large commercial events – day usage of open space	Price on application		Price on application				n/a	Market rate
On site fee for enthusiast event – day usage of open space	125.00	0.00	125.00	128.00	0.00	128.00	2.40%	Market rate
On site fee for community/voluntary event – day usage of open space	0.00		0.00				0.00%	Market rate
Refundable deposit	245.00	0.00	245.00	250.50	0.00	250.50	2.24%	Market rate
Beach Hut Charges								
Locations now at Minster Leas and Leysdown								
Ground rental – beach hut owned	530.00	0.00	530.00	550.00	0.00	550.00	3.77%	Market rate
Annual rental	1,300.00	260.00	1,560.00	1,333.33	266.67	1,600.00	2.56%	Market rate
Weekly rental	94.00	18.80	112.80	100.00	20.00	120.00	6.38%	Market rate
Refundable keys deposit	30.00	0.00	30.00	35.00	0.00	35.00	16.67%	Market rate
Transfer of an owned beach hut licence	A fee of three times the ground rent or 10% of the sale value whichever is greatest		A fee of three times the ground rent or 10% of the sale value whichever is greatest				n/a	Market rate
Purchase of beach hut	Market price		Market price				n/a	Market rate
Access Over Open Space Licence								
Used for residential properties requiring access over our land to undertake works/deliveries etc.								
Standard fee	85.00	0.00	85.00	87.00	0.00	87.00	2.35%	Market rate

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Traffic Regulation Order Applications								
<i>On application (yellow lines and changes to existing orders - advice and scheme design)</i>								
Small (1-30 properties consulted)	1,310.00	0.00	1,310.00	1,360.00	0.00	1,360.00	3.82%	Market rate
Medium (31-50 properties consulted)	1,550.00	0.00	1,550.00	1,600.00	0.00	1,600.00	3.23%	Market rate
Large (51+ properties consulted)	1,910.00	0.00	1,910.00	2,000.00	0.00	2,000.00	4.71%	Market rate
<i>On application (loading bays, single bays)</i>								
Small (1-30 consultations)	620.00	0.00	620.00	650.00	0.00	650.00	4.84%	Market rate
Medium (31-50 consultations)	940.00	0.00	940.00	1,000.00	0.00	1,000.00	6.38%	Market rate
Large (51+ consultations)	1,250.00	0.00	1,250.00	1,350.00	0.00	1,350.00	8.00%	Market rate
<i>TRO drafted (yellow lines and changes to existing orders)</i>								
All size consultations	620.00	0.00	620.00	660.00	0.00	660.00	6.45%	Market rate
<i>TRO drafted (loading bays, single bays)</i>								
All size consultations	310.00	0.00	310.00	340.00	0.00	340.00	9.68%	Market rate
<i>Formal objections received and reported to Swale Joint Transportation Board</i>								
All size consultations	310.00	0.00	310.00	330.00	0.00	330.00	6.45%	Market rate
<i>Progress/implement TRO (yellow lines and changes to existing orders)</i>								
Small (1-30 consultations)	630.00	0.00	630.00	650.00	0.00	650.00	3.17%	Market rate
Medium (31-50 consultations)	750.00	0.00	750.00	800.00	0.00	800.00	6.67%	Market rate
Large (51+ consultations)	900.00	0.00	900.00	950.00	0.00	950.00	5.56%	Market rate
<i>Progress/implement scheme (loading bays, single bays)</i>								
Small (1-30 consultations)	130.00	0.00	130.00	140.00	0.00	140.00	7.69%	Market rate
Medium (31-50 consultations)	130.00	0.00	130.00	140.00	0.00	140.00	7.69%	Market rate
Large (51+ consultations)	130.00	0.00	130.00	140.00	0.00	140.00	7.69%	Market rate
<i>Fixed Fee for including new or amended waiting restrictions into planned TRO</i>								
Inclusion of new or amended waiting restrictions into Traffic Regulation Order	1,320.00	0.00	1,320.00	1,400.00	0.00	1,400.00	6.06%	Market rate
White Bar Markings								
Installation of new white bar marking across vehicle crossing	154.17	30.83	185.00	158.33	31.67	190.00	2.70%	Market rate
Re-painting existing white bar marking across vehicle crossing	129.17	25.83	155.00	133.33	26.67	160.00	3.22%	Market rate
Installation of Advisory Bays on Private Lane (e.g. Disabled Bay in Housing Association Car Park)								
Installation of Advisory Parking Bay on Private Land	116.40	0.00	116.40	125.00	0.00	125.00	7.39%	Market rate
Street Naming & Numbering								
Changing or requesting new property (up to and including 4 units)	90.75	0.00	90.75	95.00	0.00	95.00	4.68%	Cost recovery
New street name	181.50	0.00	181.50	186.00	0.00	186.00	2.48%	Cost recovery
New street developments per property/unit (4 or more properties/units, first 4 charged at full price)	60.50	0.00	60.50	65.00	0.00	65.00	7.44%	Cost recovery
Provision of historical information relating to street naming & numbering	36.30	0.00	36.30	40.00	0.00	40.00	10.19%	Cost recovery
Changing street name	847.00	0.00	847.00	870.00	0.00	870.00	2.72%	Cost recovery

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Garden Waste Subscription (brown bins – domestic)								
Fortnightly collection of garden waste (excluding Christmas where service is suspended for 2 weeks). Fee includes hire of bin. Price is per annum	59.00	0.00	59.00	62.00	0.00	62.00	5.08%	Market rate
Bulky Waste Collections								
Charge covers up to 4 bulky items. If white goods, charge covers only one item.	32.50	0.00	32.50	33.20	0.00	33.20	2.15%	Market rate
Clinical Waste Collection								
Residents receive up to 2 free collections per annum then any subsequent collections will be charged at the following rates per collection	3.50	0.00	3.50	3.60	0.00	3.60	2.86%	Cost recovery
Wheeled Bins for new developments								
Wheeled bins 140 litre	47.90	0.00	47.90	49.00	0.00	49.00	2.30%	Cost recovery
Wheeled bins 180 litre	54.20	0.00	54.20	55.40	0.00	55.40	2.21%	Cost recovery
Wheeled bins 240 litre	54.20	0.00	54.20	55.40	0.00	55.40	2.21%	Cost recovery
Wheeled bins 1,100 litre	525.90	0.00	525.90	537.50	0.00	537.50	2.21%	Cost recovery
Food waste container 23 litre	12.60	0.00	12.60	12.90	0.00	12.90	2.38%	Cost recovery
Kitchen caddy 5 litre	6.40	0.00	6.40	6.50	0.00	6.50	1.56%	Cost recovery
Bin repairs	15.00	0.00	15.00	15.50	0.00	15.50	3.33%	Market rate
Replacement domestic 180 litre or 240 litre refuse or recycling bin if damaged, lost or stolen (unless damaged during emptying by contractor). This fee includes delivery of new bin and removal/ disposal of old bin.	32.00	0.00	32.00	32.70	0.00	32.70	2.19%	Market rate
Note: Wheeled bins are non-vatable when supplied directly to a householder for domestic/household waste								
Additional Litter Bins (each)								
145 litre galvanised (fee does not include emptying the bin)	530.00	106.00	636.00	541.67	108.33	650.00	2.20%	Market rate
Annual emptying cost	130.00	0.00	130.00	168.00	0.00	168.00	29.23%	Cost recovery
Bin Store Clearance								
Per occasion	200.00	0.00	200.00	204.00	0.00	204.00	2.00%	Market rate
Wheeled Bins for Community Events								
Provision of wheeled bins for events (cost per occasion) – delivery/ collection charge	122.00	0.00	122.00	125.00	0.00	125.00	2.46%	Market rate
Wheeled bin hire (cost per bin)	15.50	0.00	15.50	16.00	0.00	16.00	3.23%	Market rate
Servicing of bins during event	Price on application			Price on application			0.00%	Market rate

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Radar Key for Disabled Toilets								
Fee	3.50	0.00	3.50	3.50	0.00	3.50	0.00%	Market rate
Environmental – Fixed Penalty Notices (FPN)								
Fly tipping (level 1)* - single item or black bag, no criteria from level 2 met	600.00	0.00	600.00	600.00	0.00	600.00	0.00%	Externally set
Fly tipping (level 2) - multiple items, or multiple locations, or hazardous waste, or blocking access, or specialist equipment required to clear any item	1000.00	0.00	1,000.00	1000.00	0.00	1,000.00	0.00%	Externally set
Littering (level 1)** - single item of litter eg cigarette butt, no criteria from level 2 met	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Littering (level 2) - repeated offence, multiple items, littering from vehicles, hazardous waste, littering into a watercourse	500.00	0.00	500.00	500.00	0.00	500.00	0.00%	Externally set
Householders/Commercial duty of care – lack of care in disposal of waste*	600.00	0.00	600.00	600.00	0.00	600.00	0.00%	Externally set
Refuse left out inappropriately	80.00	0.00	80.00	80.00	0.00	80.00	0.00%	Externally set
Graffiti	150.00	0.00	150.00	150.00	0.00	150.00	0.00%	Externally set
Fly posting	150.00	0.00	150.00	150.00	0.00	150.00	0.00%	Externally set
Waste carrier offences	300.00	0.00	300.00	300.00	0.00	300.00	0.00%	Externally set
Failure to comply with a Community Protection Notice	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Breach of any Public Space Protection Orders (PSPOs)	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
*Reduced to £450 if paid in full within 14 days (24/25 charge)								
**Reduced to £150 if paid in in full within 14 days (24/25 charge)								

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Animal Welfare Licensing								
The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 came into force on 1 October 2018. Charges have been calculated using the Local Government Association guidance document on locally set licence fees ('Open for Business').								
Part A - Covers the application and authorisation process.								
Part B - Is the cost for administering and enforcing the legislative framework.								
Boarding in Kennels for Dogs, Boarding for Cats, Day Care for Dogs, Home Boarding for Dogs, Breeding Dogs and Selling Animals as Pets (This fee applies to both arranging the provision of accommodation for other people's dogs and/or host families where dogs are boarded within the Borough.)								
Part A ¹	263.50	0.00	263.50	269.00	0.00	269.00	2.09%	Cost recovery
Part B								
1 Star and 2 Star establishments - 1 year licence (Boarders up to 50 dogs; Breeders with 1 - 5 breeding bitches; Pet shops with up to 3 groups of animals (i.e fish, reptiles, cats, dogs etc).	212.00	0.00	212.00	217.00	0.00	217.00	2.36%	Cost recovery
1 Star and 2 Star establishments - 1 year licence (Boarders with 51 or more dogs; Breeders with 6 or more breeding bitches)	233.00	0.00	233.00	238.00	0.00	238.00	2.15%	Cost recovery
3 Star and 4 Star establishments - 2 year licence (Boarders up to 50 dogs; Breeders with 1 - 5 breeding bitches; Pet shops with up to 3 groups of animals).	352.00	0.00	352.00	360.00	0.00	360.00	2.27%	Cost recovery
3 Star and 4 Star establishments - 2 year licence (Boarders with 51 or more dogs; Breeders with 6 or more breeding bitches).	387.00	0.00	387.00	396.00	0.00	396.00	2.33%	Cost recovery
5 Star establishments - 3 year licence (Boarders up to 50 dogs; Breeders with 1 - 5 breeding bitches; Pet shops with up to 3 groups of animals).	494.00	0.00	494.00	505.00	0.00	505.00	2.23%	Cost recovery
5 Star establishments - 3 year licence (Boarders with 51 or more dogs; Breeders with 6 or more breeding bitches).	543.00	0.00	543.00	555.00	0.00	555.00	2.21%	Cost recovery
Charge for each additional 'group' of animals being sold as pets (i.e fish, reptiles, dogs, cats etc)	30.00	0.00	30.00	31.00	0.00	31.00	3.33%	Cost recovery
Hiring of Horses								
Part A ¹	263.50	0.00	263.50	269.00	0.00	269.00	2.09%	Cost recovery
Part B								
1 Star and 2 Star establishments - 1 year licence (1 - 10 horses) ³	212.00	0.00	212.00	217.00	0.00	217.00	2.36%	Cost recovery
1 Star and 2 Star establishments - 1 year licence (11 or more horses) ³	233.00	0.00	233.00	238.00	0.00	238.00	2.15%	Cost recovery
3 Star and 4 Star establishments - 2 year licence (1 - 10 horses) ²	352.00	0.00	352.00	360.00	0.00	360.00	2.27%	Cost recovery
3 Star and 4 Star establishments - 2 year licence (11 or more horses) ²	387.00	0.00	387.00	396.00	0.00	396.00	2.33%	Cost recovery
5 Star establishments - 3 year licence (1 - 10 horses) ²	494.00	0.00	494.00	505.00	0.00	505.00	2.23%	Cost recovery
5 Star establishments - 3 year licence (11 or more horses) ²	543.00	0.00	543.00	555.00	0.00	555.00	2.21%	Cost recovery

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Keeping or Training Animals for Exhibition								
Part A								
For a 3 year licence ¹	264.00	0.00	264.00	270.00	0.00	270.00	2.27%	Cost recovery
Part B								
For a 3 year licence ³	494.00	0.00	494.00	505.00	0.00	505.00	2.23%	Cost recovery
Dangerous Wild Animal Licence								
Part A								
For a 2 year licence ¹	263.50	0.00	263.50	269.00	0.00	269.00	2.09%	Cost recovery
Part B								
For a 2 year licence ³	352.00	0.00	352.00	360.00	0.00	360.00	2.27%	Cost recovery
Zoo Licence (Please discuss your application with the Animal Control Officer prior to applying for a licence.)								
Part A								
For a 4 year licence ²	1,186.00	0.00	1,186.00	1,215.00	0.00	1,215.00	2.45%	Cost recovery
Part B								
For a 4 year licence ³	656.00	0.00	656.00	670.00	0.00	670.00	2.13%	Cost recovery
¹ Plus vet fees based upon an hourly rate (including travel time)								
² Plus vet fees for an initial inspection based upon an hourly rate (including travel time)								
³ Plus annual vet fees based upon an hourly rate (including travel time)								
Other Charges								
Licence renewals	charged as new applications			charged as new applications			n/a	
Request for re-inspection (for all licences) (plus vet fees if applicable)	112.00	0.00	112.00	114.50	0.00	114.50	2.23%	Cost recovery
Requests for Variations								
Administration amendment only	42.50	0.00	42.50	43.40	0.00	43.40	2.12%	Cost recovery
Inspector visit (if required) (additional to administration charge)	70.00	0.00	70.00	72.00	0.00	72.00	2.86%	Cost recovery
Vet fees	hourly rate plus travel time			hourly rate plus travel time			n/a	
Stray Dog Collection								
Statutory charge as per legislation	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
Additional fee for collecting/returning stray dogs	42.00	0.00	42.00	43.00	0.00	43.00	2.38%	Market rate
Out of hours additional fee for collecting/ returning stray dogs	54.00	0.00	54.00	55.00	0.00	55.00	1.85%	Market rate
Transport fee for returning dog to owner after a kennel stay	36.00	0.00	36.00	37.00	0.00	37.00	2.78%	Market rate
Kennel stay fee per night	25.50	0.00	25.50	26.00	0.00	26.00	1.96%	Market rate
*If we are unable to return a dog to the owner straight away and the dog is taken to the kennels, then the dog owner will be charged the cost of kennelling the dog.								

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Environmental Health								
Food Export Certificate								
For businesses already in receipt of Export Health Certificate (EHC) issued by Swale BC	146.00	0.00	146.00	149.00	0.00	149.00	2.05%	Market rate
For new businesses applying for export certificates	302.00	0.00	302.00	310.00	0.00	310.00	2.65%	Market rate
Admin charge for changes to certificate	29.00	0.00	29.00	31.00	0.00	31.00	6.90%	Market rate
Sampling associated with Export Health Certificates (per hour)	70.83	14.17	85.00	74.17	14.83	89.00	4.71%	Market rate
EHC for transit to destination country	42.00	0.00	42.00	43.00	0.00	43.00	2.38%	Market rate
Voluntary Surrender of Food								
Charge for food unfit for human consumption or unsuitable for sale	247.00	0.00	247.00	254.00	0.00	254.00	2.83%	Cost recovery
Chartered Institute of Environmental Health (CIEH) Level 2 Award Training in Food Safety in Catering								
Food Hygiene Rating Scheme								
Fee to food businesses for re-inspection and re-scoring	205.00	0.00	205.00	210.00	0.00	210.00	2.44%	Market rate
Food Business Advice								
Food hygiene advice (per hour)	70.83	14.17	85.00	89.00	0.00	89.00	4.71%	Market rate
Registration Fee under the Local Government (Miscellaneous Provision) Act (Relates to establishments offering cosmetic piercing, electrolysis, tattooing or acupuncture)								
Standard fee	354.00	0.00	354.00	362.00	0.00	362.00	2.26%	Cost recovery
Supplementary treatment registration fee (for additional beauty treatment registration inspection either at or after initial registration)	64.00	0.00	64.00	66.00	0.00	66.00	3.13%	Cost recovery
Tattoo and Beauty Treatment Events (falling within the Local Government (Miscellaneous Provisions) Act)	222.00	0.00	222.00	228.00	0.00	228.00	2.70%	Cost recovery
Tattoo and Beauty Treatment Event charge for Artists (new artist registrations)	35.00	0.00	35.00	36.00	0.00	36.00	2.86%	Cost recovery
Requests for Environmental Information (e.g. Contaminated land)								
Charge per hour	23.00	4.60	27.60	22.50	4.50	27.00	-2.17%	Market rate
Requests for Enhanced Environmental Information for Contaminated Land and Professional Opinion								
Charge per hour	71.00	14.20	85.20	74.17	14.83	89.00	4.46%	Market rate
Charges for photocopying apply at 10p per page plus postage								
Pre-Application Consultation for Environmental Health Advice for Acoustics, Air Quality, Contaminated Land Assessments								
Charge per hour	71.00	14.20	85.20	74.17	14.83	89.00	4.46%	Market rate
Private Water Supplies Regulations 2016 & 2018 Amendments								
Risk assessment (hourly rate)	71.00	14.20	85.20	74.17	14.83	89.00	4.46%	Market rate
Sampling (hourly rate)	71.00	14.20	85.20	74.17	14.83	89.00	4.46%	Market rate
Investigation (hourly rate)	71.00	14.20	85.20	74.17	14.83	89.00	4.46%	Market rate
Derogation request	71.00	14.20	85.20	74.17	14.83	89.00	4.46%	Market rate
Analysis – Group A	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Analysis – Group B	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Analysis – audit monitoring	n/a	n/a	n/a	n/a	n/a	n/a	n/a	

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Housing & Community Services								
Taxi Licensing								
Vehicle licence for 1 year	290.00	0.00	290.00	290.00	0.00	290.00	0.00%	Cost recovery
Private Hire operator licence valid for 5 years	430.00	0.00	430.00	430.00	0.00	430.00	0.00%	Cost recovery
Licence and plate for temporary hire vehicle	40.00	0.00	40.00	40.00	0.00	40.00	0.00%	Cost recovery
Knowledge test – initial	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Cost recovery
Knowledge test – re-sit	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Cost recovery
Dual / Private Hire Drivers Badge for 1 year (for medical or over 70 years of age)	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Cost recovery
Upgrade Private Hire Drivers Badge to a Dual Badge	35.00	0.00	35.00	35.00	0.00	35.00	0.00%	Cost recovery
Dual / Private Hire Drivers Badge for 3 years	150.00	0.00	150.00	150.00	0.00	150.00	0.00%	Cost recovery
Non-refundable plate fee (plate number only issued once)	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Cost recovery
Replacement plate	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Cost recovery
Change of address	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Cost recovery
Change of ownership licensed vehicle	35.00	0.00	35.00	35.00	0.00	35.00	0.00%	Cost recovery
Dual / Private Hire Drivers badge replacement	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Cost recovery
Replacement paper licence certificate	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Cost recovery
Change of vehicle on an existing plate	80.00	0.00	80.00	80.00	0.00	80.00	0.00%	Cost recovery
Street Trading Licensing								
Annual consents (not events)	151.30	0.00	151.30	155.00	0.00	155.00	2.45%	Market rate
6 month consents (not events)	75.65	0.00	75.65	77.50	0.00	77.50	2.45%	Market rate
One off consent	10.60	0.00	10.60	11.00	0.00	11.00	3.77%	Market rate
Assistants Badge	17.45	0.00	17.45	18.00	0.00	18.00	3.15%	Market rate
Gambling Licensing								
New Applications/Applications for Provisional Statement								
Small casino	8,000.00	0.00	8,000.00	8,000.00	0.00	8,000.00	0.00%	Externally set
Large casino	10,000.00	0.00	10,000.00	10,000.00	0.00	10,000.00	0.00%	Externally set
Bingo club	3,500.00	0.00	3,500.00	3,500.00	0.00	3,500.00	0.00%	Externally set
Betting premises	3,000.00	0.00	3,000.00	3,000.00	0.00	3,000.00	0.00%	Externally set
Tracks	2,500.00	0.00	2,500.00	2,500.00	0.00	2,500.00	0.00%	Externally set
Family entertainment centres	2,000.00	0.00	2,000.00	2,000.00	0.00	2,000.00	0.00%	Externally set
Adult gaming centre	2,000.00	0.00	2,000.00	2,000.00	0.00	2,000.00	0.00%	Externally set
Temporary use notice	500.00	0.00	500.00	500.00	0.00	500.00	0.00%	Externally set
Licence Applications (Provisional Statement Holders)								
Small casino	3,000.00	0.00	3,000.00	3,000.00	0.00	3,000.00	0.00%	Externally set
Large casino	5,000.00	0.00	5,000.00	5,000.00	0.00	5,000.00	0.00%	Externally set
Bingo club	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Betting premises	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Tracks	950.00	0.00	950.00	950.00	0.00	950.00	0.00%	Externally set
Family entertainment centre	950.00	0.00	950.00	950.00	0.00	950.00	0.00%	Externally set
Adult gaming centre	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Annual Fee								
Small casino	5,000.00	0.00	5,000.00	5,000.00	0.00	5,000.00	0.00%	Externally set
Large casino	10,000.00	0.00	10,000.00	10,000.00	0.00	10,000.00	0.00%	Externally set
Bingo club	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
Betting premises	600.00	0.00	600.00	600.00	0.00	600.00	0.00%	Externally set
Tracks	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
Family entertainment centres	750.00	0.00	750.00	750.00	0.00	750.00	0.00%	Externally set
Adult gaming centre	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
Application to Vary								
Small casino	4,000.00	0.00	4,000.00	4,000.00	0.00	4,000.00	0.00%	Externally set
Large casino	5,000.00	0.00	5,000.00	5,000.00	0.00	5,000.00	0.00%	Externally set
Bingo club	1,750.00	0.00	1,750.00	1,750.00	0.00	1,750.00	0.00%	Externally set
Betting premises	1,500.00	0.00	1,500.00	1,500.00	0.00	1,500.00	0.00%	Externally set
Tracks	1,250.00	0.00	1,250.00	1,250.00	0.00	1,250.00	0.00%	Externally set
Family entertainment centres	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
Adult gaming centre	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
Copy licence	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
Notification of change	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
Application to Transfer a Licence								
Small casino	1,800.00	0.00	1,800.00	1,800.00	0.00	1,800.00	0.00%	Externally set
Large casino	2,150.00	0.00	2,150.00	2,150.00	0.00	2,150.00	0.00%	Externally set
Bingo club	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Betting premises	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Tracks	950.00	0.00	950.00	950.00	0.00	950.00	0.00%	Externally set
Family entertainment centres	950.00	0.00	950.00	950.00	0.00	950.00	0.00%	Externally set
Adult gaming centre	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Application for Re-instatement								
Small casino	1,800.00	0.00	1,800.00	1,800.00	0.00	1,800.00	0.00%	Externally set
Large casino	2,150.00	0.00	2,150.00	2,150.00	0.00	2,150.00	0.00%	Externally set
Bingo club	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Betting premises	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Tracks	950.00	0.00	950.00	950.00	0.00	950.00	0.00%	Externally set
Family entertainment centres	950.00	0.00	950.00	950.00	0.00	950.00	0.00%	Externally set
Adult gaming centre	1,200.00	0.00	1,200.00	1,200.00	0.00	1,200.00	0.00%	Externally set
Sex Establishment Licensing (sex shop, sex cinema and sex encounter venue)								
Application fee and 1 st licence	5,262.50	0.00	5,262.50	5,380.00	0.00	5,380.00	2.23%	Market rate
Annual licence renewal	817.00	0.00	817.00	835.00	0.00	835.00	2.20%	Market rate
Application to vary	943.00	0.00	943.00	965.00	0.00	965.00	2.33%	Market rate
Transfer of licence	36.00	0.00	36.00	37.00	0.00	37.00	2.78%	Market rate
Duplicate licence	18.10	0.00	18.10	18.50	0.00	18.50	2.21%	Market rate

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Scrap Metal Dealers Licensing								
Site licence	566.00	0.00	566.00	578.00	0.00	578.00	2.12%	Cost recovery
Site licence renewal	540.65	0.00	540.65	552.50	0.00	552.50	2.19%	Cost recovery
Collections licence, grant or renewal	264.50	0.00	264.50	270.00	0.00	270.00	2.08%	Cost recovery
Variation – collector to site	91.00	0.00	91.00	93.00	0.00	93.00	2.20%	Cost recovery
Variation – site to collector	66.65	0.00	66.65	68.00	0.00	68.00	2.03%	Cost recovery
Variation (minor administration, such as change of address)	42.35	0.00	42.35	43.50	0.00	43.50	2.72%	Cost recovery
Change of site manager	127.00	0.00	127.00	130.00	0.00	130.00	2.36%	Cost recovery
Pleasure Boat Licence								
Licence	174.60	0.00	174.60	178.50	0.00	178.50	2.23%	Market rate
Pavement Licence								
Application Fee	500.00	0.00	500.00	500.00	0.00	500.00	0.00%	Externally set
Renewal Fee	350.00	0.00	350.00	350.00	0.00	350.00	0.00%	Externally set
CCTV Services								
Swale Radio Link Annual Charge								
Charities	150.00	30.00	180.00	150.00	30.00	180.00	0.00%	Market rate
Independent Businesses	200.00	40.00	240.00	200.00	40.00	240.00	0.00%	Market rate
Large Organisation	350.00	70.00	420.00	350.00	70.00	420.00	0.00%	Market rate
Third Party Service Charges								
Insurance Company Footage Review	74.04	14.81	88.85	75.83	15.17	91.00	2.42%	Market rate
CCTV Services which may include design, installation, monitoring, maintenance, upgrades and decommissioning	Price on application			Price on application			n/a	Market rate
Legal								
Legal Charges for Third Parties								
Hourly rate (no VAT)	271.00	0.00	271.00	277.00	0.00	277.00	2.21%	Market rate
Hourly rate (when VAT applicable)	271.00	54.20	325.20	276.67	55.33	332.00	2.09%	Market rate
Note: VAT may be chargeable depending on the nature of the transaction. VAT is not payable in relation to most income (as most income is S106 related, which derives from a statutory function) but VAT is payable in certain circumstances, e.g. charging for provision of extra copies of documents.								
Revenues & Benefits								
Council Tax liability orders	66.00	0.00	66.00	67.50	0.00	67.50	2.27%	Cost recovery
Council Tax summons	47.30	0.00	47.30	48.50	0.00	48.50	2.54%	Cost recovery
Business rates liability order	66.00	0.00	66.00	67.50	0.00	67.50	2.27%	Cost recovery
Business rates summons	47.30	0.00	47.30	48.50	0.00	48.50	2.54%	Cost recovery

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Property								
Room Hire of Swale House								
Non-Commercial								
Council chamber (half day)	87.29	17.46	104.75	89.17	17.83	107.00	2.15%	Market rate
Council chamber (full day)	145.46	29.09	174.55	148.75	29.75	178.50	2.26%	Market rate
Committee room (half day)	58.21	11.64	69.85	59.58	11.92	71.50	2.36%	Market rate
Committee room (full day)	87.29	17.46	104.75	89.17	17.83	107.00	2.15%	Market rate
Assembly room (half day)	43.63	8.73	52.36	45.00	9.00	54.00	3.14%	Market rate
Assembly room (full day)	72.79	14.56	87.35	74.58	14.92	89.50	2.46%	Market rate
Commercial								
Council chamber (half day)	174.58	34.92	209.50	178.33	35.67	214.00	2.15%	Market rate
Council chamber (full day)	290.96	58.19	349.15	297.50	59.50	357.00	2.25%	Market rate
Committee room (half day)	116.38	23.28	139.66	119.17	23.83	143.00	2.39%	Market rate
Committee room (full day)	174.58	34.92	209.50	178.33	35.67	214.00	2.15%	Market rate
Assembly room (half day)	87.29	17.46	104.75	89.17	17.83	107.00	2.15%	Market rate
Assembly room (full day)	145.46	29.09	174.55	148.75	29.75	178.50	2.26%	Market rate
Landlord's Consent Fee								
Assignments, subletting, charging *	423.21	84.64	507.85	432.50	86.50	519.00	2.20%	Market rate
Alterations *	423.21	84.64	507.85	432.50	86.50	519.00	2.20%	Market rate
Commercial wayleaves / easements*	925.75	185.15	1,110.90	945.83	189.17	1,135.00	2.17%	Market rate
Parking space licences	200.00	40.00	240.00	204.17	40.83	245.00	2.08%	Market rate

* VAT is only applicable if the rent is subject to VAT.

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
FEES AND CHARGES SET NATIONALLY BY THE GOVERNMENT								
Housing								
Houses in Multiple Occupation Licensing								
New Application								
Non-accredited landlord	838.35	0.00	838.35	857.00	0.00	857.00	2.22%	Cost recovery
Accredited landlord	712.55	0.00	712.55	728.00	0.00	728.00	2.17%	Cost recovery
Renewal of Application								
Non-accredited landlord	657.00	0.00	657.00	671.00	0.00	671.00	2.13%	Cost recovery
Accredited landlord	558.60	0.00	558.60	571.00	0.00	571.00	2.22%	Cost recovery
Mobile Home Site Licence Fee								
New Mobile Home Site Licence Application Fee								
1-5 mobile homes on site	181.55	0.00	181.55	186.00	0.00	186.00	2.45%	Cost recovery
6-24 mobile homes on site	249.15	0.00	249.15	255.00	0.00	255.00	2.35%	Cost recovery
25-99 mobile homes on site	316.85	0.00	316.85	324.00	0.00	324.00	2.26%	Cost recovery
100+ mobile homes on site	364.25	0.00	364.25	372.00	0.00	372.00	2.13%	Cost recovery
Annual Mobile Home Site Inspection Fee								
Relevant sites occupied solely by owners and family members	No charge		No charge		No charge			Cost recovery
1-5 mobile homes on site	No charge		No charge		No charge			Cost recovery
6-24 mobile homes on site	204.10	0.00	204.10	208.60	0.00	208.60	2.20%	Cost recovery
25-99 mobile homes on site	244.40	0.00	244.40	249.80	0.00	249.80	2.21%	Cost recovery
100+ mobile homes on site	295.10	0.00	295.10	301.60	0.00	301.60	2.20%	Cost recovery
Fee to Transfer or Amend Mobile Home Site Licence								
Transfer or amend mobile home site licence	153.50	0.00	153.50	156.90	0.00	156.90	2.21%	Cost recovery
Fee for the Deposit of Mobile Home Site Rules								
Deposit of mobile home site rules	216.35	0.00	216.35	221.10	0.00	221.10	2.20%	Cost recovery
Smoke and Carbon Monoxide Regulations 2015								
Fine level progresses to maximum fine permitted (1st offence £1,500, 2nd £2,500, 3rd £5,000)								
Penalty charge for non-compliance of Smoke or CO Alarm Regulations	5,290.00	0.00	5,290.00	5,406.00	0.00	5,406.00	2.19%	Cost recovery
The Redress Scheme for Lettings Agency Work & Management Work Order 2014								
Fine level progresses to maximum fine permitted (1st offence £2,500, 2nd £5,000)								
Penalty charge for non-compliance of Redress Scheme for Letting Agents Order	5,290.00	0.00	5,290.00	5,406.00	0.00	5,406.00	2.19%	Cost recovery

	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Non-Compliance with Minimum Energy Standards in Private Rented Properties								
Breaching the ban on letting a property with an F or G rating for less than 3 months (Statutory Maximum £2,000)								
First offence £1,000 (or £750 if paid within 21 days)	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
All other offences £2,000 (or £1,500 if paid within 21 days)	2,000.00	0.00	2,000.00	2,000.00	0.00	2,000.00	0.00%	Externally set
Breaching the ban on letting a property with an F or G rating for more than three months (Statutory Maximum £4,000)								
First offence £2,000 (or £1,500 if paid within 21 days)	2,000.00	0.00	2,000.00	2,000.00	0.00	2,000.00	0.00%	Externally set
All other offences £4,000 (or £3,000 if paid within 21 days)	4,000.00	0.00	4,000.00	4,000.00	0.00	4,000.00	0.00%	Externally set
Registering false or misleading information on the Private Rented Sector Exemptions Register (Statutory Maximum £1,000)								
First offence £500 (or £375 if paid within 21 days)	500.00	0.00	500.00	500.00	0.00	500.00	0.00%	Externally set
All other offences £2,000 (or £1,500 if paid within 21 days)	2,000.00	0.00	2,000.00	2,000.00	0.00	2,000.00	0.00%	Externally set
Failing to provide information to the council demanded by a Compliance Notice (Statutory Maximum £2,000)								
First offence £1,000 (or £750 if paid within 21 days)	1,000.00	0.00	1,000.00	1,000.00	0.00	1,000.00	0.00%	Externally set
All other offences £2,000 (or £1,500 if paid within 21 days)	2,000.00	0.00	2,000.00	2,000.00	0.00	2,000.00	0.00%	Externally set
Planning								
Planning Fees	The full details of current Planning fees can be found on https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf							
Environmental Health								
Public Health Control of Diseases Act 1984								
Various Fixed Penalty Notices (FPN's) issued under the Coronavirus legislation								
Pollution Prevention Control (PPC)								
A2 Process Application Fees								
A2 New application	3,363.00	0.00	3,363.00	3,363.00	0.00	3,363.00	0.00%	Externally set
Additional fee for operating without a permit (A2 and Standard Part B)	1,188.00	0.00	1,188.00	1,188.00	0.00	1,188.00	0.00%	Externally set
A2 Process Subsistence Fees								
A2 Low	1,447.00	0.00	1,447.00	1,447.00	0.00	1,447.00	0.00%	Externally set
A2 Medium	1,610.00	0.00	1,610.00	1,610.00	0.00	1,610.00	0.00%	Externally set
A2 High	1,747.00	0.00	1,747.00	1,747.00	0.00	1,747.00	0.00%	Externally set
A2 Low (E-PRTR)	1,551.00	0.00	1,551.00	1,551.00	0.00	1,551.00	0.00%	Externally set
A2 Medium (E-PRTR)	1,715.00	0.00	1,715.00	1,715.00	0.00	1,715.00	0.00%	Externally set
A3 High (E-PRTR)	2,438.00	0.00	2,438.00	2,438.00	0.00	2,438.00	0.00%	Externally set
Part B Process Application Fees								
Part B (Standard Process)	1,650.00	0.00	1,650.00	1,650.00	0.00	1,650.00	0.00%	Externally set
Part B Standard Process Subsistence Fees								
Part B Subsistence low	772.00	0.00	772.00	772.00	0.00	772.00	0.00%	Externally set
Part B Subsistence medium	1,161.00	0.00	1,161.00	1,161.00	0.00	1,161.00	0.00%	Externally set
Part B Subsistence high	1,747.00	0.00	1,747.00	1,747.00	0.00	1,747.00	0.00%	Externally set

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Part B Reduced Fee Application Fees (including car re-sprayers)								
Reduced fee application fee	362.00	0.00	362.00	362.00	0.00	362.00	0.00%	Externally set
Part B Reduced Fee Subsistence Fees (including car re-sprayers)								
Reduced fee subsistence low	228.00	0.00	228.00	228.00	0.00	228.00	0.00%	Externally set
Reduced fee subsistence medium	365.00	0.00	365.00	365.00	0.00	365.00	0.00%	Externally set
Reduced fee subsistence high	548.00	0.00	548.00	548.00	0.00	548.00	0.00%	Externally set
Petrol Vapour Recovery I and Dry Cleaners Application Fees								
PVR I & DC New Application	155.00	0.00	155.00	155.00	0.00	155.00	0.00%	Externally set
Petrol Vapour Recovery I and Dry Cleaners Subsistence Fees								
PVR I and DC subsistence fees low	79.00	0.00	79.00	79.00	0.00	79.00	0.00%	Externally set
PVR I and DC subsistence fees medium	158.00	0.00	158.00	158.00	0.00	158.00	0.00%	Externally set
PVR I and DC subsistence fees high	237.00	0.00	237.00	237.00	0.00	237.00	0.00%	Externally set
Petrol Vapour Recovery I & II Combined Application Fees								
PVR I & II Application Fees	257.00	0.00	257.00	257.00	0.00	257.00	0.00%	Externally set
Petrol Vapour Recovery I & II Combined Subsistence Fees								
PVR I & II Subsistence low	113.00	0.00	113.00	113.00	0.00	113.00	0.00%	Externally set
PVR I & II Subsistence medium	226.00	0.00	226.00	226.00	0.00	226.00	0.00%	Externally set
PVR I & II Subsistence high	341.00	0.00	341.00	341.00	0.00	341.00	0.00%	Externally set
Part B Mobile Concrete Crusher Plant – Application Fee per Number of Permits								
1 – 2	1,650.00	0.00	1,650.00	1,650.00	0.00	1,650.00	0.00%	Externally set
3 – 7	985.00	0.00	985.00	985.00	0.00	985.00	0.00%	Externally set
8 or more	498.00	0.00	498.00	498.00	0.00	498.00	0.00%	Externally set
Part B Mobile Concrete Crusher Plant – Subsistence Fee per Number of Permits								
1 – 2 Low	626.00	0.00	626.00	626.00	0.00	626.00	0.00%	Externally set
1 – 2 Medium	1,034.00	0.00	1,034.00	1,034.00	0.00	1,034.00	0.00%	Externally set
1 – 2 High	1,551.00	0.00	1,551.00	1,551.00	0.00	1,551.00	0.00%	Externally set
3 – 7 Low	385.00	0.00	385.00	385.00	0.00	385.00	0.00%	Externally set
3 – 7 Medium	617.00	0.00	617.00	617.00	0.00	617.00	0.00%	Externally set
3 – 7 High	924.00	0.00	924.00	924.00	0.00	924.00	0.00%	Externally set
8 or over Low	198.00	0.00	198.00	198.00	0.00	198.00	0.00%	Externally set
8 or over Medium	316.00	0.00	316.00	316.00	0.00	316.00	0.00%	Externally set
8 or over High	473.00	0.00	473.00	473.00	0.00	473.00	0.00%	Externally set
Late Payment of Subsistence Fee								
All Permits	52.00	0.00	52.00	52.00	0.00	52.00	0.00%	Externally set
Operating without a Permit Fee								
Reduced Fee Activities	71.00	0.00	71.00	71.00	0.00	71.00	0.00%	Externally set
Standard Part B and A2	1,188.00	0.00	1,188.00	1,188.00	0.00	1,188.00	0.00%	Externally set

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Electoral Services								
Purchase of Electoral Register								
Full Register and the Notices of Alteration								
Hard copies (standard charge) plus charge (a) below	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Externally set
(a) charge for each 1,000 entries	5.00	0.00	5.00	5.00	0.00	5.00	0.00%	Externally set
Data format (standard charge) plus charge (b) below	20.00	0.00	20.00	20.00	0.00	20.00	0.00%	Externally set
(b) charge for each 1,000 entries	1.50	0.00	1.50	1.50	0.00	1.50	0.00%	Externally set
List of Overseas Electors								
Hard copies (standard charge) plus charge (c) below	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Externally set
(c) charge per 100 entries	5.00	0.00	5.00	5.00	0.00	5.00	0.00%	Externally set
Data format (standard charge) plus charge (d) below	20.00	0.00	20.00	20.00	0.00	20.00	0.00%	Externally set
(d) charge per 100 entries	1.50	0.00	1.50	1.50	0.00	1.50	0.00%	Externally set
Open (Edited) Register								
<i>(Available for purchase by anyone)</i>								
Hard copies (standard charge) plus charge (e) below	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Externally set
(e) charge per 1,000 entries	5.00	0.00	5.00	5.00	0.00	5.00	0.00%	Externally set
Data format (standard charge) plus charge (f) below	20.00	0.00	20.00	20.00	0.00	20.00	0.00%	Externally set
(f) charge per 1,000 entries	1.50	0.00	1.50	1.50	0.00	1.50	0.00%	Externally set
Marked Polling Station and Absent Voter Registers								
Hard copies (standard charge) plus charge (g) below	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Externally set
(g) charge per 1,000 entries	2.00	0.00	2.00	2.00	0.00	2.00	0.00%	Externally set
Data format (standard charge) plus charge (h) below	10.00	0.00	10.00	10.00	0.00	10.00	0.00%	Externally set
(h) charge per 1,000 entries	1.00	0.00	1.00	1.00	0.00	1.00	0.00%	Externally set
Housing and Community Services								
Liquor Licensing								
Main Application Fees for Premises and Personal Liquor Licensing								
Rateable Value B and A	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Rateable Value B and B	190.00	0.00	190.00	190.00	0.00	190.00	0.00%	Externally set
Rateable Value B and C	315.00	0.00	315.00	315.00	0.00	315.00	0.00%	Externally set
Rateable Value B and D	450.00	0.00	450.00	450.00	0.00	450.00	0.00%	Externally set
Rateable Value B and E	635.00	0.00	635.00	635.00	0.00	635.00	0.00%	Externally set
Main Annual Charge for Premises and Personal Liquor Licensing								
Rateable Value B and A	70.00	0.00	70.00	70.00	0.00	70.00	0.00%	Externally set
Rateable Value B and B	180.00	0.00	180.00	180.00	0.00	180.00	0.00%	Externally set
Rateable Value B and C	295.00	0.00	295.00	295.00	0.00	295.00	0.00%	Externally set
Rateable Value B and D	320.00	0.00	320.00	320.00	0.00	320.00	0.00%	Externally set
Rateable Value B and E	350.00	0.00	350.00	350.00	0.00	350.00	0.00%	Externally set
Personal licence for alcohol	37.00	0.00	37.00	37.00	0.00	37.00	0.00%	Externally set
Personal licence change	10.50	0.00	10.50	10.50	0.00	10.50	0.00%	Externally set
Premises licence change	23.00	0.00	23.00	23.00	0.00	23.00	0.00%	Externally set
Transfers	23.00	0.00	23.00	23.00	0.00	23.00	0.00%	Externally set
Temporary events	21.00	0.00	21.00	21.00	0.00	21.00	0.00%	Externally set
Register of interests	21.00	0.00	21.00	21.00	0.00	21.00	0.00%	Externally set

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Licensed Premises Gaming Machine Permit								
Grant	150.00	0.00	150.00	150.00	0.00	150.00	0.00%	Externally set
Existing operator grant	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Variation	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Transfer	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
Annual fee	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
Change of name	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
Copy of permit	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Externally set
Licenses Premises Automatic Notification Process								
On notification	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
Club Gaming Permits								
Grant	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Grant (Club Premises Certificate holder)	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Existing Operator Grant	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Variation	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Renewal fee	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Renewal (Club Premises Certificate Holder)	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Annual Fee	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
Copy of permit	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Externally set
Club Machine Permits								
Grant	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Grant (Club Premises Certificate holder)	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Existing Operator Grant	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Variation	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Renewal fee	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Renewal (Club Premises Certificate Holder)	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Annual Fee	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
Copy of permit	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Externally set
Family Entertainment Centre Gaming Machine Permits								
Application fee	300.00	0.00	300.00	300.00	0.00	300.00	0.00%	Externally set
Renewal fee	300.00	0.00	300.00	300.00	0.00	300.00	0.00%	Externally set
Transitional application fee	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Change of name	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
Copy of permit	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Externally set
Prize Gaming Permits								
Grant	300.00	0.00	300.00	300.00	0.00	300.00	0.00%	Externally set
Renewal	300.00	0.00	300.00	300.00	0.00	300.00	0.00%	Externally set
Existing Operator Grant	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Change of name	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
Copy of permit	15.00	0.00	15.00	15.00	0.00	15.00	0.00%	Externally set
Annual Fee	20.00	0.00	20.00	20.00	0.00	20.00	0.00%	Externally set
Small Lottery Registration								
Grant	40.00	0.00	40.00	40.00	0.00	40.00	0.00%	Externally set
Annual Fee	20.00	0.00	20.00	20.00	0.00	20.00	0.00%	Externally set

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	2024/25			2025/26			Increase	Fee Structure
	Charge	VAT 20%	Total Charge	Charge	VAT 20%	Total Charge		
	£	£	£	£	£	£		
Environment & Leisure								
Civil Parking Enforcement - Penalty Charge Notices (rate depends on offence)								
Lower Penalty System								
Up to 14 Days	25.00	0.00	25.00	25.00	0.00	25.00	0.00%	Externally set
14 days to 56 days	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
57 days to 70 days	75.00	0.00	75.00	75.00	0.00	75.00	0.00%	Externally set
After 70 days	82.00	0.00	82.00	82.00	0.00	82.00	0.00%	Externally set
Higher Penalty System								
Up to 14 days	35.00	0.00	35.00	35.00	0.00	35.00	0.00%	Externally set
14 days to 56 days	70.00	0.00	70.00	70.00	0.00	70.00	0.00%	Externally set
57 days to 70 days	105.00	0.00	105.00	105.00	0.00	105.00	0.00%	Externally set
After 70 days	112.00	0.00	112.00	112.00	0.00	112.00	0.00%	Externally set
Environmental Fixed Penalty Notices								
Anti Idling (failure to turn off engine once requested to do so)	20.00	0.00	20.00	20.00	0.00	20.00	0.00%	Externally set
Abandoning a vehicle	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Repairing vehicles on a road (or) exposing vehicles for sale on a road	100.00	0.00	100.00	100.00	0.00	100.00	0.00%	Externally set
Smoking in a smoke free premises or vehicle	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
Failure to display no smoking signs in smoke free premises or vehicle	200.00	0.00	200.00	200.00	0.00	200.00	0.00%	Externally set
Smoking in an enclosed vehicle carrying a person under 18	50.00	0.00	50.00	50.00	0.00	50.00	0.00%	Externally set
¹ Increases to £40 if not paid within 28 days								
² Reduced to £30.00 if paid within 15 days								
³ Reduced to £150.00 if paid within 15 days								

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1. Risk Assessment

The Council takes a measured risk-based approach to the budget setting process

- 1.1 A comprehensive financial risk assessment is undertaken for the revenue and capital budget setting process to ensure that all risks and uncertainties affecting the Council's financial position are identified as far as is reasonably practical. These are reviewed each year as part of the refresh of the MTFs and future year's budget forecasts. The key strategic financial risks to be considered in developing the MTFs are included within the table below.
- 1.2 Medium term financial planning, set against a backdrop of severe reductions in Government funding and unprecedented economic challenges, both nationally and globally, carries with it a significant element of risk. Many factors may impact on the figures presented here and themes have been highlighted where appropriate. Most significant are the spending pressures (waste/homelessness) and the future funding position for local government following ongoing delays with things such as the Fair Funding Review. All of these issues are placing further pressure on the council in the delivery of a balanced budget, without impacting on frontline services.
- 1.3 There were issues for the first few months of the implementation of the new waste contract and a rerouting exercise was undertaken in September to help address the problem with continued missed bins. A special meeting of the Environment and Climate Change Committee has been scheduled to scrutinise the contract implementation. The scale of the waste and street cleansing contract will always provide an element of risk to the council, but there are measures in place to minimise the impact of that risk.
- 1.4 A return to recession would present further risk to the budget position, in particular significant areas of income such as lettings income, planning fees and car park income that are linked directly to economic demand. Although a recession has so far been avoided and interest rates are now beginning to fall there remains a risk to future impact on the council's income streams.
- 1.5 Uncertainty around current and future local government finance policy will undoubtedly affect our finances over the coming years but hopefully this will become more stable following this year's general election.
- 1.6 Despite these risks, we will continue to plan effectively to strengthen our culture of strong financial management so that the Council can continue to meet its Corporate Plan priorities and provide the best possible services to the borough.
- 1.7 As part of strengthening the financial management of the Council, we will be looking to deliver a medium term financial policy that details future savings beyond 2025-26 to show how the budget will remain balanced over the four year period.

Risk	Likelihood	Impact	Risk Management
Future available resources less than assumed.	Possible	High	Annual review of reserves and reserves policy to identify future resources. Assumptions on funding for 2025/26 and beyond are based on best estimates at this time. A prudent approach has been adopted based on previous years' experience as well as

			using regional network contacts to inform modelling.
Escalating costs of local plan and planning service	Likely	High	Ongoing recruitment delays are adding significant cost to the service with the use of locums. The additional requirements for evidence to support the local plan is also adding pressure to the budget position. The unknown cost of the Highsted Park call in by the Secretary of State will also need to be considered.
Efficiency/transformation initiatives not delivered	Possible	High	The MTFS is currently forecasting significant budget gaps, peaking at £5.4m in 2028/29. Use of one-off reserves to help plug these gaps is not sustainable.
Planned savings not delivered	Possible	High	The MTFS contains budget changes resulting from agreed service changes. Ongoing monitoring of the achievement of these, through regular budget monitoring, will help identify any issues.
Uncertainty around government grant funding	Likely	High	The MTFS is currently forecasting government grant funding of £2.3m in 2025/26. However, 2024/25 is expected to be the final year for most of these grants, so this adds £1.95m to the annual future savings requirement. There may be transitional support available, but this is currently an unknown.
Uncertainty around county council funding	Likely	High	A number of council services are supported through funding from KCC. If the funding is removed, the burden will fall to Swale and increase the budget gap. Managers are working closely with KCC to manage the risk to finances and service delivery.
Deadline pressure on capital project funding	Possible	Medium	Delays in funding announcements, without extensions to project end dates creates risk that projects may not receive the full funding award. Project Managers are in constant contact with government to raise the awareness of this

			issue and to request extensions to the end date where possible.
Overreliance on reserve contributions supporting base budget deficits which is not a sustainable position.	Likely	High	Early preparation of 2026/27 MTFS to address the ongoing budget gap and deliver a sustainable base budget position.
Volatility of business rates funding given uncertainty around impact of appeals.	Likely	High	Volatility of funding stream outside of council control but impact mitigated by establishment of specific earmarked reserve and financial monitoring framework. Modelling of potential impacts is used to inform internal financial planning.
Pay Awards, fee increases and price inflation higher than assumed.	Possible	Medium	Impact of potential increases mitigated by central contingency budget for pay, price increases and fees. Where pay awards have been agreed these will be factored into the future estimates.
Future spending plans underestimated.	Possible	Medium	Service planning process identifies future budget pressures, and these will inform the indicative budget forecasts. An effective budget monitoring framework is in place to identify in year and potential future cost pressures.
Revenue implications of capital programmes not fully anticipated.	Unlikely	Low	Capital bid approval framework identifies revenue implications and links to Council priorities. Full analysis of revenue implications assessed and considered in scenario planning.
Income targets not achieved.	Possible	Medium	Regular budget monitoring and reporting takes place. Review of fees and charges included within the budget build process.
Budget monitoring not effective.	Unlikely	High	Regular monitoring and reporting in line with corporate framework. Action plans developed to address problem areas. Track record of delivering budget.
Exit strategies for external funding ceasing/tapering not met.	Possible	Medium	Regular monitoring and reporting, medium-term planning, review of fixed term funding and posts completed.

Loss of principal deposit.	Unlikely	Medium	Limited by the controls in the Treasury Management Strategy which balance security of deposit over returns. Impact limited due to the strategy of a diverse portfolio with top rated institutions.
Interest rates lower than expected.	Unlikely	Low	Regular review, monitoring and reporting on interest rates. Prudent assumptions on likely interest rates for 2025/26 will be incorporated into the budget.
Collection rates for retained business rates and council tax lower than anticipated.	Possible	High	Impact mitigated by the review of bad debt provisions and availability of reserves. Monitoring of Collection Fund is formally incorporated into the revenue monitoring process.
All MTFS risks not adequately identified.	Unlikely	Low	Council's Risk Management Framework ensures all operational and strategic risks are identified as part of the annual service planning process.

Recommendations for approval

Swale Joint Transportation Board - 7 October 2024

Minute No. 317 – Informal Consultation Results – Petition for Residents’ Parking, Wellwinch Road, Sittingbourne

(1) That the results of the recent informal consultation with residents of Wellwinch Road, Victoria Road and Regency Court, Sittingbourne be noted and the Residents’ Parking Scheme is not extended into any of these roads.

Minute No. 318 – Formal objections to Traffic Regulation Order Swale Amendment 56 2024

(1) That the formal responses received during the consultation period for the Traffic Regulation Order be noted, and:

- a. The disabled persons’ parking bay outside 6 Bredhurst Close, Sheerness be formalised.***
- b. The proposed double yellow lines in Park Road, Faversham be removed from the current Order until an informal consultation has taken place with residents on these and other requested double yellow lines in Park Road.***

Minute 319 – Petition – Request for Residents’ Parking Scheme, Belmont Road, Faversham

(1) That the submitted petition be noted and officers undertake an informal consultation with residents of Belmont Road, Faversham on the possible introduction of a Residents’ Parking Scheme on this road.

Minute 320 – Informal Consultation Results – Proposed Removal of Disabled Persons’ Parking Bays & Installation of Double Yellow Lines – Strode Crescent, Sheerness

- (1) That the results of the recent informal consultation with residents be noted and the disabled bays be removed, and a double yellow line be installed, and officers look at installing dashed lines for parking partially on the footway.***
- (2) That residents be consulted upon the option of extending double yellow lines on the opposite side of the road.***
- (3) That the Chair and Vice-Chair of the Joint Transportation Board (JTB) look further into the Council’s byelaws at the next JTB Chair’s briefing in relation to the issue of parked commercial vehicles on residential streets.***

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Policy and Resources Committee Forward Decisions Plan – November 2024

Report title, background information and recommendation(s)	Date of meeting	Open or exempt?	Lead Officer and report author
Final Budget 2025/26	5 February 2025	Open	Head of Service: Claire Stanbury Report Author: Caroline Frampton and Claire Stanbury
Review of the Discretionary Rate Relief Policy	5 February 2025	Open	Head of Service: Lisa Fillery Report Author: Zoe Kent
Treasury Management Strategy 2025/26	5 February 2025	Open	Head of Service: Claire Stanbury Report Author: Olga Cole and Claire Stanbury
Newington Conservation Area Appraisals: - Newington Church - Newington High Street - Newington Manor	5 February 2025	Open	Head of Service: Joanne Johnson Report Author: Jhilmil Kishore
Conservation Area Appraisals: - Bredgar – Bexon (New) - Graveney Church - Graveney Bridge - Goodnestone Graveney	5 February 2025	Open	Head of Service: Joanne Johnson Report Author: Jhilmil Kishore
Pay Policy Statement	5 February 2025	Open	Head of Service: Bal Sandher Report Author: Bal Sandher
Adoption of Swale Business Continuity Policy	5 February 2025	Open	Head of Service: Stephanie Curtis Report Author: Uche Olufemi
South Thames Gateway Building Control Business Plan 2025-2028 - approval	5 February 2025	Open	Head of Service: Joanne Johnson Report Author: Joanne Johnson
Swale Health & Safety Tree Works	5 February 2025	Open	Head of Service: Jay Jenkins Report Author: Steven Gale

Public Space CCTV Policy for Sign-off	26 March 2025	Open	Head of Service: Charlotte Hudson Report Author: Steph Curtis
Empowering You in Swale – Community Development Strategy sign off	26 March 2025	Open	Head of Service: Stephanie Curtis Report Author: Sarah-Jane Radley

Policy and Resources Committee	
Meeting Date	27 November 2024
Report Title	South Thames Gateway Building Control Partnership Business Plan 2025 – 2028
EMT Lead	Emma Wiggins Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson Head of Place
Lead Officer	Joanne Johnson Head of Place
Classification	Part Open / Part Exempt
Recommendations	<ol style="list-style-type: none"> 1. Members are asked to provide comment on the draft South Thames Gateway Building Control Partnership (STGBC) Business Plan for 2025 – 2028. 2. Members are asked to endorse a partnership review of STGBC budget and expenditure during the course of the next financial year to evaluate the appropriateness of the chosen financial model.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to seek comments on the draft South Thames Gateway Building Control Partnership (STGBC) Business Plan for 2025 – 2028.
- 1.2 The STGBC Constitution states that before 1 October each year the STGBC Joint Committee is required to approve and send its draft Business Plan for the following year to each partner authority for comment. This draft was considered at the STGBC Joint Committee meeting of 26 September 2024.
- 1.3 This draft Business Plan sits within the Council's membership of the fourth term of the STGBC partnership.
- 1.4 Following consideration by each partner authority, the revised business plan will be reviewed at the December STGBC Joint Committee, including the final financial statement. This will then return to each authority for ratifying in the new year.
- 1.5 The Joint Committee has a duty under the Memorandum of Agreement to formally adopt the Business Plan at the Annual General Meeting.

2 Background

- 2.1 The STG Building Control Partnership (involving Medway, Gravesham and Swale) was formed in October 2007 with Canterbury joining in April 2018. Under the terms of the Memorandum Agreement between the partner authorities, a rolling business plan needs to be agreed.
- 2.2 Each partner authority is requested to comment on the draft business plan and advise the STBGC Joint Committee.
- 2.3 Much of the STGBC operation is subject to competition from approved inspectors within the private sector. The service however retains statutory responsibilities regarding public protection e.g. dangerous structures.
- 2.4 Over recent years, the service has found itself increasingly competing with approved inspectors within a diminishing market. This has put pressure on income generation within the service, and correspondingly has put pressure on the resourcing of the service itself. This has been exacerbated by the Building Safety Act 2022 which mandated the licensing of all individuals within the profession, placing further pressure on staff resources, with many surveyors opting to leave the profession / not operate at advanced levels. This is set against a national picture of 25% of local government building control posts being vacant (LGA Capacity Survey – Building Control: December 2023).
- 2.5 The draft Business Plan 2025-2028 (Appendix I) outlines how the building control function is proposed to be delivered on behalf of the partnership local authorities up until 2028, and forecasts budget contributions from 2025/26 to 2027/28.
- 2.6 It sets out steps to secure ongoing stability in the face of resourcing and regulatory challenges. Three possible future financial and operational models are proposed. At its meeting of 26 September 2024, Joint Committee agreed to recommend option 3, with an end of year financial review to determine its ongoing suitability.

3 Proposals

- 3.1 Members are asked to comment on the draft South Thames Gateway Building Control Partnership Business Plan for 2025 – 2028.

4 Alternative Options

- 4.1 The Council could consider recommending option 1 or option 2. Option 1 is not considered to offer a sustainable future for the partnership. Both alternative options were considered in detail during the Joint Committee on 26 September 2024. The Committee shared the view that option 1 would not be a sustainable choice. Option 2 was rejected as the least affordable for the partner authorities, and was considered be out of kilter with local financial pressures. Option 3 (plus review) was the Joint Committee's recommendation.

4.2 The Council could consider removing itself from the partnership (by giving the requisite year's notice). However, one of the recognised successes of STGBC is the efficiencies secured by economies of scale. This has been borne out through separate reviews undertaken by the partner authorities. There is considerable value in resilience and risk mitigation through being part of the partnership. As such, this option is not recommended.

5 Consultation Undertaken or Proposed

5.1 The draft Business Plan was approved by the STGBC Joint Committee at its meeting of 26 September 2024. Councillor Gibson is Swale Borough Council's representative on this Joint Committee.

5.2 Officer input had been sought and provided on earlier drafts, from Planning and Finance teams.

5.3 This same process is carried out with each of the partner authorities.

6 Implications

Issue	Implications
Corporate Plan	The Business Plan supports the 'Running the Council' priority of the Corporate Plan, by supporting the operation of a fiscally sound and resilient partnership arrangement.
Financial, Resource and Property	<p>Costs involved in being a partner authority are set out in the appendix.</p> <p>The Medium Term Financial Plan will reflect the proposed contributions as set out in the appendix.</p> <p>Finance colleagues were consulted on the draft plan.</p>
Legal, Statutory and Procurement	<p>The Partnership and Joint Committee operate under a memorandum of agreement signed by each of the partner authorities.</p> <p>Legal colleagues were consulted on the draft plan.</p>
Crime and Disorder	Effective control and enforcement of building standards and dealing with dangerous structures is consistent with an increased perception of security and wellbeing.
Environment and Climate/Ecological Emergency	None identified at this stage

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	The risk of insufficient operational resources is documented in the appendix. The Building Control function makes important contributions to health and safety, many of which are statutory.
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: Draft STBGC Business Plan 2025 – 2028 (exempt)

8 Background Papers

[Local Government Capacity Survey – Building Control: December 2023](#)

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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