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

1 Purpose of Report and Executive Summary

1.1   The document '*Looking Ahead*' was published to provide a consultation opportunity to help scope the content for the next Local Plan. The consultation was responded to by 283 parties, making a total of 3,308 responses. An accompanying quick questionnaire was responded to by 481 respondents including 30 responses from schools. In addition to the set options responses to the 11 QQ questions, a further 1,781 free text comments were submitted.

1.2   The purpose of this report is to:

1) Report back the responses made to both the consultation itself and the quick questionnaires, together with the outcomes of a series of workshops held.

2) Highlight the main issues raised via the consultation and how they will be taken forward to the next stage of the Local Plan process.

3) Seek a steer from Members on a number of key questions posed by the consultation.

2 Background

2.1   The document '*Looking Ahead*' (*LA*) was agreed by Panel on 28 March and subsequently published for a 6-week consultation that ran from 27 April to 11 June 2018. It was also supported by quick questionnaires (*QQ*). Their purpose was to provide a consultation opportunity to help scope the content for the next Local Plan and to also help establish community priorities across a range of planning matters.

2.2   Letters were sent to some 2,000 individuals and organisations on the Council's planning policy data base. The consultation material was made available online (the website and consultation portal), via a limited number of hard copies and through Council offices and local libraries. Press coverage and social media assisted the consultation. It was necessary for the Council to amend the consultation format to ensure that the consultation was framed in a way to be

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

2.3   *LA* sought views on 46 questions ranging from the national and local challenges facing the economy, housing, infrastructure, climate change, transport and the environment. It also began to explore some of the issues around the possible settlement strategy for the next Local Plan. It posed questions about a new Local Plan vision, what the alternative approaches to distributing development should be and, specifically, whether the Council should be considering new settlements.

2.4   As a wide-ranging document, *LA* was intended for audiences including local communities, planning professionals, developers and statutory consultees. Recognising that not all would have the time or inclination to address all the matters being canvassed, a quick priority setting questionnaire (*QQ*), aimed principally at residents, was also made available. Overall the *QQs* were intended to allow more instant reactions to issues and contained 11 questions, with opportunities to input free text. It also asked some GDPR compliant general questions about the respondent, but was anonymous. Officers also targeted the *QQ* at local schools via the Council's Youth Forum.

2.5   To support the consultation, five invitee only technical workshop/discussions were held, attended by representatives from a range of organisations. Notes of these workshops are included in Appendix IIIa-d.

- Developer/landowners: 27 April 2018. This coincided with the launch of the Council's *New Garden Communities Prospectus*, but the event was also used to consider the approach to meeting future development needs in the Borough and how such issues as improving delivery of housing and infrastructure could be tackled.

- Infrastructure and utilities: 12 June 2018 and attended by 11 services and organisations, including most of the principal infrastructure providers. This considered the big infrastructure issues affecting future growth, but also took the opportunity to look at the initial expressions of interest made to the Council's *New Garden Communities Prospectus*.

- Natural Environment: 22 June 2018 and attended by 15 organisations, including most of the principal environmental organisations. This considered the main natural environmental challenges ahead for the Local Plan, but again, also took the opportunity to look at the initial expressions of interest made to the Council's *New Garden Communities Prospectus*.

- Heritage and Culture: 28 June 2018 and attended by 11 organisations, including Historic England. This considered the main challenges to the historic environment, but also its links with tourism and culture, as well as culture and tourism issues generally.

- Rural Communities: 4 July 2018 and attended by 9 organisations, including CPRE, and Action with Communities in Rural Kent as well as English Rural Housing Association. This considered the main issues affecting the future of rural communities and also considered their role in meeting future development needs.

2.6   The consultation itself conformed to the Council's Statement of Community Involvement. Whilst some Members had expressed concern at the proposed anonymity of the *QQ* a similar approach was used in the early stages of the last Local Plan and they are effective at this stage where a lack of personal information is not particularly essential. The requirement under GDPR that only information necessary for the performance of the task is collected resulted in a decision being made to only collect post code details. Whilst some Members and consultees

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

2.7 For the *LA* consultation itself, it was more possible, with some considerable pre-publication work, to embed the GDPR requirements. However, in reporting back the representations within the schedules attached to this report and in the Members Room, it has been necessary to withhold personal details, in the case of private individuals, even in cases where they may have consented to have them displayed. This is because the online 'Objective' system currently only has the ability to turn on or off the details in totality rather than for each individual respondent. Therefore, individuals are simply known by their ID number, although the names of organisations can and have been displayed. 'Objective' is working to change this in future to allow those who opt in or out to be displayed as appropriate.

2.8 At the heart of the concern about the anonymity of the *QQ* was its possible manipulation, particularly from developers. However, this has been checked and no evidence of misuse of the system in this way has been found and the content of the results would bear this out.

2.9 The *QQ*, with its use of ranked choices within each question enables 'Objective' (if that is wished) to 'smooth' out the effects of co-ordinated responses. This is because whilst people may all choose the same first choice, they rarely all pick the same 2nd, 3rd, 4th and so on. 'Objective' applies scoring to the numbers of persons selecting each choice made, so as well as looking at the top answer to a given question (Top Preference at Appendix II), the Panel is able to also look at the 'Overall Preference Scoring' at the end of each question. This can sometimes give a more rounded picture that considers every preference and the number of people who selected each. In most cases, this makes little difference to the outcome shown under 'Top Preference ', but for some questions 'Overall Preference Scoring' can bring out nuances that can be considered.

Discussion of the representations

2.10 Full copies of all the representations to both *LA* and the *QQ*s are available in the Members Room. Three Appendices are included within this report:

1) A summary of the responses received to each of the questions in *LA*, together with a summary of the further actions needing to be carried forward (Appendix I).

2) 'Pie Chart' reports of the responses to the *QQ*s, together with a compiled summary of the main issues raised in free text boxes (Appendix II).

3) Attendance and meeting notes of the four workshops held to support the consultation (Appendix IIIa-d).

2.11 The main covering report is structured as follows:

1. Discussion on the overall nature/character of the comments made.

2. Commentary on the characteristics of the responders themselves (i.e. type, location, age, etc.).

3. 'Headline' comments highlights.

4. Consideration of the *LA* questions themselves, with reference to the *QQ*s and workshop responses as appropriate. Overall themes are picked out in the answers to the question, together with key points that the Council will need to take forward. For some questions, the Panel are asked to give a specific direction to officers on the way forward. However, in many cases it will be premature to do so, given that evidence gathering is still at a relatively early stage.

The overall nature and character of the comments

2.12   The *LA* consultation was responded to by 283 parties, making a total of 3308 responses. 460 QQ were returned, plus 30 questionnaires which were tailored to local schools. There will of course have been parties who responded to both consultation opportunities.

2.13   Many have engaged with the questions as they were intended, although frustration has emerged in the responses particularly with the national housing targets and the impotency of the Council to change them; issues arising from the Bearing Fruits Plan; and poor overall levels of trust in the Council, consultants and developers.

Who responded?

2.14   For *LA*, some 64 respondents out of the total of 283 filled out the Equalities section of the questions, but not all of the questions were answered. Consequently, only a fairly basic range of information has been extracted.   Some 50% of those responding were in the 61-74 years age group, with 30% aged 45-60; and a further 16% aged 25-44. There was a fairly equal split between men and women. 90% of respondents were married and all were English. 80% were abled bodied. Of the people responding to these issues 75% were from the ME9 postcode area; and 20% from ME10, so a considerable focus on Sittingbourne end of the Borough. Less than 1% of people answering this section were from the Faversham postcode area.

2.15   In the case of the *QQ*, responses are split roughly 50:50 between those below and those above 60, but with those from the 60-74 age group forming the largest and those below 30 and over 75 the smallest. The stereo typical responder appears, on the face of it, likely to be a person who is employed or retired and a home owner. They are also likely to be White, British and living in the wider Sittingbourne area. Some 90% of the question responses were from residents, with the remainder made up of (in descending order) businesses, developers, groups, visitors and 'other'.

2.16   In terms of the overall levels of response for both *LA* and the *QQs*, clearly there is a significant majority of the population of Swale whose opinions are entirely absent. This is partly due to the nature of this stage in plan preparation where parties do not tend to get involved until there is something more definite and possibly site(s) specific which the Council itself is seeking views on. There is also the historic problem of the general inability nationally for the local planning process to engage wider communities beyond the so-called usual suspects. This is not to say that the silent majority do not share the views of those who have made comments; it's just simply the case that planning consultations frequently do not reach them to enable this to be determined one way or the other. On a positive note, response levels are greater for the *LA* campaign than at the equivalent stage for *Bearing Fruits*.

2.17   In the case of the *QQ* for schools, the low level of response was not helped by the timing of the consultation (at the end of the school year) and thus its outcomes need to bear this in mind. However, this questionnaire does bring out nuances from the different age profile of those responding to the main *QQ* and these are highlighted in the report as appropriate.

2.18   Given the relatively moderate level of overall responses, is there a criticism that can be levelled at the consultation arrangements themselves or the consultation documents? – there are a small number of responses who highlight this. Concerns relate to the online portal not working or the *LA* questions being too complicated and/or too time consuming. Some parties repeat difficulties that they have heard from someone else, but overall, the level of responses suggest little to support the view that people just gave up due to difficulties.

2.19   It was never the case that all 46 *LA* questions were compulsory for all to answer and the *QQ* gave the opportunity for those who did not have the time to engage in a different way. It is

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

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

The 'big' themes

2.21   The following is a digest of the 'big' themes from all the consultation responses. It comes as no real surprise that the biggest issue is housing – how much and where it should go. In the case of *LA*, residents, amenity groups and Parish Council's, form the clear majority, with a strong Sittingbourne based emphasis. These parties believe that growth has gone too far and that the social and environmental implications, particularly for infrastructure/services (esp. health and roads) and, notably, food production and wildlife, are unacceptable. Specific proposals (not part of the consultation) come in for particular criticism. If development is to be contemplated, then other parts of the Borough are generally suggested from the location of the commentator, but with a strong belief that only brownfield land with higher density should be used. Many have found it difficult to move beyond their fundamental concerns about housing numbers to engage meaningfully with the other questions posed by *LA*. Although similar concerns may be widespread, a more nuanced view is present in some representations. Such individuals are more likely to pose the question that if growth is to come, what will it offer and look like?

2.22   Developers are more likely to engage with wider questions, but, again, it is no surprise that they take the view that the Government's housing numbers represent the minimum. It can also be seen that the individual developer's response reflects their own particular site portfolio and, as a result, most advocate a variety of strategy responses to ensure that all the bases are covered. There is however, recognition that better development quality is needed; albeit more than tinged with a need for reality, flexibility and concerns about viability. Residents, amenity groups and Parish Council's want developers to be more tightly controlled and not allowed to 'get away with it', with more rigorous use of best practice standards by the Council.

2.23   On the constraints to the delivery of housing numbers, infrastructure providers and statutory consultees appear to keep their powders dry, but at the same time, no potential show-stoppers are flagged up by them at this time.

2.24   Residents, amenity groups and Parish Council's highlight future uncertainties and how these may require caution. Brexit is often cited, not only in terms of the belief that it will mean that less housing will be required, but also that more agricultural land will be needed to feed ourselves. There is a mix of views about the effects of technological changes, particularly their ability to deal with transport related problems.

2.25   Environmentally, there are strong themes from residents, amenity groups, Parish Council's and statutory bodies, both around the need to protect designated areas, but also the need for better environmental standards for wildlife, built design, for green building initiatives and green energy to tackle climate change. Renewable energy potential is viewed as a significant asset for the Borough.

2.26 Economically, there is much agreement about the need for jobs and what the future could include, but less around what areas should form the focus. There is however an emphasis on the need for a better educated future workforce and more training.

2.27 The poor quality of the Borough's town centres is cited, particularly Sittingbourne, which comes under fierce criticism for the quality of its shops, parking, pedestrian environment and the type of shopper it attracts.

The 'Looking Ahead' questions

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

2.29 Q1 and Q2 of *LA* related to GDPR and Equal Opportunities, which are dealt with earlier in the report.

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

2.30 This was an open ended question and rather than making specific reference to the adopted Local Plan, comments from residents, Parish/Town Councils and amenity groups raised general concerns about the potential scale and location of growth and its impact upon a wide range of infrastructure and the environment. Responses from developers and planning agents were of the view that the Council would need to meet the objectively assessed housing need set by the new standard methodology, but acknowledged the large challenges this presents. It was suggested that the adopted Local Plan's strategies and policies would need completely re-thinking.

2.31 Various pieces of evidence base are either planned or currently being prepared which will help inform future issues and options to deal with the concerns raised and at this point, no new matters have been identified. Eventual determination of the settlement strategy will be fundamental to how these issues move forward.

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

2.32 Q4 was answered in much the same way as Q3 and again shows that the key concerns for residents, Parish/Town Councils and amenity groups are housing and its impacts upon infrastructure and the built and natural environment. As touched upon above, many pieces of evidence base are imminent or underway to inform these matters including transport modelling, air quality modelling a Heritage Strategy and a Landscape Designation Review to name a few.

2.33 Developers and planning agents considered that a range of deliverable sites would be required to meet the challenging growth requirements before us and these issues will again be informed by a number of pieces of evidence currently planned, underway or completed, including a SHLAA, SHMA and Employment Land Review. At this point, no additional evidence requirements have been identified.

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

2.34 Responses to this question repeated many of the main issues raised and discussed in Q3 and Q4, however there was more of a steer towards things such as the impact of Brexit upon the population statistics and the resulting need for housing and agricultural land. The production of an evidence base for these issues is outside the remit of the local planning authority, as housing land targets will now be determined through the standard methodology introduced by the revised NPPF (2018). That has ONS population projections at its heart and consequently should reflect demographic trends. That said, Government has already committed through the Housing White Paper and policy statements to boosting housing delivery nationally to 300,00 dwellings per annum. Local Plan process and any future Government guidance on such impacts would be implemented as necessary.

2.35 Another issue more keenly raised in this question were the potential future changes in working environments and patterns, such as home working and automation. The recently completed Employment Land Review does touch upon these issues. A policy response will need to be an integral part of the overall local plan development strategy. Overall, responses to this question were again largely in line with the summaries outlined in the big themes above and no additional research requirements have been identified at this time.

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

2.36 Responses to this question tended to agree with the analysis noted in *LA*, but considered that the scale of potential growth would put many of the strengths at risk and possibly even push them into the weaknesses category. For example, a new settlement around Kent Science Park could destroy the outstanding natural environment currently listed as a strength. There was also some disagreement around the strength of having cheap land, and of the employment opportunities at large distribution centres and business parks. There was some disagreement over whether migration should be seen as a threat and developer/planning agent responses considered future growth to be an opportunity, where planned properly.

2.37 Many responders also used the question as another opportunity to raise their general concerns which have already been outlined and discussed above and others considered whether the Council had the will to actually deal with the matters raised. At this time, it is not considered that responses to this question raised matters which require any currently unidentified pieces of research or evidence.

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

2.38 This issue attracted substantial comment from residents, groups and Parish Councils. Most respondents felt that Swale's new employment sites should be located either in Sittingbourne, Faversham and Sheppey, either at existing employment locations or near good transport networks. There were conflicting views as to the suitability of the Kent Science Park to expand for further employment. Various other general points were made about where to locate employment development, these included:

- Adjacent to the motorway/main roads, rail links and local ports.

- On brownfield land.

- Located close to existing housing.

- Sites with the least ecological and landscape impacts should be used for employment use

- Good public transport corridors are required between housing areas and employment nodes.

- Employment in town centres to sustain retail and leisure.

- No green belt or agricultural land should be used for employment.

- Release land in smaller settlements and in deprived communities.

- Need to be in locations sought by employers.

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

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

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

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

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

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

2.44 Again, a wide range of answers were received with the most common response being around the issue of skills and opportunities for training. This includes the skills of both young people seeking to enter the workforce and adults, more support for apprenticeships and better public transport to education/skills providers. There was an interesting suggestion that there should be positive discrimination in planning and investment towards deprived communities, but how that would work in practical terms is unknown. There were suggestions that infrastructure needed improving, both to attract investment and to support existing residents. This included road infrastructure, health and social care provision and more affordable housing. This would require a multi-agency approach between the NHS, Social Services, schools, Police, businesses, KCC, etc.

2.45 There were a number of comments around enhanced investment into Sittingbourne & Sheerness town centres and the regeneration of existing housing estates with more sport, leisure and cultural facilities.

2.46 Responses to *QQ* Q3 on making stronger communities again highlighted supporting infrastructure for new development as the overwhelming requirement, with improved education facilities and development enabling people to live healthier lives highlighted.

2.47 A number of the responses were actions which are for central Government, rather than the Local Plan. These included a radical change to business rates to encourage businesses into Swale and the creation of small enterprise funds to encourage SME set ups. The Local Plan review will be supported by an Infrastructure Delivery Plan.

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

2.48 This issue attracted substantial comment from residents, groups and Parish Councils. There was a consensus that future policies need to be flexible for areas both beyond the core retail area and within it. Many responses felt that the future High Street would be about leisure/amenities/restaurants/culture, as well as retail units. There was also support for residential (especially affordable units) uses within both the core and the periphery and support for vacant shops being used for offices/hot desking opportunities, etc.

2.49 It was proposed that the LP policy needed to be a reactive policy as to what a town needed at any given time. This is supported by the NPPF which recommends flexible planning policies for town centres to allow them to react to changing trends and which allow the diversification of town centres. One group wanted Sheerness, Sittingbourne and Faversham to have their own specific regeneration/town plans.

2.50 A number of practical suggestions were made including assistance with improving the look of the current High Streets, especially some of the extremely architecturally attractive buildings in need of restoration, and free parking was also a popular choice.

2.51 *QQ* responses to Q2 on making our town centres more successful, highlighted image and appearance as the most important issue, with heritage and easier car parking as other key themes. This also reflected the view that allowing non shopping uses and housing in the town centres would assist with vitality. There were however conflicting views on whether encouraging more larger and multinational retailers and additional restaurants and coffee shops was a good or bad idea.

2.52 The existing town centre policies will need to be re-drafted to be more in line with the NPPF's move towards more flexible policies to allow town centres to accommodate changes in shopping

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

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

2.53 There were a few key themes raised in response to this question. The need for continued investment on Swale's existing strategic employment sites was a popular response, as was the need for these areas to be pro-actively managed and subject to continued investment to raise productivity. Another key theme was the need for investment in infrastructure improvements across Swale to support the needs of the strategic employment sites. The main infrastructure requirements suggested were the M2 J5 improvements and the completion of the NRR down to the A2.

2.54 One respondent suggested that all existing employment sites should be allocated/safeguarded for employment uses in the LP review. This is something that officers are investigating as it was also raised by the ELR consultants.

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

2.55 Responses to this question echo the broad themes highlighted in paras 2.28-2.34 above. There is no appetite within the responses from residents, Parish Councils and amenity groups that any imposed or higher housing target would be acceptable from the environmental and infrastructure perspectives. There is also a view that the problems caused by new housing is generated by non-locally generated needs, usually perceived as being from London. Developer responses also echo their general themes outlined in para 2.29 but stress the benefits of growth – better economy, more housing delivery, with more affordable homes and improved infrastructure.

2.56 Responses to Q4 of the *QQ* also considered this question. In the 'Preference Scoring', there is a clear view that other authorities should meet some or all of Swale's provision (36.8%), although 26% felt that Government targets should be adhered to. Some 22.7% made 'other' comments which largely related to the same reasons expressed above as to why a target should be reduced or even ignored.

2.57 A key question for Members to consider in due course is whether the exceptional circumstances required by the NPPF exist for Swale to pursue a lower housing target from that which will be set by the Government's standard housing methodology. The latest Government population projections indicate a housing target in the vicinity of 1,050 dwellings per annum as proposed in *LA*. This is against a downward trend for many other local authorities who have seen reductions as a result of lower than previously forecast in-migration figures. Whilst there is to be further consultation on the standard methodology, to enable MHCLG consideration of how the latest trends and distribution sits with the Government's stated objective of delivering 300,000 dwellings per annum nationwide, the Swale figure is not expected to reduce, not least as Swale's in migration trends remain significant (whereas other areas are showing a decline).

2.58 Residents who responded to the consultation believe there are strong reasons to seek a lower housing number (see above), whilst developers believe the opposite. The argument for lower numbers is the same one that ran through the adopted Local Plan process.

2.59 The question now is 'what has changed' and if things have, do they amount to exceptional circumstances? Obviously, the housing numbers have and it would clearly be wrong to deny that these will not increase pressures on infrastructure and environmental resources. However, for the revised NPPF (2018), the direction to Councils remains clear in that they:

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

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

2.60   In the case of i., the policies being referred to are those relating to international and national wildlife sites; land designated as Local Green Space, an Area of Outstanding Natural Beauty, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding or coastal change. For ii., these policies must not only apply in such a way as to impact upon the overall number that can be accommodated, but that the harm has to be significant and demonstrable enough to outweigh the benefits.

2.61   The Council will need to undertake an assessment of the Borough's physical and environmental capacities by such means as its Sustainability Appraisal, Strategic Housing Land Availability Assessment and transport modelling. As a result, it is therefore premature to make firm judgements on whether the housing figure should be higher or lower than the standardised figure. However, it remains the case, as with the adopted Local Plan, that there are significant parts of the Borough not affected by the environmental assets listed by the NPPF, whilst in the case of infrastructure, future growth will only be required to address its own additional stresses, as opposed to it dealing with existing capacity problems. Likewise, it also clear that any perceived inability of the market to deliver the housing numbers expected will not be grounds to lower a housing target, despite widespread scepticism from the public, politicians and professionals alike.

2.62   Whilst it is still premature to rule anything in or out, Members are advised that it will be more than likely that for most local authorities, the Government's standardised housing figures will represent the starting point figure for their housing targets. If this is the case for Swale, it goes without saying that the Council is likely to have a difficult journey ahead with challenging choices to make.

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

2.63   There is some overlap in the responses with the previous question, however, from resident's perspective, the belief that Swale cannot cope with the additional development leads to the view that other areas should be receiving some or all of its growth. The *QQ* (Q4) also reflects this view with some 37% of the responses believing (Preference Scoring) that other areas should take the growth. In the schools *QQ*, although a wish to divert development to other areas remains the first choice at 32%, within the 'Preference Scoring', it is a much closer affair with 31% revealed as wishing to see the Government targets met – perhaps a reflection of how the young can see the housing crisis differently.

2.64   Developers and landowners believe that there is no question of Swale's growth being diverted elsewhere as there is no case to do so. However, a number are quick to highlight the possibility of Swale needing to consider taking unmet need from elsewhere.

2.65   There is little appetite from residents for Swale to take a greater share from elsewhere or to unilaterally increase the numbers, although developers cite that affordable housing, economic, housing and infrastructure delivery may be strong reasons to do so.

2.66   Some parties extend the view of cross-border co-operation into other issues, such as infrastructure and education. The reliance for Swale residents on general hospital services outside of Swale is given particular attention.

2.67   It is very early in the process, but Swale has not, to date, been asked to consider taking unmet need from any other area, although there is interest in its economic ambitions from Maidstone. This probably has as much to do with the stages reached by local plans in other areas, but may also be, in part, explained by the likely lower than expected (although not for Swale), demographic forecasts that will form the next round of standard methodology housing targets for these Councils. Any future changes to the standard methodology may also have a bearing.

2.68   However, London remains the big uncertainty and this could still yet lead to further demands being made on Swale (although no direct approach from the Mayor has been made to date). Regardless of any formal need to take London growth, demographic trends tell us of influences on Swale's housing need from London migration that will need to be addressed.

2.69   Despite the Duty to Co-operate, there remains a lack of co-ordination in the SE on the 'big' and strategic cross boarder issues. The Government is relying on Statements of Common Ground between Councils to address questions of unmet need and infrastructure; however, as yet, there is little evidence anywhere that Councils are showing an appetite for this form of co-operation and it seems likely that this vacuum will leave Councils vulnerable to multiple suggestions from developers of a need to take other areas unmet housing needs.

2.70   As with the previous question, the Council's response will be linked to ongoing work around development capacity and it will be continuing its dialogue with its neighbours, which will be including over time, scoping potential Statements of Common Ground.

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

2.71   The responses here from Q12/13 re-surface here, but some residents develop the comments to refer to reforms they believe are needed to the wider planning system.

2.72   A specific view from residents and some Parishes is that the Council should only be planning to meet local need and this is linked by some (both there and elsewhere) to the position post Brexit on the presumed assumption that as immigration falls we would not need to build so much housing.

2.73   Some developers, as before, develop their arguments as to why the number should be increased, although this is not a universal view held by all of them as some appear content with the standardised numbers.

2.74   Q14 was aimed at whether there was any technical demographic reason why the Government's standard methodology should not be used. The views from residents would represent clear departures from the standardised housing number methodology. In the case of planning only for local need, this would be contrary to Government policy, whilst the other 'Brexit' issues highlighted, if correct, would be reflected in the future demographic forecasts that inform the standardised methodology and it would not therefore be for an individual Council to unilaterally take them on board.

2.75   Whilst this question will need to be covered by the Councils Strategic Housing Market Assessment, Swale has historically not had any demographic peculiarities that have brought into question the reliability of demographic forecast which might suggest a future departure from the standardised approach.

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

2.76   There are a range of practical responses here ranging from the strategic to process issues. Strategically, the Council could direct housing to most viable areas, use brownfield land only, invest in infrastructure first (inc. schools) or use prudential borrowing to build homes. It could also allocate a range of different sites, including smaller sites as well as splitting up allocations. Use of modular forms of construction could also help speed up delivery. Ideas to improve the process of applications are also suggested, including more joint working with developers, Member training, more delegation and a speeding up of the SBC 'pre-app' and S106 processes.

2.77   Some of the suggestions are now confirmed in the revised NPPF - time bounded consents, ensuring a proportion of allocated sites are small sites and considering a range of development options, such as the sub-division of sites and new communities.

2.78   Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations.

2.79   Related to the speeding up of housing delivery, is the question of the industry's ability to deliver. The Government's focus until recently has been on local authority failure, whether it be a failure to prepare up to date Local Plans, or the insufficient allocation of land. National planning policy has therefore focused as a result on imposition, the most recent being the Housing Delivery Test. However, national action is now looking at financial incentives, both through initiatives such as the Housing and Infrastructure Fund, but also the recent launch of the £1billion housing delivery fund to provide loan finance to help support small and medium sized developers. This is an attempt to open up the housing market, which currently sees almost two-thirds of new homes built by just ten companies. Despite scepticism over market delivery, it will be some time before the effects of such measures can be assessed. However, as already indicated, perceived market failures will be no reason for Councils not to meet their housing numbers through allocation of the necessary land.

2.80   However, there may be one option to insulate Councils from the penalties associated of non-delivery in the early phases of a Local Plan period and that is consideration of stepped housing targets. If supported by the likely trajectory of delivery, housing performance can be based on an initial lower target number on the assumption of delivery higher numbers later on. For Swale, this option can only be considered once it has selected its development strategy and determined the likely delivery timescales associated with it.

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

2.81   There is a strong community view that affordable homes should be built by the public sector/RSLs and kept affordable in perpetuity. There is scepticism about the new definitions of affordability advocated by the Government and a strong view that developers are using viability arguments as the means not to provide sufficient numbers of affordable homes. There is by some a wish to see more community led affordable homes initiatives, such as Community Land Trusts.

2.82   Developers and landowners, whilst keen to encourage the authority to assess their needs, via a Strategic Housing Market Assessment (SHMA), promote the full range of products as promoted by the Government's new definition. At the same time, some are keen to promote higher numbers in the right (i.e. viable) locations as the means to increase the amount of affordable housing, whilst suggesting that brownfield sites are less capable of affordable housing delivery. Others are keen to stress the need for flexibility, particularly when dealing with viability questions.

2.83 Q5 of the *QQ* also considered this issue, although the results were fairly evenly split between more housing for shared ownership, affordable rent and private ownership (circa 25% each). Housing for private rent was the least popular in the responses. For the *QQ* for schools, the emphasis was slightly different, although private rent was also the least popular.

2.84 Members have been understandably concerned about the ability of developments on Sheppey and at Sittingbourne to deliver meaningful numbers of affordable homes. However, the Council will need to undertake both a SHMA and viability evidence to inform the policy commitments on this topic.

2.85 The question of the role of Community Land Trusts is an undercurrent in a number of the responses. Community Land Trusts are a form of community-led housing, set up and run by ordinary people to develop and manage homes as well as other assets. They act as long-term stewards of housing, ensuring that it remains genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier. As a grass roots form of housing, it is the Council's role to facilitate them. In this respect, support can be expressed through the general housing policies of the plan, but perhaps also via specific 'reservations' for such initiatives within allocations or as bespoke allocations.

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

2.86 Responses here are overwhelmingly from residents in the so-called 'settled community'. A small number include comments judged as inappropriate and these have been redacted as appropriate. The majority of views from residents and Parish Councils advocate minimal or no provision, with more rigorous use of enforcement powers by the Council. Some parties indicate that provision should be made in remote locations, or that large housing developments should include provision. The National Federation of Gypsy Liaison Groups supports the preparation of a needs assessment that should be fair and engage with Travelling Community, including those who fall outside of definition. Sites should then be allocated and supported by a fair criteria based policy.

2.87 Some Members may recall that during preparation of the adopted Local Plan, the question of whether provision for Gypsies and Travellers could be made on large housing schemes. The Council went as far as consulting upon a policy and collecting viability evidence that would have required sites of 50 dwellings or more to make provision. The approach found no support in the development industry or within groups acting for the Gypsy and Traveller community. Residents also objected to the housing allocations that included the provision. Despite the provision being potentially viable for developers, the Council agreed to remove the policy approach late in the plan making process.

2.88 The Panel will be aware that the Council has been preparing its new Gypsy and Traveller Accommodation Assessment (GTAA) and it is the intention to bring this before Members at their November Panel meeting. Subject to the overall need figures that this evidence will generate, the process may require the Council to allocate sites in the Local Plan review and as such a 'call for sites' may be required for consideration as part of the Strategic Housing Land Availability Assessment. Once the overall need figures have been identified, the Panel will be asked to agree the means by which any necessary additional sites are sought.

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

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

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

2.90   Q6 of the *QQ* also asked what sort of housing should be provided. The 'Preference Scoring', perhaps reflecting the prevailing demographics of the respondents, indicated 22.3% for specialist housing, e.g. for an ageing population, 20.4% for family housing and 17.9% for supported housing for those in care. The *QQ* for schools, reflecting the younger age profile, saw family housing and housing for couples as clear priorities.

2.91   The Council will need to prepare a SHMA to determine the type of housing that will be required. Some respondees are correct that there are developers who have a clear leaning toward the provision of larger 4/5 bed homes in their mix as a means to help maximise profit and/or viability. This has often been at odds with local need. This has been a difficult negotiating point at the planning application stage as the evidence for the adopted local plan expresses the housing mix need at a Borough-level and this has provided developers with the means to argue a different mix at the neighbourhood level. It will be necessary for officers to explore whether the next SHMA is able to provide the housing need at a much more local level.

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

2.92   Although there is some disagreement, across the comments is a large measure of support for encouraging this sector. The differences emerge when considering how it should be done. The majority view is that areas should be set aside on large developments, reserved for self-build, although at least one developer is concerned about the use of quotas. Others indicate that plots should be found at rural communities, although here there are parties who believe that the Parish Councils should be the final arbiter of where they would be located. Some residents believe that only those people with a commitment to the community in question should be considered. A further theme is the view that any such houses permitted should be of a very high environmental standard.

2.93   The Council has been maintaining a register of those wishing to have self-build plots made available; however, it will be the preparation of a SHMA that will take this expression of demand into account to determine the actual need and how it might be met. This is certainly an area that many mainstream house builders and developers are willing to consider by way of a reservation for serviced plots on a larger scheme and particularly in new settlements. The self-build register tends to include people who seek to build on large plots in rural areas which would otherwise be subject to general policies of restraint. In these cases, there is likely to be disconnect between their wishes and where they can be met.

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

2.94   Respondees cast their nets wide on this question to include a wide range of environmental and design standards beyond those indicated in national policy. In contrast, developers were far more guarded and considered that any standards should only be applied where evidence and viability showed them to be justifiable.

2.95   The majority of the comments relate more to general design best practice standards, such as that which might be covered by Council adopting documents such as Building for Life 12. The scope of the optional technical standards are however prescribed by national planning policy/guidance and are more specific than the general good practice standards that tend to be included in design manuals.

2.96 Use of the optional technical standards is intended to allow exceedance of the minimum required by Building Regulations. As well as for water usage, they also relate to improved accessibility and wheelchair housing, as well as internal space standards for all house types/sizes. In the case of space standards, planning guidance allows the use of a nationally described space standard. Guidance requires the Council to gather evidence to determine whether there is a need/justification for additional standards in their area.

2.97 Swale already has one such standard in the adopted Local Plan relating to water usage. This is perhaps the easiest of the standards to justify given that this is an area of water stress.

2.98 Other authorities in gathering the evidence for the use of nationally prescribed space standards have generally simply undertaken a comparison of schemes permitted against the standards to demonstrate that a certain percentage do not meet the standards, meaning that use of the national standard is justified. However, this appears insufficient to satisfy a Local Plan Inspector and it might therefore be necessary to examine factors present within the demographics of the local population, e.g. age, social deprivation and physical and mental health, which might be impacted upon by the standard of accommodation. Questionnaires to residents of new schemes known to be below the national standards might be helpful to establish this.

2.99 Even if the evidence of need is present, the Council would still need to test them for their impacts on viability. This is potentially a fairly significant piece of evidence base that is currently not programmed or resourced and Members views on whether it should be progressed would be helpful.

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

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

2.100 The use of brownfield land as a principle is a clear and strong theme across many of the responses to *LA* questions, particularly from residents, groups and Parish Councils. There is a belief that there are resources of such land available to meet all development needs, or if not, then growth should be capped to the level that is available so that no greenfield sites are used for development. Some consider that all brownfield sites, regardless of their location or sustainability, should be used, whilst statutory organisations point out that not all sites will be suitable because they may not relate to a particular community or may be of biodiversity interest. There is a suggestion in a minority of comments that the Council's brownfield register is inadequate, even that it has been deliberately kept short as a means to justify the use of greenfield sites. Some residents believe that greater sticks should be used to force developers to use brownfield land.

2.101 In contrast, developers are quick to point out the potential shortcomings of an over-reliance on brownfield land, e.g. slower delivery and poorer viability.

2.102 There has been some strengthening of the emphasis on the use of brownfield land in the revised NPPF. Councils are urged to make as much use of it as possible, whilst giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Authorities are encouraged to be more pro-active and there is helpful ancillary commentary in the NPPF on the use of under-utilised land and buildings, for example converting space above shops and building on or above service yards, car parks, lock-ups and railway infrastructure, alongside using airspace above existing residential and commercial premises.

2.103 However, what is not present in the revised NPPF is any suggestion of a brownfield only or even a 'use brownfield first' policy. Outside of metropolitan areas, it is therefore highly likely

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

2.104 Swale has also produced its Brownfield Register in line with national regulation, which revealed very few larger brownfield sites which are not already being brought forward and these tend to be challenging to deliver. The majority of other identified brown field sites identified are les than the site size threshold for entry on the Register and are already subject to planning permission.

2.105 A key question for the Council is whether it can be any more pro-active to increase the amount of brownfield development currently achieved. For Swale in 2017/18, of all the extant planning permissions, some 34% are on brownfield land. There are some positives, for example, two of the largest local plan allocations are brownfield and these are now moving forward to deliver housing, whilst large windfall brownfield sites are also delivering. However, for most brownfields, it has been a long road from first identification, beset with site issues and viability challenges.

2.106 In terms of potentially being more pro-active, it would be relatively easy to simply identify swathes of existing town centres and say that within them X number of dwellings could come forward on vacant plots and in spaces above commercial premises (although this risks criticism of double counting where a windfall allowance was also counted in the housing land supply). This was the approach used by the Urban Capacity Studies prepared by Councils in the early 2,000s, but the reality is that more needs to be done to show the actual certainty of delivery, with viability and market preference the key barriers. Councils would not only need to identify the opportunities, but be prepared to support the process in direct ways, e.g. identification of Business Improvement Districts, the sale or use of car parks, use of Compulsory Purchase Orders, Local Development Orders and Permissions in Principle.

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

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

2.107 Respondents again interpreted this question quite widely, including other suggestions for standards which should be adopted. Although there was probably a slight majority in favour of setting minimum densities, including those who felt it would prevent developers from prioritising high value housing, there were concerns from many over the poor standards that would result and the inflexibility to determine a density that responded to the context of a site or area. Developers were also cautious, although one felt they might be appropriate in central areas or at transport hubs. Some residents, groups and Parishes also felt that if standards were to be applied, then they should be variable between different locations.

2.108 The NPPF does allow Councils to consider the use of density standards, provided the evidence is provided and that the impacts upon viability are tested. At present, the Council does use density standards, but only outside of the Local Plan and development management processes via its Strategic Housing Land Availability Assessment work and as a guide to determine the yield of a site. This has the effect of influencing the housing numbers for Local Plan allocations, before detailed analysis of the context of the site and its surrounding is undertaken. In policy the numbers are expressed as a minimum and in many cases, as applications come forward on allocated sites, densities rise. For all other proposals, the

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

2.109 There should not necessarily be any link between higher density development and poor quality design; although it would be reasonable to say that the best examples are often from areas with higher value for developers.

2.110 It would be possible for evidence to be gathered to examine developments permitted across a series of site typologies, using typical densities as a benchmark to determine whether such schemes are too high or low. However, it would be necessary to also consider the relationship between density and its effects on massing and building height, which tends to be a very site specific matter. The issue could be addressed by urban design analysis at the site allocation level, although this would not assist with windfall development. The latter could be addressed through considering review and strengthening if possible, of general design policies in the local plan.

2.111 The need to consider density as a means to potentially reduce the take of greenfield land for development is entirely understood. The research to support it would currently be an unplanned resource. In addition, there are some reservations that the use of standard minimum densities, albeit ones that could be variable depending on location could, unless somehow applied with great flexibility, cut across other objectives which are more about the context of the site and the local area. Even if work to establish density standards are progressed, these would still need to be subject to viability testing. A middle way would be to limit density analysis to urban design work associated with the proposed housing allocations.

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

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

2.112 This issue attracted substantial comment from residents, groups and Parish Councils. In totality, the full range of social and physical infrastructure is highlighted as priorities. However, health (hospital, GP and dentists, but also other facilities with health related benefits – i.e. sport and open space, reducing pollution), education, transport and sport/open space are notable in the level of responses.

2.113 A large number of site specific infrastructure priority needs are highlighted that include:

- Sittingbourne station parking.
- Sittingbourne Northern Relief Road.
- J5/A249 improvements.
- Extra motorway junction south of Sittingbourne.
- M2 widening.
- A2 from Western Link to Brenley Corner to become a street.
- A Swale general hospital/new hospital at Brenley Corner.
- Leisure facilities.
- A Swale incinerator.

2.114 Some used the question to say what infrastructure they did not want to see, notably a link road between the A2 and M2.

2.115 The *QQ* also gives supplementary help in the answer to infrastructure priorities. Q3 asked what more could be done to make communities in Swale stronger. The Preference Score showed that over 41% of the answers cited both the need for new development to deliver the infrastructure needed to support it and improvements both to the access to and facilities for education and training. Not surprisingly, the *QQ* for schools reversed this. Q7 also asked what the infrastructure priorities should be, with the Preference Score placing health care at 15.1%, roads at 13.6%, education at 12.4% and green infrastructure at 12.1%. The *QQ* for schools placed health care and education at the top of the list.

2.116 The question of the timing of infrastructure relative to development was prominent in comments to *LA*, with the prevailing view that developers were getting away with it, with the current system flawed. Other means to fund infrastructure were considered to be required and that no further development should be approved until infrastructure issues were addressed.

2.117 A thread of commentary amongst residents, but also in those of the statutory and other consultees, was the question of multi-functional green infrastructure. Kent Downs AONB considered that the linking green infrastructure with wider infrastructure needs was causing its neglect in priorities for funding and that the AONB itself was being impacted upon by increased footfall and increased use of rural infrastructure in the same way as other infrastructure provision. The KCC GIF has identified a large funding gap for GI across Kent and this needed to be addressed. To support the approach to green infrastructure in the local plan, officers are in the process of commissioning work on a new green infrastructure strategy.

2.118 The top infrastructure priorities continue to reflect those identified for the adopted Local Plan, notably health and roads. The question of means other than developers to fund infrastructure is pertinent, but although the Council will continue to explore all opportunities to leverage in external funding, the reality will be that the vast majority of future infrastructure provision will be developer led. The degree to which this will be a continuance of an infrastructure bolt-on approach or a more settlement wide approach will be a matter dependent upon the next Local Plan settlement strategy.

2.119 The Local Plan will be supported by an Implementation and Delivery Schedule and as the Council moves toward considering its development allocations, discussions with infrastructure providers will become more detailed and specific. Likewise, transport modelling will determine the extent of improvements required. However, at the present time, early discussions with those agencies, including those present at the Infrastructure Workshop on 12 June, were not indicating showstopper issues with the local plan review moving ahead. Many may find this likely position difficult to accept, particularly in the areas of health, roads and water, but it will be the major infrastructure providers that will have to signal the 'red' light if there is to be any adjustment either to overall levels of growth or its distribution and site allocation.

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

2.120 A number of parties were not able to move beyond the view that no development should be permitted without the infrastructure to support it. Developers were viewed negatively in terms of being the party failing to provide infrastructure at the expense of land banking and high CEO bonuses.

2.121 A number looked to the Government to provide the necessary funding, or see the need for developer contributions to be higher for greenfield sites. Others cited examples from other countries, or, like some Parish Councils, see CIL as the means to collect the sums required. Some felt that community solutions needed to be considered, although with no specific

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

2.122 There was some appetite for more radical approaches to be considered and a belief that for large schemes, requiring significant infrastructure, the responsibility for delivery should not lie in the hands of the private sector, but in a process that was fully accountable to local people. There was also a view that the Council does not have the expertise in this area.

2.123 Developers were cautious. One believed that land value capture was entirely a matter for Government to address, whilst another saw the best way to secure land value capture by directing development to the highest value areas. One felt that the master developer or Development Corporation models would be worthy of consideration, but that because of concerns about the speed of delivery on large sites, smaller sites should be allocated that follow more 'usual rules'.

2.124 Two useful developer comments are made. The first, who, whilst promoting a form of master developer approach, is of the view that land value capture (LVC) will only work on developments of a certain scale. There are concerns though that it would deter investment as developers prefer more traditional approaches. A site specific policy approach on infrastructure is advocated, ensuring that the cost of the infrastructure is factored into the overall land value. Early engagement would be essential to minimise risks, as would the early identification of infrastructure needs.

2.125 The second contribution notes that even where LVC is used, the value of the land in the first place will be part of it (and therefore varies as some areas will generate more than others). In any event, they felt that because local communities were not presented with the full information, they were undervaluing the contributions being made by developers. LVC was not considered to be without its problems – highlighting the North Essex Garden Communities. Unless landowners are given an incentive to sell, they may wait and in such cases, CPO is likely to be the only option.

2.126 It is certainly the case that the approaches here will strongly depend upon the settlement strategy agreed by the Council. It seems likely that a range of measures will be required with smaller schemes likely to follow the 'traditional' approach, but where larger schemes are being contemplated, there is the opportunity to dampen down the expectations of landowners provided that the infrastructure 'ask' is identified early enough. In the case of new communities, the potential for LVC is perhaps at its greatest, but it carries significant implications and, as one contributor notes, this is not an area where the Council currently has all the expertise it needs. Ultimately, it would only be where the public sector or a Development Corporation is in full control that LVC can be fully exploited to achieve all objectives; however, developers may be reluctant to engage with such models. For example, in the work undertaken for the *New Garden Communities Prospectus*, developers see a Development Corporation as unnecessary either due to their scale of landownership or interference. However, there are other models, such as via master developers, which can still capture well land values.

2.127 This is an area of work which will continue to be developed in accordance with the revised NPPF and Practice Guidance.

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

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

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

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

2.130   There was an overall acknowledgement of the issue of climate change and its impacts on health, habitats and species. Most responses encouraged innovative solutions for example: learning from best practice abroad; a general support for renewable energy in new housing development (solar, ground source heat, wind); build quality and insulation; water efficiency measures including grey water recycling; a better standard of green infrastructure including more tree and hedgerow planting (which is currently seen as poor in Swale); an emphasis away from building new roads and concentrating on keeping communities 'local' with good public rail and bus transport, walking and cycling facilities/routes and use of smart technology; encouragement of waste reduction and recycling.

2.131   The case was also made for ambitious environmental standards to be set and enforced and tax cuts for eco building. Air quality, urban heat gain and flooding were identified as issues and the case for infrastructure (e.g. electric vehicle charging points, tree planting, improved drainage including sustainable drainage systems) was made. It was argued that design was important in adaptation and repeated calls for avoiding development on countryside/agricultural sites and in areas of water stress. Historic England emphasised the inherent sustainability of conserving historic buildings and Natural England stressed that the effects of climate change (e.g. coastal squeeze) must be fully integrated into Local Plan policies and site allocations and that Swale should work with neighbours on ecological networks and with aim of achieving urban cooling. Developers argued that Swale's resources include its green energy and grid infrastructure and it has a duty to ensure the best is made of this potential.

2.132   Q8 of the *QQ* sought views on how the Local Plan can protect the environment and mitigate the effects of climate change. The top preference was to do this by protecting and enhancing the countryside, particularly land designated for biodiversity and landscape (34%) and second, to protect high quality agricultural land (30%). Within the context of any other comments, there is substantial support for developing brownfield sites only and to reject housing numbers. To a lesser extent but still of significance, is support for the use of renewable energy (7%).

2.133   In terms of the local plan review, the policies in the adopted local plan will need to be reviewed and updated in light of the revised NPPF. One policy area highlighted in paragraph 149 of the revised NPPF is the need for plans to take into account the risk of overheating from rising temperatures, an issue of particular relevance in Swale. This could be accommodated in updated policies on green infrastructure, sustainable design and construction, woodland, trees and hedges, general development criteria or a new design policy. However, an evidence base to support any requirements, which is neither programmed nor budgeted for, would need to be completed.

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

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

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

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

2.135 There was some support for solar farms in appropriate locations but equal recognitions of landscape/biodiversity etc. harm they can bring. Wind farms at eastern Sheppey, offshore and in rural communities were suggested with appeal that local communities should benefit.

2.136 There was frequent support that green energy in new development should be compulsory and new development should aim to be energy self-sufficient. Some suggested that renewables should be incentivised with grants and tax breaks and existing development should be retrofitted with renewables before new schemes progress.

2.137 Whilst there was encouragement for what Swale is doing already, there was recognition that a strategic approach is needed (e.g. identifying suitable sites for renewables and referencing KCC's Energy Opportunities Map). It was felt that SBC should lead by example, but there was an appreciation that central government also has a role to play.

2.138 Natural England supports renewables where no unacceptable environmental impacts. The AONB unit stated that renewable energy development of significant size in AONB would only be acceptable in exceptional circumstances and in public interest.

2.139 In terms of the local plan review, the policies in the adopted local plan will be reviewed and updated in light of the revised NPPF and consultation views to ensure they provide a positive strategy for renewable energy. Reference to KCC's Renewable Energy Opportunities Study will be made along with reference to the 2011 Swale Renewable Energy and Sustainable Development Study. Due to timescale and budget limits there are at present no plans to redo the Swale Renewable Energy study, however, if this was done it could assist identify suitable areas for renewable and low carbon energy and identify opportunities for decentralised systems and co-location of customers and suppliers as set out in the NPPF.

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

2.140 Responses to Q28 echoed some of the responses made on physical infrastructure requirements in Q23. Respondents tended to use this question for comments on transport issues in general and in particular highways issues. A significant number of residents considered that stopping all development in the area was the only way to halt worsening congestion in the A2 corridor.

2.141 Road improvements were also seen as a major issue in responses to the *QQ*. Q1 (How can the Local Plan create a positive economy for Swale?) and Q7 (What infrastructure should the Local Plan seek to deliver?) saw road infrastructure delivery as the top priority preference (43% and 32% respectively). Public transport improvement was also featured as a significant priority in both of these question responses.

2.142 There was broad agreement that the improvements to M2 Junction 5 and the A249 junctions at Key Street and Grovehurst are needed, in the short term to deal with development already planned for. Additionally, there was support for widening the M2 to three lanes to relieve pressure on the A2 and improving Junction 7.

2.143 There was some support for completing the Sittingbourne Northern Relief Road as soon as possible to see what that could achieve, especially in respect of taking commercial traffic and

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

2.144 Better traffic management (especially through Sittingbourne) through use of roundabouts rather than signals to improve traffic flows was supported by Parish Councils and residents. Some felt 20mph zones were the answer, whilst others felt this would slow traffic too much and make pollution worse. Managing school and HGV traffic at busy times were also suggested, as was making Sittingbourne electric vehicle access only. There were also suggestions for the use of bypasses for Ospringe, Teynham, Newington and Bapchild to avoid pinch points on the A2 corridor. Others considered that there is little which can reasonably be done to the A2 itself, without unacceptable impact to properties and the environment.

2.145 At the eastern end of the Borough there were suggestions to turn the A2 at Faversham into a more pedestrian / cycle friendly 'street' serving and linking new development with the town centre; and suggestions to bridge link Oare with Harty Ferry to open up the eastern end of Sheppey without further impacting the western end of the A2 corridor.

2.146 Non highway improvement focused suggestions to relieve the A2 corridor included improving rail and bus travel, introducing trams or light railway and consideration of public subsidy. The need to site and design development so as to reduce the need to travel and facilitate walking and cycling to local services and to public transport hubs was also noted by developers as part of a wider package of measures to support new development in all parts of the Borough.

2.147 In terms of messages for the local plan review to take forward, the concerns about existing congestion and the impact of additional development are very clear. However, there is a general reluctance to move past resistance to the imperative for further development and associated assumptions that car based travel will continue to be the main means of supporting this. Transport modelling is already in hand to support the local plan review and test future development scenarios and transport mitigations and inform a range of reasonable alternative development strategies. The work will need to be refined in more detail once a preferred option is chosen for the submission version of the plan; to inform strategic transport policies; development management transport policies; specific land allocation policies; and a supporting Local Transport Strategy (prepared with Kent County Council Highways).

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

2.148 Several suggestions were made for a bridge at the eastern end of Sheppey to link with the mainland at Conyer or Faversham and then link back to the M2, although there is acknowledgement by residents and some developers that this would probably be too costly to implement. Improvement of road links on the island, including a dual carriageway from the A249 all the way to Leysdown was also suggested, to be paid for by developer contributions. The (already planned) improvements to the A2500 and the junction with Barton Hill Drive were also highlighted as necessary. Developers promoting land east of Scocles Road (Minster) suggested that a roundabout with the Lower Road could be provided as part of such development.

2.149 Non highways improvements suggestions included extending train services to the island and improving bus services such as the click and ride system at Sittingbourne. Trams or monorail to the east of the island were also suggested. Improving cycling and walking trails to coincide with nature trails was also highlighted.

2.150 Some commentators also considered that the costs involved in facilitating further development on the island were so substantial that it was pointless and that Sheppey should be allowed to stay rural.

2.151 There are undoubtedly viability challenges with development on Sheppey and therefore sustaining further major improvement in transport links, which has been realistically reflected in the consultation responses. It will be for the local plan review development strategy to determine what is viable and achievable here and what measures could be achieved through the local transport strategy which will support the local plan.

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

2.152 Overall, there was some divergence between respondents who continued to support key road transport schemes as a 'sustainable' response to transport issues who consider that there is little real or economically viable alternative in a semi rural Borough. Nevertheless, there was also some acknowledgement that non car travel needs to be higher on the agenda than car travel if more sustainable means of travel are to be embraced. Technological advance and catering for electric cars and treating them preferentially for car parking are seen as a move towards sustainability. High density development and simply reducing provision for cars was also noted as a possible solution.

2.153 Better and cheaper public transport was noted as a key requirement to get cars off the road and should be subsidised. Covering key routes such as Sittingbourne to Maidstone with better services was also highlighted to reduce car traffic. Additional tram, train or trolley bus routes were also suggested to extend links with the existing public transport network.

2.154 Improved train services, especially to London to support commuting, was noted by many, although there was wide divergence of opinion as to what this should involve. Some respondents considered that fast trains should be truly fast and make fewer stops, whilst others felt that all train stations in the Borough should be improved and made best use of. Accessibility to all stations was also noted as an issue and an important consideration for the location of new development.

2.155 Expansion of and improvement in the reliability of bus services especially for short local trips and to neighbouring boroughs was highlighted, with expanding the click and ride Aviva system seen as having potential.

2.156 The importance of designing new development for cycling and walking to link with existing development, networks and especially local services such as schools was also highlighted. Pedestrianising town centres further and traffic taming (particularly in the context of the A2 at Faversham) were suggested.

2.157 The responses to Q30 of the *LA* consultation reflect the mixed approach which will be likely to be needed for the local transport strategy needed to support the local plan review. It is unlikely that public transport can be extensively subsidised or viably extended to all areas. Technology will undoubtedly have a role to play in making all transport 'greener' and more sustainable. However, national policy (NPPF 2018) is also clear on the need for local plans to focus development at locations which are or can be made sustainable through minimising the need to travel and offer a choice of modes of transport. The local plan review itself will need to respond to all of these issues through its development strategy; policies to facilitate transport infrastructure provision; the design, layout an access elements of land allocation policies; and development management policies relating to transport mitigations and parking.

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

2.158 Air quality issue recognised as very important and requiring investigation through the Local Plan process, looking at both NOX and particulate matter from traffic, road surfaces, industrial pollution and agricultural pollution. Technology is seen as playing a major part in reducing pollution (e.g. retrofit particulate filters, car design, electric vehicles and charging points in new homes/town centres, public transport based on clean energy, smart working practices (e.g. home working/shifting hours) and more monitoring) but not an immediate impact so current concerns remain. It was also suggested that there is a need for high level political support and funding to be combined with strategic network improvements (e.g. relief roads and traffic improvements on existing roads) alongside an encouragement of walking and cycling infrastructure, sustainably located new development and improvements to public transport which must use clean technologies; and more freight should be moved by rail.

2.159 Some respondents suggested that mitigation is inadequate and there should be bans on HGVs and any new development in AQMAs, including the deallocation of allocated sites. Some suggested that the amount of new development should be restricted, that both developers should be required to pay long term mitigation costs and residents to pay for the pollution they cause and there should be a maximum of 2 cars per family.

2.160 Some suggested that traffic flow should be prioritised e.g. by removing speed bumps, signals, and 20mph zones as they restrict traffic flow and increase congestion and increasing roundabouts which are good for flow. However, others argued for more pedestrianisation especially in town centres and 10mph limits. It was suggested that the A2 in Faversham should be planned as a local street, rather than a road. Several argued for more planting and trees in existing and new development including town centres. The school run was a cause for concern and arguments were made for making parking at schools more difficult and that children should only attend local schools.

2.161 Maidstone Borough Council welcomed early engagement to assess the implications of proposed future development patterns in Swale and the potential traffic congestion and air quality impacts upon Maidstone.

2.162 In terms of the local plan review, the policies in the adopted local plan will need to be reviewed and updated in light of the revised NPPF and alongside the results of the transport model, air quality modelling and the green infrastructure strategy which will need to prioritise walking and cycling infrastructure. The local plan review will also need to be prepared to actively manage patterns of growth to support sustainable transport objectives as outlined in the NPPF. Development management policy could also cover the need for adequate provision of plug in charging points. Opportunities to improve air quality set out in the forthcoming Swale Air Quality Action Plan will also need to be promoted through the local plan review. It is also recommended that the Local Plan review pursue a specific Air Quality policy which could provide the opportunity to promote technical guidance for developers on air quality to be produced in parallel with any future revisions to the Swale Air Quality Action Plan.

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

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

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

2.164 The revised NPPF now requires that LP's and developments must "minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures." The LP policy will need to be reworded for the LP review to enshrines this principle within it.

2.165 The environment stakeholder workshop (Appendix III) highlighted the need for a Green Infrastructure Strategy and a Water Cycle Strategy. A Green Infrastructure Strategy is about to be commissioned but a Water Cycle Study is also needed which will be part of the evidence base.

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

2.166 Residents and parish councils widely supported local designations (both landscape designations and countryside gaps) and argued they should be retained and extended and protected from development – to prevent settlement coalescence, protect town centre vitality, preserve village identity, to protect settings to villages and towns and comply with the Government's 25 year Environment Plan.

2.167 It was recognised that the Countryside has value beyond landscape itself: to prevent settlements merging, as mitigation for air pollution, for biodiversity, public amenity, flood prevention, sustainable drainage and to prevent soil erosion. The countryside also contributes to Swale's identity and brings a 'feel-good' factor. Brownfield land should be developed before countryside and farmland should be protected.

2.168 There was a perception that Faversham's countryside is better protected that Sittingbourne's. Many parish councils south of Sittingbourne argued for a designated buffer to the AONB to preserve its setting.

2.169 Some argued that small scale development can be integrated into designated land, but not garden village proposals. Local designations are a material consideration but their weight could be reduced in certain situations e.g. by custom build.

2.170 Historic England argued to keep local designations to preserve landscape and settlement character. The AONB Unit expressed support for review of local landscape designations to inform the Borough's development strategy.

2.171 Developers argued for a more flexible approach to development of locally designated sites (or that they should be removed completely) and allow villages and towns to grow organically/sustainably whilst retaining green space for community benefit and mitigating landscape harm.

2.172 There was recognition that designations can prevent new development being located in the most sustainable areas and can put extra pressure on undesignated land. It was considered that some development in the AONB could be less damaging that outside an AONB. Reference to updated NPPF and hierarchy of designations was made.

2.173 In terms of the local plan review, the policies DM24 (Conserving and enhancing valued landscapes) and DM25 (The separation of settlements – Important Local Countryside Gaps) in the adopted local plan will be reviewed and updated in light of the revised NPPF. The review of local landscape designations will be used as part of the evidence base to inform the local plan review. Important local countryside gap boundaries will also need to be examined during the course of the local plan review.

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

2.174 This question was primarily answered by residents, Parish Councils and amenity groups. Responses to this question were very much in support of requiring design to respect local character and distinctiveness, particularly with regards to heritage related matters and a general view was that good design should be sought everywhere, rather than extraordinary design achieved in some places.

2.175 The relevant adopted Local Plan policies already strive for development which respects local character and it is unlikely that this concept will change. However, the comments also criticised developers who are considered to be getting away with using 'off the shelf' standard designs and cheap materials. Examples were given in Iwade, The Meads and Great Easthall.

2.176 The NPPF states that design expectations should be made clear at an early stage and that these should follow and enhance local character. The use of assessment frameworks such as Building for Life is promoted and this is something currently being trialled by officers and could be considered for formal adoption as part of this review.

2.177 Depending upon the choice of settlement strategy and site allocations, there may be a greater role for the use of masterplans and design codes that can be used to specify and enforce, either by planning condition or legal agreement, design principles and standards. In the case of schemes where a master developer is involved, these can be further imbedded into the sale of land process to developers and the signing off of subsequent development phases.

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

2.178 Responses to this question were answered in a similar manner to Q34, but with more of a heritage focus. Residents, Parish Councils and amenity groups shared a view that the Borough's heritage should be promoted through the use of museums and community events, for example, and that heritage assets should receive better protection.

2.179 There was some criticism of the Council's enforcement of heritage matters, including for example the use of Article 4 directions. Suggestions to help promote the improvement of historic buildings included the re-instatement of VAT relief on listed buildings, but these are outside the remit of the Local Plan.

2.180 A Heritage Strategy is currently under preparation and will provide recommendations and subsequently help inform policy formation moving forwards.

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

2.181 Responses here reflect one of the big themes of the consultation; namely that Swale's agricultural land resource is considered to be a 'red line' constraint to development and that its value will increase in an uncertain world. Many residents believe that it should not be developed under any circumstances, whilst all efforts should be made to minimise its loss, notably by maximising the use of previously developed land, or, in some cases, use of lower quality land. There is a belief in some quarters that Swale is surrounded by lower quality land.

2.182 Developers are split on the issue. One developer, whose land interests' lie on Sheppey, where there is lower quality land, believes that the future settlement strategy should be directed at minimising the loss of high quality land. Others, with interests elsewhere, believe this would lead to an inappropriate strategy.

2.183 There is sympathy for those views expressed by many about the importance of the agricultural land resource for Swale. However, until there is a change in Government policy on this issue, it remains the case that national planning policy does not list agricultural land as one of the 'red

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

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

2.184 There was lots of support for the provision of accessible, multifunctional greenspace which is within easy walking distance of developments as respondents felt that it would help to deliver health and wellbeing benefits for people, along with habitat and corridors for wildlife, whilst helping to mitigate the effects of climate change. The need to ensure adequate funding to maintain the provision in perpetuity was strongly highlighted. The need to maintain and create wild life corridors was also strongly supported.

2.185 There was strong resistance from residents and communities for the loss of any existing green space or countryside.

2.186 In relation to garden communities, a respondent stated that they must have significant recreational spaces but also easy access to the surrounding countryside e.g. new public footpaths. There was also support for measures to retrofit greenspaces to existing residential areas within Swale wherever possible.

2.187 Not many responses commented on whether open space standards should be increased but Natural England felt that Swale should increase open space provision and exceed minimum requirements for green spaces.

2.188 The Local Plan Review will be supported by evidence from the Green Infrastructure and Open Space Assessment. New Garden Communities can have specific and high standard of green space incorporated into their master planning. Scope for exceeding current standards of provision elsewhere will need to be evidence based, and consideration could be given as to whether there are sufficient grounds to seek a net overall gain. Design codes can also be used to drive these standards.

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

2.189 Most of those agreeing with the challenges as set out were businesses, Parish Council's, statutory bodies.

2.190 There were lots of suggestions about extra challenges to include in the list, including:

- More skills training and apprenticeships needed;

- Meeting the increased demand for energy and the challenge of transitioning to a low-carbon economy;

- Improved sustainable transport links, leisure provision, green spaces, restaurants and shops;

- More local employment;

- Ensuring developers provide community facilities and necessary infrastructure;

- Protection of the AONB, woodland and agricultural land;

- Addressing poor quality new builds and poor design;

- Policies and plans for managing water, sewage and waste; and

- Broadband fit for the 21st century.

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

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

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

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

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

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

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

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

2.197 There were mixed reactions to this question with some respondents agreeing with the proposed vision, especially the environmental elements, but others who felt that a new vision (or Local Plan) wasn't required at this stage. There were lots of varied suggestions of things to add to the proposed vision such as meeting housing needs (especially affordable), air quality issues on the A2, the need for an FE facility in Swale, the need for infrastructure before development, support for development of small sites in the rural area and the protection of greenfield sites. There were a number of comments suggesting that the Local Plan should stop focusing on the Thames Gateway as this is outdated and not relevant and a lot of comments on the uneven split/distribution of development across Swale.

2.198 A few respondents thought that the vision was aspirational but unachievable and some wanted to see specifics as they felt that it was too general.

2.199 The revised NPPF states that Local Plans should provide a positive vision for the future of each area, so the Council must ensure that the new vision is in accordance with this. At this stage, the draft vision is still flexible and a reasonable working model. It can be revisited and firmed up as reasonable alternative strategies and a preferred option emerge from the evidence base. The 'specific' matters referred to by respondents could perhaps be more appropriately covered through an updated set of objectives for the plan, as these are the means by which the vision will be addressed.

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

2.200 Responses to this question were mixed. Some residents, Parish Councils and amenity groups were resistant to any new housing in their villages. Others accepted that some development is required but were adamant that it should of an appropriate scale and of a locally distinct design.

2.201 Developers and planning agents were supportive of village growth and considered that the existing and previous settlement strategies have led to stagnation of the Borough's rural locations. The NPPF promotes rural housing that would enhance or maintain the vitality of local services, but also states that it should reflect local need.

2.202 The rural workshop help in July 2018 painted a similar picture to that outlined above. Attendees were generally of the view that appropriately sized rural development is necessary, but again concern was raised regarding the type and tenure of dwellings here.

2.203 To help inform these matters, a SHMA is planned to be undertaken as well as a rural settlement study which will look at the current level of service provision in our villages, amongst other factors. These, along with the SHLAA currently underway, will form important evidence bases when considering development capacity and requirements in the rural areas of the Borough; and what role they could potentially play in reasonable alternative development strategies.

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

2.204 A wide range of alternative elements were suggested by respondents including:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2.217 Q9 of the *QQ* asked where new development should be located. Only 11.1% made new settlement their first choice, but (as stated at para 2.211) a preference to rural Sheppey, the villages and Sittingbourne. When the 'Preference Scoring' was examined, new settlements slipped further down, with the answers highlighting the main settlements in overall preference.

2.218 Clearly this report is not the place to consider the role or otherwise of new settlements in the Local Plan. The Prospectus process is on-going and Members will need to consider their role in due course. What can be reasonably be assumed at this point, is that the land supply benefits of new communities will only be realised over the very long term. If progressed now, new communities may not be the whole solution to the question of where new homes should be built in Swale. The reason for this is that the longer lead in time for them may not enable the Council to maintain a land supply in the medium term and it may well be the case that other more traditional types of allocation will need to be considered in the interim. Whether this would be the case depends on a number of matters such as how much of the adopted Local Plan supply is implemented and whether or not the Council would be able to 'step' its housing target to allow for later delivery. This is a question that Members will return to at a later date.

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

2.219 Residents, Parish Councils and amenity groups responded to this question in a manner critical of the LA consultation, particularly regarding its content and technical procedures. This matter has been discussed earlier in Section 2 above.

2.220 There was also some questioning of the need for the scale of the review given the final Inspector's report for the adopted Local Plan stating that an early review was required to deal with transport issues. The reason for the nature of the work being carried out has already been explained at previous Local Plan Panels.

2.221 Aside from these 2 matters, the remainder of the comments were mainly re-iterations of concerns regarding the potential scale of development and the impacts upon infrastructure, facilities and the environment as discussed in the big themes and elsewhere throughout the report.

3 Proposals

3.1 Members are invited to note this report on the consultation responses; to provide a steer to officers on the following issues; and recommend to Cabinet that these are agreed:

i) *The Panel is requested to consider whether officers should give further consideration to the use of minimum density standards.*

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

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

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

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

4   Alternative Options

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

5   Consultation Undertaken or Proposed

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

6   Implications

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

7   Appendices

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

8   Background Papers

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

        A verbatim report generated from the Objective online system of all the free text box responses on the Quick Questionnaire will also be available in the Members Room.