

Swale Borough Council



New Garden Communities Assessment of submissions

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[Second Draft] February 2019

41410

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1 INTRODUCTION

- 1.1 Peter Brett Associates LLP (PBA), now part of Stantec, is working with Swale Borough Council (SBC) to assess the proposals submitted as a response to its New Garden Communities Prospectus. Following the issue of the Prospectus on 25th April 2018 and a workshop with landowners and developers, a two-stage process has been followed to gather proposals for new garden communities.
- 1.2 This started with Expressions of Interest submitted by 8th June 2018, at which 5 proposals were submitted. The second stage involved the final submission of detailed proposals by 3rd August 2018 for 4 potential new garden communities.
- 1.3 PBA and SBC have developed an initial assessment proforma using the Prospectus questions to assess each of the proposals. This involved identifying whether the response fully addressed the questions, the extent to which it represented a sound answer, what gaps exist, the extent to which the proposal is moving towards or away from the objective, and which issues are still to be addressed as well as highlighting any risks associated with the proposal.
- 1.4 The assessment was undertaken not to rank or score the proposals but rather to identify the key elements and to inform the setting of questions to inform discussions with each of the promoters.
- 1.5 This assessment is the first stage of a longer process which has included interviews with the scheme promoters and presentations by them to Council members. There has also been input from utility providers, Highways England and Kent County Council and the Kent Downs AONB Unit.
- 1.6 As will become clear, not all promoters are able to provide full answers to the questions posed in the Prospectus. But this is to be expected – providing technical evidence is expensive and, at the moment, there is no certainty that the Council will continue to consider new garden communities are part of the strategy going forward. Therefore, we need to take a balanced and proportionate approach as part of this assessment.
- 1.7 It is also the case that some key parts of the evidence base, most obviously the Boroughs transport model is not yet (at the time of writing) available to PBA or scheme promoters. Without this vital piece of evidence, it is impossible for promoters (or the Council) to assess the transport impact of their schemes and how best to mitigate them. We understand that the model will be available shortly. [Note this is not a criticism of the Council or their Transport consultants – the timetable for this work is driven by the Plan review and not the new garden community process].
- 1.8 In addition to this report, further work has been undertaken by Land Use Consulting, who have provided an overview of the landscape context and sensitivities of each of the proposals. Their work is referred to here but is published separately.
- 1.9 The aim of this report, and the ongoing evaluation process, is to assess whether the proposals are appropriate for further assessment and whether they are appropriate to

be further considered via the Local Plan process. This is very different to the Council endorsing the proposals as part of the next plan strategy.

- 1.10 This balanced and stepped approach is helpful to the plan process because it allows the Council to shape and influence the proposals that may be put forward as candidate sites in the next plan. This is as opposed to the more conventional route whereby sites are offered as part of the plan process, at which point the Council has much less opportunity to influence them.
- 1.11 There is evidence that this process is providing positive results with a number of the proposals submitted already being amended following feedback. Most obviously two of the promoters have increased their affordable housing offer and a number have offered to amend their 'red lines' to increase the amount of landscaping / open space or provide a better potential settlement edge. Such an iterative process is much more difficult as part of the plan making process.
- 1.12 A further benefit has been the learning process for all parties. As some parties have begun to understand better the issues involved, their approach has adjusted positively, particularly around such matters as long-term stewardship and local delivery vehicles. Again, this is not something one would expect in the normal process of plan making.
- 1.13 While we provide some emerging conclusions, care is needed before treating these as final. As noted above, throughout this process, each prospective developer has responded in an iterative fashion to queries and flexed proposals as requested. There is also obviously a significant amount of further technical work needed to support the schemes. Very importantly, the Council will need to secure a firm commitment, including independently verified 'open book' viability assessments, confirming that what is being offered is achievable.
- 1.14 This report is structured as follows: chapter 2 considers the assessment process; chapter 3 the Garden Community Principles and design; Chapter 4 the other issues such as transport, infrastructure, delivery and viability, and chapters 6 to 9 summarise the individual proposals and the key issues, opportunities and risks associated with each one. Chapter 10 provides a general conclusion and Chapter 11 sets out our recommendations.

2 ASSESSMENT PROCESS

2.1 In this section we briefly outline the process that has been undertaken to date. The assessment of the proposals is covered in section 3 onwards that follows.

Stage 1 - Expression of Interest

2.2 In June 2018 5 'Expression of Interest'; proposals were received. These submissions responded to the Councils [Choices for Housing Growth](#) document and the associated 'prospectus' document.

2.3 These five expressions of interest were:

- NS1: South East Sittingbourne
- NS2: Land South of Rushehden
- NS3: Land at Bobbing, West of Sittingbourne
- NS4: South East Faversham
- NS5: Land at Ashford Road, South of Faversham

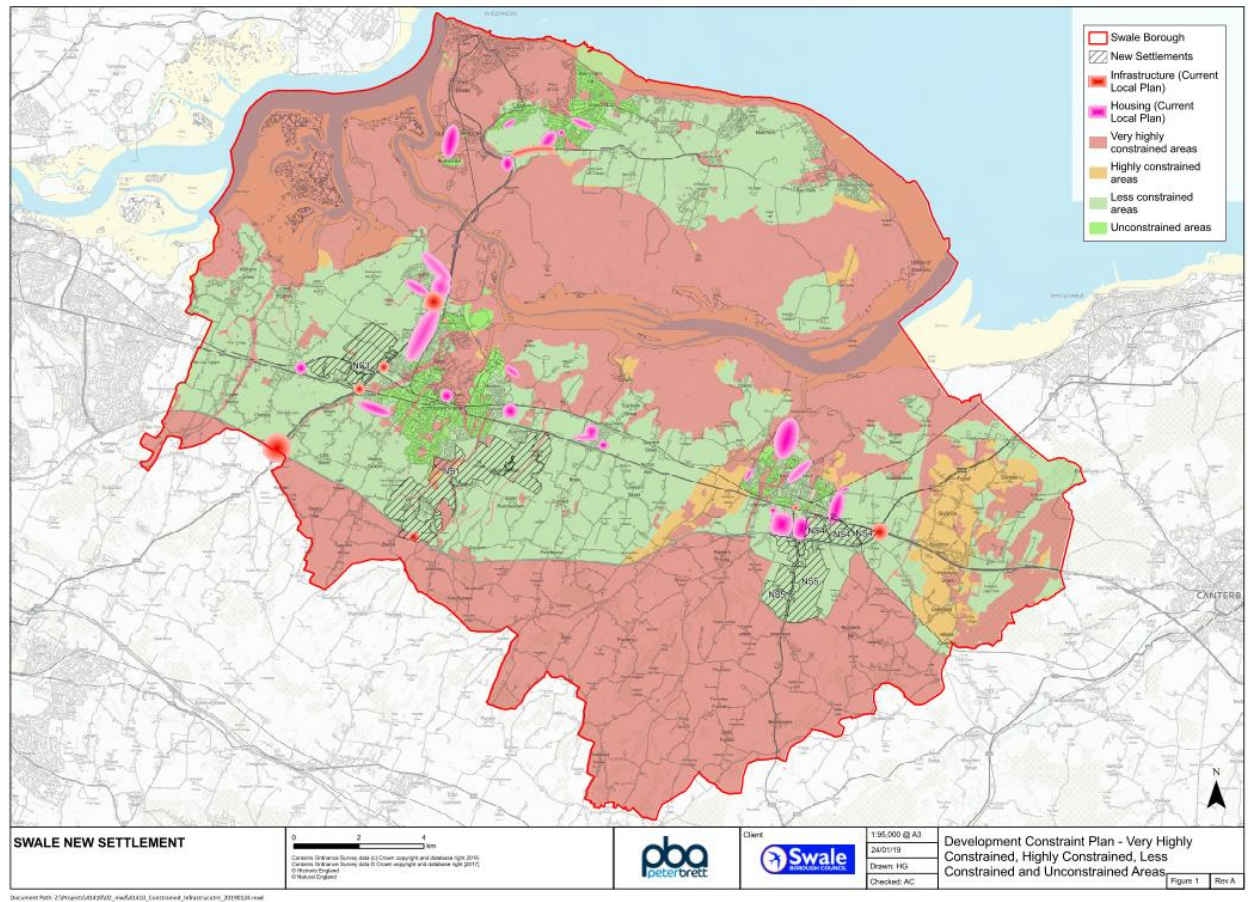
2.4 In addition, a few smaller sites were submitted but these were below the size threshold required to be considered as new garden communities. The Council advised those promoters to submit their sites as local plan candidate sites – outside this process.

2.5 Following initial feedback from the Council, four more detailed proposals were submitted by 3 August 2018.

2.6 While site NS2 was promoted at the Expression of Interest Stage no detailed submission was received. It was therefore considered to be withdrawn from this process and the promoters were advised accordingly.

2.7 We understand that the land in question may (in whole or part) be promoted through the normal plan making process. No inference concerning the merits of the land as a prospective local plan allocation should be drawn from the withdrawal of the land from this process.

Figure 1: New Garden Community Submission sites, constraints, housing and infrastructure



Note – Site NS2 is not shown.

Stage 2 – detailed submissions

Initial Review and Feedback

- 2.8 Following the receipt of the detailed submissions PBA, with the Council, undertook a rapid assessment of the information received.
- 2.9 Meetings with each promoter were held on 10th September 2018 with:
- DHA Planning on behalf of Crabtree and Crabtree Ltd
 - Quinn Estates
 - Duchy of Cornwall
 - Gladman Developments Ltd
- 2.10 As part of these meeting gaps in evidence were identified and the site promoters given the opportunity to address these.
- 2.11 The promoters were also invited to present their proposals to Members in September 2018. Comments and feedback from Members has been used to inform the more detailed assessment process.

Detailed assessment

- 2.12 To guide the detailed assessment – which we report in the next sections of this report – we draw on the questions posed in the Prospectus document.
- 2.13 This sets out clear questions on a range of topics including:
- About the scheme
 - About environmental constraints and opportunities
 - About delivering the design principles
 - About infrastructure
- 2.14 In the assessment, consideration has been given to each of the prospectus questions and the responses to them. The aim of the assessment has not been to rank the proposals or test how appropriate they are against a set of criteria. Rather the approach has been to understand what each can deliver, how this will be achieved, to identify the positive opportunities and issues that each face as well as any potential risks and questions that are raised by them. In the matrix the cells are coloured to represent the degree to which the question has been answered by the promoter so far.
- 2.15 A matrix was devised which sets out each of prospectus questions and indicates, the direction of travel of each proposal to achieving the objectives. A summary of the proposal together with comments are included within a table for each of the submissions. These matrix tables are included at Appendix 1.

3 GARDEN COMMUNITY PRICIPLES AND DESIGN

Introduction

- 3.1 The Council's Prospectus expects the proposals to create a development that is well designed delivering a superb environment in which to live, work and play. This means using the TCPA garden community principles as a general guide.
- 3.2 The principles mean that there are expectations that the development will need to be master planned, designed and plan-led to the highest standards to deliver a safe, secure, vibrant, inclusive, healthy and locally distinctive self-contained community, with local ownership of community assets. As part of this, the Council's own Prospectus vision is for meeting high standards of design that includes use of Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards.

• ***TCPA Garden Community Principles:***

- *Land value capture for the benefit of the community.*
- *Strong vision, leadership and community engagement.*
- *Community ownership of land and long-term stewardship of assets.*
- *Mixed-tenure homes and housing types that are genuinely affordable.*
- *A wide range of local jobs in the Garden City within easy commuting distance of homes.*
- *Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.*
- *Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.*
- *Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.*

- 3.3 It is essential that the 'garden community' is not just used as a label but is properly integrated into the design at an early stage to set the context for a landscape led approach which ensures the principles are taken through to the detailed design. The Government in their own New Garden Communities Prospectus is clear that "successful proposals will demonstrate how they are hard-wiring these qualities in from the start, supported by long term legacy and stewardship arrangements".
- 3.4 At this stage, three of the proposals commit to deliver development in line with the TCPA principles as their guide. An exception are the promoters of NS4 who have a strong and established model they have experience of delivering. This 'Poundbury' model is very similar to the TCPA and practically their preference is of little material concern.

- 3.5 From the detailed TCPA principles, we have identified a number of cross cutting themes. These are considered below and relate directly to the questions and objectives identified in the New Garden Communities Prospectus. They include:
- Land Value Capture
 - Ensuring high quality design
 - Promoting community stewardship
 - Providing social and community infrastructure
 - A wide range of jobs in the Garden Community
 - Housing mix and affordability
- 3.6 In the next few sections we look at how the proposals have addressed the key elements of the TCPA principles.

Land Value Capture

- 3.7 One of the most important aspect of the Principles, which all four proposals apply, is that the significant infrastructure (social and physical) should be paid for from the value of the land ('land value capture') as opposed to be paid for as a 'residual' – i.e. after the landowner has taken full profit including 'hope value'.
- 3.8 The fact that these proposals (with the possible exception of NS4) are outside the current and well-established plan strategy, has allowed the sites to be assembled on the basis that, unless the schemes comply with the Prospectus, the land is only worth agricultural land value.
- 3.9 So, simply put, a landowner will accept a lower uplift over agricultural value per hectare because, in return they secure this lower uplift over more land. The 'gap' pays for the infrastructure. The Council has asked all four promoters to provide viability evidence to support their proposals going forward (see later).

Ensuing high quality design

- 3.10 High quality design is a key element of the Prospectus and one that the Council are keen to ensure is delivered as part of any new Garden Community.
- 3.11 All four promoters intend to deliver their schemes as 'master developers'. This should allow the promoter to control each land parcel as it is designed and subsequently delivered by later delivery partners. In essence the Master Developer 'signs off' each land parcel and undertakes responsibility for the delivered quality. It also allows the Master Developer to co-ordinate the delivery of infrastructure.
- 3.12 The Council, as the development management authority, only receives detailed applications for development where the Master Developer considers they conform to the agreed design specification and other relevant policies.
- 3.13 This Master Developer model is established and used elsewhere in the UK (for example at Alconbury, Cambs), but is not common because it generally only applies to very large schemes. In this case, not all the promoters appear to have extensive experience of delivering in this model. NS4 is the obvious exception.

- 3.14 It is the case that for three of the schemes (NS4 excepted) there is a lack of detail provided about how these design principles will be implemented and maintained throughout the life of the development. While there is some reference to the different standards raised in the prospectus, none of the proposals make a categorical commitment and there is no clear demonstration of how this will be achieved. More recent responses (NS1, NS3 and NS5) have referred to the use of Design codes.
- 3.15 This is an area of evidence three proposals need to better formulate and where further information will be required over time. Even NS4 that has its own model of ensuring design quality, will need further development.
- 3.16 Given that the four proposals promote the Master Developer model, we think it vital that the Council takes an active role in assisting with scoping the design principles as early as possible. At the development management stage it is much harder for the Council to influence good design and so the correct stage to ensure good design is at the plan making stage. This may include the Council working with the developers to draw up, and subsequently adopt as a development plan document, the design guidance to be applied later; either independently, or as part of the overall master planning process.

Promoting community stewardship

- 3.17 There is limited detail available about long term stewardship in all four proposals. So there are few specifics about how the built-out community will be managed by the new residents after the schemes are delivered.
- 3.18 As part of the iterative process, some of the promoters have started to discuss commitments to work towards long term stewardship of community assets via bodies such as Land Trusts. But, more detail and commitment will be needed in due course, not least how such bodies will be funded and the implication of this upon scheme viability.
- 3.19 One obvious challenge for all four promoters is that the prospective new garden communities don't yet exist and so cannot yet help to formulate how this arrangement should work. There is a role for existing communities to influence this process – but they also don't represent potential new residents and so cannot be expected to direct such a process.
- 3.20 There is therefore a role for the Council to engage more proactively in the process – to represent the prospective future residents who don't yet have a voice in shaping development and future stewardship.
- 3.21 At this stage of the process, we don't consider that the promoters' lack of design detail, or firm view about how the long term stewardship elements of their proposal will work, are significant problems. All four proposals are still dealing with the 'big' issues around deliverability of these schemes. However, they are important matters which will rapidly come up the 'batting order' of importance as schemes progress.

Providing Social and Community Infrastructure

- 3.22 All four schemes commit to deliver their social and community infrastructure in full. This was a core component of the Prospectus and the TCPA principles.
- 3.23 Further details will be needed, following discussions with the various providers over their detailed needs, requirements and standards, but in principle all four schemes will deliver the required school places, healthcare provision and other associated community / social infrastructure.
- 3.24 One area we have asked some promoters to look at is around open space provision.
- 3.25 As currently drafted NS4 provides only 33.6% open space and while in NS3 the proposed layout means that the provision is remote from the new dwellings and so may not function as intended. We have asked the promoter to consider increasing provision around the new homes – including whether changes should be made to the ‘red line’.
- 3.26 Related to open space is that NS1, as currently drawn, leaves some land between the ‘red line’ and existing settlements. This is land outside the promoters control but where its future status is not clear. The land is not formally included within proposals for development, or for open space provision and is (as far as the development plan concerned) ‘white land’. We have asked the promoter to look in detail at these land parcels. Should the promoter not be able to secure them, the Council may need to act to ensure that they are managed in some way. There is a risk that the owners promote new housing, outside the new garden community process, or the land is left isolated without any management. We have also noted that, as submitted, the NS1 site boundary, in some plans, does not appear to extend up to the A2. The Council needs to be satisfied that there are no ‘ransom’ strips that could cause delivery issues at later stages.
- 3.27 All four promoters accept that there may be a case for ‘tidying up’ their red line boundaries. There are other examples in the other schemes where small gaps exist between existing villages or properties and the promoted land. There are also other boundary issues affecting some schemes relating to environmental mitigation that are considered in the next section.
- 3.28 For the site promoters, and the Council in general, is the risk that neighbouring parcels come forward as stand-alone developments which undermine the comprehensive new garden community vision. In practical terms, this means that development comes forward in the area that does not make any meaningful contribution to the very significant infrastructure costs (and benefits) that the new garden community is promoting.
- 3.29 Raising these issues now, as part of this process, provides all concerned the opportunity to do this – an opportunity that may not exist via the normal plan making route or via planning application.

A wide range of local jobs in the Garden Community

- 3.30 The TCPA suggests new jobs should be provided 1:1 with new homes.

- 3.31 The intention is that new jobs are readily available to new residents, ideally as part of the new garden communities. So minimising the need to travel and assisting delivery of vibrant, mixed-use, new communities. Whilst the guidance is useful to re-inforce this principle, in the Swale context, this is one the most technically difficult parts of the guidance to apply in terms of its treatment by the Local Plan.
- 3.32 For Swale, most of the new homes we need to build are not to accommodate a new and growing population, but instead to manage changes in household structure. So it is not the case here that each new house needs a new job.
- 3.33 As currently submitted only NS1 and NS4 promote a 1:1 ratio.
- 3.34 Both NS3 and NS5 provide fewer jobs but both sites are well related to the existing (and growing) employment areas in their respective towns. Providing these can be accessed sustainably, we don't think this gives rise to any concerns and new homes and labour supply could be viewed as complimentary to the existing employment areas.
- 3.35 We acknowledge the risk that the type and scale of employment being suggested at NS4 may compete with the nearby town centre. The town centre may be a more appropriate place to grow a more significant critical mass and the interrelationship between the scale and quality of offer provided in NS4 may need to consider this as a risk to be mitigated and balanced with the need to create mixed use communities.

Floorspace or Land

- 3.36 One factor to be aware of is that no promoter can 'deliver' the jobs. They can only provide the land or floorspace which, if the market takes it up, will accommodate the jobs suggested in their submission.
- 3.37 In this regard, it is important to note that three of the proposals commit to deliver the required floorspace to accommodate the jobs. But NS1 only commits to provide the serviced land. i.e. there is no firm commitment to provide the floorspace to accommodate the jobs.
- 3.38 The Council has asked all four promoters to provide viability evidence to support their proposals going forward (see later). For NS1 it will be important that they can demonstrate that the proposed floorspace is viable to deliver in addition to simply servicing the land. If the floorspace is not viable to deliver as part of the new garden community proposal, then no reliance can be placed on any job estimates or commitment to deliver a number of jobs.
- 3.39 At this stage, it is also fair to note that we had expressed some concern that the proposal is too heavily reliant on higher density office jobs to meet its claim of 10,500 jobs on 120,000 sqm of floorspace. Accepting that other components of the scheme (retail & schools for example) will provide some jobs, the required 'job density' still appears to high unless most of the floorspace is provided as offices. Regarding viability, we know that higher (job) density offices struggle to be viable in this market – whereas lower (job) density light industrial and business units are more viable.

- 3.40 This concern is not a ‘show stopper’ – because we are not sure 10,500 new jobs are technically needed to meet future housing needs. A lower density form of employment may be more viable and so policy preferable. But we note that, at the moment, there does not appear to be the evidence to support the 10,500 job claim being made.
- 3.41 This is especially important for NS1 because this scheme is promoted largely on its economic credentials.

The Kent Science Park

- 3.42 We cannot discuss jobs without commenting on The Kent Science Park. NS1 is inextricably linked to the Science Park but we need to note that the Science Park estate, counter to early expectations, has been removed / omitted from the ‘red line’ of NS1.
- 3.43 Therefore, as currently proposed, NS1 does not commit to any new development on the existing estate. The scheme instead promotes alternative land for employment.
- 3.44 In the PBA Employment Land Review (2018) we discuss the Science Park proposals at length. In summary, we considered that a significant increase in the scale of the Science Park was reasonably high risk. This is because of the very competitive nature of the sector and its small scale. But this does not mean that the Council should not aspire for this step change – only that it should do so understanding the risks.
- 3.45 At the moment, it is unclear how the new space (actually land) promoted inside NS1 will work alongside the Science Park estate. One risk is that the new land competes with the science park and undermines its longer term viability.
- 3.46 Another risk is that by not including the Science Park within NS1, the opportunity is lost to use the new garden community proposal to enhance the estate. For example using funds that are (indicatively) set aside to pay for servicing the new land proposed in NS1 to instead invest on the Park.
- 3.47 The worst case scenario is that the Science Park fails to prosper; partly because a significant new land allocation is provided as part of NS1 that diverts market interest. A future risk is that in order to invest on the park ‘enabling’ development is needed (i.e. homes) and these are provided outside the comprehensive new garden community masterplan.
- 3.48 Our opinion is that every effort should be made to include the Science Park within the NS1 proposal.

Housing mix and affordability

- 3.49 The Prospectus, and the TCPA, expects the proposals to create a variety of flexible housing products for everyone and achieve greater levels of affordable housing. Specifically, this means catering for a diversity of housing provision including a diverse mix of types and tenures, self-build and affordable at 40%. Achieving affordable housing, together with an appropriate mix and tenure, are important

- objectives for the Council to ensure it meets its local housing needs. Policy often 'sets out the stall' and developers work back from this, considering the impact on scheme viability. However, the approach should be to consider the whole package of housing delivery and meeting housing needs. This would mean discussions should take place to look at options for off-setting overall affordable housing provision depending on type e.g. social housing versus affordable rent and promoting small sites for small housebuilders, custom build, private rented and discount housing etc.
- 3.50 All the proposals are alive to the need to provide a new and innovative mix of housing, including self-build and a range of unit sizes. These are not fixed at the moment and many are expressed as concepts to be tested at later stages – which are understandable. However one element we have been very clear to confirm with the promoters is what their 'affordable' offer may be. This is particularly because we know from experience that this is an element of many proposals which is often 'squeezed' but hope that that land value capture models should allow the sites to make a much more meaningful contribution.
- 3.51 Two of the original proposals did not include a commitment to deliver the prospectuses affordable and social housing. Both NS1 and NS4 were originally non-committal on the amount to be provided.
- 3.52 For the Borough, under provision on potential new garden communities is of key concern. This is because in the future one or more of these schemes may deliver a significant share of future housing targets in the area. So if these sites fail to deliver affordable targets in full, there is little opportunity to 'make up' any deficiency elsewhere.
- 3.53 Regarding NS4 the Council expressed surprise that NS4 proposal could not deliver its affordable housing expectation in full, partly because the site does not appear to carry significant abnormal costs. In response, the promoter has reconsidered their offer, and now seeks to provide in in full subject to the definitions, tenure and mix.
- 3.54 Regarding NS1, we understand the difficulty given the significant abnormal costs associated with the infrastructure package needed to deliver the scheme. The scheme promoter is, at the moment, suggesting the Council can expect around 20-25% affordable (To be confirmed – dependent on tenures and definitions). This an improvement on the 10% originally suggested. We note that this provision is higher than has been seen on other schemes in the area.
- 3.55 This is a very difficult dilemma for the Council to consider. The circumstance arises because the scheme lacks public subsidy to pay for the infrastructure – infrastructure that in other cases may be part funded by Central Government.
- 3.56 Our view is that without a significant offer of affordable housing, it is difficult to see how the proposal as a whole conforms to the TCPA principles. In turn this may challenge notions of sustainable development or whether it would be able to generate wider Government support – outside of those with a transport remit. Also for NS1, because of its scale, it will make such a significant contribution to the Borough's future supply, any significant under provision will be very detrimental to Sittingbourne in years to come. However, the Council needs to be pragmatic and may need to

balance the competing demands of transport infrastructure and affordable housing. If 20-25% is all that the scheme can viably deliver it will be vital that this is comprehensively secured via binding legal agreements of for the reasons discussed above. This also applies to other proposals but is paramount here due to the scale of the proposal.

- 3.57 On the more positive side - it is recognised that the provision of the new southern relief road and linked with the delivery of the northern relief road, may improve values in the town and thereby making the achievement of higher levels of affordable housing in future housing schemes around the town more likely.
- 3.58 It is noted that NS3 commits to 40% affordable in full - but this is subject to testing. More information, particularly for NS5, would be helpful. In addition, it is surprising and unfortunate that NS4, as a well-developed proposal using a 'template' approach, lacked any detail or commitment to affordable housing early in the process, however, they are now committing to meeting this policy requirement subject to caveats which will require further discussion.

Summary – Garden Community Principles

- 3.59 All four proposals are committed to deliver, in some form, the TCPA principles – although NS4 prefer a slightly different *flavour* modelled on Poundbury. We don't consider this of material concern, and this could be viewed as an advantage given their demonstrable experience.
- 3.60 Most importantly, all schemes propose to meet their full social and physical infrastructure need through some form of land capture. This model, as opposed to a more traditional land sale and promotion models, provides a better opportunity to secure the infrastructure – in the mutual interest of the Council, the landowner and the new garden community.
- 3.61 The most significant departure from the TCPA guide is the employment offer on some of the sites, which would lead to fewer jobs proposed than the 1:1 ratio. But although it remains useful as an ambition to secure mixed use schemes, we don't, in the context of Swale, consider this a significant issue, provided the schemes can be made accessible to the Borough's existing, and growing, employment estates.
- 3.62 None of the schemes are as yet fully formulated and there are 'red line' issues with a number, where additional land could be included to deliver more open space, environmental mitigation or better 'rounded' proposals. There is also the question that the Science Park is currently excluded from the 'red line' in NS1. The success of the Park is a pivotal part of the 'package' being promoted and the rationale for the new road network in this area.
- 3.63 In our opinion overall, none of these issues are, as yet, 'show stoppers'; the Prospectus process has allowed the promoters to assemble the land so far and as planning certainly increases we would hope these issues can be resolved before they become more critical to progression of the schemes in question.

3.64 For all four schemes, the mix of homes has evolved so that they broadly match prospectus expectations – and the TCPA guidance. When first received by the Council the proposed mix in one or two of the schemes meant that we could not consider that they met the terms of the prospectus. But, as noted above, these have now evolved.

4 OTHER FACTORS

4.1 Above we have considered a range of factors related to the Garden Community Principles as set out in the TCPA guidance. Here we address a number of other related factors, but which also arise from the Prospectus that we have included in our assessment.

4.2 This includes:

- Delivery
- Engagement
- Environmental Constraints
- Landscape and securing net gains in biodiversity
- Viability
- Transport

Delivery

4.3 The Prospectus expects the proposals to deliver a high number of housing completions and start delivering new homes as soon as possible, ideally by 2026, reaching an annual rate of at least 150-250 dwellings per year using innovative approaches to increase delivery throughout the rest of the new plan period and beyond. This is important because Swale needs to be confident that the site can deliver housing to meet its needs. There are two components of delivery to explore - the delivery vehicle and timing.

Delivery Vehicle

- 4.4 It is notable that all the proposals do not consider it necessary to work with the Council to use compulsory purchase powers, a Local Development Order, or a Locally Led Development Corporation. As submitted all four proposals favour the Master Delivery model.
- 4.5 This is however under review with NS4 suggesting that this may be helpful, and for reasons related to transport (discussed below) more involved public sector support *may* be needed to deliver NS1 than original envisaged.
- 4.6 It is recommended that further work is undertaken to explore what type of Local Delivery Vehicle (LDV) could be established to bring these forward, even if this is just an informal approach. For example, we understand the Council have agreed for NS4 to use a steering group with terms of reference which will have a series of topic groups and which will evolve as appropriate over time. This might be described as an embryonic informal LDV, which might be an appropriate model for all the schemes.
- 4.7 As noted above, there is a lack of detail about long term stewardship (i.e. how the community will be managed post-delivery). There is some recognition that community assets and open space would be transferred to a trust, parish, company to assume responsibility and retain in perpetuity. More recent information on NS1 and NS3

indicates that they are considering community trusts to ensure the long-term legacy for relevant areas and at least one is in discussions with the Land Trust. This will need further discussion and clarification in due course as the proposals are developed further. More detail has also been received from NS5 on stewardship.

Timing

- 4.8 We discuss timing in more detail in the matrices in appendix 1 of this report. But we note there is an issue with the timing, phasing and delivery of new garden communities in general, because they often require considerable up-front infrastructure and have long lead in times.
- 4.9 Actual trajectories have been provided by NS1 and NS4, but all commit to deliver housing in line with the timescales in the Prospectus.
- 4.10 However, these claims all appear optimistic. Our opinion is that the Council would be wise to allow significant 'contingency' in any development trajectory. As the schemes and evidence has evolved this has become particularly important for transport.
- 4.11 In general, we understand that improvements to J5 are well advanced to the benefit of both Sittingbourne proposals. But recent correspondence from Highways England expresses concern about the timing of the new junction J5a. We discuss this in more detail later.
- 4.12 Around Faversham, we understand Highways England are cautious about the impact of the new communities on junction 7. Unlike J5 there are no advanced proposals here.
- 4.13 For the new garden communities we need to be aware that such concerns relate to any significant new development around either town – whether new garden community or local plan allocations. So care is needed before dismissing any new garden community proposal on highways grounds – the same concerns may be raised with more traditional local plan allocations. And we know that Government policy allowed limited flexibility for Councils to underprovide new homes citing transport constraints – most Councils in the wider South East have similar constraint issues.
- 4.14 Unlike smaller scale allocations the new garden communities are better able to provide the critical mass to address strategic constraints than a collection of traditional local plan allocation sites.
- 4.15 As noted above we return to transport later.
- 4.16 Although not strictly related to delivery as a topic we are concerned that utility providers have not yet considered the cumulative impact of these proposals. We note that some promoters have engaged with the providers to demonstrate utility infrastructure is not a constraint. But further work is needed to ensure the cumulative needs of a new garden community, and 'business as usual' growth is met.
- 4.17 When questioned about this, we were referred to their statutory duty to serve the level of development allocated in the next plan. But we think further work is needed to ensure their infrastructure does not act as a timing constraint to delivery.

- 4.18 It is recommended that a Utility Working Group is set up to consider these proposals in more detail.

Engagement

- 4.19 The Prospectus expects the proposals to proactively engage the existing and new garden community in positively planning for the future. In addition, it is envisaged that the proposals will be delivered through a partnership approach and managed through a long term community controlled stewardship structure.
- 4.20 There has been engagement with technical stakeholders by some of the promoters of the proposals. This early consultation has been useful and starts the process of working to understand the key issues. These communications are being followed up by the Council who are keen to ensure that the cumulative issues on utilities and transport infrastructure are also properly considered by providers and those responsible for their operation. While we note the NS1 has consulted on utilities and infrastructure in particular, there has been much more limited engagement with environmental bodies, the design review process and wider community. This is surprising given how far it has been developed and this may lead to implications for the site boundaries, such as in relation to the impact on environmentally constrained areas, which may in turn lead to site boundaries needing to 'flex' further down the line.
- 4.21 It is not unexpected that there has been little community engagement in the proposals so far, with the exception of NS4. However, we expect full participation and community engagement to be a key part of the proposals going forward and it is necessary for all proposals to address this in detail. More recent information on NS1 indicates that Design South East has been engaged and will be involved in the consultation process. It is important that that timescales and resources as well as political expectations are aligned to provide integration with the Council's processes. There is currently limited detail on the type, process and timing of engagement with local communities, parish councils and other interested parties. Engagement strategies will need to be put in place as a key next step.

Environmental constraints

- 4.22 The Prospectus expects the proposals to be located in an appropriate, suitable and sustainable location. This means avoiding inappropriately constrained areas and responding appropriately to constraints, particularly environmental ones such as Areas of Outstanding Natural Beauty and Ancient Woodland.
- 4.23 Both NS1 and NS5 have impacts on the Area of Outstanding Natural Beauty. For NS1 this relates to the location of the new junction in particular, but also to its setting. Although outside of the AONB, NS5 needs to address setting issues; made the more difficult due to the AONB boundary wrapping around the site on three sides.
- 4.24 The AONB Planning Unit has considered these impacts and has provided initial provisional comments. The provisional views expressed set out objections to both NS1 and NS5. In relation to NS1, they have confirmed that the proposals would

constitute major development which will need to be addressed for its national planning policy implications, as well as its potential to affect the timing of the delivery of the junction. While we would not necessarily consider these to be showstoppers at this stage, it will be necessary for the promoters to respond to these comments and consider the implications for their proposals if these are not to be major issue further down the line.

- 4.25 NS1, NS3 and NS5 all have ancient woodland issues; although it is NS1 again where there may be actual loss and/or a current inability to provide the appropriate buffers to them. For NS1, the environmental issues, for both the road and built development, are compounded by the presence of several local wildlife designations and an Area of High Landscape Value which runs through the site (see also landscape below). Development is included within these areas and, overall, there is little suggestion of the scheme adequately responding to these issues at this stage. These are matters that, in turn, feed into site boundary questions, as discussed below.
- 4.26 Whilst there will always be a mix of adverse impacts to be weighed against the benefits arising from a proposal, this will be particularly so for NS1 and NS5 where, even after mitigation efforts, there may be significant environmental issues outstanding needing to be weighed in the balance by the Council.

Landscape and securing net gains in biodiversity

- 4.27 The Prospectus expects the proposals to achieve strong environmental protection and real and significant net gains in biodiversity, to support economic prosperity, health and well-being. This means delivering and maintaining extensive landscaping and multifunctional green infrastructure over a significant percentage of the land area through a comprehensive network of open spaces, habitats and green corridors.
- 4.28 To support this assessment, Land Use Consulting has undertaken an overview and evaluation of the landscape, visual context and sensitivities of each of the proposals. The full work is published separately, but the conclusions are included in the subsequent sections relating to each proposal. It is necessary for the proposals, and particularly NS1 and NS5, to consider the findings of these assessments and respond to the observations and recommendations in relation to the detailed design and masterplanning of each scheme and the relationship with the landscape character and features both in the sites and their surroundings.
- 4.29 As indicated under 'environmental constraints' above, in broad terms, NS3 and NS4 have lesser landscape challenges than NS1 and NS5. The design and layout of NS1 is based primarily on the road alignment, which in turn is dictated by the presence of the Science Park and the need to connect with the proposed Sittingbourne Northern Relief Road. Consequently, despite claims that it is, the scheme is not obviously a landscape led one, and there will be considerable landscape and visual adverse impacts needing to be addressed. These will present real challenges given the above pre-determined issues and the existing site boundary.

- 4.30 NS5 has similar challenges, but site boundaries and ownerships may have a better ability to ‘flex’ to those challenges., however, for both schemes, some imaginative approaches may need to be considered.
- 4.31 There is a wider question relating to the provision of green infrastructure in general, particularly given TCPA principles. The proposals all deal with these issues in different ways; with open space largely concentrated into a single area of the site (NS3 and NS5), as buffers around existing villages (NS1), or spread within the layout (NS4), although in that case, to a limited extent overall because they only provide 33.6% open space. While all purport to follow a landscape led approach, this is not obviously demonstrated by NS1 and less developed in NS3 and NS5, where there are conflicts between the location of open space and pylons on those sites, as well as the question of whether locating it all in one location or on a separated parcel represents the most appropriate and accessible layout (NS3). NS4 could potentially include additional land to the south of the M2 for purposes of increasing public access to the wider countryside.
- 4.32 While all the proposals repeat the concept of a “net gain in biodiversity”, it is unclear how this will be achieved in practice and none of the proposals are committing to the biodiversity standards set out in the Prospectus. However, NS4 has the most developed proposals relating to biodiversity. Whilst the lack of detail at this stage might be expected, given the current Government consultation on Biodiversity Net Gain (closes on 10th February 2019), this is a topic which will need to be taken seriously. While this objective is a challenge, there is an opportunity to address this in a comprehensive way early on the process, linked to the masterplanning and wider design of the site. This will need to be considered further as, when and if the sites progress.

Viability

- 4.33 Sites must be market viable to proceed and developers prefer to develop in an area where the sales price of housing is high. An assessment of sales values, which are a good proxy for housing viability, demonstrates that the areas in the south and east of the Borough and south of Sittingbourne are likely to be viable. Land to the west of Sittingbourne may support lower values overall. However, all the proposals are located within parts of the Borough considered to have good market values and in the normal course of events schemes in these locations would be expected to be viable.
- 4.34 Nevertheless, for this assessment and the plan making process more generally, viability evidence to support the proposals is seen as critical.
- 4.35 There is a risk, particularly for NS1, given the significant ‘abnormal’ cost associated with a privately funded Motorway junction, that developers over promise the new garden community package. Failures to identify these abnormal costs early enough mean the possibility that benefits fail to materialise later. A specific issue with new garden communities is the stewardship arrangements for the transfer of community assets. These would normally require a financial endowment to support the body charged with their stewardship, which should be built into costings early on. However, the new garden community process has been designed to mitigate these

risks as far as possible, but it is still important that the Council and the public are satisfied that schemes can deliver in full.

- 4.36 The Council is in the process of collecting viability evidence from the site promoters. But it is fair to say that this area of evidence is currently controversial across the development industry in England and not only in Swale.
- 4.37 National planning policy has recently changed and the new NPPF (supported by Planning Policy Guidance; both 2018) now requires ‘open book’ viability evidence and the use of ‘existing use value plus’ (EUV+) to assess the land value¹ unless there are ‘exceptional circumstances’.²
- 4.38 Paragraph 57 of the 2018 NPPF states:
“All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available”
- 4.39 To date three assessments have been provided. The fourth, (NS4) has not yet been made available.
- 4.40 We understand that where full (open) evidence has not been provided, it is necessary for the promoters suggest the exceptional circumstances that should apply. Part of this may relate to commitments given to landowners before the new NPPF when viability evidence was not automatically public and that it takes time for the respective parties to amend these agreements.
- 4.41 The Council is minded to take the view that new garden community schemes, with their specific approach toward land value capture, are unlikely to demonstrate that exceptional circumstances should apply, especially given the strength of the new policy.
- 4.42 It is noticeable that a significant hindrance in applying the policy is that Government had committed to provide a national ‘template’ for the development industry to universally apply. This was due in ‘autumn 2018’ but has not yet been published.
- 4.43 Whilst we have not assessed the viability assessments received in detail, they do not appear to raise any fundamental issues, although, it is too early to draw firm conclusions. Future assessments will need to be independently reviewed by specialists. The Council will also need to ensure that all components being offered by the promoters are included and fairly costed.

Transport

- 4.44 Transport is perhaps Swale’s biggest challenge. Contributing to improvements to the network, alongside the new homes, is also one of the biggest benefits the new garden communities may bring.

¹ The ‘plus’ element of the assessment provides developer profit which is judged to be sufficient to incentivise the landowner to sell the site for development. This may be very different to the price paid or previous expectations of what the land could be sold for.

² PPG - Paragraph: 021 Reference ID: 10-021-20180724

- 4.45 The Prospectus expects the proposals to deliver sustainable and long-term solutions to the transport issues, particularly in relation to congestion and air quality. It is essential to make a positive contribution to the existing transport situation incorporating necessary infrastructure improvements and latest technology.
- 4.46 Each of the four proposals have been passed to both Kent County Council and Highways England for comment.
- 4.47 We received feedback from both Highways England and Kent County Council shortly before this report was issued. We have used this to inform this report but we note these are only provisional views and obviously limited in weight because much is dependent on detailed modelling and costing.
- 4.48 The feedback has been shared with the promoters and we are aware that some are questioning the various views expressed (sometimes because they have more detailed data as well as a difference of opinion) and so the reader should be aware that transport and any mitigation that may or may not be needed is not fixed. We suggest that once all parties have been able to consider feedback in more detail the Council updates members with a more final view from Kent County Council and Highways England.
- 4.49 The approach we have taken in this assessment is that it is not for PBA (or the Council) to consider who is right or wrong. Certainty, in the case of the strategic road network, the only body able to provide a robust opinion are Highways England. They own and operate the route and so have absolute final say over their network.
- 4.50 That said, our opinion of the correspondence is that neither Highways England nor KCC have identified a 'showstopper' at this point.
- 4.51 Both have expressed concerns about all four schemes and it is the case that any additional traffic on the motorway network and its junctions raises some 'concern' from Highways England. But they are, as can be seen, willing to work positively to address these.
- 4.52 In our experience, because any major development will have some impact on the network it is normal for concerns such as these to be raised. For this process it is very helpful because it gives all parties much more time to address them than may be the case via the local plan route. This applies to both Kent County Council and Highways England.
- 4.53 Most of the Kent County Council comments are highly dependent on the results of transport modelling and the Boroughs model is not yet finalised. So, what off site works may be needed are not certain – but in all four cases some works will be needed. For NS5 local works may be more extensive given the possible need to improve the local network running from Faversham, through the proposal site and on southwards. So this will mean much more joint working with neighbouring councils than the other proposals.
- 4.54 The County is pushing for high quality public transport links across all four proposals and all four promoters are willing to deliver. However detailed questions have been raised about how this may be 'connected' between the new garden community and

- town centres – for example how the rapid transport network promoted by NS3 will address the already congested route into town down Key Street or via an alternative route.
- 4.55 We are aware of some concerns about the NS4 proposed ‘calming’ of the A2 London Road/Canterbury Road. While there are advantages to this, including making the development site much more accessible to the town centre, it brings significant ‘externalities’ to existing users of the route given this is (and will remain) the primary access to all of Faversham from the East. To address these concerns there may be merit in ‘de coupling’ these improvements from the scheme so the wider community of Faversham can consider the positives and negatives independently of the new garden community in more general.
- 4.56 A possible showstopper that could emerge over time relates to NS1. It is fair to state that Highways England preference may be for a design which is far more extensive than that proposed by the NS1 promoter. In summary, they are concerned that the route between J5 and J5a would be attractive to local traffic and undermine the robustness of the M2 as a strategic link. So their preference is for a new ‘local’ road in addition to J5a for local traffic to the use.
- 4.57 This is only expressed as a ‘preference’ at the moment. But the Council needs to be aware that should this be elevated to a requirement then this could be a ‘show stopper’. The build cost of such as new local road could cost at least £2m per KM and possibly more given the topography – so possibly circa £10m [this is provided only to illustrate the possible scale of the costs involved and no way should be taken to suggest we have undertaken a costing of the proposal]. The land would also need to be purchased and possibly the impact on the AONB assessed.
- 4.58 There are also concerns raised around the delivery model being promoted for NS1. The claim being made is that the proposal, by being privately funded, can be delivered quicker and more efficiently than a public model. There is some merit in this – many major road schemes are delayed not for engineering reasons but waiting Government funding rounds. However, it would be wrong not to flag the significant challenges in delivering a new junction and Highways England suggest that the administrative hurdles of delivering the junction may be greater than are being assumed.
- 4.59 Also related to the junction (and the scheme in general) and its timing is the risk of objections arising from possible adverse impacts on the AONB – the scheme requires land within the designated AONB. We would hope that given the strategic significance of the junction to Sittingbourne (assuming that case is made) this can be addressed, but it may add delay, given the requirements of national planning policy in respect of the national designation.
- 4.60 In addition, the Southern Relief Road may well only work effectively with the completion of the Northern Relief Road so as to provide a comprehensive solution around the town. The absence of this piece of the jigsaw from NS1 is a cause for concern and will need to be addressed as part of ongoing discussions.

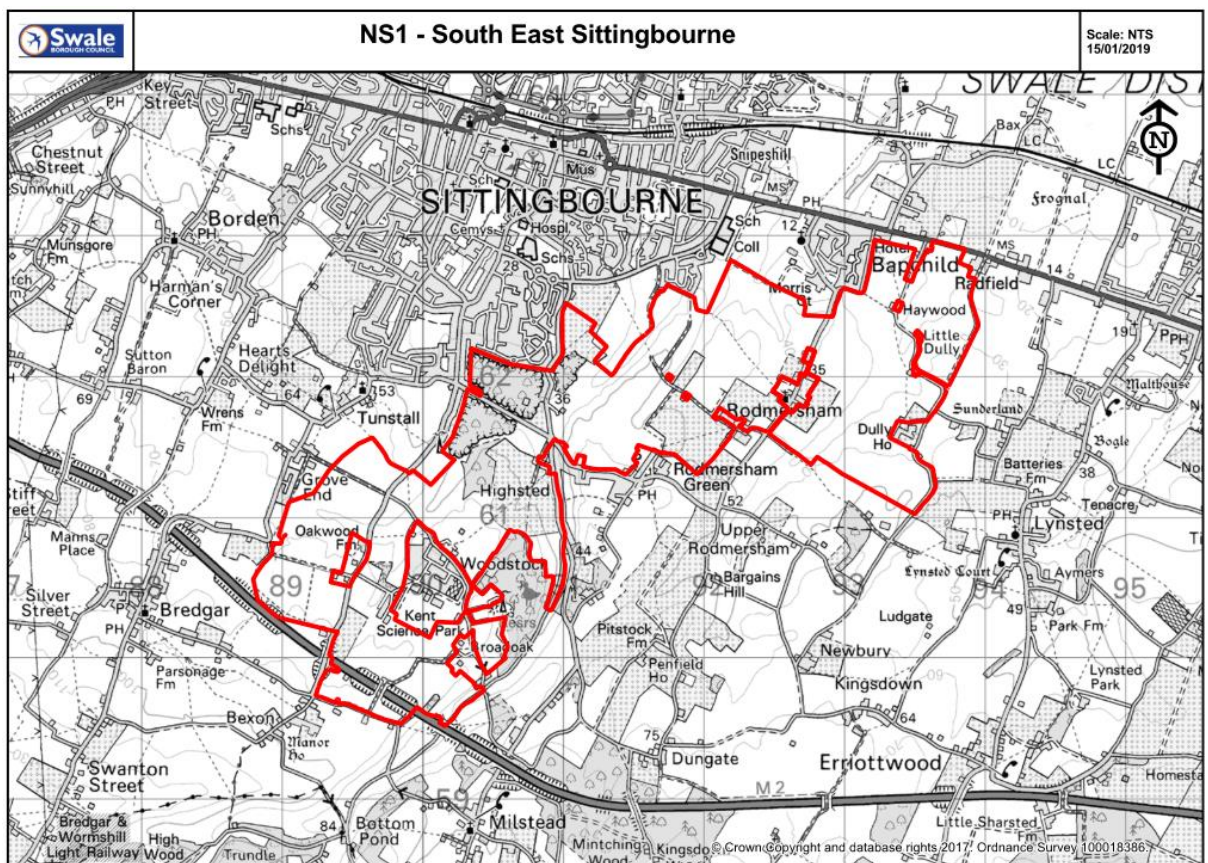
- 4.61 We appreciate that this commentary focuses on NS1 and the challenges in delivering the scheme. This is inevitable given the scale of the proposal and the much more strategic issues raised by a new junction and significant supporting infrastructure. To add 'balance' to this commentary we need to stress that while NS1 is undoubtedly challenging and the transport case has yet to be made to Highway England's satisfaction, if delivered, NS 1 provides the greatest potential improvement to the network for the whole Borough and especially Sittingbourne. Coupled with a northern link road it offers external benefits to the towns' residents far in excess of the other three proposals. It 'unlocks' not only the Science Park but also Eurolink and provides the villages to the East a new route to the Motorway avoiding Sittingbourne. So any seemingly negative comments above must be seen in this context.
- 4.62 Our main transport concern relates to timing, and the risk that over optimistic timing assumptions means NS1 delivers later than promoted. The risk here is greater given the 'strategic' nature of the works involved when compared to the other proposals.

5 NS1: SOUTH EAST SITTINGBOURNE

Summary

- 5.1 The site at South East Sittingbourne is promoted as Highsted Park by Quinn Estates for 11,500 homes with 120,000 sqm of new commercial space which is expected to generate 10,500 jobs around the existing Kent Science Park. The proposal includes 4 district centres to include nurseries, pharmacy, pubs/restaurants, medical facilities in line with CCG requirements, 4 new primary schools and a 6-form entry secondary school including 6th form and further education. Sport and leisure amenities include a new facility for Sittingbourne Football Club.
- 5.2 The proposal is predicated on the delivery of a new A2/M2 southern relief road, proposed as a dual carriageway which, together with a new motorway junction (J5a), would be paid for in full by the development. The design concept is a necklace of villages linked together by the new road.

Figure 2: NS1: South East Sittingbourne site location plan



Key issues, opportunities and risks

5.3 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- New road and junction
- Delivery and timing
- The location of development and the road alignment and their impact on environmental constraints
- Affordable housing
- Jobs and recalling commuters
- Site boundaries and relationship with existing settlements
- The football club

New road and junction

5.4 It is not clear that the road scheme is deliverable, given the constraints they must deal with, yet further modelling work is also required to prove the case. Fundamentally, there is concern that the northern relief road scheme is not included within the NS1 boundary, and this is a significant concern. It is recommended that this is part of the scheme or linked to it so that it is delivered before the completion of the new garden community.

5.5 In relation to these issues, it is essential to understand further:

- how many homes could be delivered without junction 5A?
- the differential cost between a single and dualing of the road and what is actually required to serve transport needs?
- the road alignment and some of the development parcels currently impinge significantly on local environmental designations and ancient woodland - how will the impact on these be minimised and mitigated?
- if the scheme promoters are fully funding the motorway junction and road privately how this will happen and most importantly that they own all the land right up to the A2 and M2. It is understood that a business case and further evidence about the delivery is being prepared.
- what the benefits are of the southern relief road only and exactly what the relationship is with the northern link road.
- what is the nature of the public transport package that will support this development and how reliant will it be on the public purse of transport operators to support it?

Delivery and timing

5.6 The proposal commits to start delivering in 2022/23 for 20 years achieving up to 700 per year through a range of outlets and approaches, however, this timescale is dependent on the road infrastructure being in place to ensure it is frontloaded. Given

the comments from Highways England, who doubt the timescales and believe it will take 5-7 years, we do not think it will allow completions by 2022.

The location of development and the road alignment and their impact on environmental constraints

- 5.7 Detailed scrutiny of these timescales is required together with which elements will come forward in phase 1. It will be necessary for the Council to make realistic assumptions about the timescales it uses for the Local Plan. The design concept appears to be largely a result of land ownership, rather than a coherent landscape led consideration of the best way to achieve a new garden community. The current road alignment and a number of development parcels appear to intrude on sensitive areas, such as Highsted Wood. For this to work, it will need careful consideration of existing settlements and designations and consideration as to how they should be integrated and buffered. There are opportunities for existing and new landscape and biodiversity assets to inform the masterplan, however, there will be challenges to achieving this within their site boundary.
- 5.8 The conclusions from Land Use Consultants are set out below. They are significant for this site and will need to be considered and addressed.

This is a very challenging site for development of a road and residential development of the scale proposed. In landscape terms much of the area is highly sensitive including part of the Kent Downs AONB and its immediate setting and representing special qualities (dry valley) extending out from the AONB boundary. The landscape quality is recognised by the local landscape designation. Within Swale there is no precedent for urban development climbing the dip slope transition between the coastal plain, fruit belt and chalk downs of the AONB or extending within the dry valleys. It is very difficult to achieve a scheme which is landscape-led in this context and there are limited opportunities to fully mitigate impacts in this location of high landscape sensitivity.

If a development of the size and scale proposed in this location were to be progressed, significant adverse landscape impacts would need to be accepted. At a minimum any scheme in this location would require:

- *Exploration of all possible route options for the desired link road to minimise its extent and impact and maximise opportunities for integration;*
 - *Extended site boundaries to permanently secure areas of landscape buffer/green gaps and/or mitigation for visual/landscape impacts;*
 - *Reduced residential development areas to avoid the most sensitive locations (as set out above);*
 - *Clear identification of measures to minimise impact on the AONB including reduced extent of commercial development;*
 - *A single carriageway with reduced access onto the local rural road network.*
- 5.9 Initial comments have been received from the AONB planning unit, who consider that Highsted Valley and land surrounding the Science Park form part of the setting of the AONB. They also consider that the new motorway junction would constitute major

development. It is their view that as such, there is a presumption against the new junction, which would need to be assessed against the second part of paragraph 172 of the NPPF and demonstrated that the proposal represents both exceptional circumstances and is in the public interest.

Affordable housing

- 5.10 An original commitment was given to provide 10% affordable housing due to viability issues associated with the cost of the junction and road provision. However, following the submission of a draft further review of costs and the use of creative tenure split, there is now a revised offer of 20-25% affordable housing. Viability will be subject to separate detailed and ongoing testing.

Jobs and recalling commuters

- 5.11 The delivery of 10,500 jobs is predicated on the whole employment area being used for B1a uses which may be difficult to achieve. It is unclear whether there is market demand/capacity for so much B1a space. There is also likely to be pressure for other employment uses due to the strong demand for industrial and warehousing. In addition, if it is delivered on this basis, it runs the risk of competing with / undermining the Kent Science Park and other Sittingbourne sites and the wider employment supply as well as having implications for the delivery of the Town Centre regeneration aspirations. This is because provision of larger modern units in this location will be more attractive than other, older sites. As considered above, the relationship with Kent Science Park is currently unclear in terms of the relationship between the two sites and how they will work together or separately in the future. There does not appear to be any commitment to deliver an improved Science Park, or any acknowledgement of whether there will be any change to it. Clarification of this is required and the relationship and implications will need to be explored further.
- 5.12 The proposal suggests a strategy of re-calling commuters, and although laudable, this will be challenging. This is notoriously difficult to achieve a change in commuting patterns and if pursued is likely to have Duty to Cooperate issues which will need to be considered. This quantum of space may need to be considered in the sub-regional/regional context and consequently it is likely to require work to be undertaken to show how this level of growth could be delivered and be competitive in the wider market. It is recommended that further work is undertaken to understand the implications of proposed jobs numbers and the cross-boundary implications within the context of the overall jobs numbers and how the Local Plan should address this.

Site boundaries and relationship with existing settlements

- 5.13 The location of the site should provide the opportunity for integration and access into Sittingbourne and to enhance relationships to the town centre and out to the countryside, particularly in relation to walking and cycling routes and particularly east and west across the area. However, these do not appear to have been exploited so far and there are a number of gaps in terms of 'missing fields' between existing settlements and the proposed new garden community. Further consideration could be given to what role these fields could play and whether they should be included

within the site boundary. It is also likely that any continued reliance on the existing site boundaries will ultimately produce a conflict with what can be achieved due to the need for mitigation and buffers etc.

The football club

- 5.14 There appears to be an opportunity for the relocation and improvement of Sittingbourne Football Ground, however, this needs further investigation and clarification. It is also not clear what engagement has taken place with the football club.

Matrix of emerging information

- 5.15 Following the identification of these issues and risks we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.
- 5.16 In this table and others we refer to some of the transport evidence as ‘tbc’ – as noted above we have only recently received comments from KCC and Highways England and have given the promoters time to respond.

Further information	Action	Result	Comments
Viability	Financial information requested	Provided.	Will be subject to more detailed and ongoing testing
Highways England	Letter sent 13 Nov 2018. Clarification from HE about the reasonableness and timing of the junction and road.	High level comments indicate significant investment is required. TBC	Uncertainty about the timing and consequent phasing of the housing. This remains a risk.
Kent County Council	Letter sent 15 Nov 2018. Implications of relationship with northern relief road.	TBC	
Landscape	Assessment of impact of road alignment and other important landscape issues.	LUC produced assessments.	Significant issues to be addressed.
AONB	Junction location/relationship with North Downs designation and wider	AONB Planning Unit provided initial provisional response	Significant issues to address. Highsted Valley and dip slope form part of the setting

	setting issues.		of AONB. New motorway Junction will be 'Major' development.
Utilities	Email sent 9 Nov 2018. Assessment of implications.	Still awaiting a response.	
Southern Water	Email sent 9 Nov 2018.	Feasibility studies for water supply undertaken. Upgrades required for WTW and reinforcement of sewer network.	Likely that any issues could be overcome through working with developers and network modelling.

Conclusions

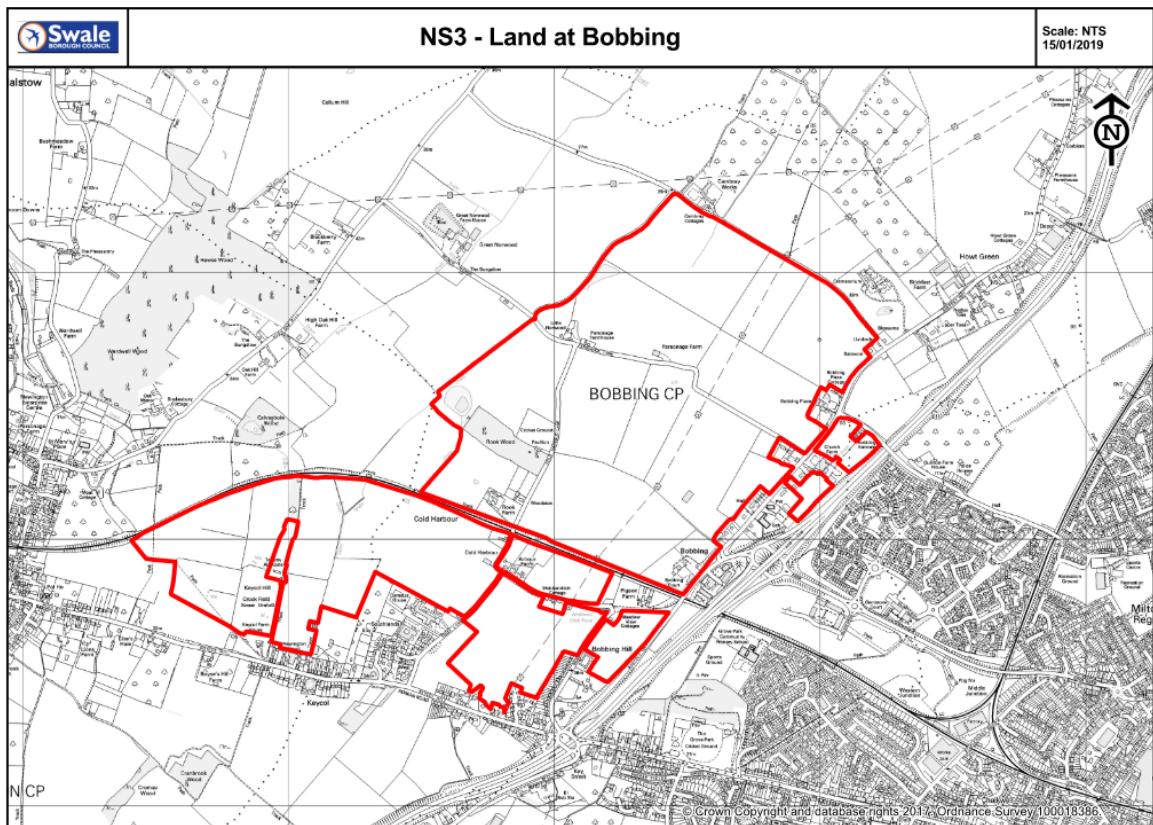
- 5.17 This proposal is making progress towards the requirement within the prospectus and has the potential to be sustainable and deliverable, subject to a number of caveats, some of which are potentially significant. The significant issue is the relationship to the AONB and the impacts on this and other environmental assets and the degree to which they can be addressed within the current site boundaries. The AONB question will also have timing issues in particular for the delivery of the junction, road and development. There are also unresolved issues to be addressed relating to the case for the road, the untested nature of its delivery model and the essential linkages with the northern relief road.
- 5.18 There is much work to be done. First and foremost, it is recommended that further work is undertaken to test the road and development assumptions via an independent masterplanning process. However, it is clear that both the benefits and impacts of the scheme need to be fully understood. In particular, the degree to which environmental mitigation can be undertaken either within or with changed site boundaries needs to be understood before the Council considers its formal role within the Local Plan. Although the economic, housing and transport benefits may ultimately be shown to be significant, it may not be impossible that the Council will be left with significant environmental issues outstanding (despite mitigation efforts) and that may ultimately need to weigh these in the balance.
- 5.19 However, despite the challenges, no 'showstoppers' have been identified at this stage and the scheme promoters should progress with their work to respond to the issues raised by this report.

6 NS3: LAND AT BOBBING, WEST OF SITTINGBOURNE

Summary

- 6.1 The site at Bobbing, West of Sittingbourne is promoted by DHL Planning on behalf of Crabtree and Crabtree Ltd. The initial proposal is for 226 ha, of which 87ha are promoted for residential development for 2,500 homes. The proposal includes 6ha of community facilities including a 3-form entry primary school, new village hall and nursery, village retail parade, pub, health centre, play area within a village green and enhanced cricket pitch and pavilion. In addition, it proposes 3ha of flexible commercial space including pop-up art and cultural use.
- 6.2 The proposal is predicated on the improvements and benefits provided at and for Bobbing village. These include:
- Realigning Sheppey Way to reduce speed and alleviate traffic from high street, improve setting and highway safety as well as air quality
 - Improvements to A249 Key Street junction
 - Pedestrianisation of the SW end of village and to provide dedicated school parking and drop off facilities

Figure 3: NS3: Land at Bobbing site location plan



Key issues, opportunities and risks

6.3 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- Highway issues
- Garden principles and design work
- Enveloping the village and masterplanning
- Social and employment space and numbers
- Open space, landscape and net biodiversity gain
- Constraints

Highway issues

6.4 There are a number of highway issues that are likely to require significant investment. Specially there are issues with the A249 Bobbing junction and at A2 Key Street, as well as possible capacity constraints within the new motorway M2 Junction 5 scheme. It is also unclear whether these improvements are likely to solve existing congestion issues in Sittingbourne. Both Kent CC and Highways England identify existing constraints at Grovehurst, Bobbing and Key junctions and the requirements for improvements. Further written advice is required about these junction proposals and J5 improvements.

6.5 While a new rail station is mentioned, we question the likelihood of this being delivered so close to Sittingbourne and Newington. Likewise, the reliance on a fast track bus service requires more information to ensure that it is achievable and how it will be implemented as it relies on a local road network which is at capacity.

Garden principles and design work

6.6 The proposal is to use Supplementary Planning Guidance to guide the development which will be delivered themselves through a master developer model. While the promoters reference their experience at Chilmington Green Ashford, it is not clear how applicable and transferable this example is and further clarification is required.

6.7 The opportunity exists to provide a local interpretation of the design principles; however, it is currently unclear what design work has been undertaken, and how the village of Bobbing will be dealt with, specifically in relation to visual coalescence. There is also the issue of how the opportunity to enhance provision for existing residents will be achieved. Further information submitted indicates that Appin would assume the role of master developer. They state that they would expect to adhere to strict masterplanning principles and development brief, but that they would also expect to allow an element of 'freedom' in terms of architectural detailing. This does raise some doubts in terms of demonstrating commitment to high quality design. They however recognise that there is an important role for a Local Delivery Vehicle and therefore this and the design issue will need to be further considered.

Enveloping the village and masterplanning

- 6.8 The proposal creates the issue that the new garden community would almost entirely envelop the existing village, so this would require careful masterplanning. While there is an opportunity to strengthen the existing village, it could be said to supplement it with a new centre to the north west. The question is whether the two could coexist?

Social and employment space and numbers

- 6.9 The proposal provides a commitment to 40% affordable housing (with a potential role for the Council), independent living and self/custom build, whilst recognising the need to meet all tenure requirements as set out in NPPF. However, they recognise that the use of a trust to manage and maintain land has not yet been accounted for within their viability work. A viability appraisal has been submitted and will be subject to separate detailed and ongoing testing.
- 6.10 More detail is required about the flexible commercial, pop up art and cultural space and the number of jobs needs confirming as this seems low, although the site is close to Eurolink site, so not providing for all jobs on site is realistic. There appears to be an inconsistency between the numbers set out in the proposal which identifies 1 job per household but elsewhere at figure 7 states that 526 jobs will be generated. This will need to be considered further in due course, but given its location close to the strategic road network, there may be a case for more generous employment provision.
- 6.11 Further information and clarification about the school size is required and it is important that engagement and liaison with the education providers takes place as part of the process.

Open space, landscape and net biodiversity gain

- 6.12 The initial site plan includes a large parcel of open space to be 'gifted' to the community, but it is not necessarily in the right location to be useable by the new residents and existing community. The parcels are very much split north and south and the red line boundary also excludes an obvious finger in the southern parcel. It is necessary to consider what the optimal location for development is and whether any additional land is needed and should be included and if necessary whether there is a role for the Council. Further consideration should be given to the boundaries and relationships with Bobbing, Sittingbourne and the surrounding area. Without this open space it is questionable whether there is enough greenspace and landscaping included within the main development area and whether the issue of achieving net biodiversity gain has been properly addressed.

Constraints

- 6.13 The conclusions from Land Use Consultants are set out below. The landscape is of moderate sensitivity and should be considered in the development of a more detailed masterplan for the scheme. Landscape issues do not suggest an overriding constraint at this stage.

- 6.14 *This site does not contain any national or local landscape designations and overall is considered to be moderately sensitive. It is considered that the site could accommodate a degree of development providing the above guidance is implemented to respect the key sensitivities and minimise landscape and visual impacts, including the site's relationship with neighbouring settlements, and its function and value as a rural setting and buffer. Further work is required to develop the masterplan for the site in line with the above guidance and a comprehensive landscape and visual impact assessment is required to guide the master planning process, including opportunities for mitigation and enhancement. There may be some significant landscape and visual impacts, although these are likely to relate to local landscape features and views.*
- 6.15 It is recognised that this scheme is very early in its preparation. There are a number of constraints which are identified but without any detail or identifying solutions having yet been provided. These include how an ancient woodland, rural lanes and pylons can be incorporated into the design. In addition, foul water management has not yet been addressed with Southern Water. Clarification is required about the use of SUDS, which the proposal says in one place is unsuitable, whilst elsewhere we are told that the approach will be used.
- 6.16 Early delivery would appear to be possible because it is not dependent on such significant infrastructure improvements, although the A249 and A2 issues will need to be resolved satisfactorily if they are not to provide future 'showstoppers'. J5 improvements may also be a constraint and could affect the phasing of the scheme. Consideration will need to be given about how much development can be delivered before the improvements take place, however, given the situation the Council faces with Highways England in respect of its current allocations, the answer to this question may well be 'none'.
- 6.17 The promoters acknowledge that there is additional land to the north and east which has the potential to be utilised, together with other sites that have been submitted to the SHLAA process. This has been confirmed by a very late submission from an adjacent landowner to the north who has confirmed their wish to support the proposal and to work with the promoters. This issue of the relationship with adjacent additional land and the boundaries of the most appropriate site will need to be further addressed and further detail provided.

Matrix of emerging information

- 6.18 Following the identification of these issues and risks we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

Further information	Action	Result	Comments
Viability	Financial information requested.	Details provided.	Will be subject to more detailed and ongoing testing.

Highways England	Letter sent 13 Nov 2018.	High level comments indicate likely impact on A249 junctions and M2 J5. TBC.	
Kent County Council	Letter sent 15 Nov 2018. A249 junction improvements, air quality and question of whether there are sustainable solutions.	TBC	
Landscape	Assessment of impact.	LUC produced assessments.	Moderately sensitive with issues to be addressed.
Utilities	Email sent 9 Nov 2018. Assessment of implications and pylons.	Still awaiting a response	
Southern Water	Email sent 9 Nov 2018.	No specific discussions yet on this scheme. Upgrades required for WTW and reinforcement of sewer network.	Likely that any issues could be overcome through working with developers and network modelling.

Conclusion

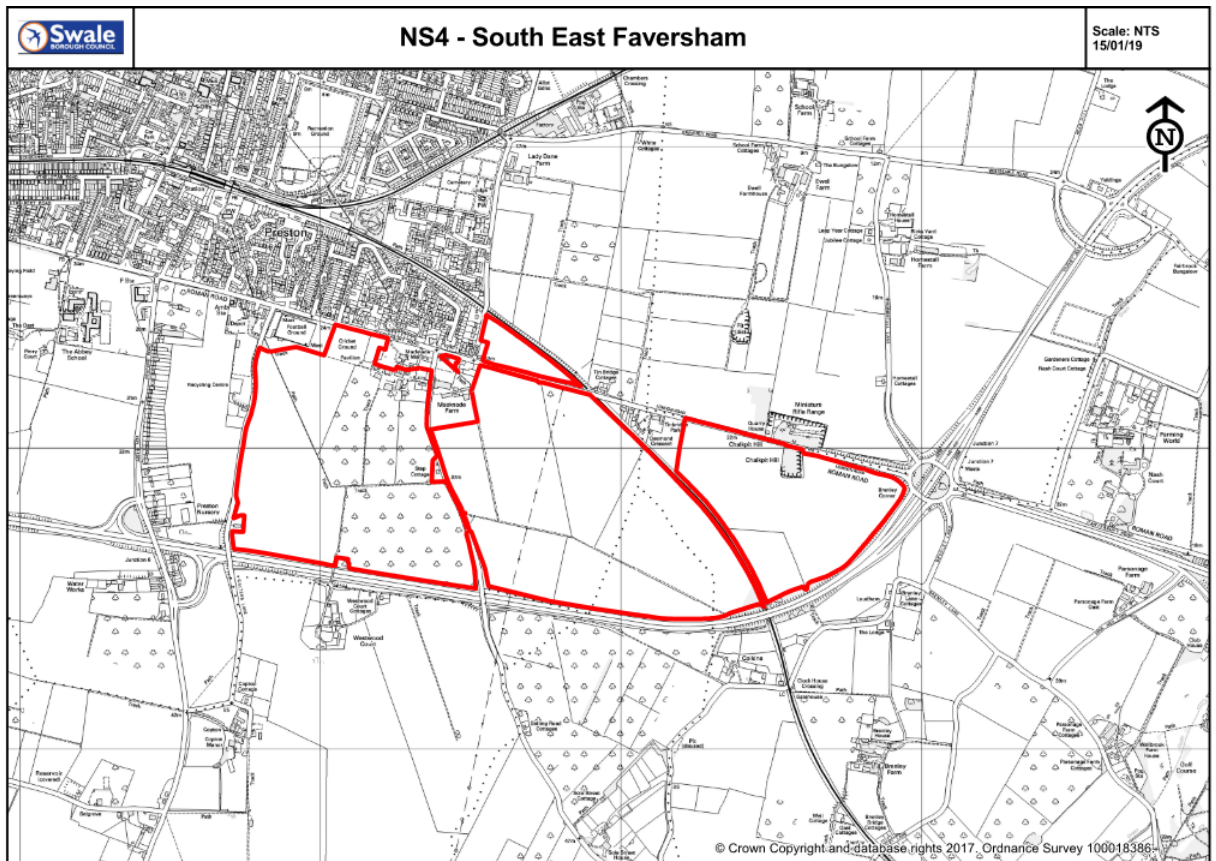
- 6.19 This is possibly the least developed of the four schemes; however, there would appear to be capable of meeting the prospectus requirements, to produce a sustainable and deliverable scheme, subject to resolution of the highways issues, the consideration of boundary issues and landscape comments into the masterplan. Although transport issues could be a significant issue moving forward, there are no showstoppers identified yet and satisfactory progress is being made to address emerging and unresolved issues.

7 NS4: SOUTH EAST FAVERSHAM

Summary

- 7.1 The site at South East of Faversham is promoted by Duchy of Cornwall and covers an area of 131ha and proposes the delivery of 2,550 homes with approx. 15-20,000 sqm of business/commercial/retail space, which is expected to provide 2,500 jobs. In addition, a local centre (or 2?) is to be provided with open space as well as the off-site benefit of traffic calming the A2. It is the intention to develop a high-quality extension to the town using the Price of Wales Principles for Sustainable Urban Growth that will also have regard to the scale and character of Faversham. These principles have been applied in other locations, notably Poundbury in Dorset and more recently Newquay in Cornwall.
- 7.2 The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail. This model brings in developer partners and grants them licences or development agreements, subject to strict adherence to a pattern book/design codes. As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards. In this respect, it is worth considering whether this model would allow for the use of a Local Development Order in support of the scheme.

Figure 4: NS4: South East Faversham site location plan



Key issues, opportunities and risks

7.3 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- Traffic calming of A2, access through to the west and capacity of M2 J7
- Duchy principles versus garden community principles
- Landscaping and biodiversity net gain
- Partnership working
- Delivery
- Employment
- Affordable Housing
- Viability
- Relationship with adjacent sites

Traffic calming of A2, access through to the west and capacity of M2 J7

7.4 The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any 'calming' may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved and secured as part of this scheme. It will need further consideration and work with Kent County Council to explore the interventions necessary and how they can be practically implemented. The securing of air quality improvements along this corridor also needs further investigating but encouraging the greater use of diversion route and/or the M2 itself, could be of considerable benefit both to congestion and air quality.

7.5 There are references to an analysis of movement patterns to identify opportunities to improve cycle and car parking at the station, and the links through to the West which would ensure traffic would not have to go back onto the A2.

7.6 The proposal appears to rely on the upgrades to Brenley Corner, however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated by the promoter. Highways England identify that there are existing and forecast congestion issues on the network which need to be considered and a longer-term scheme providing greater capacity is likely to be required at this location. It will be necessary to understand what the modelling shows about the capacity here and what timing implications this will have on the delivery of this scheme.

Duchy principles versus garden community principles

7.7 Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust, which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of

addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues.

Landscaping and biodiversity net gain

- 7.8 Work has been undertaken to explore how net gains and improvements in biodiversity can be achieved, based on the understanding of distribution of soils and early landscape evidence, using contours and ensuring the retention of hedgerows and trees. However, only 33.6% is open space and it is not entirely clear whether this would lead to net gain being achieved and how much of the site is landscaped open space, whether there would be adequate green infrastructure and how closely it would accord with TCPA principles. However, references to the use of natural food in scheme, is a key TCPA principle, which has only been grasped by NS4.
- 7.9 The conclusions from Land Use Consultants are set out below. The landscape is of moderate/low-moderate sensitivity and issues should be considered further.

It is considered that overall landscape sensitivity of this area is moderate/low–moderate. It does not contain any national or local landscape designations, although is in proximity to the AONB to the south of the M2. Should the above opportunities be implemented, it could potentially be possible to mitigate many of the landscape and visual impacts of a development in this location, although there may remain some significant impacts on the local landscape features and views. Nevertheless, a development of this size would significantly alter the relationship of Faversham with its rural setting and potentially impinge on the setting of the AONB. The site would function more as an urban extension than a discrete garden settlement (albeit that it is capable of being planned on ‘garden’ principles). The impact on the character of the historic market town of Faversham has not been considered as part of this study. The cumulative impact of this new settlement with other developments on the south and east edges of the town would be a key issue to be considered in developing the proposal.

Partnership working

- 7.10 The Duchy recognises the need to work in partnership with the Council and work is ongoing to establish an informal steering group with the Council. However, there is no formal Local Delivery Vehicle proposed and they intend to use their own approach to bring forward the new garden community using a traditional estate model with sales and control by covenants and retention of a perpetual interest.

Delivery

- 7.11 The proposal envisages an expected start date of 2023, from 120 dpa to 180dpa, however, we are aware that Poundbury demonstrated a slow start, and even if this level of completions was achieved early on, it is anticipated that it would not be completed until 2038. This rate of delivery is slow, even though limited major infrastructure is required, such as the A2 calming. However, this is caveated by the position in respect of the Brenley Corner (J7) improvements and it will be necessary to determine what level of development could start ahead of these improvements. It is recognised that this proposal is more about quality than quantity of homes, but that is

not to suggest that steps should not be taken to understand how delivery rates could be increased.

Employment

- 7.12 The proposal seeks to deliver 2,500 jobs which is a ratio of 1:1 and we have given some general observations concerning this elsewhere. Despite this, such an objective remains useful as a means to underpin the promoter's objectives of securing a genuinely mixed use scheme. Considerable work has been done by the site promoters, based on research at Poundbury. Whilst the assumptions seem largely reasonable, we have noted elsewhere the differences between Faversham and Dorchester. Whilst there is useful recognition about the mix of employment uses and relationship with what currently exists in Faversham, it is important to also understand the range and type of economic development envisaged so that it complements the town's offer. It is also important to consider how this mixed approach including the considerable FTE homeworkers can be achieved and to ensure that these are not delivered at the expense of other jobs elsewhere. Whilst the position of Faversham relative to Canterbury and Whitstable might suggest the possibility of NS4 attracting the type of uses seen on other Duchy schemes, we are interested to know what the fall-back position would be if the traditional Duchy approach of using workshops and other mixed uses is not ultimately seen to be deliverable or attractive to the local Swale market. As with NS1, it is recommended that further work is required to test the job numbers, the implications for the Swale economy and other employment land, as well as cross boundary relationships
- 7.13 A more detailed point is that clarification is required about the number of local centres to be provided as there are inconsistencies between the framework and the trajectory.
- 7.14 The masterplan identifies options for new training facilities for the football club and cricket club and/or their possible relocation to extend the site frontage. It would be useful to understand what discussions have taken place and how this is likely to work. In the case of the cricket club, its current location on a designated Local Green Space may present policy problems with regard to any potential re-use of the site once the club had been relocated.

Affordable Housing

- 7.15 While the Duchy recognises the wish for 40% affordable housing, it considers there is a need for further assessment and debate about the tenure mix. Clarification is therefore required about the amount and type of affordable housing to be provided in terms of the mix of tenure and how this will accord with the policy requirement. If there are costs which would prevent the site from meeting this policy requirement, it needs to be specified, and particularly why the other garden community obligations may mean this is challenging and what, if any, trade-offs are proposed.

Viability

- 7.16 The promoter is confident that financing will not be a problem. However, a viability assessment has not been provided so it is not possible to confirm this position, particularly with regard as to what proportion of the Brenley Corner upgrade and A2 taming is going to be funded by this promoter. Mention is made of the likelihood of

requiring an upgrade of waste water treatments works, which would need to be agreed with South West Water to implement and fund. As has been set out above, there has been considerable reluctance to share this viability information at this early stage, and as such it is not possible to conclude on this issue, other than to assume that the scheme is generally viable, but will need to be subject to detailed further information.

Relationship with adjacent sites

7.17 Whilst the site is a standalone site, adjacent sites to the north of A2 have been separately proposed by Prudential Assurance Company Ltd and Vinson Trust. If the Council felt they would need to bring forward additional land they would need to consider how these sites would, or would not, work together and whether they should be designed to be complimentary, or not. This may be an issue of timing and may not necessarily preclude both coming forward.

Matrix of emerging information

7.18 Following the identification of these issues and risks, we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

Further information	Action	Result	Comments
Viability	Financial information requested.	Still awaiting detailed figures.	Not yet able to conclude on viability of scheme.
Highways England	Letter sent 13 Nov 2018. Implications for M2 J6 & 7.	High level comments indicate that greater capacity is likely to be required. TBC	
Kent County Council	Letter send 15 Nov 2018. A2/A251 constraint and rural roads.	TBC	
Landscape	Assessment of impact.	LUC produced assessments.	Moderate/low-moderate sensitivity - issues to be considered.
Utilities	Email sent 9 Nov 2018. Assessment of implications.	Still awaiting a response.	
South East Water	Email sent 9 Nov 2018.	Awaiting a more detailed response.	

Conclusion

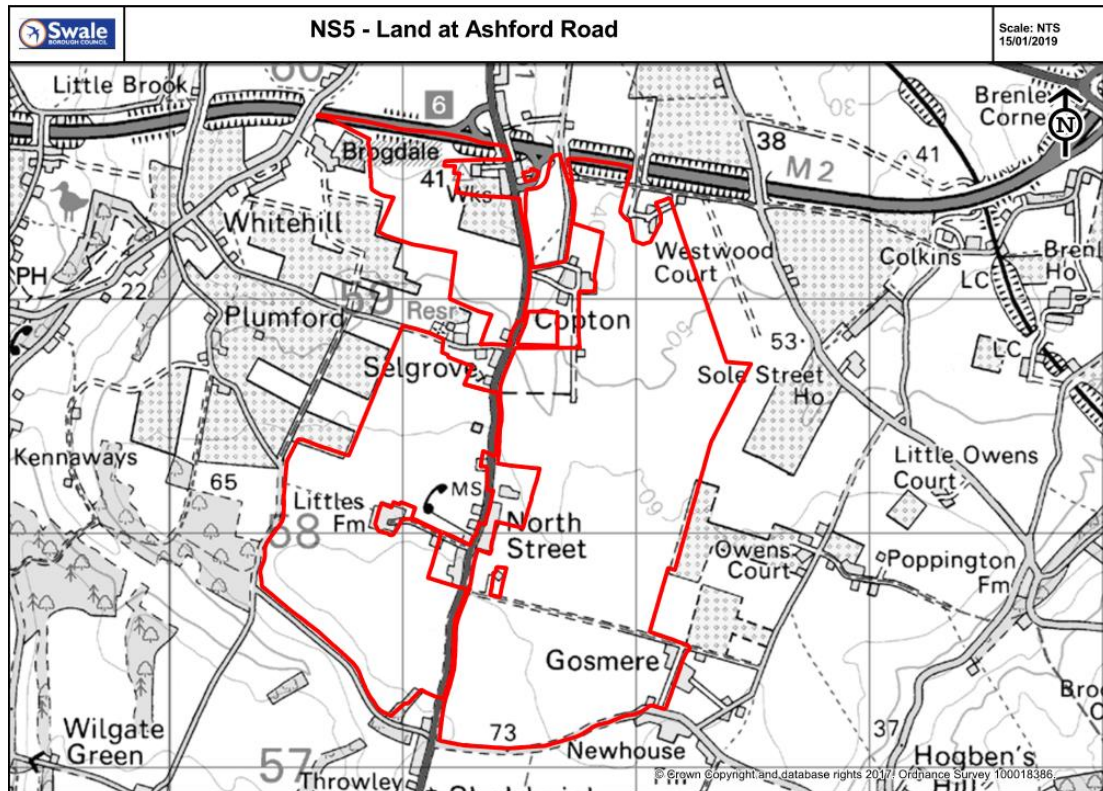
- 7.19 The proposal largely accords with the objectives in the Prospectus and is generally making good progress towards their requirements. Despite using different design principles, it should be able to provide a sustainable (inc. probably genuinely mixed use) and deliverable garden suburb extension to Faversham, without the same environmental tensions raised by other schemes. If allocated, the Council should consider how such a scheme is 'badged' in policy terms, i.e. whether it is promoted as an urban extension (albeit one planned on 'garden' principles), or as a new garden community. As an urban extension, the proposals make more policy sense in our view.
- 7.20 There may be an issue with timing if the transport modelling shows that there is no capacity at Junction 7 and the Council may not be able to rely upon a significant level of delivery. It is recommended that clarification is sought on securing the route through to the west to the A251 and further work is undertaken to test the employment assumptions and deliverability. In addition, the lack of viability information remains a concern as it will continue to raise a question mark as to what will be achieved until such times as it is provided.

8 NS5: LAND AT ASHFORD RD, SOUTH OF FAVERSHAM

Summary

- 8.1 The site at Ashford Road, South of Faversham, also known as North Street, is promoted by Gladman Development Ltd and covers an area of 317ha and proposes delivery of 5,000 homes in 5 neighbourhoods, with a high street, 2 community hubs with super market, multi-functional library, estate agent, pharmacy, shops, gym, hotel and a variety of professional services and trades as well as a secondary school and a burial ground. In addition, 3 primary schools, playing fields and a village green will be provided within each neighbourhood. Three different employment areas are proposed to include a high density retail in high street, low density rural hamlet employment on east and medium/high density office development on northern edge within a traditional business cluster close to M2.
- 8.2 The proposal is in its early stages and promises a range of retail as well as a new GP, burial ground and numerous community facilities, hubs and open space. It has the potential to offer the opportunity to be a stand-alone community with its own identity.
- 8.3 This is a new approach by Gladman, who are exploring a new way of providing homes. This change and opportunity to work collaboratively is welcomed. Lord Matthew Taylor is retained in advisory capacity, as an independent member of the design team, to shape proposals and be a sounding board to ensure the garden community principles are properly incorporated.

Figure 5: NS5: Land at Ashford Road, South of Faversham site location plan



Key issues, opportunities and risks

8.4 Key issues, opportunities and risks have been identified through the assessment of the scheme against the questions set out in the prospectus. The detailed table is included at Appendix 1. They can be summarised as:

- Accessibility
- Employment mix, type and location
- Site boundaries
- Landscape, open space
- AONB
- Other Constraints
- Affordable Housing
- Delivery

Accessibility

8.5 It would be expected that a new garden community of this size would create the need and justification for new bus links and as such for routes to be provided as part of the delivery of the new homes. We would expect this approach to be taken rather than relying on current poor bus links. It is currently unclear how a fast connection to Faversham will be achieved, given that it relies on the existing (and congested) local transport network.

- 8.6 New cycle and pedestrian links are provided, however, it is not clear how these will link north into Faversham. The opportunity to provide sustainable links into the town centre should be taken and further details are required of how this can be achieved.
- 8.7 It is necessary to consider the relationship with NS4 and its implications on junction 6 and 7 of the M2 and the junction of A2/A251; both in terms of highway capacity issues and at what point these would present a constraint on capacity. It is recognised that further improvements of junctions and a realigned A251 will need detailed technical appraisals. It is also understood that Highways England are currently concerned about the performance of the A251 and the existing situation whereby traffic queues back from the A2 / A251 junction almost as far back as the M2 junction 6. Here additional queueing could increase tailbacks towards the M2 Junction 6 coast bound off-slip. In addition, Highways England indicate that the improvements required to J6 may be more extensive than that proposed by the scheme promoters. This will need to be tested.

Employment mix, type and location

- 8.8 Further consideration is required of the mix and type of employment proposed and how this fits with the demand and also the relationship of any new provision to the science park. This is discussed extensively elsewhere in this report.

Site boundaries

- 8.9 The site boundaries are dictated by ownerships which give rise to gaps and currently the proposal surrounds a number of hamlets and isolated dwellings. These will need careful consideration about the extent to which new development simply envelops them and how it is integrated with them, or whether buffers are properly planned in. It is necessary to consider what the optimal location for development is and whether any additional land is needed and should be included and if necessary whether there is a role for the Council. It may also be worth considering whether a bigger gap is required to the north, so that it becomes its own settlement rather than functioning as an extension to Faversham.

Landscape, open space

- 8.10 Whilst there is a commitment to open space and a landscape strategy, the opportunities for linkages and access to the countryside have not yet been explored. We note that the formal sports pitches are all located in the very south, which may not represent the most accessible location.
- 8.11 There is little evidence that the proposal takes a landscape led approach. The conclusions from Land Use Consultants are set out below. They are significant for this site and will need to be considered and addressed if the scheme is to be taken forward.

This is a challenging site for a new garden village development being both in the setting of the AONB and within a local landscape designation. It is considered to be a landscape of moderate-high sensitivity, as well as being visually exposed. In Swale, there is no precedent of urban development climbing the dip slope transition between the coastal plain, fruit belt and chalk downs of the AONB. Currently urban development is limited to the North Kent Plain, relating to the Thames Estuary-Medway/Swale edge (Medway Towns, Sittingbourne and

Faversham). A development of this size in this location would introduce urban features in an otherwise open, visually exposed rural landscape. Even if all the guidance outlined above was implemented, there would remain the substantive issue of the effective loss of the rural landscape separation and setting between Faversham and the AONB, and development within an area locally designated for its landscape value. It is likely that such a development would generate significant landscape impacts with relatively limited opportunities for mitigation.

AONB

- 8.12 The site is adjacent to and surrounded on three sides by the North Downs Area of Outstanding Natural Beauty and consequently it will be necessary to consider whether there would be any significant adverse impacts. This location sets a challenge for the development, but also provides an opportunity to link with it through the provision of a country park to the south of the site (requiring additional land) and to retain and enhance existing features within the landscape framework. It may be necessary to further consider the impact of views into and out of the AONB from and to this site. We understand that Lees Court Estate own considerable land within the AONB, which could be made available.
- 8.13 The AONB unit's initial provisional comments are that *"the scale of the proposals would result in significant and adverse change to landscape character that would also be visually damaging and that they would be strongly opposed to the development of a new garden community in this location"*. They believe there will be a significant impact on the sensitive setting of the AONB, the scale of which is not capable of being mitigated. It will be necessary for all parties to consider this further.

Other Constraints

- 8.14 The site falls within an Area of High Landscape Value – a local landscape designation – noted for it being a distinctive rural landscape south of the M2 on the edge and approach to the AONB. Parts of the scheme would be highly visible and impacts may be a challenge to mitigate. This may require adjustments to site boundaries, changes in land uses, better integration of ancient woodland and, potentially, the management of adjacent land for purposes of mitigation.
- 8.15 Whilst these matters may not be 'showstoppers' at this stage, they are matters that need considerable early attention.
- 8.16 It is noted that electricity transmissions pylons currently cross site from west to east, however, these are not accounted for in the current masterplan. It is recognised that upgrades to services are required, such as water issues, however, there is little detail provided.

Affordable Housing

- 8.17 The proposal provides a commitment to 40% affordable housing, independent living and self/custom build and recognise need to meet all tenure requirements as set out in NPPF. A viability appraisal has been submitted and will be subject to separate detailed and ongoing testing.

Delivery

- 8.18 Little detail is provided about the delivery rates beyond recognition that this will be phased. While there is reference to a phasing plan, one has yet to be provided. As part of this it will be necessary to consider how this proposal relates to other proposals, particularly NS4 and what the compound effect will be on infrastructure, particularly relating to Junction 6 and the junction to the A2. There will need to be more certainty about the whole package and how deliverable it is. It is recognised that due to the early stage of the process, the masterplan will need considerable evolution to address the landscape and environmental constraints among other things.

Matrix of emerging information

- 8.19 Following the identification of these issues and risks, we asked for more information on a range of issues. The Council have been following up these issues. The matrix below sets out the progress that is being made on addressing the issues, the action that has been taken, results and provides further summary comments as necessary to identify anything that remains outstanding.

Further information	Action	Result	Comments
Viability	Financial information requested.	Details provided.	Will be subject to more detailed and ongoing testing.
Highways England	Letter sent 13 Nov 2018. Implications for Junction J6 & J7.	High level response indicates concern over A251 queueing back to M2 J6. Further detail to be provided. TBC	
Kent County Council	Letter sent 15 Nov 2018. Implications for A2/A251 junction	TBC	
Landscape	Assessment of impact.	LUC produced assessments.	Significant issues to be addressed.
AONB	Impact on North Downs	AONB Planning Unit provided initial provisional response.	Object – consider there would be a significant impact which could not be mitigated.
Utilities	Email sent 9 Nov 2018. Assessment of implications and pylons.	Still awaiting a response.	

South East Water Email sent 9 Nov
2018.

Awaiting a more
detailed response.

Conclusion

- 8.20 This proposal is at an early stage and is the least developed; however, it is making reasonably satisfactory progress and could have the potential to accord with the prospectus, as a free standing sustainable and deliverable scheme, especially in the long term. However, transport issues and its location within the setting of the AONB provide considerable challenges, as do other landscape and visual impacts, all of which will need to be addressed if 'showstoppers' are not to subsequently emerge. Likewise, transport issues will also need to make further progress.

9 CONCLUSIONS

- 9.1 The Council's prospectus has successfully encouraged schemes to come forward and potentially be considered as options in the next plan. It has opened up options that may not have been available had this process not have been undertaken.
- 9.2 However; all engaged in the process have done so on the understanding that there is no commitment from the Council to take forward any of the proposals submitted.
- 9.3 Of perhaps greatest significance is that the process has yielded four proposals where significant new garden community infrastructure is paid for via land value capture. There is the opportunity to for these schemes to make a much more meaningful contribution to the infrastructure needs to current and future residents of Swale than may otherwise have been the case.
- 9.4 The four submitted proposals are all within the area of search identified in the PBA report Choices for Housing Growth
<https://services.swale.gov.uk/meetings/documents/s8862/Appendix%20I%20to%20PBA%20Report%20Item%208Feb18.pdf>.
- 9.5 The assessment process has been used to identify issues and inform the discussion with the promoters. Consequently, many of the issues, opportunities and risks have been raised and in some cases clarification and further information has been provided. This iterative process is another benefit of this process; the Council has far more opportunity to scope and shape the proposals than may have been the case otherwise.
- 9.6 There are some issues that need to be addressed by all the proposals, and some, where the schemes are more developed, to a lesser extent. These include:
- Commitment to garden community principles and need to embed these into the scheme and where other design principles are proposed address these further and clarify the relationship
 - Over ambitious delivery claims and need to provide more detail on the realistic lead in times and overall timescales, and conversely in the case of NS4 how to speed up delivery
 - A need to provide more detail and realism on lead in times and overall timescales, alongside exploring how to speed up delivery, including in relation to boosting delivery beyond the volume housebuilder options including affordable housing provision, private rented, custom build and encouraging SME local housebuilders.
 - Need to respond to the LUC findings and conclusions and specifically address the issues raised by the AONB unit
 - Need to address long term stewardship of community assets, their maintenance and management
 - More and continued engagement with local communities, all stakeholders and interested parties
 - Clarification of site boundaries and how these may need to be adjusted in response to the issues above

- All require a detailed formal response on highway issues and other infrastructure and utility issues as well as conclusions on transport modelling; and
 - All require detailed assessment of the viability information that has been submitted
- 9.7 The most important of these gaps relates to viability. It is vital that each proposal is robustly viability tested at a point when the Council (and the promoter) is satisfied that the scheme is reasonably 'fixed'. This will need to be independently verified using costs agreed from the stakeholders including Highways England. All components that the promoters are offering will need to be included.
- 9.8 The proposals are not yet advanced enough for this detailed work – but we would hope this report provides a direction and illustrates the gaps that need filling to allow this process at a later date.
- 9.9 We consider it important that this viability assessment is 'public' to provide the Council and the residents of the Borough the confidence that any successful scheme will be delivered as promoted.
- 9.10 The Council will also need to consider what legal options are available to ensure delivery as outlined in each proposal.
- 9.11 We are also not yet convinced that the utilities companies have sufficiently grappled with the implications of these schemes and their cumulative requirements and the impacts this may have for the timing and delivery.
- 9.12 While it is not appropriate for us to rank or score these benefits and risks, the assessment process allows us to identify the issues associated with each proposal which will need to be addressed going forward and identify whether there are any showstoppers. This will allow the Council to commission further work and hold discussions with each of the promoters to address the key issues, opportunities and risks that have been identified.
- 9.13 Considerable work is being undertaken by SBC to investigate these proposals to ensure that they could, if necessary, be included as part of the Local Plan. If sites are to be included, they will need to be sustainable and deliverable, accord with the principles set out in the Prospectus and be consistent with the wider Council objectives and, of course, national planning policy and guidance. As part of the ongoing work a detailed Sustainability Appraisal of locations and options will be undertaken in due course to assess each proposal in terms of sustainability objectives, and these will be assessed alongside other options.
- 9.14 The Government have launched a Garden Communities prospectus inviting bids of ambitious, locally supported, proposals for new garden communities with a clear identity at scale. This is a good chance to attract funding to undertake work which would assist the process, such as funding staff, expertise and studies, working with communities to develop a locally supported vision, and providing bespoke support such as addressing any risks or accelerating delivery. The Council have submitted a bid to the Government (with the support of all four scheme promoters) under this scheme for funding to progress and support this garden community process. All the promoters have confirmed that they are willing to work with the Council and Gladman

Developments Ltd have also submitted their own bid. It is understood that the Government will make an announcement in Spring 2019.

Summary

- 9.15 Our very provisional conclusion about the scale of risk is as follows.
- 9.16 No one scheme is, at the moment, a 'non-starter'. All four have some element of risk but warrant further work if 'showstoppers' at to be avoided further down the line.
- 9.17 All are dependent on being found to be deliverable, viable and to have satisfactorily resolved their associated environmental and transport issues.
- 9.18 For the four schemes promoted - NS4 is clearly the lowest 'risk'. It is more developed than the other three schemes and has fewer significant barriers to delivery within a short timetable. However, the delivery rates are quite slow, and this offers a risk to the delivery of housing in the short term. It may not deliver at the pace the Council would ideally like.
- 9.19 NS3 and NS5 schemes carry medium-high risks – especially related to transport and connectivity. NS3 will benefit from significant investment in the network around Junction 5, but there will be possible capacity issues there and elsewhere on the strategic and local road networks. NS5 suggest they only need minor works at junction 6, which might not reflect what may be required by Highways England. Both have significant hurdles to address as regards the local network around each location. Likewise, they will both result in very significant changes for the villages in their respective locations – although not uniquely so. For both schemes, it is not realistic to expect significant numbers of new homes to be delivered until well into the next plan period.
- 9.20 However, in the shorter term NS3 would appear to be a more deliverable, partly because it is not so dependent on improving such a large extent of the local highway network. NS3 though may require a considerable redesign of the local network within this part of Swale and further afield and this may yet prove to be a difficulty for them.
- 9.21 NS5 is more at risk because it has more significant landscape issues to address, particularly relating to its location in the setting to the AONB. However, for Faversham it provides an opportunity to provide new housing which is not a further extension to the town. As such it provides a route to meet the growth needs in this part of the Borough, while maintaining Faversham as a smaller sized market town.
- 9.22 It is clear that NS1 is a high risk but also high reward option. It is the most aspirational of the proposals and provides the greatest number of new homes in total, but also the opportunity for more aspirational job growth and a step change in transport connectivity.
- 9.23 Of all proposals received it has the possibility to provide the greatest benefit, not only to the residents of the new garden community, but the Borough as a whole. This is particularly the case for Sittingbourne when coupled with the Northern Relief Road.
- 9.24 However, it also carries the greatest risks. There are AONB concerns, although they may not be as significant as for NS5, however, the scale of landscape, visual, biodiversity impacts generally, alongside the relationship of the scheme with existing

settlements, are such that considerable effort will be needed to address them – including how site boundaries may need to adjust. Site boundary concerns also feed into matters such as the relationship with the existing Kent Science Park and the Sittingbourne Northern Relief Road.

- 9.25 The risks may also be present within the delivery model, especially if the Council chooses to rely in it to deliver a significant number of new homes in the next plan. We consider that it would be unwise to rely on houses being delivered within the short term because of the reliance on highway infrastructure being in place by 2022.
- 9.26 In the last few weeks Highways England has suggested more significant highway improvements may be needed that the promoter envisages. But this is far from a final view – it is only a warning that further work is still needed. It not yet a ‘showstopper’.
- 9.27 Although the transport issues are entirely dependent upon appropriate support for the approach from Highways England. The same recommendation applies across all four sites but here the risk profile is obviously greater.
- 9.28 The Council needs to be alive to the risks of this scheme, but because of the possible benefits, the Council’s efforts should be focused on de-risking the timing, and delivery and environmental impacts of the scheme. Ways to include the Science Park within the proposal should be actively encouraged.
- 9.29 While the promoter is committed to a private led model – should this falter, perhaps because the cost of carrying the full delivery risks becomes too great – the Council, if convinced of the overall benefits may wish to look to a different delivery route where the risk is carried by the public and private sector. We would suggest that discussions should take place with the promotor and public sector agencies (MHCLG, Homes England, DfT and Homes England) in order to consider the delivery issues surrounding this scheme.

10 RECOMMENDATIONS

10.1 If the option of new garden communities is going to be supported and consulted upon, further work will be required. We recommend that this further work includes:

- work is progressed and discussions continue with the promoters to further clarify and remove the potential risks identified in this assessment
- the use of a resolution recognising that the broad locations will be a material consideration in any development management decisions on surrounding land
- detailed viability assessment of each of the proposals
- scrutiny of trajectory and market capacity as well as exploration of what interventions can be used to increase the rate of delivery as well as the type of homes provided
- early masterplanning support to explore the most appropriate layout in relation to the landscape, sensitive locations and relationships with existing communities which is then followed up with the use of SPD or masterplan in due course to direct design parameters of any preferred options
- further work is undertaken to understand the implications of proposed jobs numbers, employment land issues relating to cross boundary issues of commuting, labour supply and competition implications within the context of the overall job numbers and how the Local Plan should address this
- continued liaison with stakeholders and technical consultees, particularly relating to highway issues
- clarification about the delivery of Northern relief road as part of the NS1 proposal or how it is achieved separately but before the completion of NS1
- establishing a Utility working group addressing cumulative issues and timing
- dedicated engagement support to achieve sustained community involvement in the concepts and through to their development

NS1 – South East Sittingbourne

Question 1 – About the Scheme?			
Question 1a: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Responds to the Councils SHMA which sets out the profile of homes needed	Simply saying will provide an appropriate mix etc.	<p>The proposal sets out to provide mixed communities as a necklace of villages (character areas) providing 11,500 new homes connected by a green network. Originally there was no commitment to any affordable housing, but this was subsequently explained as an assumption of 10% affordable housing. The affordable housing officer has now been increased to 20-25%, on the basis of creative interpretation of tenure – this will need further consideration, including testing of the viability assumptions.</p> <p>The proposal mentions specialist and extra care, private rented and serviced sites for self and custom build so it is considered that a flexible and diverse basis for housing will be delivered. The proposal is unable to offer the tenure or mix of homes expected in the Prospectus, however, we understand that a significant number of new homes (several thousand) are expected to be 'built to [market] rent' i.e. let without any market discount. This model is used partly because it allows the site promoter to forward fund some of the infrastructure needed. Without judging the competing merits of build to rent vs build to buy, the Council needs to be aware of the product being offered. The increase in affordable provision is welcomed but it still may pose a challenge to make much contribution to 'affordable need', which given the scale of the proposal could mean little affordable housing is delivered in Sittingbourne (and Swale) for a whole plan period.</p>	Further information required, including testing of viability assessment.
Other ownership and site optimisation issues	Not owning/controlling the site	<p>The promoted land is within their control, and it is noted that the 'red line' reflects land under option as opposed to necessarily reflecting a sensible land area. It also excludes Kent Science Park (KSP) and some sites between their proposal and Sittingbourne and other settlements which are considered as 'missing fields'. There is a risk that the 'missing fields' between Sittingbourne and the proposal cease to function as efficient agricultural land, or quality amenity space (if left undeveloped), or alternatively come under pressure as new housing sites outside the wider masterplan approach.</p> <p>Other boundary changes may need to be considered if it becomes necessary for the scheme to 'flex' in response to environmental challenges and any mitigation that may be required.</p> <p>There may be a role for Swale BC to help assemble land into a better parcel, and we understand this issue is being considered. One real issue is that the Kent Science Park (KSP) is excluded. The proposal delivers no new space on KSP itself, net additional or improved, and it is noted that all the employment space offered is adjacent and potentially competing. Further information is required to understand the relationship and working arrangements with KSP, given their exclusion from the site.</p> <p>These issues need further discussion to ensure a robust development area.</p>	Further information required, including follow up and clarification of adjacent land parcels, as well as rationale for land which has been included.

Question 1b: What mix of other uses is proposed?			
Note – this could be broken down by use- i.e. commercial, retail, leisure etc.			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the New Settlement Study which outlines the Council's expectations (land balance). Or provides alternative evidence to support an alternative mix	Fails to commit to the outline provided in the New Settlement Study	<p>The proposal is for 11,500 homes with 120,000sqm new commercial space and 10,500 jobs around the existing KSP and is predicated on the delivery of a A2/M2 southern relief road and new Junction 5A. It includes district centres (4) to include nurseries, pharmacy, pubs/restaurants, medical facilities in lines with CCG requirements, 4 new primary schools, secondary including 6th form and further education, sport and leisure including new facility for Sittingbourne FC.</p> <p>The social infrastructure is as expected. However, it is not clear what the relationship is with the football club (are they relocating, selling old site etc.?) and what do they expect from the scheme?</p> <p>However, as an employment led proposal there is little detail about the employment offer. While they are trying to respond to the 1:1 jobs requirement, there are a number of issues these include the relationship with Science Park, the qualitative offer and type of jobs, and the fact that unlike the others they do not commit to providing the floorspace, just serviced land, which means the viability to build this is far more important because there is less opportunity to cross subsidise.</p> <p>We consider that only a small minority of the jobs will be science park type jobs but there will be strong demand for other uses – including warehousing and industrial. However at the employment densities suggested (158,000 sqm and 11,500 jobs (from follow up letter) this makes the delivery of anything other than main B1(a) office space very unlikely. This would needs an average employment density of 13.8sqm per worker, which is within the realm of B1a but not B1(c), B2 or B8. HCA Guidance states that R&D needs 40-60 sqm. On these numbers, it is difficult to see how the proposal would be viable. The Promoter's also build their case on re-calling outward commuters – this may have some merit but runs into Duty to Cooperate issues and is notoriously hard to achieve. Because of the quantum of space, further work would be required to consider: the sub regional /regional context and how this could deliver or compete in that market; to clarify the market demand for Ba(a) space; and ensure it does not undermine KSP or other Sittingbourne sites and supply.</p> <p>Further work is required to check and clarify the employment work and the viability appraisal will need to be subject to detailed testing.</p>	Further work required on employment assumptions and testing of viability work.

Question 1c: Outline the proposed trajectory			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideally delivers early.	Fails to demonstrate the site can start delivering in a meaningful (shortish) period.	<p>The proposal seeks to deliver 11,500 new homes – from 2022/23 for 20 years and achieving up to 700 per year. Accelerated by a range of suppliers and approaches, 4 national housebuilders, serviced developments, PRS, self-build, extra care and retirement homes.</p> <p>This is well thought through - with evidence that the proposal has a number of different outlets and routes to market on site, which will support overall delivery. However, we query whether 700 dpa is deliverable in Sittingbourne – possible with other sites alongside. Our understanding was that the homes to rent would forward fund the infrastructure, but this suggests the commercial will come first, which given the uncertainties we have raised under 1b, may be questionable, despite its desirability from a sustainability point of view. Further information to test this will be required.</p> <p>It is not very clear what can be delivered without J5a, and this means there is a risk that the site requires Junction 5a to be delivered at record pace will be difficult given the likely need for a DCO. More information is required to clarify the delivery timetable and the implications of the highway requirements, particularly in view of AONB issues and the detailed matters raised by Highways England in their comments of 12/02/19.</p>	Timing issues which requires further work and highways clarification.

<p>Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).</p>	<p>Fails to identify milestones and barriers and/or fails to state how these may be overcome.</p>	<p>The proposal suggests that the strategic infrastructure works will commence in 2022 with housing upfront delivery before housing in 2022/23, whilst the commercial land near the M2 will commence early. This includes water upgrades likely to be required in medium term, beyond 2025, which will need to be phased. Southern Water have confirmed that also require work to provide any more than 3,500 homes. It is also noted that approx. 4km of underground cables will be required for electricity provision.</p> <p>The proposal considers Sittingbourne is a separate housing market and that both areas could support level of demand in their own right. However, this will need testing. There are also a number of unanswered issues relating to the timescales, and trigger points such as how many homes can be delivered without the J5a and what the implication and relationship is with the Northern Relief Road. Initial comments from Kent County Council (KCC) advise caution about the proposed delivery timescale and recognise the volume of work and availability of resource as constraints on delivering at accelerated pace. Initial comments from Highways England (HE) confirms that although they cannot commit without knowledge of the type of junction and land take and detailed drawings, a DCO will be highly probably, and that there would be a minimum of 7 years from allocation within the HE programme to the junction opening.</p> <p>There is considerable doubt about the timescales and this is the most significant issue and challenge facing this proposal.</p>	<p>Timing issues which requires further work and highways clarification.</p>
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Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
<p>Clearly identifies the benefits under the three broad areas.</p>	<p>Fails to move beyond prospectus and New Settlement Study.</p>	<p>The proposal expects the infrastructure to be provided and funded in full by the development through land value capture at the outset. It also commits to providing education, health, community and open space for sports and open space. It recognises that there will be Council tax and GVA benefits. However, these benefits accrue per new dwelling and are not unique, although for Swale, the overall scale on offer is.</p> <p>Little consideration is given to the long term stewardship issues, or social benefits. Given the scale of the proposal it is surprising that there is not more information picking up wider benefits for Sittingbourne and Swale in general. However, there may be two barriers to wider benefits: a) not investing in the KSP; and b) without a Northern Relief Road, J5a benefits cannot spread around Sittingbourne efficiently.</p>	<p>Further clarification is required relating to the KSP and northern relief road.</p>
<p>Provides evidence to demonstrate that the benefits are achievable</p>	<p>Little or no evidence provided.</p>	<p>Costings were not included within the initial submissions. However, some details have now been provided.</p>	<p>Requires further evidence that benefits can be achieved. Viability will be subject to testing.</p>
<p>Provides evidence that they have been realistically calculated.</p>	<p>Concern that they may be too optimistic.</p>	<p>The proposal places heavy reliance on the reduction in out-commuting. The robustness of this assumption needs to be tested and it is important to understand where the market is for this scale of development. In our experience, local plans based on this kind of adjustment are vulnerable to Duty to Cooperate and general soundness challenges. Further information on this is required.</p>	<p>Further information about out commuting is required.</p>
<p>Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).</p>	<p>Lack of recognition of any dis benefits.</p>	<p>This is not provided and needs further exploring in relation to the Northern Relief Road and how and when it is to be delivered. There could also be more recognition of any dis-benefits arising from the scheme, notably on environmental issues.</p>	<p>Requires further consideration of any dis-benefits, particularly the relationship with the Northern Relief Road.</p>
<p>Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough</p>	<p>Benefits only relate to this proposal.</p>	<p>The road is proposed as a Swale wide benefit. The transport modelling will need to test this assertion in detail. However, it is noted that the Northern relief road is not included within the submission and this is a significant issue, which reduces the off-site advantages which would unlock Sittingbourne and improve the town all round.</p> <p>Initial comments from KCC recognise that there are benefits to the A2 with the suggested improvements, although increased traffic will be diverted onto the motorway. These concerns are reflected in the initial HE comments which state that ‘significant infrastructure investment could include link capacity improvements, including potentially (subject to all assessments and approvals) a parallel link to accommodate traffic other than that which is destined for the M2/A2’</p>	<p>Requires further information resulting from HE comments and the relationship with a new parallel road and the northern relief road and its delivery.</p>

Question 2: Abnormals			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	<p>The proposal intends to fully fund the motorway junction and road privately. Whilst this may be possible, no costs are provided and the technical case for the junction has yet to be made.</p> <p>There is a discrepancy between the red lines on the plans on page 25, and page 27. 23 and 22 in terms of whether all the land is included all the way up to the A2. Therefore, it is necessary to confirm that they own or control land right up to A2 and M2, as well as any potential parallel link road to ensure that all the works can be undertaken.</p> <p>Further work required to clarify land ownership and relationship with the Northern Relief Road as well as testing the costs and implications of Highways England comments, in particular, any need for a parallel road next to the M2.</p>	Further work required to test costs and implications of highways works.
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. <i>We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.</i>	Or over optimistic assessment.	Costings were not included within the initial submissions. However, some details have now been provided.	Requires further evidence that delivery can be achieved, with viability costs tested.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promotor would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	<p>The proposal sets out how they envisage the Council being a partner and how they also want to involve Kent Wildlife Trust and Natural England. They explain how they have already engaged with KCC education and highways HE, CCG, Sport England, Kent Downs AONB and draws on support from Thames Estuary 2050 Growth Commission Vision.</p> <p>It is clear that there has been joint working on the Swale wide Transport Model, and whilst some work has been undertaken with transport infrastructure providers and utilities, little has been done to consider environmental issues and implications. While there is a recognition that these are to be undertaken, it would be expected that more would have been achieved. This is important due to the impacts of the road alignment and certain development parcels upon designated landscapes, ancient woodland and nature conservation sites. There is also a lack of detail in relation to local community engagement.</p> <p>Further information has been received addressing some of these points, particularly how the community and Design South East will be used via a combination of approaches. It is also understood that a PPA is being discussed. There are therefore signs of progress, but joint working will need to be developed further as the scheme progresses to ensure robust engagement at the relevant time with the right people.</p>	Satisfactory progress with further work required on engagement.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc).	No acknowledgement of need for resources.	<p>This was not initially addressed and has been probed further via letter. The response in Jan 2019 indicates they are supportive of the Local Plan process and willing to sign up to a PPA. This will need to be explored further at the next stages.</p> <p>There is little acceptance currently of the need for intervention on site boundaries, particularly those areas falling outside of the scheme and existing settlements.</p>	Satisfactory progress. Will require further details as the scheme progresses.
Outline when intervention or action is needed and what form they would like this to take (timetable,	No timetable or detailed plan given.	<p>There is a good recognition that further evidence is required. Specific mention is made of the need for a water cycle strategy to be prepared to inform the masterplan. However, no detailed timetabling is provided and this will require further consideration at the next stages.</p> <p>There is a general need to consider what additional evidence is required and what action will result from this.</p>	Satisfactory progress, with further work required to detail how and when they will work with the Council.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
consideration of policies needed in Swale or wider).			
Demonstrates this action plan aligns with the next local plan. And outlines what policies may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail is provided, however, they appear committed to the plan timescale and willing to sign up to a PPA.	Further work required to agree the policy approach.
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	<p>The promoters are happy to discuss alternatives to partnering, delivery and stewardship, but clearly wish to undertake the delivery of the scheme themselves.</p> <p>Further clarification in January 2019 has revealed that they are willing to work with Council in a number of ways, although they don't see them as essential to the success of the project. However, they are happy to discuss further and this is to be welcomed.</p>	Satisfactory progress with further work required to agree the best way to work together.

Question 4: Delivery vehicle			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Discusses various delivery models, weighs up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	<p>Initially no clear arrangements were specified, however, there is now clarification that Quinn Estates would take the role of Master Builder. Already have land owner agreements in place and 4 housebuilders to provide 6,000 homes. Some examples are provided of who they would work with, however little detail is provided in relation to delivery models.</p> <p>This was further clarified in the January 2019 response which states they do not envisage using a LDV for the scheme; however they are not averse to discussing this further. Clarification regarding delivery vehicle will be required and options explored in more detail.</p>	Satisfactory progress with further work required, particularly relating to exactly what model will be used.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	This is not addressed, however further detail is provided in relation to stewardship – see below.	Further information required.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	<p>This level of information is not provided, and this route is not proposed. The lack of reference to LLDCs and other mechanisms or changing government policy is not necessarily a problem, but the Council may want to explore different mechanisms with them.</p> <p>Consideration will need to be given to emerging Government proposals for net-biodiversity gain.</p>	Further information is required about details of the mechanism going forward.
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples	The promoters rely on their track record citing Connect 38, Sittingbourne town centre and relationship with Barratts and Redrow Homes. However, it is not clear that they have any experience of acting as a master developer at this scale. Further consideration of how these examples are appropriate would be helpful.	Further clarification required to ascertain how relevant and transferable the examples are.

Question 4: Delivery vehicle			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	<p>The proposal sets out principles for planning for long term stewardship, paying for it and running a stewardship body. It seeks to involve of range of groups, depending on assets and most appropriate approach. While initially little detail was provided, this has been expanded upon in Jan 2019 response. This commits to considering community trusts, the use of an overarching board with relevant interested parties. A flexible approach and discussions with the Land Trust have been suggested as well as use of endowments to seed fund the stewardship vehicle.</p> <p>This will need to be explored in more detail to ensure it is factored into the process at an early stage and any cost implications properly accounted for.</p>	Further detail of how this would work in practice and testing required to ensure costs have been included.

Question 5: Advice			
What specific advice do you require and what technical research will you undertake should the bid be successful?			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	The proposal is a self-contained document which does not explore the question of what advice and research is required, which either means it is confident all issues are covered, or it has not been considered in detail. Clarification can be sought.	Further information required to progress scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response. (e.g. we need a Borough wide Water Cycle Study to help develop our scheme)	No acknowledgement of the need for further work	<p>There is a good recognition that further evidence is required and they expect a water cycle strategy is to be prepared to inform the masterplan. However, no detailed timetabling is provided, and this will require further consideration at the next stages.</p> <p>There is a general need to consider what additional evidence is required and what action will result from this.</p>	Satisfactory progress with further work required on how and when they will work with the Council.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.)	Highlights problems or data issues with no positive way forward.	This is not addressed in any detail. There are potentially significant issues relate to transport and landscape needing to be clarified, with specific reference to the initial provisional views from AONB Unit and also from Highways England and KCC.	Further work required to address AONB, Highways England and KCC comments.

Question 6: Environmental Opportunities			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Clearly identifies the net gains or improvements under the five broad areas	Fails to move beyond prospectus and New Settlement Study.	<p>The proposal states that it has engaged with a range of stakeholders to inform approach, but it is not clear exactly who has been involved and how the comments have been addressed. There is little detail on the stakeholders contacted and how any input has directly informed the development of the masterplan and layout, particularly in relation to the road alignment and the approach to environmental enhancement/constraints.</p> <p>The proposal claims that there will be improvements in air quality – scale of relative reduction is anticipated to be higher than generation from import of development itself. This will need to be explored in more detail and evidence provided and tested.</p> <p>This does not appear to be a landscape led scheme, which takes advantages of the opportunities available and has been based upon an understanding of landscape and the influence of AONB. Despite landscape evidence having been prepared, initial work by LUC indicates potential concerns. Their conclusions will need to be addressed. The AONB Unit has also submitted initial provisional comments which will also need to be responded to.</p>	Further information required including a response to LUC and AONB unit comments.
Provides evidence to demonstrate that these are achievable	Little or no evidence provided.	A number of reports have been provided as part of submission, which is helpful. Landscape work has been assessed by LUC and their comments (together those provided by the AONB Unit) will need to be considered and responded to.	Satisfactory progress, but further information is required in response to LUC and AONB Unit comments.
Provides evidence that they have been realistically assessed	Concern that they may be too optimistic.	Reports provided as part of submission, but as yet there is little acknowledgement of potential concerns. Landscape work has been assessed by LUC and comments will need to be considered and responded to, together with the initial provisional views of the AONB Unit.	Further information required to provide a response to LUC and AONB Unit comments.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible)	Lack of recognition of any negative impact.	<p>Net biodiversity gain is mentioned but is not considered in any detail.</p> <p>Further detail is required about how this will be achieved, especially in view of the current road alignment and the siting of some development parcels and their impacts on landscape and wildlife sites.</p> <p>This issue would benefit from being considered as part of the masterplan review.</p>	Further information is required to demonstrate how net biodiversity gain will be achieved. It is recommended that the scheme is also subject to masterplan review.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough	Improvements only relate to this proposal.	There are significant 'green' areas identified, however, their significance in terms of their overall benefit and relative to the other implications of the scheme are not clear due to environmental issues highlighted above and in Question 7.	Further information is required to develop the environmental opportunities arising from the scheme.

Question 7: Environmental Constraints			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	<p>The proposal includes an initial assessment which provides list of higher sensitivity features. Conservation areas and heritage assets are identified with opportunity to use these to inform masterplan through clear principles. This includes prehistoric and roman archaeological sites present – intend to undertake pre application surveys and mitigation arranged. Consideration has been given to flood risk, ground water, surface water and foul water, as well as agricultural land most of which is grade 2 as well as mineral geology.</p> <p>A suite of ecological surveys have been undertaken by Aspect Ecology - phase 1 habitat: concept plan seeking to retain and strengthen habitats and provide buffers.</p> <p>A reasonable start has been made to understand the constraints, however, it does not appear that this is a landscape led scheme, which takes advantages of the constraints and been based upon an understanding of landscape and influence of AONB. The line of the road is also a concern in terms of its relationship with the constraints of the ancient woodland and quarry.</p> <p>The work by LUC raises a number of issues of concern arising from the location of the site, specific impacts on environmental assets, such as landscape designations, woodland and quarries, and about how any understanding of the site has been used to inform the masterplan. Likewise, initial provisional views from the AONB Unit express concern about the implications of the scheme for the AONB and its setting. The scheme is likely to be judged as 'major' development within the AONB for the purposes of para. 172 of the NPPF.</p> <p>The implications of the NPPF will need to be considered, as will the issues raised by both LUC and the AONB Unit. Overall, this scheme would benefit from additional masterplanning review and input to see how the constraints can be addressed, particularly relating to the road alignment.</p>	Further information required on the constraints and comments received. It is recommended that this site is subject to masterplanning review.
Provides reasonable confidence that the 'long list' (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	The proposal addresses the key issues and provides a variety of supporting evidence is submitted. Comments on this by LUC and initial views of the AONB Unit need to be addressed and it is likely that and others such as England Nature will also require further information. Their formal views will be needed.	Satisfactory progress, but further response to LUC and AONB Unit comments are required.
Where constraints are identified provides a 'action plan' outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc.	No mitigation strategy – or over optimistic.	<p>The proposal identifies principles which inform masterplan and aim to identify opportunities and improvements (see page 26). There is recognition of key issues such as integration of existing development, avoiding skyline development, and network of green spaces. However, it is not clear how these have been translated into the scheme itself.</p> <p>There is some acknowledgement of the partial loss of Quarries that is to be off-set by the use of ecology hubs within schemes, and the damage/loss to the woodland which is to be compensated for through replanting (see page 35).</p> <p>The mitigation and compensation measures are not detailed and there appears to be the implication that the quarry and wood are not so valuable that they need to be preserved. This issue will need to be clarified and tested. Further work relating to the damage/loss to important sites, or mitigation should be further considered and commissioned.</p>	Further information required in respect of mitigation.
Considers off site (close proximity) constraints and provides a realistic view to managing these.	No consideration or inadequate approach to management.	<p>The site plan is based on ownership and means that there are potential areas which are not included. There are concerns about missing fields, the need for buffers or the ability of the schemes boundaries to 'flex' in order to avoid or mitigate constraints. There is also little information provided about the integration and access to Sittingbourne and the relationship the scheme will have with it, especially in relation to the gap between existing and proposed development.</p> <p>Site boundary issues need to be addressed to ensure the most logical and appropriate sites are included.</p>	Further information required relating to site boundary issues.

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	<p>The proposal is clear that it wants to agree set of principles based on key themes, and that it accepts and sets out design principles.</p> <p>Whilst there is general recognition of good design and the use of design principles, no detail is set out. Further information provided in Jan 2019 envisages a masterplan for the site with disposal contracts which could reflect the ethos of these documents. It recognises the Council will still want control and suggest using conditions attached to individual elements as a way of achieving this. However, it is now clear exactly how design quality will be achieved using this approach.</p> <p>To achieve high quality design the approach will need to go further and require discussion and agreement to the approach.</p>	Further details required on how the design principles have been used and good design will be delivered.
Recognises the TCPA principles and met these in a meaningful way	References them but with no detail or reasons for departure.	<p>The proposal commits to embracing these principles and interprets them in a way that is relevant. It considered that it sets green infrastructure and self-contained communities at the heart of the scheme.</p> <p>However, while there is recognition of the principles, their interpretation does not go as far as the TCPA objectives. It is not clear that this is a landscape led strategy or how will cycling and walking be achieved due to the large road splitting the site. This will need to be addressed in more detail.</p>	Further detail required to demonstrate how these have informed the masterplan.
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	<p>Further information provided in January 2019 demonstrates that the promoters had previously engaged with Design South East to ensure masterplanning are subject to peer review.</p> <p>This approach is welcomed, but it is not clear what the outcomes were and how this enabled the scheme to evolve taking account: the constraints; the need to involve stakeholders; and whether there are to be any changes in the scheme as a result of this engagement process.</p> <p>Further commitment to delivering these principles is required.</p>	Further detailed required on the design work and how this has informed the masterplan.
Shows that the proposal responds to landscape context (accepting limited detail may be available)	Lack of recognition of landscape within and surrounding the site.	<p>The proposal claims to be landscape led – uses green grid strategy approach and believes that the AONB has been considered, with elements to be retained through country parks and open spaces.</p> <p>However, the layout appears to be strongly influenced on land ownership and the road alignment, both of which have significant implications and may not represent the most appropriate design. The Green infrastructure masterplan is difficult to read and discern the different elements (page 22) This will need further interrogation/evidence. As stated above, there are issues about the impacts on environmental designations, together with a lack of ‘green’ links through to Sittingbourne.</p> <p>The landscape impact has been considered by LUC and there is a need to respond to their comments. It may also be necessary for further visual impact evidence at the next stage.</p>	Further detail required and specifically their response to the LUC comments.
Provides a ‘action plan’ outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	<p>The proposal makes reference to engagement, however, limited detail is provided.</p> <p>The January 2019 response states that they will engage with a variety of local groups through numerous events and that “the events and feedback are a key driver for the proposals and seek to pull strands together to ensure a coherent overall proposal which reflects inputs”.</p> <p>Further detail and commitment to this element of the design principles will be required.</p>	Satisfactory progress. Further information required to set out the process.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	See above. An engagement strategy will be required moving forward.	Further information required to include an engagement strategy.
Agree with community land ownership and stewardship – ideally	Fails to commit to community land ownership	<p>The proposal initially included little detail and no examples of successful use had been provided.</p> <p>However this has been expanded upon in the January 2019 response, which commits to considering community trusts, the use of an</p>	Satisfactory progress, subject to further detail about land ownership and stewardship

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
with details and examples	and stewardship.	<p>overarching board with relevant interested parties. A flexible approach and discussions with the Land Trust have been suggested as well as an endowment approach to seed fund any community vehicle.</p> <p>Further information will be required as the scheme progresses.</p>	being agreed.

Question 9: Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direct of travel
Outlines what infrastructure. is proposed and why	No consideration of what is required or failure to commit.	<p>The proposal commits to providing:</p> <ul style="list-style-type: none"> • 4 primary schools, 1 (6 FE) secondary plus 6th form, exploring nursery and FE facility. • New sports facilities for Sittingbourne FC, Health provision and healthy living in line with CCG requirements. <p>The promoters state that discussions have taken place with Southern Water with respect to foul and supply and that there is capacity without upgrades in the short term. Also with utility providers who confirm services can be provided, subject to phasing and upgrades and electricity requires 4km of underground cables. Fibre to the area can be achieved.</p> <p>The proposal is quite well advanced in terms of the infrastructure requirements and a commitment is given to meeting all its own needs. It is noted that there may be an issue getting power to the site because the high voltage line is some distance to the north. It is understood that the costs will be covered by the developer, but there may there may be timing implications. We recommend that it is checked that this has been included in the costs and viability appraisal.</p> <p>Further discussion will be required with the education authority and the clinical commissioning group in relation to provision. Further evidence and information is required about the detail and costs to ensure these are robustly established and properly costed.</p>	Good progress but further work required to address electricity supply, type of community and employment space and other infrastructure requirements.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of the proposal. Further detail will be required if the scheme progresses.	Satisfactory progress and further information required.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided. Given the importance of timing for this proposal and the significant infrastructure provision required, it would be useful to set up a Utility working group to consider cumulative impact and timing issues.	Further information required. It is recommended that a Utility working group is established to consider cumulative issues and timing.

Question 9: Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direct of travel
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided. However, it will be required for the viability assessments which will need to be tested and will evolve throughout the process.	Further testing required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	<p>The proposals are potentially transformational from an infrastructure perspective, in particular in terms of transport. There is though little reference to Sittingbourne residents or those being impacted upon by development in terms of the benefits that they too could receive. In this respect, the promoters could be said to have underplayed this question.</p> <p>In general terms, these issues and people will need to be considered, particularly in terms of the villages that are enveloped by the proposal and their engagement in the process, as well as the infrastructure improvements required.</p>	Further information required, particularly on how the existing communities are dealt with.

Question 10: Transport			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what infrastructure is proposed and why	No consideration of what is required or failure to commit	<p>The proposal considers that the Southern Relief Road is a major goal for the area and a solution to existing problems. Proposes to link into new junctions and provide enhanced bus routes and sets out walking and cycling strategy with clear links into Sittingbourne. This includes the reallocation of road space to buses, and use of Highsted Road as a non car only connection.</p> <p>The case for the road and junction needs to be made and there are a number of questions to be addressed, such as capacity issues on the road corridors. The need for the junction and operation of relief road on Sittingbourne, and the link with and delivery of the northern relief road is also essential and needs to be properly addressed. It will be necessary to check how far the Southern relief road is dependent on the delivery of the rest of the Northern Relief Road? Will it bring benefits on its own?</p> <p>There are a number of other issues to be addressed, including the type of road used because there appears to be a discrepancy about its size (single carriageway or dual). There is a lack of detail and feasibility about how links into the town will be achieved and whether the scheme will be accessible to rail. There are also issues about linkages with the existing road network, especially rural lanes.</p> <p>This is a scheme that will require a significant public transport intervention. Whilst there is an outline of a potentially innovative scheme indicated, considerable further work will be needed to determine firstly how it will be implemented and, secondly, its likely effectiveness in off-setting considerable car usage.</p> <p>Considerable further information is required to address the fundamental element of the scheme. Initial comments from Highways England confirm that a junction could be accommodated in this location, however they are concerned that due to congestion, significant infrastructure investment is required that could potentially include a parallel link to the M2 to accommodate local traffic not destined for the A2/M2. They also consider that a DCO will be required and that the scheme is likely to take 5-7 years from allocation within the programme. These comments do not reflect the current submission and masterplan and further discussions/clarifications will be required.</p> <p>Initial comments from Kent County Council also state that while there are likely to be benefits for the A2, more traffic will be diverted onto the M2. While they are happy for development to proceed from both ends, further modelling would be required to demonstrate the extent of development that could occur without the completed link and they are keen to test alternatives to the absolute need for a dual carriageway. They recognise that there are accessibility implications for both Sittingbourne residents and rural communities via the rural lanes modelling is required to ascertain whether measures will be needed to prevent vehicle access from the new development onto these lanes. They are happy to assist and investigate the bus only link via Highsted Road.</p>	Further information required relating to highways and public transport issues and specifically a response provided to the HE and KCC comments.

Question 10: Transport			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	<p>Air quality and congestion improvements are a driving motivation for the proposal. Modelling is being done in conjunction with HE and KCC and transport work has been done and an air quality technical note produced. All the evidence submitted will need to be reviewed and considered in detail as the scheme progresses.</p> <p>Initial comments have been provided by KCC and HE (see above). The key issues they raise have implications for the masterplan and will need to be addressed going forward</p>	Further information required relating to highways and specifically a response provided to the HE and KCC comments.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	<p>The proposal commits to the delivery of the road and new junction within 2 years of construction commencement on site (2022). It is stated that this is informed by initial discussions with HE and at higher levels of Government. It is understood that a business case and further evidence is being prepared.</p> <p>Timescales are considered very optimistic given the process to be followed. We consider that the new junction and road layout will probably require a DCO and as such the timescales will be much longer given the HE view. There is therefore a risk in terms of timing should the Council rely on the delivery of this site in the short term. The issue of timing is given more weight in the light of the initial provisional views of the AONB Unit who regard the junction as major development. A response to these comments will be required.</p> <p>Initial comments from KCC express caution at the proposed delivery timescale and support HE initial comments that the junction would not take a minimum of 5-7 years from allocation in their programme to junction opening.</p> <p>Detailed consideration will need to be given to formal responses from Highways England and Kent County Council and a realistic timetable agreed.</p>	Timing issues and further information required relating to highways and in response to the AONB Unit's comments.
Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities. (e.g. HA re J5a or Faversham junctions).	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	<p>The proposal states that the J5a junction distance is 4km from J5 and is therefore acceptable. It is claimed that clarification from HE has confirmed that a DCO is not required and that the S278 process can be used instead. It is expected that work can start work from both the north and south to open up sites for delivery.</p> <p>Initial comments from HE confirms that a junction could be accommodated in this location and KCC confirm in principle that development can proceed from both ends, subject to modelling to demonstrate the extent of development that could occur without the completed link. However, there are a number of discrepancies between the promoter and the HE in terms of the use of a DCO and the overall timings. We have above expressed caution about the timings and the likelihood of needing a DCO. This position has been confirmed by both KCC and HE who state that a DCO is highly probable and believe that it would take a minimum of 5-7 years from its formal allocation. Importantly, HE also believes that a parallel road to the M2 may be required to accommodate local traffic.</p> <p>Further consideration will need to be given to the results of the transport modelling and the highways comments and their implications for the masterplan.</p>	Further information required relating to highways and specifically a response provided to the HE and KCC comments.
Any calculations and modelling clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the minimum need for the new community.	<p>The proposal is predicated on the delivery of a new junction and southern relief road, which may be of considerable wider benefit to the area. However, this needs to be tested, particularly in terms of how it works with the northern relief road and its delivery.</p> <p>The initial comments from KCC recognise that there are some benefits to the local roads and particularly the A2 and that flows would increase on the M2. There may also be additional benefits from the bus routes, but these would need to be modelled. Initial comments from HE raise the potential need for a parallel road next to the M2 for local traffic, which appears not to have been accounted for in the submission. These comments will need to be addressed and a response provided.</p>	Further testing required and a response to highway comments.

Question 11: Open Space and Green Infrastructure.			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Outlines what green infrastructure is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal is based on the concept of a necklace of villages along the new road.</p> <p>However, this layout appears strongly to be a result of land ownerships and the proposed road alignment, rather than led by an analysis and provision of green infrastructure.</p> <p>The proposal does not appear to be green infrastructure/landscape led and further work is required to address LUC comments, environmental constraints and whether amendments are required.</p> <p>This scheme would benefit from additional masterplanning review and input to see how the constraints can be addressed, particularly relating to the road alignment.</p>	Satisfactory progress, but further masterplan review is recommended.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	<p>The proposal includes 3 components of green infrastructure: focused around AHLV dry valley features; Bapchild/Rodmersham Church; and along the new link road.</p> <p>However, it is not clear how the green infrastructure will work crossing the road to ensure accessibility east to west, particularly if it is not publically managed. Links to the wider green infrastructure network off-site are also not especially explored.</p> <p>LUC have assessed the landscape evidence submitted, and their comments should be considered. In addition, there is a role for green infrastructure and linkages across the road and out to Sittingbourne to be considered within a masterplanning review process.</p>	Further information required to address the LUC comments and recommend further masterplan review.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing of risks (Question 1b).	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. Whilst this is not surprising, it will need to be considered further.	Further information required.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	<p>This is not provided in any detail and it is currently unclear as to whether the green infrastructure is of wider benefit and if so how this will be achieved.</p> <p>Further information is required and green infrastructure requirements should be considered as part of a wider review of the masterplan.</p>	Further consideration required of landscaping, buffers and green infrastructure as part of a masterplan review.

Question 12: Sustainability			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideas set out but also evidenced with a reasonable prospect of	Commits to sustainable design and delivery but no	No detail provided. Further work on sustainability and adherence to specific principles needs to be addressed.	Needs further development to address sustainability issues

Question 12: Sustainability			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
delivery and ideally examples.	details provided.		
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed	Fails to move beyond simply acknowledging they are within the prospectus.	<p>There is some reference to exploring neat networks/district heating with a commitment to prepare an energy statement.</p> <p>However, no detail has been provided on high standards of design including Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards. It will be important that these are agreed early in the process to ensure that costs are fully factored in.</p> <p>Given a potential commitment to a district heating system, it will be important to explore this opportunity as it will have major implications that need early understanding.</p> <p>It is not clear whether these sustainability issues have been costed and included within the viability appraisal.</p>	<p>Needs further development, particularly around standards and a district heating system.</p> <p>Viability work will be subject to detailed testing and should include the standards to be adopted by the scheme.</p>
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

NS3 – Land at Bobbing, West of Sittingbourne

Question 1 – About the Scheme?			
Question 1a: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Responds to the Councils SHMA which sets out the profile of homes needed.	Simply saying will provide an appropriate mix etc.	<p>The proposal includes 2,500 homes with 40% affordable, independent living and self/custom build, as well as the possibility to giving land to the Council to build affordable homes. They recognise need to meet all tenure requirements as set out in NPPF.</p> <p>The proposal meets expectations and offers viability work to confirm that this is achievable.</p> <p>A viability appraisal has been submitted and further detailed assessment of this is required.</p>	Satisfactory progress, subject to viability assessment.
Other ownership and site optimisation issues.	Not owning/controlling the site	<p>Proposal is in two large parcels with smaller infill around Bobbing. There are additional SHLAA sites promoted close to this and the adjacent landowners have expressed support for the site and any potential expansion northwards. <i>NB: It is understood that further submissions are expected to the master plan proposals. However, these will be subject to assessment at a later date.</i></p> <p>A reasonably sensible red line, although open space is effectively being provided 'off site' in the southern parcel. There is however, limited buffering with the existing village, which is almost entirely enveloped. It is slightly unclear whether the indicative proposal strengthens the existing village or supplements it with a new settlement centre to the north west - in which case there is a question about whether the two can co-exist. Options as to how best to secure a sensible relationship between existing and new communities should be explored through masterplanning.</p> <p>No significant questions are raised about ownership, but in an ideal world the layout would not be fractured between the two north and south parcels. It would be useful to understand why the two parcels are proposed and why the tongue of land is omitted in the south. Consideration should be given to a larger northern parcel for open space which would possibly allow the open space to buffer the settlement into the wider landscape. Other land might be available to provide this and/or any compensatory development land that might also be required.</p>	<p>Further information required.</p> <p>Follow up and clarification of adjacent land parcels, as well as the rationale for land which has been included.</p>

Question 1b: What mix of other uses is proposed?			
Note – this could be broken down by use- i.e. commercial, retail, leisure etc			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the New Settlement Study which outlines the Council's expectations (land balance). Or provides alternative evidence to support an alternative mix.	Fails to commit to the outline provided in the New Settlement Study	<p>The Proposal covers 226 ha of land (subject to further amendment) because it includes open space. Within this, 87ha of residential development for 2,500 homes is proposed, 6ha of community facilities including a 3FE primary school, new village hall and nursery, village retail parade, pub, play area within a village green. 3ha of flexible commercial space, pop up art and culture space is also proposed.</p> <p>A full package is proposed. While less than 1:1 employment is proposed, this appears credible and the job yield is probably reasonably realistic – 3ha equates to approximately 1,000 B space jobs (if it is offices, but less if it is warehousing.) The site is close to Eurolink site, so not providing for all jobs on site is realistic, especially given that demand in the area has been warehousing which would be difficult to incorporate into the settlement. However, given the potential available access to the A249, there may be an opportunity to increase provision. More information is required about the flexible commercial space and what this means.</p> <p>Other social infrastructure is provided as expected. There is a discrepancy between the plan and the letter about school size and this needs to be clarified. A large parcel of open space is to be 'gifted' to the community, but as noted elsewhere, it is not clear that this land is in the right place to be useable by new residents; rather it appears to be a buffer. It is not clear if any 'externally' benefiting uses are proposed, although it is noted that there would be onsite infrastructure benefits for Bobbing village.</p>	Satisfactory progress, subject to viability check.

Question 1c: Outline the proposed trajectory			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideally delivers early.	Fails to demonstrate the site can start delivering in a meaningful (shortish) period	<p>Early delivery as not dependent on significant infrastructure, but recognises that J5 improvements may be a constraint, and it is likely that the junction to the A249 could be a future problem. Seek to start in 2021 to link with 2022 improvements of motorway. The response from HE broadly confirms these timescales however, it is clear that no additional capacity should be assumed and that further detailed analysis is needed.</p> <p>Housing delivery is proposed as 50-100 dpa in first year, 100-150 in second and rising to 200 dpa up to completion by 2032. Developed by Crabtree and Jarvis homes.</p> <p>There is a risk with J5 and the constraint that this imposes, as well as issues with the A249 junction. This is out of their control, but clarification of what progress and delivery can be made on site before J5 improvements are required. However, for the Council, any development at Sittingbourne is likely to be caught by the same trigger point, so this will need to be considered in the round with all the sites across the town. The delivery rate appears quite slow, but there may be ways to increase this, although it is not clear whether this includes the affordable housing element.</p>	Requires further work and highways clarification.
Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	Trigger points to be agreed. There is an unknown risk in terms of the timescale and capacity of the J5 improvements. See above.	Requires further work and highways clarification.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New Settlement Study	<p>Proposal refers to 1 job per house and recognises the environmental sector as a key growth area but then lists in fig 7 a total of 526 jobs. A new school is proposed together with community facilities, possible health centre, new village hall and nursery, village parade and public house.</p> <p>The number of jobs needs confirming. A range of social facilities are proposed, which will be paid for by the development. It does not currently suggest any wider (off site) benefits for Sittingbourne.</p> <p>The additional information provided in January 2019 makes reference to investigating the provision of a new health facility and recognises that additional funding may be required through S106 or other sources.</p>	Requires clarification of the job figures and exact nature of what is provided including health facility.
Provides evidence to demonstrate that the benefits are achievable.	Little or no evidence provided.	Not provided at this early stage. It will be necessary for further evidence to be provided which sets out how the benefits will be delivered.	Requires further evidence that benefits can be achieved.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic	Initial viability costing was provided and further details have been submitted. Viability work will be subject to detailed testing	Satisfactory progress – will require ongoing viability testing and the scheme moves forward.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits	Not provided. It will be necessary for further consideration to be given about the trade-offs that may be required	Requires further consideration of any dis-benefits.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough.	Benefits only relate to this proposal.	The proposal refers to the new school drop off area and road realignment as a wider benefit; however, it is not clear that this has district wide benefit. Open space levels might also be said to be of wider benefit, but this is unclear due to its proposed location.	Further information required to ascertain the extent to which there are wider benefits.

Question 2: Abnormals			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	<p>No abnormals are identified and proposal considers that all infrastructure costs are met through the provision of residential development. However, the A249 junction is an issue which needs to be addressed and could be considered an abnormal.</p> <p>It is noted that there are pylons on site and these will need to be considered. The additional information in January 2019 makes reference to a health facility which may need additional funding.</p>	Further work required on the junction, how the pylons are dealt with through masterplanning and taking the health centre forward.

Question 2: Abnormals			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. <i>We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.</i>	Or over optimistic assessment	<p>The viability appraisal uses cash flow model and Argus Developer, with headline figures, but states that these are commercially sensitive.</p> <p>Further detailed viability work has been requested and received and a detailed assessment and testing will be undertaken.</p>	Satisfactory progress – further testing required.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promoter would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	<p>The proposal sets out that the developer will be responsible for delivery, in collaboration with range of others and supported by a consultant team led by DHA.</p> <p>The proposal indicates that they have spoken to KCC about education.</p> <p>This proposal is at an early stage so it is not surprising that a model is undeveloped and limited engagement has taken place. It is not clear whether this Master Developer approach has been done before and if the examples are entirely transferable. There is recognition that engagement will be required and further work.</p> <p>The further information submitted in Jan 2019 recognise that there will be a role for external support in ensuring that the performance of the proposals against garden community principles.</p>	Satisfactory progress with further work required on engagement.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc.).	No acknowledgement of need for resources.	<p>The proposal makes clear that they would like to discuss supporting infrastructure and employment/commercial development with the Council to inform layout and viability.</p> <p>While limited information is provided, this is not surprising at this early stage and the promoters seem keen to engage with the LPA and others.</p>	Satisfactory progress with further discussion about infrastructure and employment issues.
Outline when intervention or action is needed and what form they would like this to take (timetable, consideration of policies needed in Swale or wider).	No timetable or detailed plan given.	<p>The proposal suggests that an SPD would be used, which would set parameters and design codes for development. They also recognise that it would be helpful to use a PPA to work together and shape proposal.</p> <p>The proposal addresses this issue well and recognises the need for joint working and clear design codes.</p> <p>Further information submitted in January 2019 suggests that they would support the Council with the evidence base and fund officer attendance at consultation events.</p>	Satisfactory progress with further work required on how and when they will work with/fund the Council.
Demonstrates this action plan aligns with the next local plan. And outlines what policies may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail is provided, however they are committed to the plan timescale. Further discussion will be required to consider what policy approach will be most appropriate.	Satisfactory progress with further work required to agree the policy approach.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	Additional information provided in January 2019 suggests there is a strong role for the Council to play in the delivery of affordable housing on the site and in wider partnership. This would require further discussion.	Good progress with further work required to agree the best way to work together to delivery housing on site.

Question 4: Delivery vehicle			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Discusses various delivery models, weighs up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	<p>The developer (Crabtree and Crabtree Ltd) would be responsible for delivery and take the role of master developer, supported by consultant team led by DHA.</p> <p>This proposal is at an early stage so it is not surprising that a model is undeveloped and limited engagement has taken place. This was further clarified in the January 2019 response which set out that Appin would take on the role of Master Developer. They also now recognise the role of the Council and intend for the LPA to have a stake in the development, either delivering or managing housing. They expect any developer to have an element of 'freedom' in terms of architectural detailing, with most issues being dealt with as part of the landowner/promoter agreement which will ensure adherence to the design brief and control to ensure quality on the ground. This will need further clarification because there appears to be a disconnect between the agreement in principle and the commitment to control the design process in practice.</p> <p>There is though little detail on the proposed delivery body itself and, at this stage, whether some form of steering group would be established.</p>	Satisfactory progress with further work required, particularly relating to exactly how the master developer will ensure control of the design process and the nature of the delivery vehicle itself.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	<p>The proposal includes a commitment to work closely with stakeholders, and with parish and council to identify what is required and how can be managed.</p> <p>This is at a very early stage, so it is not surprising that an inclusive model of community involvement is not included. The commitment to engagement will need to be explored further with an engagement strategy in due course, as will the detail on the delivery body itself.</p> <p>Further information provided in January 2019 recognises that should the principle of these new communities be agreed, a full consultation exercise with LPA involvement will be undertaken. The process would include design workshops, Q&A, drop in sessions, and engagement with local groups within the village including the school and church. Consideration will need to be given about how best to fully engage with the wider community, prospective occupiers and through the development of an engagement strategy.</p>	Further work required in due course to provide a detailed engagement strategy and the nature of the delivery vehicle itself.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	<p>This level of information is not provided, and this route is not proposed. The lack of reference to LLDCs and other mechanisms or changing government policy is not necessarily a problem, but the Council may want to explore different mechanisms with them.</p> <p>It will also be important here to consider such matters as the Government's consultation in respect of net biodiversity gain.</p>	Further information required about details of the mechanism going forward.
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples.	<p>Reference is made to Chilmington Green is referred to as an example.</p> <p>It is not clear whether a delivery vehicle has been used before and if the examples are entirely transferable, and this will need to be discussed further.</p>	Further clarification required to ascertain how relevant and transferable the example is.
Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	Limited consideration is given to stewardship and the long term management of facilities, however, this has been expanded upon in the Jan 2019 response which anticipates that a Trust would be set up in order to manage and maintain the land. It is notable that the cost of this has not been included within the viability work and it will be important that it is properly costed. There is also reference to SUDs, which are considered elsewhere. This needs clarifying because there is reference to the approach not necessarily being appropriate.	Further detail and testing required.

Question 5: Advice			
What specific advice do you require and what technical research will you undertake should the bid be successful?			
A good answer would be:	A weak answer would be:	PBA Comment	PBA Simple
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	The proposal recognises the need for a considerable amount of evidence and working together. A useful response which recognises the considerable need for additional research to undertake further work.	Good response, for the stage reached, with further work required in due course to satisfactorily progress the scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response. (e.g. we need a Borough wide Water Cycle Study to help develop our scheme).	No acknowledgement of the need for further work	The proposal recognises that it is at an early stage, that EIA is required and includes a long list of research and supporting studies which will be needed. It is not surprising that further work is required give the very early stage of the proposal and it is helpful to have a comprehensive list set out so clearly. Clarification of what work could be undertaken when, by whom and addressing cumulative issues is required moving forward.	Good response, for the stage reached, with further work required to be undertaken, including cumulative impact.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.).	Highlights problems or data issues with no positive way forward.	The proposal seeks to rely on the Council's evidence, but recognises the need to work together with Highways England and others to explore what is needed. The issue of the J5 capacity and improvements is important and needs to be addressed. In addition, the A249 junction needs assessment and clarification of what is required. Highways England have responded that the upgrade of junction 5 is due to start in 2020, but that no more capacity is available than assumed for local plan schemes, however, they are in discussions with promoter and will require detailed analysis of capacity of improvements. We are still awaiting modelling information from Kent County Council and these will then need to be taken into account.	Satisfactory progress subject to further work required and Highways England comments.

Question 6: Environmental Opportunities			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Clearly identifies the net gains or improvements under the five broad areas.	Fails to move beyond prospectus and New Settlement Study	The proposal includes: <ul style="list-style-type: none"> • 100 ha of open space (although there are questions as to its location) • Retain and enhance historic character of Bobbing through green buffer and materials • Retain and enhance the rural lane • Woodland to be surveyed and enhanced and improve existing resource (although not obviously so from the indicative masterplan). • Seeks to celebrate and improve setting of heritage assets, through village green and community facilities etc. • New Green Infrastructure and space in corridors formed by existing rights of way • New hedgerows, planting etc particularly in open eastern part of the site. • New watercourses <p>There is potential for a good approach to environmental issues. A variety of environmental opportunities are identified which have the potential for biodiversity net gain. Little detail is provided but this is not surprising given the early stage of the proposal. LUC have commented on these proposal and these conclusions will need to be addressed</p>	Satisfactory progress, response to LUC comments required.
Provides evidence to demonstrate that these are achievable.	Little or no evidence provided.	Not provided. It will be necessary for this to be explored in more detail.	Further information required.

Question 6: Environmental Opportunities			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Provides evidence that they have been realistically assessed.	Concern that they may be too optimistic	Not provided. A response to the LUC comments is required.	Further information required to provide a response to LUC comments.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible).	Lack of recognition of any negative impact.	<p>The proposal sets out the relationship with existing provision and new areas.</p> <p>Little detail is provided but this is not surprising given the early stage of the proposal. It is not clear how much of the new Green Infrastructure is outside the main residential area below the railway. There may be an opportunity to optimise the landscaping provision through dealing with the red lines which can be considered through a masterplanning review process.</p>	Satisfactory progress, subject to masterplanning review.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough.	Improvements only relate to this proposal.	The proposal includes considerable open space which may be considered a wider benefit, specifically relating to the separation of the settlements and protection/enhancement of the landscape. However, this issue needs further explanation of how this would work and the relationship with the open space within the layout.	Further information required about how this would be delivered as a wider benefit.

Question 7: Environmental Constraints			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	<p>The proposal recognises the constraints and states that there are none which are overriding constraints. 2km to SPA, so recognises need to provide natural green space for dog walking secured in perpetuity and financial contribution to the monitoring strategy</p> <p>There is recognition of the Pylons NE to SW are a major visual detractor and will require an easement and which will need careful design.</p> <p>The proposal does recognise that parts are identified as an important local countryside gap, but only 2 small areas of site within this. Suggests this is used as open space to uphold the gap. Open space north of Newington will protect area from development and retain views of Newington church.</p> <p>There is recognition that there is likely to be noise from A249 and the railway and that this will require attenuation and careful orientation, but nothing out of ordinary required.</p> <p>Within flood zone 1, recognises that infiltration based SUDs may be unsuitable, but then proposes the use of SUDs techniques. This will require clarification.</p> <p>There is good recognition of the key constraints and provides good level of detail given the early stage of the proposal. There are no constraints which mean development could not proceed in principle.</p> <p>Further development of the masterplan to ensure the best layout of open space and the relationship with surrounding landscape. Consideration will be required of LUC conclusions relating to landscape issues.</p>	Satisfactory progress, subject to further information on the constraints and development of how these will be incorporated into the masterplan.
Provides reasonable confidence that the 'long list' (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	See above. Requires further consideration and a response to the LUC comments.	Further information required to provide a response to the LUC comments.
Where constraints are identified provides a 'action plan' outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc.	No mitigation strategy – or over optimistic.	Not provided at this early stage. Whilst this is not surprising, it will need to be considered further.	Further information required.
Considers off site (close proximity) constraints and provides a realistic view to managing these.	No consideration or inadequate approach to management	<p>The proposal states that the relationship with Bobbing Village with Bobbing and Sittingbourne would remain substantially unchanged.</p> <p>It will be important to consider how the village of Bobbing is dealt with in terms of the links with the development and this will need to be considered in more detail in the masterplan.</p>	Satisfactory progress subject to further detail about the relationship with Bobbing Village.

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	<p>The proposal accepts the principles and states that the emerging masterplan has been assessed against them.</p> <p>There appears to be acceptance of the design principles, which are repeated with acknowledgement that they will be used to assess the proposal. However, it is not developed enough to assess whether these principles have been demonstrably used to inform the scheme. Further information is the January 2019 response which commits to delivering a high-quality development and anticipates the need for a detailed masterplan, design brief and strict criteria. There is recognition that design standards are maintained in order to generate/retain values throughout the development, and that the LDV will take a strong lead.</p>	Satisfactory progress subject to further detail on how the design principles have been used.
Recognises the TCPA principles and met these in a meaningful way	References them but with no detail or reasons for departure.	<p>Seeks to achieve TCPA principles while retaining qualities of Bobbing. Makes specific reference to how each will be achieved on site, linking the old and new, improving level crossings, linear green and blue park, village green and sports provision, open to a range of densities and 2/3 storey development, reflecting the vernacular and linking new with the old village.</p> <p>Satisfactory early approach which appears to show commitment to the principles. Further work will be required to translate these into the masterplan.</p>	Satisfactory progress subject to further detail to demonstrate how these have informed the masterplan.
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	<p>Provides specific local interpretation and actions that will be incorporated in responding to the principles.</p> <p>The approach is reasonably well developed for the early stage. More detail will need to be provided setting out what design work and input has been provided.</p>	Satisfactory progress subject to further detail on the design work and how this has informed the masterplan.
Shows that the proposal responds to landscape context (accepting limited detail may be available).	Lack of recognition of landscape within and surrounding the site.	<p>The proposal states that it understands the character and its ability to accommodate change. Recognises there will be an effect on views and ensures key landscape elements and features will be integrated and retained to limit adverse effects, ensure mitigation.</p> <p>A visual assessment has been undertaken, and will be further developed alongside a parameter plan. The proposal states there will be no visual coalescence.</p> <p>Whilst this is not yet a well-developed landscape led proposal, it recognises the importance of landscape and seeks to address the key issues. There are clearly opportunities which could be exploited and some concern about linkages between the parkland and housing, particularly over the railway line and also how the increased volumes of traffic will be controlled along the lanes to conserve their rural character. LUC advice appears to indicate that there are no showstoppers and that the landscape is only moderately sensitive. At next stages it will be necessary to address their comments and conclusions in order to better exploit environmental opportunities.</p>	Satisfactory progress subject to further detail and specifically to respond to the LUC comments.
Provides a 'action plan' outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	<p>The proposal seeks to undertake a series of workshops at an early stage. Recognises the need to engage with all, young, families and elderly.</p> <p>Sets out a consultation strategy which will be ongoing and evolve throughout next stages.</p> <p>Good commitment to engagement principles, although this has not yet occurred given the early stages of the proposal.</p>	Satisfactory progress. Further information and an engagement strategy required.
Agree with community land ownership and	Fails to commit to community land ownership	It concludes that a model has not yet been decided upon, but is aware of options and will compare and ensure most appropriate one used.	Further detail required about land ownership and stewardship

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
stewardship – ideally with details and examples.	and stewardship.	It is not surprising that little detail is provided. Further detail is provided in the January 2019 response, which anticipates that a Trust would be set up in order to manage and maintain the land.	is addressed.

Question 9: Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what infrastructure is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal sets out what will be provided including:</p> <ul style="list-style-type: none"> • New school, Health centre – engage with CCG, Local retail convenience shopping • Community centre – relocated village hall, would free up plot and provide better parking turning for existing village school • Open space – considerable increase. Asserts that there is apparently not much existing open space in the area. <p>Good recognition of what is required, although little developed in relation to transport. Further clarification required about the level of open space and the relationship with local area and quantity and quality that exists.</p> <p>It is not clear whether there has been any discussion about foul water management with Southern Water. A formal response from them is required – however an initial email states that upgrades are required and any issues are likely to be overcome through working with the developers.</p>	Satisfactory progress but further work required to address transport issues, open space, type of community and employment space and other infrastructure requirements.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of the proposal. Further detail will be required.	Further information required.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required. It is recommended that a Utility working group is established to consider cumulative issues and timing.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed. (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 9: Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The promoters believe that a key element is the opportunity to enhance provision for existing residents - Bobbing village, traffic, school and community facilities. Whilst there is evidence that this scheme has been thought through and could lead to benefits, subject to the road realignment being realised, it is debateable whether this goes over and above what is needed. Concern has been raised by Kent County Council about the A249 junctions.	Further information required, particularly on the highway issues.

Question 10: Transport			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what infrastructure is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal includes construction of 2 new roundabouts along the main road through Bobbing, linked with the realignment of Sheppey Way. It seeks possible improvements to A249 Key Street junction.</p> <p>It sets out the options to investigate potential of new rail station and suggests out a fast track bus service between Sittingbourne and Rainham.</p> <p>Further detail and justification is required to understand the highway requirements, including those relating to the capacity of the A249 junction at Bobbing. A key question is the extent to which there is capacity on J5 to bring forward development of the site. Highways England have responded that the upgrade of junction 5 is due to start in 2020, but that no more capacity is available than assumed for local plan schemes. However, they are in discussions with promoter and will require detailed analysis of capacity of improvements.</p> <p>It is not clear whether the railway station is really an option and more detail is required relating to any fast track bus service and how it could operate using the same road network. KCC have provided initial comments and are very concerned about the A249 junctions but have not modelled this proposal so are uncertain of the exact impact. They also consider it likely that some of the rural lanes would not have capacity and that careful consideration would be required in respect of any movements towards the Westbound A2. They are also unclear how fast track bus route could be achieved.</p> <p>It will be necessary to respond to these transport comments.</p>	Further information required relating to transport and the claims made about junctions and the proposed fast track bus service.
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	<p>The proposal recognises air quality as an issue in Sittingbourne and proposes various measures for Electric vehicles and low emissions.</p> <p>Solutions include reduces speeds and alleviate through traffic from Bobbing, improving setting and highway safety.</p> <p>While some interesting ideas are included, there is little detail provided, and particularly not enough information is provided yet about the A249 junctions.</p>	Further information required relating to highways.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	<p>The proposal recognises that it is reliant on J5 motorway improvements to increase capacity.</p> <p>The capacity needs to be identified and this issue resolved. Highways England have responded that the upgrade of junction 5 is due to start in 2020, but that no more capacity is available than assumed for local plan schemes. However, they are in discussions with the promoter and will require detailed analysis of capacity of improvements. This has been confirmed by initial comments from KCC who are very concerned about the A249 junctions and Sheppey Way and its approach to Key Street. Although they have not modelled this proposal so are uncertain of the exact impact. However, they consider it likely that some of the rural lanes would not have capacity and that careful consideration would be required in respect of any movements towards the Westbound A2.</p> <p>It will be necessary for these comments to be considered and a response provided.</p>	Further information required relating to highways and a response provided to the initial comments of HE and KCC.

Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities (e.g. HA re J5a or Faversham junctions).	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	<p>The proposal states that Kent County Council and Highways England have been contacted but that the promoters have not received any information. Despite this, the proposal recognises the links with various junction improvements at Bobbing A249 and at Grovehurst and that it will require further advice relating to A249/A2 Key Street junctions.</p> <p>KCC have provided initial comments, but do not go into any detail because the modelling has not considered the impacts of any development above that in the Local Plan.</p> <p>Further work will be required to understand the capacity and implications and respond to the initial comments provided.</p>	Further information required relating to highways.
Any calculations and modelling clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the minimum need for the new community.	<p>The proposal suggests the realignment of Sheppey Way to allow pedestrianisation of SW end of village, however, this is not really considered to be of wider benefit.</p> <p>This solution is creative and will need to be tested.</p> <p>The open space could be of benefit, but is currently not in the right location. There is also the potential opportunity to make more of the open spaces proximity to Newington station and routes through. It is suggested that this needs to be considered further and thinking about this could evolve further.</p>	Further information required and subject to further testing.

Question 11: Open Space and Green Infrastructure.			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Outlines what green infrastructure. is proposed and why.	No consideration of what is required or failure to commit	<p>The proposal sets out that there will be 50% open space. It provides different GI areas and purposes, with majority gifted to the community and to prevent coalescence with Newington.</p> <p>While this is not a landscape led proposal, a large amount of open space is provided. However, it is debatable whether it is in the right place, and whether it is properly spread throughout the development for use by the potential residents. It is suggested that further consideration is given to the open space and landscaping through the use of a masterplanning review process.</p>	Satisfactory progress but further masterplan review is recommended.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	<p>Landscape is provided as a buffer and there is recognition of the neighbouring countryside and existing pylons.</p> <p>The approach is pragmatic, but potential improvements may be appropriate. In addition, consideration should be made to the conclusions and comments provided by LUC, particularly as there appears to be scope for enhancement.</p>	Further information required to address the LUC comments.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing of risks (Question 1b).	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 11: Open Space and Green Infrastructure.			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposal suggests that the southern buffer does provide a general benefit. Consideration should be given to the most appropriate approach to the surrounding countryside and to ensure the most appropriate site boundaries are included.	Satisfactory progress but further consideration required of land area, landscaping and buffers.

Question 12: Sustainability			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideas set out but also evidenced with a reasonable prospect of delivery and ideally examples.	Commits to sustainable design and delivery but no details provided.	The proposal states that the developers will incorporate sustainable construction technologies. The proposal repeats the design principles in the prospectus and does not provide any more detailed information.	Needs further development to address sustainability issues.
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed.	Fails to move beyond simply acknowledging they are within the prospectus.	Design standards are repeated from the prospectus. No detail has been provided on high standards of design including Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards. It will be important that these are agreed early in the process to ensure that costs are fully factored in. It is not clear whether these have been costed and included within the viability appraisal.	Needs further development. Viability work will be subject to detailed testing.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.

NS4- South East Faversham

Q1 – About the Scheme?			
Question 1b: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the Councils SHMA which sets out the profile of homes needed.	Simply saying will provide an appropriate mix etc.	<p>The proposal provides detail on affordable, rather than the general mix and states that mixed tenure homes and housing types is fundamental to the Duchy's approach. It gives examples of what has been done in Poundbury, but limited detail is provided for Faversham. While it recognises the wish for 40% affordable housing, it considers there is a need for further assessment and debate about the tenure mix etc.</p> <p>This is the most well advanced and comprehensive proposal. One of the strengths of the proposal is that it offers a 'template model' which reduces risk and demonstrates to Swale what the proposal could look like. Given this is the approach they have taken, the lack of clarity or commitment to the type and scale of affordable housing and lack of detail is disappointing. It is unclear why the promoter cannot commit to meet the policy expectation.</p> <p>It is necessary to understand what other potential costs prevent the site meeting its policy obligations and if so what are they likely to be (so the Council can understand what trade-offs may be needed).</p>	Satisfactory progress subject to further detail.
Other ownership and site optimisation issues.	Not owning/controlling the site.	<p>This proposal is promoted as a sensible extension site. The land is in single ownership and can be delivered without significant offsite works or other land parcels being bought in.</p> <p>There is a need to understand how this site relates to other adjacent additional land which has been promoted (NS5). It is not proposed that these additional sites would be developed together but it will be necessary to explore the issues and how they could compliment rather than compete. The two garden community proposals, as well as additional northern sites, provide a critical mass and may have infrastructure issues to address (positive and negative). It is also important to understand the relationship with the land to the west which may offer an opportunity to access through the site without going back onto the A2.</p> <p>There is also land in the same Duchy ownership to the south of the M2 with linkages to the scheme. Discussions are required as to whether the land may play a role in facilitating access to the wider countryside.</p>	Satisfactory progress, further detail required relating to the links to M2.

Question 1b: What mix of other uses is proposed?			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the New Settlement Study which outlines the Councils expectations (land balance). Or provides alternative evidence to support an alternative mix.	Fails to commit to the outline provided in the New Settlement Study.	<p>The proposal is for 131ha, 2500 homes, 15-20,000sqm of business/commercial/retail space for 2,500 jobs, off site benefits of calming the A2 and the provision of a local centre. It is unclear how many local centres are to be provided – framework shows one but trajectory mentions two. It will also be important not to compete with the town centre and further assessment of this may be required.</p> <p>This is a well-rounded proposal package. Some thought has gone into the commercial offer, but it will need to ensure that it integrates the proposal with Faversham to complement the towns offer. The job numbers look reasonable and the mix credible as most space is needed for B1c which we would agree with. Of the 2,500 new jobs, 500 are proposed to be FTE home workers – this will need more assessment in relation to job densities and how achievable this may be here. More information is required about their approach to mixing industrial with homes, and more certainty (beyond Poundbury) that this is actually in demand in Faversham. In Faversham occupiers have a wider choice of standard industrial offer nearby, so it may be appropriate to explore the scope for a more conventional ‘fall-back’ position of what is best located here. If a mixed Poundbury style offer does not work in phase 1 – can later phases offer something more conventional?</p> <p>Further information is required to consider the employment issues and implications</p>	Satisfactory progress. Further information required to assess implications of the type of employment which is likely to be delivered.

Question 1c: Outline the proposed trajectory			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideally delivers early	Fails to demonstrate the site can start delivering in a meaningful (shortish) period.	<p>The proposal provides for 2500 homes over 16 year period with an expected start of 2023. These levels are taken directly from their experience at Poundbury which demonstrates a slow start and possibly up to 120 per year. This would mean it would be delivered over 20 years using specialist and local developers. The approach is predicated on the statement that “the proposal is more about quality than the quantity of homes” (para 2.4 Propertonomics report). They are however investigating how to increase delivery.</p> <p>This a much slower than other sites being offered and 120 dpa may not meet the Councils expectations, given this will only be about 7% of target. This would not meet the test of giving a ‘boost’ to delivery in the Borough. Given the limited infrastructure needed and a buoyant market we question whether this rate is too slow. It is recognised that the increases to 180 is better, but these are long term and take a while to ramp up to. The trade-off is potentially the quality product that would be achieved. The risk would then be that it could slow delivery even more on this site. It is suggested that there are further discussions about the delivery rates and how this could be increased.</p>	Further information required to explore how delivery could be speeded up.
Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	<p>The proposal identifies 3 main phases 2023-27, ramping up to 180, then 180 per year between 2028-37, with the final year mopping up the rest in 2038 (See Fig 17). The trajectory recognises that local centre, A2 taming and Brenley corner improvements are required early in first 3 years with second local centre and school starting in year 6.</p> <p>This is more developed than most and sets a clear timeline; however, it is necessary to understand what existing infrastructure capacity exists and also how NS4 & NS5 could come along together and with what effect and requirements, particularly in relation to junction 7.</p>	Satisfactory progress, subject to further information and detail about accelerated delivery.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New	The proposal seeks to provide 2,500 jobs with a scenario which sets out 52,000sqm of B class space and 3,000sqm of retail/leisure through enterprise centre and flexible space and the provision of a school and local centres. General benefits of business rates, council	Good progress, subject to further clarification on jobs,

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
	Settlement Study.	<p>tax, new homes bonus, S106 re also mentioned.</p> <p>A good evidence base is provided to support the proposal. The job numbers look reasonable and the mix credible as most space is needed for B1c which we would agree with. Of the 2,500 new jobs, 500 are proposed to be FTE home workers – this will need more assessment in relation to job densities and may be exaggerated. More information is required about their approach to mixing industrial with homes, and more certainty (beyond Poundbury) that this is actually in demand in Faversham would be helpful. In Faversham occupiers have a wider choice of standard industrial offer nearby, so it may be appropriate to explore the scope for a more conventional ‘fall back’. If a mixed Poundbury style offer does not work in phase 1 – can later phases offer something more conventional? There is an inconsistency between Propernomics work on size and that in para 9.2 (1). It will also be important to understand how the long term future of the commercial/retail/local space would be secured.</p> <p>There is little detail provided about social and health provision, which appears to be subject to further consultation and not much information provided on open space and retail provision. For example, how many local centres are to be provided? The framework shows one, whilst the trajectory mentions two.</p>	and local centres.
Provides evidence to demonstrate that the benefits are achievable.	Little or no evidence provided.	No costings or viability information provided, so while there is reasonable evidence of appropriate and sensible employment mix, the costings are not available and little detail of other items is provided. It is noted however that in broad terms the site is within a location with good values.	Further information required on viability.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic.	Not provided. The implication of not providing viability costings means that it is not possible to identify what has been included and whether the calculations are reasonable.	Further information on viability is required.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits.	Not provided. It will be necessary for further consideration to be given about the trade-offs that may be required, specifically affordable housing tenure.	Required further consideration of any dis-benefits.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough.	Benefits only relate to this proposal.	<p>The taming of A2 is considered a considerable off site benefit. This will need to be considered in more detail with Kent County Council.</p> <p>There is also mention of new training facilities for football club or possible relocation to extend site frontage. However, no detail is included and it is unclear what discussions have been held.</p>	Further information required.

Question 2: Abnormals			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	There are no abnormals identified. While the proposal mentions that likely to require the upgrading of waste water treatment works, this will be dealt with by South East Water, from whom we are still awaiting a response. There will be also be an issue with J7 which is considered in the transport section below.	Satisfactory progress. Further information required from SE Water and relating to Junction 7.
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. <i>We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.</i>	Or over optimistic assessment.	<p>The proposal gives a commitment to nearly 40% affordable housing and a school, but it is vague and does not seek to fully fund anything else. Even A2 taming refers to contributions from others and equitable apportionment.</p> <p>The Duchy confirms the proposal is viable, but no information is provided. Consequently, it is not possible to test the viability in detail or confirm this. It is noted however that in broad terms the site is within a location with good values.</p>	Further information required.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promoter would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	<p>The Duchy states that they would be pleased to work in partnership.</p> <p>They are also in discussion with the Council over a PPA and they appear willing to support further professional work by the Council provided it is properly related to its proposed development scheme. They are also happy to share with the Council the technical work that has been undertaken by our professional team, and further technical work that will be done in the future. Recently, a steering group has been established with the Council.</p> <p>In respect of scheme development and community consultation, the Duchy has their own Enquiry by Design approach and the proposal appears to be responding to the issues raised by this process.</p> <p>Joint working is an important element and will need to be further considered to ensure its satisfactory delivery.</p>	Good progress. Further details will be required about joint working going forward.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc.).	No acknowledgement of need for resources.	<p>While the Duchy are not expecting anything, the most recent response (Dec 2018) states that they would certainly be receptive to public sector support, including: resourcing of the Council's evidence; contributing to infrastructure funding (e.g. to road improvements in the wider area); facilitating co-operation by public sector and other stakeholders (such as a steering group for sports clubs and facilities); and making development finance available on favourable terms, if required by our developer partners.</p> <p>A PPA is being developed with the Council and there is now a steering group in place to take forward the process.</p>	Satisfactory progress. Further clarification of resources will be required going forward.
Outline when intervention or action is needed and what form they would like this to take (timetable, consideration of policies needed in Swale or wider).	No timetable or detailed plan given.	<p>The proposal says that want to work with Council to help persuade Highways England to bring forward upgrade of Brenley Corner. However, this potentially overlooks the problem of highway capacity ahead of any such improvements. They also intend to work with the SBC and KCC to secure improvement to air quality along the A2 corridor. The proposal potentially requires relocation of the cricket and football clubs within their site boundary but it is not clear whether there been any discussion about this with them.</p> <p>There is little detail or timetable included and further information is required to address the outstanding issues.</p>	Further information required specifically to address the relocations of the football and cricket clubs.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Demonstrates this action plan aligns with the next local plan. And outlines what polices may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail is provided, however they are committed to the plan timescale. Further discussion will be required to consider what approach will be most appropriate.	Satisfactory progress with further work required to agree the policy approach.
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	Propose the use of their own approach as in Poundbury and their other projects. This is not entirely in line with a joint approach envisaged by the garden community principles, particularly in respect of the possible delivery vehicle. However, a PPA is being developed with the Council and there are emerging proposals for a steering group to take forward the process.	Good progress. Further clarification required about how this is taken forward.

Question 4: Delivery vehicle			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Discusses various delivery models, weights up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	<p>The proposal envisages a traditional estate model with sales and control by covenants and retention of a perpetual interest, as in Poundbury.</p> <p>The Duchy rely on their well proven approach, which brings in carefully assessed partner developers, and grants them building licences or development agreements, subject to strict adherence to design codes. Thereafter, properties completed to an acceptable standard may be sold to households and registered providers, with the Duchy retaining ownership of certain infrastructure. This provides control through the ability to enforce ongoing covenants over design quality and estate management standards.</p> <p>There is reliance on their model as the only approach and there does not appear to be any openness to use other models. However, the model in question has the potential to deliver, although some partnership arrangement with the Council and others would be advisable and appears to be emerging.</p>	Satisfactory progress. However, further work required in relation to how the partnership will work.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	<p>The Duchy has a clearly established approach to the way it will develop the site, its approach to the wider process and stewardship. It has a long term vision and expects to be the delivery vehicle or master developer which will ensure it maintains control.</p> <p>One element of this is through the use of the Enquiry by Design process, which they consider a fundamental part of a highly proactive and inclusive stakeholder engagement strategy. They expect to pursue this strategy throughout the planning process. It will be important that this is inclusive and seeks ongoing involvement from a range of interested parties and the community.</p> <p>The Duchy proposes to either to retain ownership and work with local community representatives to manage the estate, or transfer to a community based organisation to maintain and enforce covenants directly. Further details on how this will be achieved would be helpful.</p>	Satisfactory progress. However, further information is required on the general stewardship issues.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	This level of information is not provided, and this route is not proposed. The lack of reference to LLDCs and other mechanisms or changing government policy is not necessarily a problem, but the Council may want to explore different mechanisms with them.	Satisfactory progress with further discussion about details of the mechanism going forward.

Question 4: Delivery vehicle			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples.	<p>The Duchy is committed to leading by example. Indeed, Poundbury, Nansledan, Tregunnel Hill and the Duchy's other new community projects are primarily intended to be exemplar national role models, although this is concentrated on design. It proposes the use of same model as Poundbury and of their experience in Cornwall. They believe they are well placed to use a master plan and design code, which they would enforce quality control through its land disposal mechanisms (building licence or development agreement). Applicability to Faversham will need to be further explored.</p> <p>There is little consideration about the wider role of the delivery vehicle and how this might work in practice.</p>	Good progress, subject to details on how this will work in the context of Faversham and wider delivery vehicle issues.
Also considers long term stewardship arrangements – not only delivery phases.	Focus on short term delivery only.	As the single site landowner with a long term commitment to sustainable land stewardship, the Duchy sets out in its most recent letter Dec 2018 that it has a long term vision and expects to be the delivery vehicle or master developer, as it is on its other strategic development projects in Poundbury and Nansledan. Reliance is given to their proven track record, however, little detail is provided, particularly in terms of stewardship generally. Although this is perhaps to be expected for some developers, as the approach has been rolled out elsewhere, some further detail on long term stewardship might have been expected and further details will need to be provided.	Satisfactory however further detail required.

Question 5: Advice			
What specific advice do you require and what technical research will you undertake should the bid be successful?			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Well thought out response with sensible queries for the Council / PBA as appropriate.	Question not addressed.	<p>The Duchy considers this as a standalone project. Although it will work with the Councils and stakeholders, it is not reliant on them. This is perhaps under-played given the transport issues surrounding the scheme.</p> <p>It expects to be the long term freeholder of the main infrastructure, and to be proactive in enforcing covenants and maintaining the appearance, estate management and general functioning of the new community. Little advice is sought, but the Duchy wishes to work proactively together to progress the scheme.</p>	Satisfactory progress with further work required in due course to satisfactorily progress the scheme.
Highlights areas where further work or engagement is needed – i.e. caveats to the wider response. (e.g. we need a Borough wide Water Cycle Study to help develop our scheme).	No acknowledgement of the need for further work.	<p>The proposal recognises some of the key issues that still need to be addressed, including air quality. It intends to work with the SBC and KCC to secure improvement to air quality along corridor. There is likely to be other additional issues to be addressed which will require further work. Specifically it will be necessary to understand the capacity of the junction and road network, together with more detail about the calming of the A2 and access through to the west.</p> <p>Highways England have provided initial comments, which state that the interim work on M2 J7 comprises signals and a pedestrian crossing and is not designed to increase capacity. Initial comments from Kent County Council states that the junction of A2/A251 remains a concern and that modelling has been done which will be reported separately. These comments should be reviewed and addressed to inform the next stage of the process.</p>	Further information required to address the highways comments received from KCC and HE.
Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.).	Highlights problems or data issues with no positive way forward.	The proposal and subsequent information provides a considerable amount of evidence and commits to sharing this and others, as it develops, with the Council. Transport issues are perhaps now the main priority.	Satisfactory progress, subject to highways issues.

Question 6: Environmental Opportunities			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the net gains or improvements under the	Fails to move beyond prospectus and New	The proposal identifies local lanes and other landscape opportunities in its preliminary appraisal. The masterplan retains hedgerows and trees based on arboricultural survey and early landscape evidence. Ecological surveys have been undertaken by EPR who have met with KCC, RSPB and Natural England. LDA Design has undertaken a preliminary landscape and visual appraisal which is relatively	Satisfactory progress with need for further work on net gain and a response to LUC

Question 5: Advice		What specific advice do you require and what technical research will you undertake should the bid be successful?	
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
five broad areas.	Settlement Study.	detailed and provides a good level of background. LUC have undertaken an initial appraisal and make some useful comments which should be considered as part of the development of the masterplan. However, the actual extent of net gains has yet to be quantified, although there are good prospects.	comments.
Provides evidence to demonstrate that these are achievable.	Little or no evidence provided.	Evidence is provided by external consultants who have started to address these issues. Further details will need to be provided in due course.	Good progress. Subject to more detail being provided in due course.
Provides evidence that they have been realistically assessed	Concern that they may be too optimistic	Evidence is provided by external consultants who have started to address these issues. Further details will need to be provided in due course.	Good progress. Subject to more detail being provided in due course.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible).	Lack of recognition of any negative impact.	This proposal identifies improvements to secure biodiversity net gain based on the understanding of the distribution of soils. Ideas include restoring old chalk quarry adjacent to A2, providing orchards, swift bricks on 1:1 ratio. Biodiversity net gain would be integral and measured through Integrated Annual Reporting. Although this is a well-developed proposal which has the capability of addressing the key issues, the extent of actual gains needs to be quantified, particularly within the area of green infrastructure.	Satisfactory progress with the need for further work on net gain.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough.	Improvements only relate to this proposal.	The taming of A2 may well be considered an off-site benefit. This will need to be considered in more detail with Kent County Council. This is a well-developed approach, but there may need to be further consideration of environmental benefits.	Satisfactory progress subject to further consideration of how benefits will be delivered.

Question 7: Environmental Constraints			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	<p>The proposal submits a detailed plan of agricultural land classification. The majority of the site (58%) is high quality land. It recognises the presence of rural lanes and seeks to maintain and enhance these. Three built heritage constraints are identified in Briefing Note (Orion Heritage), together with potential archaeological remains. It considered that noise from the motorway will need to be mitigated and solutions are suggested. However, the presence of a Local Green Space (the cricket ground) has not been fully acknowledged.</p> <p>This is a well-developed and evidence assessment which sets out the key issues. The LUC assessment notes that the evidence is detailed and helpful. However, it raises a number of issues which can be addressed in the masterplan moving forward.</p>	Satisfactory progress, with further work required and specifically a response to LUC comments.

Question 7: Environmental Constraints			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides reasonable confidence that the 'long list' (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	Evidence is provided which lists all the key issues in relation to environmental constraints and begins to deal with them. Further detail will be required as the masterplan develops, but there are good prospects that constraints can be addressed.	Good progress.
Where constraints are identified provides a 'action plan' outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc.	No mitigation strategy – or over optimistic.	Some issues are dealt with in more detail. This includes a programme of archaeological works agreed with KCC to test results. It also set out mitigation strategy which is helpful. The recommendations made by LUC should be further considered. Given that there are options to relocate the cricket club, consideration should be given as to how the existing Local Green Space designation on the site can be addressed in any re-use of the land.	Satisfactory progress, with further work required specifically to respond to LUC comments.
Considers off site (close proximity) constraints and provides a realistic view to managing these.	No consideration or inadequate approach to management.	The proposal recognises that the site is adjacent to AHLV – but no further detailed consideration is given. There is also recognition of the opportunity to connect and improve the interface with Preston-Next-Faversham Conservation Area. The scheme also suggests the need to work with cricket and football clubs, however, little detail is provided, particularly in respect of the Local Green Space designation. The site is outside of the AONB; however, there is Duchy land to the south of the motorway in the AONB with connections into the scheme. Some further consideration of using this land to improve links to the wider countryside could be explored.	Satisfactory progress and further information required.

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	The proposal promotes the use of its own design principles the Prince of Wales Principles for Sustainable urban growth and sets out specifically how they will be followed for this site. Specifically, it will consider how scale and harmony will be included consistent with Kent country towns. They promote the idea of establishing a detailed masterplan, linked to a pattern book and design code, They have a design team working on this, including Ben Pentreath Architects and Ben Bolgar of The Prince's Foundation. This is a well-developed scheme. It seeks to use its own design principles, which will need to be considered in terms of their relationship with the garden community design principles, to consider where tensions may exist. While it is not for us to question to the specific approach to design, the issue of relationship with the local area is important and there may be a role for the potential use of contemporary design.	Good progress. Further consideration of the design approach and how it reflects the local character is required.
Recognises the TCPA principles and met these in a meaningful way.	References them but with no detail or reasons for departure.	The proposal considers that while these are worthy, they not necessarily applicable because the site is not large enough to be a garden city – it is to be seen as an extension rather than a free standing settlement. This however does not mean that the principles are not applicable. Nevertheless, detail is provided about how they will be applied to the site that shows there is some synergy between TCPA and Duchy principles. The scheme, uniquely amongst all the submissions, considers the question of local food production. There may be an issue the relationship with Faversham and the extent to which the design principles properly reflect the design vernacular and character of Faversham and properly deliver a garden style community.	Good progress. Further consideration of the design approach and how it reflects the local character is required.

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	The proposal provides a schedule of its own principles and application – proposes these are addressed by the BIMBY housing manual. It states that it has undertaken an analysis of place to identify the character of Faversham to influence design. In addition it says that it has done an analysis of movement patterns which identifies opportunities. Further discussion will be required to ensure that the design code is appropriate for the location and demonstrates close synergy with TCPA principles, and how these relate to the masterplan.	Satisfactory progress. It may be useful to consider further how these have informed the masterplan.
Shows that the proposal responds to landscape context (accepting limited detail may be available).	Lack of recognition of landscape within and surrounding the site.	Landscape is included within their principle 1 and seeks to provide development which is sited to flow within the natural contours. Will include a food growing strategy and edible streets. Duchy has provided a preliminary Landscape appraisal which would form the basis of the landscape proposals, green infrastructure and other relevant elements of the proposal. The specific recommendations from that have been used in the Framework. LUC comment that the evidence provided is detailed and helpful and address the key issues. It makes some helpful comments about elements that can be addressed at the next stage of the work.	Good progress. Further work required specifically to respond to LUC comments.
Provides a 'action plan' outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	The proposal provides a summary of Enquiry by Design (EbD) process and output report and identifies the next steps of creating a BIMBY Housing Manual. Further engagement is required to ensure the continuing engagement of the local community and stakeholders.	Good progress. Further information is required to produce an engagement strategy.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	The process the Duchy has used and envisages is an EbD led by the Princes Trust. Considerable interaction has already taken place. Key issues have been identified and this will need to be continued as the scheme progresses.	Good progress. Further detail of how the key issues will be incorporated into an engagement strategy.
Agree with community land ownership and stewardship – ideally with details and examples.	Fails to commit to community land ownership and stewardship (Pass/Fail?).	Propose either to retain ownership and work with local community representatives to manage the estate, or transfer to a community based organisation to maintain and enforce covenants directly. Previous schemes have levied an Estate charge with each resident having a share and voting rights to become directors of the management company. The most recent correspondence states that the Duchy expects to be the long term freeholder of the main infrastructure, and to be proactive in enforcing covenants and maintaining the appearance, estate management and general functioning of the new community. It is recognised that they are the single site landowner with a long term commitment to sustainable land stewardship a long term vision and expectation of using a delivery vehicle or being the master developer. The eventual in-use supervision of the new development is likely to be integrated with the long-term management of the extensive agricultural estate. Although there is detail on the Duchy model itself, their attitudes to community ownership of assets is apparently absent.	Satisfactory progress. Further discussions needed, particularly relating to community ownership.

Question 9: Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	The proposal includes provision for a Primary school, health centre, mixed use centre and a range of employment space. They mention at paragraph 8.5 that it is likely to require the upgrading of waste water treatment works. Comments are awaited from South East Water which will provide further information about this. Further detail will be required as the scheme progresses.	Satisfactory progress – further information required.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of development proposed. Further detail will be required.	Satisfactory progress and further information required.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	The Duchy states that they have a great deal of experience of financing social and physical infrastructure, and it is an entity with considerable covenant strength. They believe it is too early to say quite how different elements of the Faversham scheme would be financed, but The Duchy is confident that financing will not be a problem. No costs provided. Even though the site is located within an area of good values, it is not possible to see what has been included in the costs calculations and therefore whether the proposal is viable.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposal is based on the quality offered by the Duchy model and approach. The taming of the A2 is provided as a wider benefit, however, it is unclear as to whether this would be fully funded by the development. Kent County Council have provided initial comments which do not specifically address the A2 calming. Their modelling in the Faversham area in particular is flagging up some issues in terms of junction capacities and as such they are keen to investigate the possibility of car free development. This issue will need to be considered in more detail.	Satisfactory progress subject to further detail in relation to the potential option and benefits of a car free development.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	<p>The pedestrian is envisaged at the centre of the proposal and this is held up as the most important principle. The Manual for Streets principles are embedded into framework plan. The proposal seeks to encourage more people onto cycles with links out to Faversham and AONB, although limited detail of this is provided. Proposes a range of measures and network of streets and spaces achieving 20mph and bus route around area and into town centre.</p> <p>However, further work is required in respect of wider transport infrastructure, i.e. J7 improvements and capacity ahead of this, A2 'calming' and links to the A251/J6 to the west. Initial comments have been received from KCC who are concerned about the Faversham junctions and who are supportive of a link between A251 and A2 via Preston Fields, subject to modelling. They are also keen to investigate the possibility of car free development. A response to these comments and more detailed work will be required to assess capacity and whether a cap on occupancy is required before enhancement schemes are implemented, as suggested by the initial HE response.</p>	Further information required relating to transport and a response to highway comments from KCC and HE.
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	<p>The proposal recognises congestion issues and sees the A2 as a barrier. It seeks to incorporate it into the development, whilst 'taming it'. However, it is not entirely clear exactly what would be done, how it would be achieved, what it would cost and who would pay. There is mention of work with KCC to upgrade and through interventions to slow traffic down. More information is required about how practical this is and what impact it would have on Faversham as a town, given this is the key route.</p> <p>Kent County Council have provided initial comments and do not comment on the calming of the A2 as a concept they are concerned about the Faversham junctions. They are generally supportive of a link between A251 and A2 via Preston Fields, subject to modelling and are keen to investigate the possibility of car free development as well as what else may be required to address the cumulative implications.</p> <p>There is some acknowledgement by the promoters of the capacity issues at Brenley Corner – but no solution has been proposed yet or any understanding demonstrated as yet of capacity ahead of improvements. Highways England are clear in their initial response that the interim improvements work due to commence in 2020 are not intended to increase capacity or deliver spare capacity over the existing situation. They acknowledge that if capacity enhancement schemes are required these could take 2 years before commencement of construction works and may require a cap on occupancy.</p> <p>The proposal provides evidence of an Air Quality strategy and appraisal which is helpful but will need further consideration.</p>	Further information required relating to highways.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	<p>A Transport strategy is provided, but sets out what will be explored and identified rather than committing to them. It states that work will be undertaken to persuade Highways England to bring forward the upgrading of Brenley Corner, but a more pro-active recognition of the need to model and determine capacity would be helpful. Reference is made to identifying ways of improving the links to the town centre and countryside, but not detail is provided.</p> <p>Following the comments from HE and KCC, set out above, a response to and further development of these issues will be required and specifically relating to the timescales.</p>	Further information required relating to timescale following the highways comments.
Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities. (e.g. HA re J5a or Faversham junctions).	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	The proposal indicates that they are already engaging but no detail provided. There is recognition that it would be beneficial to improve cycle access and parking at Faversham station but no commitment to fund this. Again lots of good intentions however, little detail provided.	Further detail required to address sustainable transport modes and relationship with the station.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence	Fails to explain why the infrastructure package is proposed and how it will be delivered.	No costs provided. It is not possible to see what has been included in the cost calculations and therefore whether the proposal is viable.	Further information required.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
where needed).			
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	Possibility of removing the overbridge to The Abbey School and replace it with dedicated pedestrian crossing. Links to adjacent employer Macknade Fine Foods. Also opportunity to link through to west and onto A251 and J6. It is understood that this is being considered and discussions are taking place. This will have significant implications and could provide an important additional benefit if it can be achieved. More information is required and this will need to be addressed in more detail.	Further information required about the adjacent sites and access through to A251.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal provides a network of green corridors, tree lined avenues and verges throughout, as well as greens, squares and pocket parks and the percentage of open space is 33.6%. However, whilst there is landscaping it may be less than expected as it is not clear whether there is enough more formal open space for play, with much of the landscaping appearing to be buffers to the railway and motorway. There is also a good recognition of links with food growing. Further clarification will though be required as to its compliance with TCPA principles.</p> <p>LUC have assessed the proposal and make some useful comments in relation to the footpaths, rural lanes, severance by the railway line and relationship with the AONB, which should be taken account of in the masterplan.</p> <p>This will need to be considered in more detail as the scheme progresses.</p>	Further information required to consider a more landscape let approach and address LUC comments and landscaping issues.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	The Landscape and visual appraisal evidence provided is detailed and helpful and responds to the site context. LUC have assessed it and the site and provided helpful comments which should be addressed going forward in the development of the masterplan.	Satisfactory progress. LUC comments should be addressed.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing of risks (Question 1b).	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	There is reference to Faversham football club and the opportunity to enhance it by providing new training facilities or consider a new location. However, this is not explored in detail and further information is required. The links out to Faversham and the AONB also need further detail, as suggested by LUC.	Further information required specifically relating to the football club.

Question 12: Sustainability			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideas set out but also evidenced with a reasonable prospect of delivery and ideally examples.	Commits to sustainable design and delivery but no details provided.	The proposal is based on walkable neighbourhoods. It suggests a variety of solutions for energy efficiency low to zero carbon buildings. Included as part of the evidence is a Low carbon energy note with a variety of measures. The scheme draws heavily on the experience in Poundbury. This is a well-developed proposal which goes further than most and has experience that it can bring to the scheme.	Good progress.
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed.	Fails to move beyond simply acknowledging they are within the prospectus.	The proposal says these are all matters for a later stage and this is fair up to a point, however, a commitment to work toward these standards would have been helpful. Instead, they rely on its reputation, and will seek, energy efficient building fabric, all electric homes, renewable building practices, energy efficient management systems, storage and distribution and smart meters. While this is more developed than others, which draws upon specific experience, further information is required to specify exactly what will be provided. The lack of costs and any viability information means it is not possible to see what has been included and to test these costs and whether these are viable.	Further information about exactly what is to be provided and specifically how this has been costed.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Examples are provided which demonstrates what they have done elsewhere. However, further detail is required to explain how these will be translated into practical solutions here.	Satisfactory progress subject to further information required about what is proposed on site.

NS5 – South of Faversham

Question 1 – About the Scheme?			
Question 1a: What mix and tenure of homes is being proposed and the justification?			
Note - the prospectus requires proposals to meet affordable needs in full (Pass / Fail)			
Question 1a: Outline the proposed trajectory			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Responds to the Councils SHMA which sets out the profile of homes needed.	Simply saying will provide an appropriate mix etc.	<p>The proposal includes 5,000 new homes, high quality, affordable in line with policy and specialised with a mix of types and tenures, affordable, starter homes, key worker, self- build, and for older people delivered through a range of house builders.</p> <p>In general, everything appears to be covered, but due to the early stage there is a lack of detail about exactly what is being offered and to what extent the promoters think they can comply with policy and prospectus. Pragmatically this is understandable given the stage, but given that the promoters appear to be working up a suite of similar proposals, we would have expected some clearer 'headlines'. The risk here is that it is not clear where the compromises may be and that there may be some 'glossing' over these questions – saying the right things but not actually committing.</p> <p>This issue can hopefully be addressed with further detail at the subsequent stages.</p>	Satisfactory progress and further work required to provide more detail.
Other ownership and site optimisation issues.	Not owning/controlling the site	<p>The large area has a number of owners and gaps in sites and ownership around existing hamlets and dwellings.</p> <p>There are issues which need to be resolved around the red lines and that the proposed land simply envelops the hamlets / villages. The question is how will this work in practice and can it be made attractive to existing residents? What is the optimal location for development and is any additional land needed? Could the Council help manage this process? In terms of location this has the possible benefit of extending Faversham while not impacting too directly on the town. There are significant issues in relation to the location surrounded by the AONB, together with other landscape issues (to be discussed below), but which have potential implications for boundaries.</p> <p>Further work is required on boundaries to better understand how this layout would work with the existing dwellings / hamlets/AONB/landscape impacts. Further information submitted in January 2019 recognises these issues and the impact on individual homes owners around the site. The scheme promoters are committed to working with them to best mitigate the impact.</p>	Further information required to confirm boundaries.

Question 1b: What mix of other uses is proposed?			
Note – this could be broken down by use- i.e. commercial, retail, leisure etc.			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
Responds to the New Settlement Study which outlines the Councils expectations (land balance). Or provides alternative evidence to support an alternative mix.	Fails to commit to the outline provided in the New Settlement Study.	<p>The proposal includes 317 ha of mixed use development with 5 neighbourhoods, a high street, and 2 community hubs with super market, multi-functional library, estate agent, pharmacy, shops, gym, hotel, professional services, and trades. 3 primary schools, secondary schools, playing fields, village greens within each neighbourhood and a burial ground. Jobs – high density retail in high street, low density rural hamlet, employment on east and med/high density office on northern edge and traditional business cluster close to M2 on north of the site.</p> <p>Due to the early stage, this scheme is less well developed than others, but it promises all the right things.</p> <p>There is very little detail provided, such as whether the CCG have been approached in relation to a new GP, and in relation to jobs it would be helpful to better understand the mix proposed – demand is for B1c space and will this fit in their vision and land budget?</p> <p>The important issue is that the whole package is deliverable (and viable) and will all be provided, how, and when and with what trade-offs.</p> <p>Further information is required to work up the proposal in more detail and to ensure there is sufficient viability to deliver. The viability assessment will be assessed in detail.</p>	Satisfactory progress subject to further information and viability testing.

Question 1c: Outline the proposed trajectory			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideally delivers early.	Fails to demonstrate the site can start delivering in a meaningful (shortish) period.	<p>The proposal says it will be delivered on phased basis – with the master builder building the key infrastructure.</p> <p>Little detailed information is provided, and no phasing plan is included, despite mention of one. It is also not clear whether this can deliver at pace and how this will be achieved. It will be important to understand how this site, together with NS4, could both be developed, what the road capacity is and what compound infrastructure needs emerge.</p>	Further information required.
Identifies key milestones / barriers in the trajectory AND suggests how these will be overcome (linking to other questions).	Fails to identify milestones and barriers and/or fails to state how these may be overcome.	<p>Not yet provided, which means the timing implications for delivery and relationship with the current capacity of the Motorway junction is uncertain.</p> <p>Initial comments from Highways England consider it unlikely that signalisation of J6 would address the issues and consider that the cumulative impact may require a full grade-separated gyratory junction, but this may not be justified by the economic case due to the numbers. The long term implications for Faversham should be considered and modelling undertaken. Kent County Council considers that signalling can be managed so as to not interfere with other junctions, however, modelling is required to demonstrate the interrelation of the junctions.</p>	Requires further work and response to the highway comments from KCC and HE.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the benefits under the three broad areas.	Fails to move beyond prospectus and New Settlement Study.	<p>The proposal provides for a full range of facilities including; Homes, schools, range of retail and commercial, GP, village greens, open space and play areas, bus hub, burial ground.</p> <p>This proposal is at an early stage and while it promises much, there is little detail. Some of the benefits don't appear to be tailored to a smaller site and not scales appropriately for a garden community and we would expect new links to flow from the development</p>	Requires further work to provide detail about the benefits particularly in relation to jobs.

Question 1d: Outline the benefits (Social, Economic, Financial)			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
		<p>especially when a new bus hub is proposed.</p> <p>There is very little information provided on the number of jobs. More work needed to ensure that the scheme does itself justice and to explain how realistic, deliverable and viable it is.</p>	
Provides evidence to demonstrate that the benefits are achievable.	Little or no evidence provided.	Not provided at this stage. It will be necessary for further evidence to be provided which sets out how the benefits will be delivered.	Requires further evidence that benefits can be achieved.
Provides evidence that they have been realistically calculated.	Concern that they may be too optimistic.	A viability appraisal has now been submitted and will be subject to detailed testing.	Satisfactory progress – requires testing.
Provides evidence that they are genuine positive benefits and where dis benefits may be implied they are considered. (e.g. we would expect a social dis benefit where environmental assets are harmed with no mitigation).	Lack of recognition of any dis benefits.	<p>The proposal recognises the location which is surrounded by the AONB and provides buffer and open space in the south. However, the location adjacent to the AONB (and other landscape matters) is a significant issue which will need further work if it is to be addressed.</p> <p>The AONB planning Unit have provided initial provisional comments and indicate a potential objection to this scheme. These comments will need to be considered and addressed.</p>	Further work required and to respond to the AONB comments.
Shows that the benefits extend beyond the scheme – i.e. benefits the wider borough.	Benefits only relate to this proposal.	Not provided at this stage. It is surprising that a scheme of this scale is not providing more district wide benefit, and this should be considered further.	Further work required to identify whether any benefits can be provided.

Question 2: Abnormals			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Identifies costs which could be considered abnormal by their size or cost. But concludes that they are not barriers to delivery and sets out the reasons.	The question is unaddressed.	<p>The proposal recognises that upgrades to services are required.</p> <p>Little information is provided about the constraints or abnormals, such as pylons across the site, or requirement for significant landscape mitigation and relationship with AONB. No costs or trade-offs have been set out, however the viability appraisal has been submitted and this will be tested in detail.</p> <p>Further information will be required to explain how the AONB issue will be addressed. This is particularly important given the initial provisional concerns expressed by the AONB Unit.</p>	Further work required to explain how the pylons and AONB issue change the masterplan.
Provides evidence – inc. viability evidence to demonstrate delivery can be achieved. <i>We don't expect micro detail but evidence the question has been thought through and possible abnormal costs discounted.</i>	Or over optimistic assessment.	Further detailed viability work has been requested and received and a detailed assessment and testing will be undertaken.	Satisfactory progress - Further testing.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Provides an 'action plan' detailing how the promotor will work with the Council and others to deliver.	No commitment to engage and/or limited detail about how the promotor would like to work with the Council and other stakeholders. Fails to identify wider stakeholders.	<p>The proposal envisages a partnership approach.</p> <p>Lord Matthew Taylor retained in advisory capacity to shape proposals and be a sounding board to ensure Garden Community principles not lost. Would be an independent member of design team and speak to members.</p> <p>This is a new approach for the developer, who recognises the need for joint working. However, little detail is provided, but the additional information provided in January 2019 includes an organogram which sets out their approach for a strong partnership. They would be willing to explore working with Homes England and other organisations and welcome the support of MHCLG, to provide dedicated funding for officer support. They also want to join the Garden Villages and Towns Forum to learn from and share good practice.</p>	Satisfactory progress and will require further information and detail about how the joint working will be delivered.
Outlines what resources they expect to use from the Council and commit themselves (time, finance, expertise, other etc).	No acknowledgement of need for resources.	<p>The additional information provided in January 2019 states that they would support the Council in the Local Plan process and commits to providing all the evidence required to justify its allocation, including attending the EIP. Agreement would be needed about what evidence is required and how this is to be provided.</p> <p>Some commitment to enter into a PPA process is helpful.</p>	Satisfactory progress, subject to further information about how this will be delivered.
Outline when intervention or action is needed and what form they would like this to take (timetable, consideration of policies needed in Swale or wider).	No timetable or detailed plan given.	<p>Further information provided in January 2019 commits to entering into a PPA which would produce a masterplan, set a framework for joint working, strategic allocation in the Local Plan Review, and submission and determination of a planning application.</p> <p>This is welcomed and more detail will be required in due course.</p>	Satisfactory progress, subject to further information about how this will be delivered.

Question 3: Joint working			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Demonstrates this action plan aligns with the next plan. And outlines what polices may be needed to support the proposal.	Promoter's timetable runs counter to the development plan. Or no recognition of the wider policy environment.	No detail was initially provided, although further information in January 2019 shows they appear committed to the plan process and to provide evidence, defend the allocation, attend the EIP hearings and take an active role in the plan review.	Satisfactory progress, subject to further information.
If joint working is not proposed outline why and what alternative is preferred.	Decline joint working with no reason given.	The additional information provided in January 2019 welcomes assistance and joint working both with the Council, Homes England MHCLG and others to deliver homes quickly. Further detail will be required.	Satisfactory progress subject, to further information about how the joint working will be delivered.

Question 4: Delivery vehicle			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Discusses various delivery models, weights up the pros and cons and provides evidence for the preferred route.	Only one option promoted with little or no justification of merits or demerits of the choice.	<p>The initial proposal envisaged 4 landowners who will work in partnership with Gladman and consultancy support.</p> <p>It proposes a master builder approach who will deliver crucial infrastructure, in accordance with a Design code and control parcel release in accordance with phasing plan.</p> <p>Little detail was initially provided, but further information was received in January 2019, which explains that they do not see the need to establish a formal LDV and are continuing to use a model of 4 private landowners who will work collaboratively. They are relying on an 'effective partnership' between key stakeholders to formal governance board, delivery team and Governance committee. This is set out within the organogram, but further detail will be required to be assured of its operational objectives and governance arrangements.</p>	Satisfactory progress with further detail required about how this vehicle will work in practice.
Promotes an 'inclusive' model which provides an element of local control for new residents and (ideally) the wider community.	Failure to outline how the local community can be involved in the model used.	Little information was initially provided about the model and engagement, however, it is understood that there have been meetings with the Parish Council and also public meetings in November and January, with others scheduled. The latest information says that they will take a proactive approach to pre-application consultation, and that they are committed to continuing this consultation post consultation. They will make resources available for effective delivery of stakeholder and public engagement. A specialist PR and communications company MPC have been engaged and a draft strategy has been provided. There appears to be a good commitment to engagement and further partnership working on this and an engagement strategy will be required. However, further detail is required about the model and community control.	Further work required on the nature of the delivery vehicle and an engagement strategy produced.
Looks ahead to emerging government policy for example locally led development corporations (accepting little evidence about these yet).	Lack of awareness about how national policy may change over the life of the proposal.	Not provided. Gladman are known to have submitted the scheme for consideration under the Government's Garden Community Prospectus and as such will be aware of emerging policy. It is will also be important here to consider such matters as the Government's consultation in respect of net biodiversity gain.	Further information required about details of the mechanism going forward.
Provides evidence of where the approach has worked elsewhere.	No experience of relevant examples,	This is a new approach for Gladman, who are keen to embrace garden communities and who have bought Mathew Taylor on board. They are experienced land promoters, however no examples are provided. This model may therefore be untested, which could pose some risk that will need to be considered and if necessary mitigated.	Further information required to provide detail on how it will be delivered.

<p>Also considers long term stewardship arrangements – not only delivery phases.</p>	<p>Focus on short term delivery only.</p>	<p>The proposal recognises this issue and believes that this should be managed through a long term community controlled stewardship structure using a community management company funded through an annual management charge with resident and stakeholder participation. Community assets and open space would be transferred to a trust, parish, company to assume responsibility and retain in perpetuity. No consideration appeared to have been given to the range of potential creative options and it would seem that management and transfer issues are considered separately.</p> <p>Whilst further information is provided in January 2019 that shows progression of thought, it does not really provide more clarification, other than recognising that there are numerous mechanisms and that a Governance committee should be put in place at the outset and then for a new parish to take over responsibility. A dowry is suggested and then that it will be self-financing.</p> <p>It is not clear that this will adequately manage and maintain the considerable community assets and while the capital cost and ongoing maintenance has been included within the calculations, this will need to be examined and the viability appraisal tested in detail.</p>	<p>Further detail and testing required.</p>
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Question 5: Advice		What specific advice do you require and what technical research will you undertake should the bid be successful?	
A good answer would be:	A weak answer would be:	PBA Comment	Direction of Travel
<p>Well thought out response with sensible queries for the Council / PBA as appropriate.</p>	<p>Question not addressed.</p>	<p>Little information is provided in the initial submission, however, further detail is given in the January 2019 response. This welcomes any form of assistance to accelerate delivery whether that be direct funding of infrastructure, access to public funding of loans on preferential terms. Further discussion and agreement about the approach will be required.</p>	<p>Satisfactory progress Further detail required to progress scheme.</p>
<p>Highlights areas where further work or engagement is needed – i.e. caveats to the wider response e.g. we need a Borough wide Water Cycle Study to help develop our scheme).</p>	<p>No acknowledgement of the need for further work,</p>	<p>Little information is provided, although further details are included in the January 2019 response which recognises the need for pre-application advice with key stakeholders, sign up to a PPA and work collectively. However, there is a general lack of information about what additional work is required or will be provided. This will need to be considered in more detail and provided as the scheme progresses,</p>	<p>Further information required on how and when they will work with the Council.</p>
<p>Provides solutions to gaps in evidence not simply flagging problems (who, when how etc.).</p>	<p>Highlights problems or data issues with no positive way forward.</p>	<p>Not provided at this early stage. It appears that little consideration has been given to exactly what technical evidence and solutions based approaches will be used. This is particularly an issue in relation to the AONB and the initial comments of the Unit, which raise objections to the approach. Further consideration and response to these comments is required,</p>	<p>Further information required to address AONB issues.</p>

Question 6: Environmental Opportunities			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Clearly identifies the net gains or improvements under the five broad areas.	Fails to move beyond prospectus and New Settlement Study.	<ul style="list-style-type: none"> The scheme proposes an extensive country park to the south of the site linking to the AONB. It seeks to retain and enhance existing feature within landscape framework and Provide SUDS. Opportunity to provide mitigation package for SPA and SACs. <p>It is unclear as to whether this is a landscape led scheme or whether net biodiversity gain will be achieved. There are also landscape issues to potentially address (see LUC comments and initial provisional views from the AONB Unit). There is also little detail about the relationship with North Street and the other hamlets and how these are enveloped and dealt with within the masterplan and from an environmental view.</p>	Further information required including a response to LUC and AONB Unit comments.
Provides evidence to demonstrate that these are achievable.	Little or no evidence provided.	Not provided It will be necessary for this to be explored in more detail if the scheme is progressed.	Further information required if the scheme progresses.
Provides evidence that they have been realistically assessed.	Concern that they may be too optimistic.	Not provided. A response to the LUC comments is required.	Further information required to provide a response to LUC comments.
Provides evidence that they are genuine positive improvements and where there is negative impact they have been considered and mitigated (Ideally to make them neutral or positive where possible).	Lack of recognition of any negative impact.	Considers that the open space and Country Park to the south provides benefits. However, this will need to be clarified and tested further in relation to the LUC findings. There may be an opportunity to optimise the landscaping provision and to further consider landscape mitigation through dealing with the red lines which can be considered through a masterplanning review process.	Further information required to respond to LUC comments and recommend masterplan review.
Shows that the improvements extend beyond the scheme – i.e. benefits the wider borough.	Improvements only relate to this proposal.	The proposal provides open space and a country park to the south to respond to the AONB surrounding this part of the site. However, given the initial comments of both the AONB Unit and LUC, this will need to be considered in more detail and a response provided to their conclusions.	Further information required to provide a response to AONB Unit and LUC comments.

Question 7: Environmental Constraints			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Recognises constraints and moves beyond the PBA new settlement study – provides additional detail where needed.	Simply refers to the Councils strategic evidence base.	<ul style="list-style-type: none"> The proposal is adjacent to the AONB and within AHLV. Topography identified, hydrology considered – not in flood risk area. Use of SUDs proposed and proposal for how deal with western source protection zone. Network of mature woodlands and hedges. Existing properties at centre of site, but not in ownership, relationships. listed buildings within site and on edge and potential archaeology along western edge. Recognise noise source of M2. States that there are no significant views of the site from any roads or PROW more than 1.5km away. <p>While the issues are identified, they are not always clearly provided with a solution and addressed. For example:</p>	Further information to specifically address LUC and AONB Unit comments.

Question 7: Environmental Constraints			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
		<ul style="list-style-type: none"> How does the masterplan relate to the hydrology constraints? Electricity transmissions pylons cross site west to east –but not accounted for in masterplan. Does there need to be more of a gap to the north? – in order that it becomes its own settlement rather than an extension to Faversham. Views are considered but it is not then specified whether there are any views which are more important than others? For example what about views into and out of AONB? <p>While the proposal recognises the adjacent AONB it does not appear to view it as a major issue. However, the initial provisional comments from the AONB Unit demonstrate that this is a key issue and indicate a likely objection to development in this location. It will be necessary for these initial comments to be considered and responded to. There are also clearly other landscape issues identified by LUC which will also need to be further considered.</p>	
Provides reasonable confidence that the 'long list' (bullet point) constraints have been considered and discounted where relevant.	Dismisses the long list without reason.	See above. Requires further consideration and a response to both the AONB Unit and LUC initial comments.	Further information required to provide a response to the AONB Unit and LUC comments.
Where constraints are identified provides a 'action plan' outlining how these will be addressed, managed or mitigated. Ideally who, when and how etc. No mitigation strategy – or over optimistic.	No mitigation strategy – or over optimistic.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Considers off site (close proximity) constraints and provides a realistic view to managing these,	No consideration or inadequate approach to management,	The proposal recognises the adjacent constraints of AONB, nature reserve in West, ancient woodland in SW corner and conservation area to South. Whilst there is recognition of the constraints, it is not clear what the masterplan is doing about them and how they are being addressed. Further consideration is required to address these issues and those relating to the AONB and landscape generally.	Further information required to provide a response to the AONB Unit and LUC comments.

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Challenges the design principles set out in the prospectus in a positive way.	Challenges the prospectus in a negative way.	<p>The proposal recognises the Governments 'Locally led' paper, but does not provide any detail. Their position is clarified in the further information provided in January 2019 which believes the council has the opportunity to set out design principles and requirements in the local plan. They caveat this by saying that these should not be too prescriptive to limit alternative innovate design.</p> <p>There is an issue here about how this will be achieved in practice. For this scheme they envisage the development of a detailed Design Code/ development brief and a team to work collaboratively on this and with the master planner, and for this code to be secured by way of condition and secured through the land sale contract.</p>	Further detail required, specifically about their wish not to be too prescriptive.
Recognises the TCPA principles and met these in a meaningful way.	References them but with no detail or reasons for departure.	The proposal seeks to align scheme with the TCPA principles, but there is little detail or expansion upon these. See above.	Further detail required to demonstrate how these have informed the masterplan.

Question 8: Delivering the design principles			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Commits to deliver the principles but provides re-enforcing evidence as to why they are good to apply. Also relevant to the site or location.	Agrees to deliver the principles but provides little confidence that the proposal has actively considered whether the principals can be improved.	The proposal mentions exemplary design with emphasis on spacious and efficient layouts, embracing technological solutions, but no detail or examples are included.	Further information required to show how the principles will be applied locally.
Shows that the proposal responds to landscape context (accepting limited detail may be available).	Lack of recognition of landscape within and surrounding the site.	The scheme proposes a landscape buffer from north M2 and south AONB and country park along south and west. A north south landscape corridor. However, this is a less well-developed landscape led proposal and little detail is translated into the masterplan. LUC have considered the evidence submitted and provided comments which express concern about the AONB which will need to be addressed (alongside those from the AONB Unit) and further information provided.	Further information required to respond to the LUC and AONB Unit comments.
Provides a 'action plan' outlining the engagement strategy. Ideally recognising the Council will continue with the plan review consultation and how these two need to inter-relate.	No commitment to engage or recognition of plan led approach.	Not provided at this early stage. Whilst this is not surprising, it will need to be considered further and provided.	Further information required.
Covers the need to engage with new residents and also wider community – because different approaches may be needed.	Only considers one or the other. Fails to consider how strategy may need to change over time.	Little information was initially provided about engagement; however, it is understood that there have been meetings with the Parish Council and also public meetings in November and January, with others scheduled. The latest information says that they will take a proactive approach to pre-application consultation, and that they are committed to continuing this consultation post consultation. They will make resources available for effective delivery of stakeholder and public engagement. A specialist PR and communications company MPC have been engaged and a draft strategy has been provided to the Council. There appears to be a good commitment to engagement and further partnership working on this and an engagement strategy will be required.	Satisfactory progress. An engagement strategy is required in due course.
Agree with community land ownership and stewardship – ideally with details and examples.	Fails to commit to community land ownership and stewardship (Pass/Fail?).	<p>This issue is not addressed in any detail, and whilst further information is provided in January 2019, which shows progression of thought, it does not really provide more clarification, other than recognising that there are numerous mechanisms and that a Governance committee should be put in place at the outset and then for a new parish to take over responsibility. A dowry is suggested and then that it will be self-financing.</p> <p>It is not clear that this will adequately manage and maintain the considerable community assets and while the capital cost and ongoing maintenance has been included within the calculations, this will need to be examined and the viability appraisal tested in detail.</p>	Further information is required about how land ownership and stewardship is addressed.

Question 9: Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what infrastructure is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal will be self sufficient and seeks to provide a neighbourhood centre, three primary school, a secondary school, playing fields, a variety of jobs, green infrastructure a well-connected network of footpaths and cycle paths.</p> <p>There is a good recognition of what is required including fibre optics to premises. Services are available to the site without new provision, that this will require localised upgrades. It recognises there are water issues and that they will need to work with Southern water to model demands and phase delivery and investment. Further consideration will need to be given to the Pylons crossing the site and also the Gas mains. A response from South Eastern Water is still awaited.</p> <p>Further detail will be required to address these issues.</p>	Satisfactory progress with further information required specifically relating to water and how the pylons will be addressed.
All items noted in question considered at scale appropriate to the proposal (e.g. if a secondary school is needed in addition to primary etc). Reference to table in New Settlement Study.	Departs from New Settlement study without reason or justification.	Provision appears appropriate to the scale of the proposal subject to detailed discussion with the Education Authority specifically in relation to the Secondary School.	Further information required in relation to education.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No commitment to deliver or failure to explain constraints/risks.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required. It is recommended that a Utility working group is established to consider cumulative issues and timing.
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed. (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits. Only addresses the min. need for the new community.	Only addresses the min. need for the new community.	This issue is not addressed. It is unclear as to the likely wider benefits that might be available, which has potentially under-played those that might be available to existing residents in terms of new community facilities. There is also little by way of references to existing Faversham residents and how this proposal relates to the town.	Further information required particularly on the AONB issue.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what inf. is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal considered that the current M2 J6 operates satisfactorily and that there are no constraints. It suggests that signalling of J6 could deliver significant additional capacity and recognises that further improvements would need detailed technical appraisals. The A251 runs north south and the proposal considered that it offers the opportunity for alternative high quality spine road, to deflect traffic and downgrade existing road and link in with roundabout at north. It identifies bus routes and mentions a transport hub with quick bus link.</p> <p>it is necessary to understand the capacity of the motorway junction and the extent to which signalling is appropriate. It is understood that there may be an issue with the junction further north up the A251 and the existing situation whereby traffic queues back from the A2 / A251 junction almost as far back as the M2 junction 6 where additional queueing could increase tailbacks towards the M2 Junction 6 coastbound off-slip. It is understood that a meeting with Kent County Council is to be held on 31 January 2019 and that a meeting is also to be arranged with Highways England.</p> <p>Initial comments from Highways England are concerned about the impact on Junctions 5 and especially 7 and these require further work to what level of development could be accommodated before additional mitigation is required. They also consider it unlikely that signalisation of J6 would address the issues and consider that the cumulative impact may require a full grade-separated gyratory junction, but this may not be justified by the economic case due to the scale of development proposed. The long term implications for Faversham should also be considered and modelling undertaken.</p> <p>Initial comments from Kent County Council state that while signalling can be managed so as to not interfere with other junctions, modelling is required to demonstrate the interrelation of the junctions. They also require consideration of the impact on the B2041 junction with the A2. Duty to cooperate discussions are also recommended to consider the wider impact south on M20 J9 and Trinity Road Ashford. Finally, and subject to modelling results, they consider that the rural lanes (A251) will not have the requisite capacity for anticipated flows.</p>	Further information required to address highways comments from KCC and HE.
Shows how this works with, or addresses known constraints.	Fails to explain how the constraints are to be resolved.	<p>The site encloses the A251 which runs north south and adjacent to J6 of M2. Improvements to this junction are proposed, but this will need further discussion with Highways England and confirmation that this could work.</p> <p>The proposal states that the station is 6 minutes' drive, but it is doubtful as to whether this would be from whole site or, indeed, likely given traffic queues at the A251/A2 junction. It is also unclear where the data for the graphic on trips (page 17) comes from and how the potential to capture trips externally will be achieved.</p> <p>It is also difficult to understand how the proposed quick bus link would operate any more efficiently than the current Ashford-Faversham service.</p> <p>Finally, more detail is required about this and also in relation to the proposed new footpaths and whether there are also cycle routes and how these would link to Faversham.</p>	Further information required to clarify highways issues.
Action plan demonstrating how and when inf. will be delivered. Linking to development trajectory and timing of risks (Question 1b).	No action plan.	<p>The proposal recognises that the design and implementation of a revised layout and junction would need to be provided early, however, no detail is provided. It is also necessary to understand the extent to which J6 is a current constraint on capacity.</p> <p>Initial comments from Highways England are discussed in detail above and the key issue is the concern about the junctions, however, it makes no specific comments on timescales. Comments from Kent CC are discussed above and the key issue is that initial modelling on cumulative impact concludes that the local network around Faversham would be unlikely to cope without significant mitigation.</p> <p>The issues raised will need to be considered in more detail and in particular the understanding of timing and delivery issues.</p>	Further information required and response to HE and KCC comments.
Where stakeholders are needed (e.g. HA, Network Rail) evidence of positive engagement has (or will) take place to address constraints and maximise opportunities. (e.g. HA re J5a or	Where stakeholders identified no 'action plan' or evidence they are willing or able to assist.	<p>The proposal recognises the importance of meeting with Kent County Council and Highways England and this is happening with meetings scheduled for 31st January 2019 and onwards.</p> <p>The outputs have not been provided however, informal comments from both HE and KCC have been received. Highways England are concerned about the impact on Junctions 5 and especially 7 and they require further work to what level of development could be accommodated before additional mitigation is required. They also consider it unlikely that signalisation of J6 would address the issues and consider that the cumulative impact may require a full grade-separated gyratory junction, but this</p>	Further information required to clarify highways issues and respond to HE and KCC comments.

Question 10: Transport			
Note – there is overlap with other questions			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Faversham junctions).		<p>may not be justified by the economic case due to the scale of development proposed. The long term implications for Faversham should also be considered and modelling undertaken.</p> <p>Initial comments from Kent County Council state that while signalling can be managed so as to not interfere with other junctions, modelling is required to demonstrate the interrelation of the junctions. They also require consideration of the impact on the B2041 junction with the A2. Duty to cooperate discussions are also recommended to consider the wider impact south on M20 J9 and Trinity Road Ashford. Finally, and subject to modelling results, they consider that the rural lanes (A251) will not have the requisite capacity for anticipated flows.</p>	
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits. Only addresses the min. need for the new community.	Only addresses the minimum need for the new community.	Not provided at this stage. It is surprising that a scheme of this scale is not providing more district wide benefit, and this should be considered further.	Further work required to consider how highways issues could benefit wider Faversham area.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Outlines what green infrastructure is proposed and why.	No consideration of what is required or failure to commit.	<p>The proposal includes a Country park, green space, allotments, community orchards, comprehensive network of linked spaces, and for cycling and walking it will create new north south PROW links.</p> <p>While this is not a landscape led proposal, a reasonable amount of open space is provided. However, this is largely located in the south and incorporates a country park along the southern and western edges of the site, and woodland planting to tie in with the recreational space and links with the AONB. However, LUC take issue with some of the conclusions put forward, especially in relation to the visual containment and use of the buffer planting and how to fit this into the open landscape. In addition there is a need to recognise the rural lanes and how these will be integrated into the development.</p> <p>There is some scope to offer further green infrastructure enhancements, for example, it is understood that other land made be available to the south.</p> <p>It is suggested that further consideration is given to the open space and landscaping through the use of a masterplanning review process.</p>	Satisfactory progress but further review of the masterplan recommended.
Shows how this works with, compliments and improves existing green inf in or around the site.	Fails to explain how green infrastructure issues are to be resolved.	The approach appears to be a pragmatic one to address the relationship with AONB; however, the AONB Unit have expressed concern in their initial provisional comments, whilst LUC have also provided views. Therefore landscape issues in general are significant issues and they need to be considered further and addressed.	Further information required to address AONB Unit and LUC comments.
Action plan demonstrating how and when inf. will be delivered AND maintained. Linking to development trajectory and timing	No action plan. And/or plan only deals with delivery.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.

Question 11: Open Space and Green Infrastructure			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
of risks (Question 1b).			
Any calculations clearly expressed in a way Members can understand why the Inf. package is what is proposed (with supporting evidence where needed).	Fails to explain why the infrastructure package is proposed and how it will be delivered.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided if the scheme progresses.	Further information required if the scheme progresses.
Demonstrates that the offer goes over and above that needed for the new community. And who it benefits.	Only addresses the min. need for the new community.	The proposal suggests that the screening and Country Park will help promote better engagement with communities about the benefits of the AONB. There may also be opportunities to extend the park further to the south. However, it is unclear whether this will be of wider benefit, whilst it will also be necessary to respond to the landscape issues raised by LUC and the AONB Unit.	Further information required to respond directly to LUC and AONB Unit comments.

Question 12: Sustainability			
A good answer would be:	A weak answer would be:	PBA Comment	Direction of travel
Ideas set out but also evidenced with a reasonable prospect of delivery and ideally examples.	Commits to sustainable design and delivery but no details provided.	The proposal mentions water conservation, food production and new technology and that this could include using zero carbon and energy positive technology to ensure climate resilience. This includes reference to SUDs, corridors, rainwater harvesting and consideration of renewable technologies PV and Solar panels, and ground source heat pumps. However, no detail is provided, and this will need to be subject to more detailed information. It is also not clear what has been costed and this will need to be tested as part of the assessment of the viability appraisal.	Satisfactory progress but further information required to show how these will be delivered.
Includes reference to BREEAM and other standards and explains how these will be included, with evidence that they have been costed.	Fails to move beyond simply acknowledging they are within the prospectus.	<p>The specific standards are not referenced or included.</p> <p>There is no detail on high standards of design including Building for Life 12, BREEAM, the BRE's Home Quality Mark, the Government's optional technical standards for housing (on water, accessibility and wheelchair housing and internal space) and Building with Nature certified core standards. It will be important that these are agreed early in the process to ensure that costs are fully factored in.</p> <p>It is not clear whether these have been costed and included within the viability appraisal.</p>	Needs further development Viability work will be subject to detailed testing.
Consideration given to the long list in the Prospectus – beyond simple repetition.	No information or simply repeats what is in the Prospectus.	Not provided at this early stage. While this is not surprising, it will need to be considered further and provided.	Further information required.