

Swale Borough Council



New Garden Communities Assessment of Stage 2 submissions

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CONTENTS

- 1 INTRODUCTION..... 5**
- 2 NATIONAL POLICY BACKGROUND..... 8**
 - Introduction 8
 - A shift in national policy..... 8
 - Summary.....10
- 3 CHANGES SINCE FIRST ASSESSMENT11**
 - NS1: South East Sittingbourne12
 - NS3: Land at Bobbing, West of Sittingbourne.....14
 - NS4: South East Faversham15
 - NS5: Land at Ashford Rd, South of Faversham16
- 4 CRITICAL QUESTIONS.....20**
 - NS1: South East Sittingbourne20
 - NS3: Land at Bobbing, West of Sittingbourne.....22
 - NS4: South East Faversham23
 - NS5: Land at Ashford Road, South of Faversham25
- 5 RED LINE BOUNDARY ASSESSMENTS, LANDSCAPE, DESIGN AND HERITAGE 27**
 - Introduction27
 - NS1: South East Sittingbourne28
 - NS3: Land at Bobbing, West of Sittingbourne.....30
 - NS4: South East Faversham32
 - NS5: Land at Ashford Road, South of Faversham34
 - Conclusions.....36
- 6 UTILITIES INFRASTRUCTURE.....38**
 - Introduction38
 - Method.....38
 - NS1: South East Sittingbourne40
 - NS3: Land at Bobbing, West of Sittingbourne.....40
 - NS4: South East Faversham41
 - NS5: Land at Ashford Road, South of Faversham42
 - Summary.....43
- 7 HIGHWAYS INFRASTRUCTURE.....45**
 - Introduction45

NS1: South East Sittingbourne45

NS3: Land at Bobbing, West of Sittingbourne.....46

NS4: South East Faversham46

NS5: Land at Ashford Road, South of Faversham47

Summary.....48

8 VIABILITY TESTING49

Introduction49

Summary of the approach taken.....51

9 CONCLUSIONS.....57

Comparative risk matrix.....62

10 RECOMMENDATIONS64

FIGURES

No table of figures entries found.

APPENDICES

- Appendix A: Red Line Assessments
- Appendix B: Design Assessments
- Appendix C: Heritage Assessments
- Appendix D: Highways Authority Analysis Letters from Kent County Council
- Appendix E: Viability Grids

1 INTRODUCTION

- 1.1 Peter Brett Associates LLP (PBA), now part of Stantec, is working with Swale Borough Council 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 next stage involved the final submission of detailed proposals by 3rd August 2018 for 4 potential new garden communities. These were assessed and reported to Local Plan Panel on 14th March 2019.
- 1.3 The first assessment identified the critical issues where further work was required. This was used as the basis of further discussions with the landowners. Further work has been undertaken by the promoters, the Council and its consultants to address the issues raised and provide more detailed information. In addition, more work has been done on viability and transport, as well as utilities.
- 1.4 The aim of this report, and the ongoing evaluation process, is to update the members on progress, identify what has changed and how the proposals are moving forward and addressing the issues raised.
- 1.5 The overarching objective of this process is to provide the Council with possible ways of meeting housing needs in the next local plan. It is not the role of this work to formally allocate or advise on allocations in the next local plan. That is clearly the responsibility of the elected Members. But, as part of their duty, the Members need to ensure that all possible avenues to meeting the prescribed housing need for Swale Borough have been explored – and the most sustainable options are available for allocation in the next local plan.
- 1.6 Throughout this process, each prospective developer has responded in an iterative fashion to queries and amended proposals as requested. There is also obviously a significant amount of further technical work needed to support the schemes, which is far more than would normally be expected and provides a valuable resource for the Council. Whilst we provide some emerging conclusions, care is needed before treating these as final. It does in no way mean that the Council are endorsing the proposals as part of the next local plan strategy.
- 1.7 In this report we update the Council with what has changed in each of the proposals since the 14th March. So, where schemes have changed size, shape, layout or development quantum's.
- 1.8 We also update the Council following the most recent meetings between the PBA team and the site promoters. These were held in August 2019. As part of these meetings we challenged the promoters on possible key weaknesses of their emerging proposals and areas requiring more detail or improvements.
- 1.9 We also report the progress of further technical work undertaken by the Council and/or their consultants, such as transport, landscape, utilities and viability.

- 1.10 In previous reports the Council has not sought to challenge assumptions or assertions made by the promoters on technical grounds – beyond the collective knowledge of the Councils (and PBAs) planning teams. While any process such as this relies on trust between the promoters and the Council, it is understandable that some may be sceptical of untested developers' assumptions. For developers promoting sites carries risk and considerable cost. But for the Council the key risk is delay which can jeopardise a potential 5-year land supply in the next local plan and, at worst, could result in the new local plan being set aside and the 'tilted balance' engaged. It could also result in the benefits, the Council accepted in return for allocating sites, being lost. In these cases, for example, if developers' costs increase then planning benefits (affordable housing, social infrastructure etc) may be curtailed.
- 1.11 So, at this stage of the process, the Council has undertaken additional technical 'due diligence' into each proposal.
- 1.12 This has focused on the potential 'show stopping' technical issues that could delay schemes, increase costs, or if not addressed or acknowledged, impede the progression of sites through a potential local plan process.
- 1.13 With these objectives in mind additional work has been undertaken in the following areas:
- 1.14 The Council has undertaken additional landscape advice from their Consultants. This work focusses on the potential landscape impact of the proposals and the possible mitigation already being promoted, or where the Consultants consider mitigation could be possible. This work was undertaken by LUC – the same firm who provided the local plan landscape evidence.
- 1.15 The Council has met with the AONB Unit to discuss the proposals which are located in or adjacent to the AONB, namely NS1, South East Sittingbourne and NS5, Land at Ashford Road, South of Faversham. This adds to the LUC landscape advice provided but, as far as the AONB is concerned, is more authoritative. Should the AONB Unit consider a proposal harms the AONB and this harm cannot be mitigated, this could be a significant hurdle to progressing a scheme. In this regard the AONB unit are the 'gatekeepers' of the AONB and while LUC and/or the promoters own landscape experts may disagree, it is the AONB Unit that promoters need to persuade. It would obviously be unwise for the Council to progress a scheme with a significant risk of an objection in principle.
- 1.16 The County Council has provided an updated view regarding the possible transport impacts and proposed mitigation of the proposals having reviewed the Transport Statements submitted by the promoters.
- 1.17 PBA have provided a view of the utility infrastructure needed to deliver the proposals.
- 1.18 In addition, the Council commissioned specialist viability advice from Aspinall Verdi (AV). AV are well placed to provide this advice and have experience of working with Homes England to assess potential new communities for Central Government funding.
- 1.19 At the time of writing some data / feedback is still awaited. This most obviously relates to Highways England – the 'gatekeeper' of any improvements needed, or

which impact on, the M2 in Swale. Also, the Borough's local transport model, has only recently been made available and so the site promoters have yet to fully test the mitigation that may be needed to the local highway network. Accepting this limitation, in reaching our conclusions on each site, we consider to what extent there is scope for the developers to provide additional mitigation, over and above that they have already offered, to address issues not yet identified or quantified. At this stage such an approach is proportionate partly because the full extent of local mitigation will depend on which non-strategic sites may be allocated in broad proximity to the proposals we discuss there. For example, should the Council choose to allocate both the NS4 proposal south of Faversham and also additional land north of the A2 local mitigation needs to consider the cumulative impact of both (or more) proposals.

- 1.20 Also; as introduction and context, in this report we discuss the four proposals as the 'developers' proposal to Swale. This is materially factual at the moment because the developers are promoting these to the Council. But, should one or more be taken forward, all four proposals are expected to come forward in partnership with the Council. The schemes will become the Council's schemes in partnership with those who have assembled the proposals so far. There is no suggestion that a Development Corporation or other delivery agency or body will be needed to bring forward these schemes. It will be for the Council to shape what partnership arrangements are wanted and also what role they see for other interested parties. In this case the Parish Councils and local communities.
- 1.21 This report is a high-level assessment, proportionate for this stage of the process. It is not a detailed plan making or planning application assessment. The report is structured to provide an update on each proposal by site and then by detailed theme. A general conclusion as well as further recommendations are provided at the end of the report.
- 1.22 In this report no inference can or should be made to any site's development potential or suitability outside the plan making context.
- 1.23 All consultees referenced in this report have made comments in the positive context of a potential allocation in the next local plan, where schemes come forward working in partnership with the Council and local communities.
- 1.24 The evidence we (and others) have considered, while proportionate to emerging local plan options, falls far short of what may be needed to support and consider a planning application. It would therefore be wrong to assume, for example, that a favourable opinion from one stakeholder could be transcribed to support a planning application. Any application would need to be determined in the context of the much more detailed supporting material needed in that scenario and at the relevant time.
- 1.25 Before we look at the sites in detail, we first update and review the national policy background and context. This is simply because Government has now confirmed a number of key policy and process changes since our last report; which have been incorporated into a new version of the National Planning Policy Framework (NPPF) and associated Planning Policy Guidance (PPG).

2 NATIONAL POLICY BACKGROUND

Introduction

- 2.1 In this section we briefly update the wider policy background to this process.
- 2.2 Some of this background has been addressed before, but it remains useful to repeat and update here. This is mainly because the Government has released new planning guidance which clarifies exactly what Swale must test, in terms of housing numbers, in the next local plan round.
- 2.3 This analysis should not be taken as endorsement of national policy, or the centrally derived minimum housing target in the next plan (the “Standard Method”). But, regardless of whether the Council agrees with national policy, it is important to recognise the factual starting point for the next local plan.
- 2.4 If the Council ultimately allocates less land than the Standard Method suggests, both the Secretary of State and the Inspectorate will need to see robust evidence that this decision has only been reached following extensive testing of all possible ways of meeting the need in full. The phrase often cited in cases where a plan proposed to allocate less land than ‘needed’ is that it can only do so where “no stone is left unturned”¹. In other Council’s, where there is no alternative, this instruction has resulted in new housing allocations within areas of AONB and also revisions to greenbelts, for example in the very recent Wycombe District Inspectors report (July 2019). Many other Councils are in the process of releasing greenbelt sites to meet housing or economic needs – including Councils such as the Royal Borough of Windsor and Maidenhead – the home Council of the recent (former) Prime Minister. This demonstrates that the ‘no stone’ bar is currently set very high.

A shift in national policy

- 2.5 The adopted local plan was drafted to address a very different set of national policy documents. In summary; the adopted local plan was drafted to address the 2012 version of the National Planning Policy Framework and associated Planning Policy Guidance.
- 2.6 Under that guidance the Council was permitted to adopt a housing target similar to the ‘raw’ (i.e. unadjusted) household projections. In fact, the Council successfully adopted a target slightly below the official projections against considerable objection from the development industry at the time.
- 2.7 Since that local plan was adopted there has been a significant shift in national policy and for Swale it is useful to outline three key changes. These changes all relate to the new, 2019 version of the National Planning Policy Framework and associated changes to the Planning Policy Guidance.

¹ From the Brighton and Hove local plan examination and Inspectors correspondence which is summarised here: [https://present.brighton-hove.gov.uk/Published/C00000689/M00005085/AI00037211/\\$20141007125948_004993_0026346_CityPlanSignificantMainModsOctPRfinal1RF.doc.pdf](https://present.brighton-hove.gov.uk/Published/C00000689/M00005085/AI00037211/$20141007125948_004993_0026346_CityPlanSignificantMainModsOctPRfinal1RF.doc.pdf)

Plan targets must now exceed the official household projections

- 2.8 The first point to note is that housing need assessments that only meet the official household projections are no longer allowed in most of England.
- 2.9 The system used to arrive at the Councils current housing target (objectively assessed housing need or OAN) does not comply with the new guidance. Throughout most of the south of England the Government now requires housing targets to exceed the household projections by up to 40%.
- 2.10 The exact uplift factor is a product of a standardised formula where the uplift is higher where homes are less affordable (the Standard Method). For right or wrong the Government has removed local discretion for local Councils to assess their own needs.
- 2.11 The Government's rationale is that housing targets, such as in the Bearing Fruits Local Plan, may meet the needs of household growth, providing homes for new households arising in line with past trends, but will not address the current shortage of housing in England. If local plans only address household growth, then no inroads will be made into the lack of affordability in the market and the inability of many (especially younger people) to access housing. Hence why future housing targets must be higher than the 'raw' projections.
- 2.12 As previously reported to the Council we estimate the local housing need generated by the Standard Method may be around 1,050 dwellings per annum (dpa). The Council is testing its data, as a separate piece of work, to ensure the robustness of the potential housing targets here, but it is unlikely, given the limited scope to depart from the 'standard method' that the next local plan will be able to adopt a target lower than the 'method' as its starting position.

Development Plans must be reviewed at least every 5 years

- 2.13 The Bearing Fruits Local Plan covers the period up to 2031. But changes in national policy now mean that the Council should must review the local plan within five years of the adopted local plan.
- 2.14 The Council always expected to review the local plan but not necessarily promote a significantly higher housing target. Changes to national policy now means the Council will be required to revise the housing target and apply the 'standard method' as part of the plan review.
- 2.15 This new method will supersede the adopted plan target – even through the adopted plan has a 2031 end date.

The adopted plan target automatically expires at 5 years

- 2.16 Under the old (2012) NPPF the development industry criticised many Councils for not reviewing their plans in a timely manner. So, in the past it may have been in the Councils interest to delay reviewing the plan for as long as possible – pushing back the point where the Council needed to grapple with a higher housing target.

- 2.17 The Government has now made changes to national policy that resemble a 'kill switch' which is triggered should Councils fail to review their plans.
- 2.18 Under new guidance a local plan housing target 'dies' at 5 years post adoption and, for development management, is automatically replaced by the relevant Standard Method number at the time. Inspectors have no discretion in this matter. So, if a Council fails to apply the Standard Method at 5 years the Inspectorate and Secretary of State (via appeal) will.
- 2.19 As a worst case scenario this means that the Council effectively loses control of development in the Borough and is unable to plan properly for development using its local plan. Outside of the local plan process each Inspector will only be able to consider each development on its own merits and how individual schemes may contribute to the Boroughs total housing need as per the Standard Method.
- 2.20 The practical implication of this is that those areas, currently (largely) protected from development by the plan's spatial strategy, will be vulnerable to 'piecemeal' applications, appeals and development.

Summary

- 2.21 National policy has changed significantly since the last plan. The Government made the conscious decision, in full light of various objections, to remove the scope for Councils to derive their own assessments of need.
- 2.22 The Government also made the decision to 'ratchet up' local housing targets by replacing the previous OAN approach with the much higher Standard Method.
- 2.23 Swale may disagree with national policy (and many other Councils do too). But if the ultimate decision is made to submit a plan with fewer new homes then the 'no stone left unturned' approach is one that the Council needs to follow.
- 2.24 The Council is currently testing the future housing target – but it is not credible to assume it will be lower than that included in the Bearing Fruits Local Plan. The most likely scenario is that the Council will be required to progress a significantly higher target. In the past we have estimated around 1,050 dpa. It looks likely that the standard method figures going forward will be within 10% of this figure, depending on the projections used and whether there are any changes to the methodology.

3 CHANGES SINCE FIRST ASSESSMENT

- 3.1 Considerable work has taken place since the four garden communities were first proposed last summer. Since the first assessment in Spring 2019 significant work and some changes have been made to improve the proposals and respond to the issues the Council raised at that time.
- 3.2 The following table shows the changes that been made to the proposals:

Table 1

	Original Submission	Proposal now
NS1: South East Sittingbourne	11,500 homes with 10- 20% affordable, 120,000 sqm of new commercial space, 10,500 jobs, 4 district centres to include nurseries, pharmacy, pubs/restaurants, medical facilities, 4 new primary schools and a 6-form entry secondary school including 6 th form and further education. Sport and leisure facilities	Reduced number of homes to 8,000 homes, and confirmed with 20% affordable, Kent Science Park and land to north of A2 included within the red line boundary.
NS3: Land at Bobbing, West of Sittingbourne	2,500 homes, 40% affordable, 3ha of flexible commercial space including pop-up art and cultural use, 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.	Increased potential for 2500-3,000 homes, 2 options for dealing with the village of Bobbing, additional land for future expansion
NS4: South East Faversham	2,550 homes, 40% affordable, with approx. 15-20,000 sqm of business/commercial/retail space, which is expected to provide 2,500 jobs. In	No change

	addition, 1 or 2 local centres with open space as well as the off-site benefit of traffic calming the A2.	
NS5: Land at Ashford Road, South of Faversham	5000 homes with 40% affordable, 3 different employment areas, 5 neighbourhoods with a village green, 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. 3 primary schools, a secondary school and burial ground and playing fields	No change

3.3 NS1 has been significantly changed by reconsidering the effect on the landscape and avoiding sensitive locations, NS3 has recognised the constraints of Sittingbourne and is now looking towards Newington, NS4 has continued to engage with the local community and NS5 has provided considerably more technical evidence to address the gaps that existed.

3.4 Set out below is a summary of what issues were raised in the first assessment and what has changed in each submission since then.

NS1: South East Sittingbourne

3.5 This site is promoted as Highsted Park by Quinn Estates. It proposes 8,000 homes of which 20% are to be affordable which applying our standard assumption would result in 1,440 homes for affordable rent and 160 intermediate homes. It commits to 1:1 homes and jobs, together with all necessary social and community infrastructure provided on site.

3.6 In terms of the trajectory the promoters envisage a start date of 2024 with 5,500 dwellings completed in the Local Plan period to 2036 and an additional 2,500 dwellings beyond that and delivered by 2042.

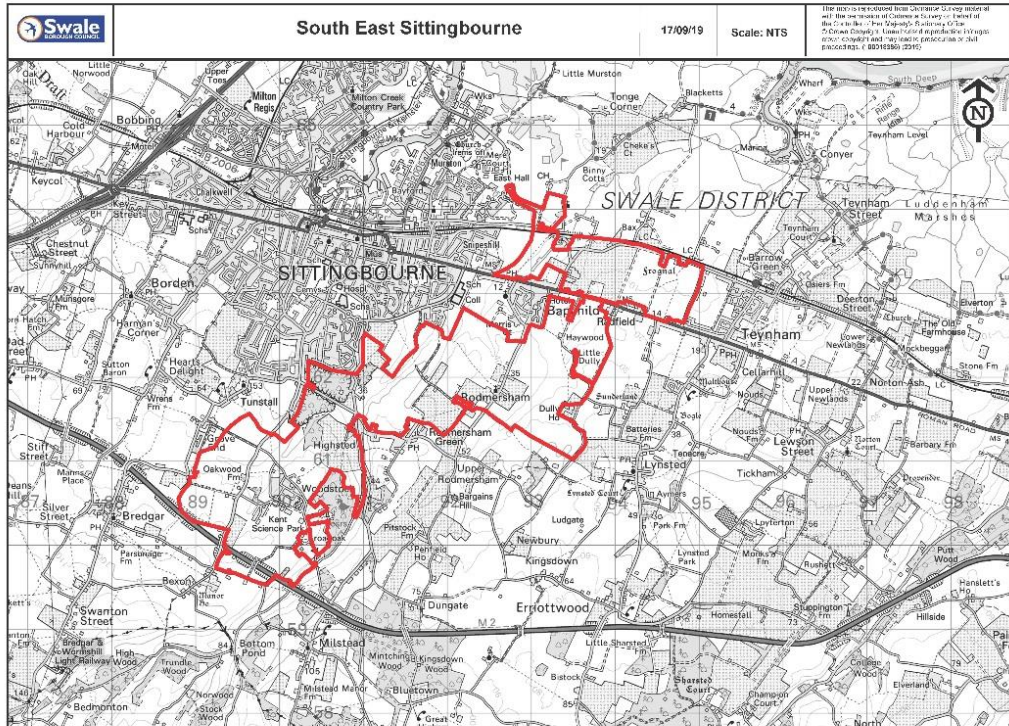
3.7 The last assessment identified a number of key issues, opportunities and risks which were summarised as:

- 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 reducing out-commuters
 - Site boundaries and relationship with existing settlements
 - The football club
- 3.8 Most of these have been addressed in the changes that have been made to the scheme and the additional information provided.

Changes

- 3.9 Considerable further work has been undertaken which has changed the scheme as follows:
- It has been reduced from 11,500 to 8,000 dwellings, with an additional 1,125 on the northern land with an extended timeframe for delivery with completion by 2042
 - There is a revised masterplan which changes the location of development to avoid the ancient woodland and dry Valley, moves away from a necklace approach, focuses on less sensitive areas, using a green grid which seeks to preserve views and reduces access points along the new road
 - Includes the Kent Science Park within the red line
 - Northern relief road delivered in tandem through integrated masterplan with 2 different options suggested for the location of development, around the road.
- 3.10 These changes largely reflect previous comments made by PBA and the Council. These include concerns that the scale of the proposal was such that the development would result in harmful landscape impacts and provisional layout of the proposal was poorly conceived (from a design perspective). The reduction in the number of homes allows the promoter to respond to these concerns (as we detail later). This reduction is possible because the cost of the junction has been reduced due to the reduction in the number of bridges crossing the M2.
- 3.11 We also previously expressed concerns that that the Science Park, while forming a core component of the 'sell' for this proposal was outside the 'red line'. The original proposal was also promoting a possible competing employment allocation. By bringing the Science Park inside the 'red line' the current proposal better integrates the new development with the Science Park. Further explanation of what employment is to be delivered will be required.
- 3.12 Finally; the Council's view has always been that any southern link road to Sittingbourne would not be acceptable without completing the northern relief road, which is currently subject to a safeguarded area within the Local Plan. Since our last assessment the promoters have developed a northern link proposal, which is outside the new community, but we understand is viable to deliver. The details of this proposal is outside this assessment but, responding to previous concerns, this change is welcomed and the land area is shown on the plan below.
- 3.13 The latest site boundary is shown below:



NS3: Land at Bobbing, West of Sittingbourne

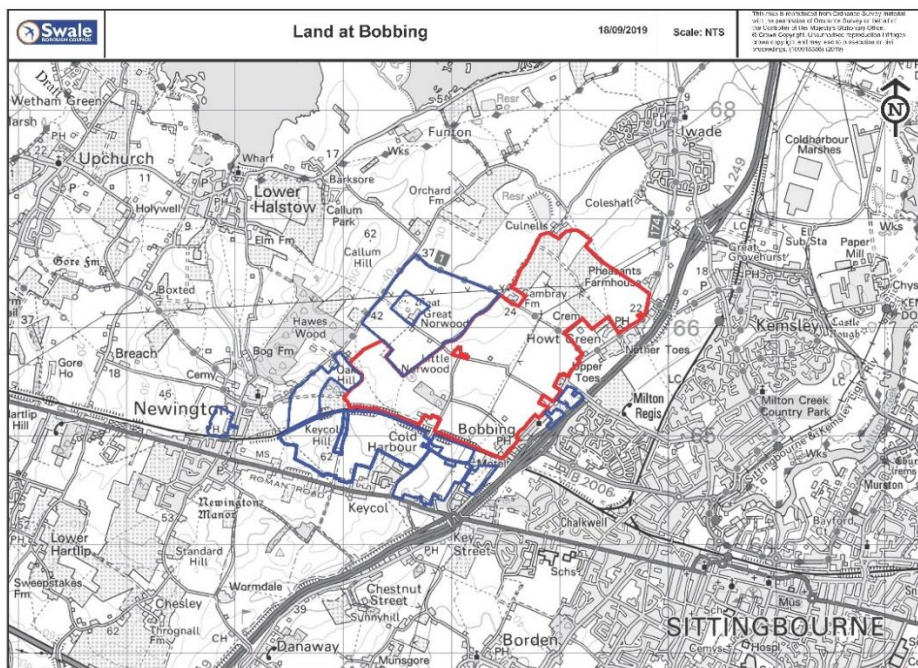
- 3.14 The site is promoted as Foxchurch by Appin Land Ltd and Crabtree Ltd for up to 3,000 homes, of which 40% are to be affordable which applying our standard assumption would result in 1,080 homes for affordable rent and 120 intermediate homes. It commits to 1:1 homes and jobs, together with all necessary social and community infrastructure provided on site.
- 3.15 In terms of the trajectory the promoters envisage a start date of 2021 with completions reaching 200 dpa within 5 years and all 2,500 dwellings completed in the Local Plan period.
- 3.16 The last assessment identified a number of key issues, opportunities and risks which were summarised as:
- Highway issues
 - Garden principles and design work
 - Enveloping of Bobbing village and masterplanning issues
 - Social and employment space and numbers
 - Open space, landscape and net biodiversity gain
 - Constraints such as highways issues and overhead power lines
- 3.17 Most of these have been addressed in the changes that have been made to the scheme and the additional information provided.

Changes

3.18 Considerable further work has been undertaken which has changed the scheme as follows:

- The redline site boundary plan has been amended to provide more open space to the north. In addition it also identifies future extension land to north west and also land south of the railway which has the potential to accommodate an additional 1,000 homes in the future
- The proposal refocuses its emphasis on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus
- The masterplan includes two different options for either a small or no buffer or 30m buffer around the existing village of Bobbing with a number of additional sites to the east which could come forward
- Includes village centre, open space and local parade and employment area under the overhead pylons and recognises need for sensitive design here.

3.19 The latest site boundary is shown below:



NS4: South East Faversham

3.20 The site at South East Faversham is promoted by the Duchy of Cornwall for up to 2,500 homes, of which 40% are to be affordable which if applying our standard assumption would result in 918 homes for affordable rent and 102 intermediate homes. It commits to 1:1 homes and jobs, together with all necessary social and community infrastructure provided on site.

3.21 In terms of the trajectory the promoters envisage it start in 2023 and will be built over 15 years, with a peak delivery of 240 dpa. This will deliver 2,350 dwellings within the plan period to 2036 and 150 dwellings in 2037.

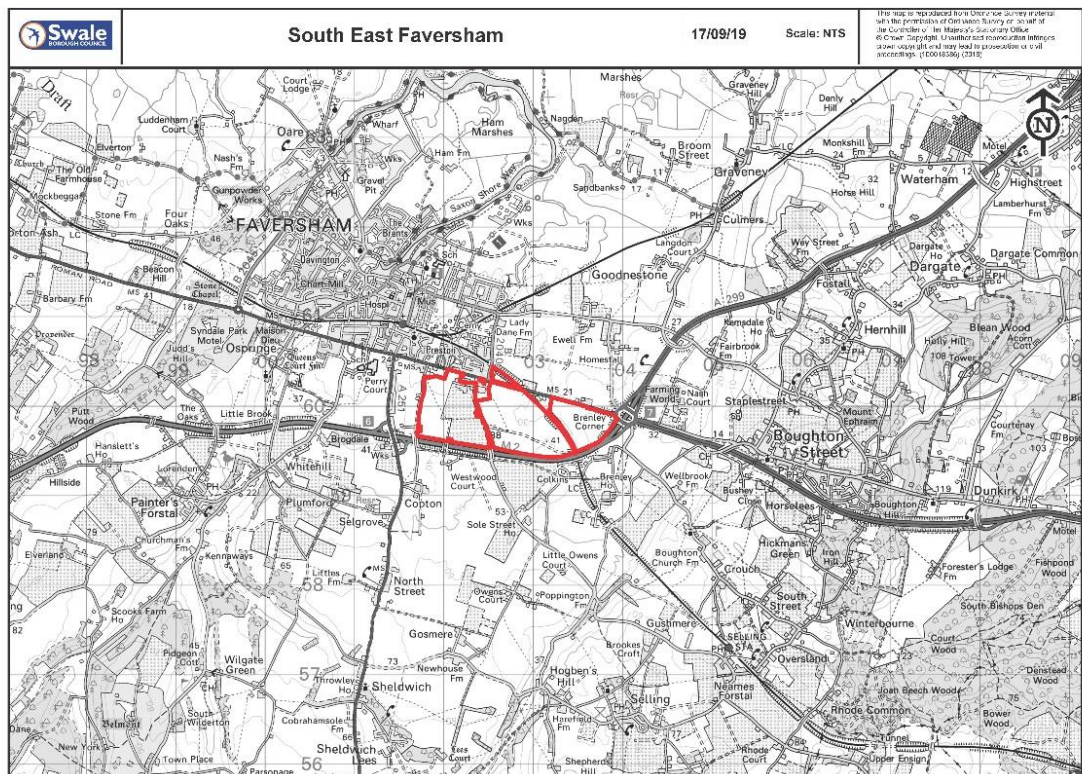
3.22 The last assessment identified a number of key issues, opportunities and risks which were summarised as:

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

Changes

3.23 This scheme has not changed although some additional information has been provided and consultation with the community continues.

3.24 The latest site boundary is shown below:



NS5: Land at Ashford Rd, South of Faversham

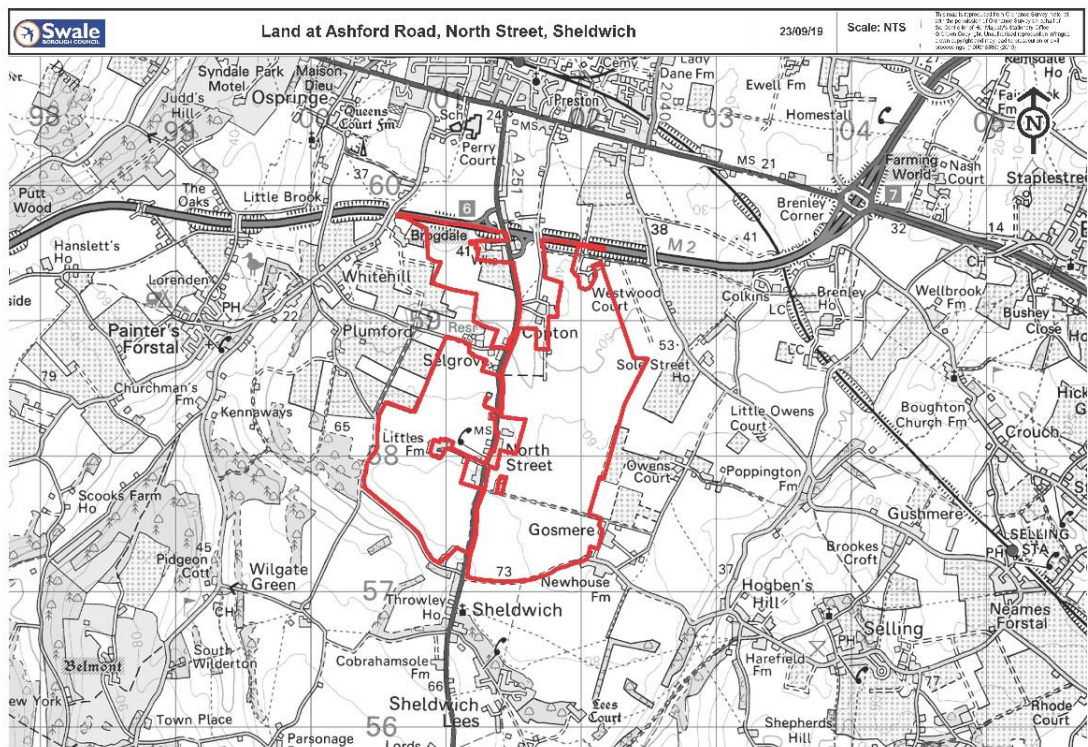
3.25 This site, also known as North Street, is promoted by Gladman Development Ltd for 4,500 homes of which 40% are to be affordable which applying our standard assumption would result in 1,800 homes for affordable rent and 200 intermediate

homes. It commits to employment, together with all necessary social and community infrastructure provided on site.

- 3.26 In terms of the trajectory the promoters envisage a start date of 2023 with 3,500 dwellings completed in the Local Plan period to 2036 and an additional 1,500 dwellings outside the period delivered by 2042.
- 3.27 The last assessment identified a number of key issues, opportunities and risks which were summarised as:
- Accessibility
 - Employment mix, type and location
 - Site boundaries
 - Landscape, open space
 - AONB
 - Affordable Housing
 - Delivery

Changes

- 3.28 Some further work has been undertaken which provides more information but does not change the fundamentals of the scheme:
- Updated transport modelling
 - Landscape and visual considerations, design review, and with further development of, but no substantial change to the masterplan
 - Utilities information and various consultations
- 3.29 The latest site boundary is shown below:



Summary of changes

3.30 It is difficult to compare the changes that have occurred, because each one has addressed their own individual site-specific concerns. Many of the issues, such as employment numbers and uses, and transport implications are still being developed and assessed, and others such as social infrastructure, such as the number of schools, community facilities and retail provision will be provided as a direct result of the size of the development and the needs it generates. A table is provided to show the current position of each proposal on a consistent basis. It identifies the total number of dwellings and the number that will be provided within the plan period to 2036, as well as the percentage of affordable homes and other key differences where these exist.

Table 2

	NS1	NS3	NS4	NS5
Number of homes	8,000	3,000	2,500	5,000
Number of homes by 2036	5,500	2,500	2,350	3,500

% of affordable homes	20%	40%	40%	40%
Employment provision	General commitment to 1:1 jobs and homes but being developed in more detail with provision dependent on what is required in the market at the time			
Social infrastructure	General commitment to meet all the needs arising, schools, community facilities, retail and leisure			
Open space	General commitment to 50% open space and green infrastructure			
Transport	New J5A and SRR, as well as commitment to NRR	Stopping up Sheppey Way and focus on access to Newington Station	Local improvements, but no commitment to J7 improvements	

4 CRITICAL QUESTIONS

- 4.1 As discussed above there have been changes to the schemes to directly respond to the issues previously raised. Through the second stage assessment process we have identified the critical issues that remain a priority and need to be addressed. Each scheme is different and needs to address different issues. Consequently, different questions were asked for each proposal to specifically explore the relevant outstanding matters.
- 4.2 The section below sets out the different questions which were discussed at the meeting with each of the promoters held on 5th August 2019. It sets out the critical issues raised with the developers and provides a summary of the response for each of the proposals.

NS1: South East Sittingbourne

- 4.3 The critical questions for this scheme were:
- Can you please elaborate on the relationship between the New Garden Community proposal and the land around the Northern Link Road?
 - How can we ensure that that Sittingbourne's wider growth (assuming both the New Garden Community & land north of the A2 is in the next plan) are integrated and brought forward in a sustainable and comprehensive way?
 - Can you please clarify how and why the proposed funding arrangement has changed – from being forward funded (partly) by built to rent and what the new model may be. As part of this what discussions have been had with Homes England?
 - Can the same level of infrastructure still be provided with the reduction of dwellings to 8,000?

Response

- 4.4 The proposal has changed as a direct result of the further landscape work. It is still expected that the funding of the infrastructure can be achieved from 8,000 dwellings because there are cost savings. The idea would be to use a loan from Homes England to forward fund the infrastructure in line with priorities to accelerate delivery and reduce air quality issues and congestion in Sittingbourne.
- 4.5 Kent Science Park has now been included within the red line with the objective of moving the non-science uses out to new accommodation and allowing the science related uses to expand within the secure science park area. The promoters are reviewing the Employment Land Review which will inform the number and type of jobs provided. Further information is required about what is to be provided in terms of jobs and employment uses and this is being explored to ensure it is compatible with the needs of the area.

Relationship with northern link road

- 4.6 A statement has been submitted to explain the relationship between the sites north and south of the A2. A holistic approach is envisaged which seeks to unlock

Sittingbourne and its major employment sites in the north of Sittingbourne. The sites are in different ownerships, but work has been ongoing and there are now 2 options proposed for the northern land for an adjoining garden village settlement of 1,250 homes. The options are either for development to the west of Teynham, or a separate new village further to the west. There is a commitment to mirror the garden settlement principles set out in the prospectus and ensure the use of land value capture to deliver the road and all appropriate community infrastructure together with 20% affordable housing. The intention is to develop a single comprehensive masterplan and that applications will be submitted in tandem with the delivery of both roads and J5a alongside each other. A detailed programme will be required to identify how this is brought forward.

Affordable housing

- 4.7 PBA and the Council asked for more information about affordable housing provision in relation to the tenure mix. Additional information provided states that they are working with Horton Strategic and local providers Optivo and L&Q. While there is a commitment of 20% affordable to deliver at least 1,600 affordable units, this could be provided in a variety of ways including a lower policy requirement but one which delivers social and local housing association lettings to meet the needs. While there is little detail provided there is considerable scope for discussion and delivery of a mix which meets needs over the lifetime of the scheme. The promoters also mention models such as cooperative housing and land trusts together with private rental to provide more secure tenancies.

Transport

- 4.8 Further information is provided in the form of a letter from Highways England. However, this does not categorically support or commit to the delivery of the new junction and dual carriageway relief road within the timescales. Indeed, it states that works to construct the new junction cannot start until J5 works are complete. Although the promoters contest this and believe junction 5A and SRR can be built at the same time and majority of works are off the motorways which reduce the time needed to build junction. The promoters believe that the scheme will be below the threshold to trigger a Development Consent Order (DCO)², and therefore this will be pursued through the usual planning process. If a DCO is required this means it would be subject to a separate planning regime with its own processes and timescales. This is subject to Highways England confirmation of the scheme which has not yet been agreed. It will be necessary for all these issues to be clarified. Further detail about the highway implications is set out in Chapter 8.

AONB and Landscape

- 4.9 A meeting between AONB Unit, developers and the Council was held on 19th August 2019. This discussed the concerns and whether mitigation to reduce the impact could be achieved within the scheme. There are several issues to address which includes the junction that is within the AONB, and also the proposed location of large

² A Development Consent Order (DCO) is the means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP). This includes energy, transport, water and waste projects.

warehouses and employment uses close to the junction and AONB. These are far more difficult to mitigate than residential development. There is concern about the buffer to the north of the M2 which is currently proposed to include tree planting which is not typical of the area and dip slope. It is suggested that this is widened and that any planting is more suitable to its landscape character. A further concern relates to the increase in traffic through the AONB and how this can be mitigated as well as light pollution from motorway junction lights, as well as those required for the sports pitches. The promoters are also looking at ways to address this including what uses will be located nearest the AONB and how to suitably landscape around the motorway junction, as well as the use of reduced polluting floodlights. The AONB Unit consider that their concerns can be mitigated and therefore do not have a strong objection.

- 4.10 It will be important to engage Natural England in this process to ensure their views are sought and incorporated into any masterplanning.

Sustainability

- 4.11 Further information is provided which sets out how the scheme will deliver a green development. They are working with Daedalus Environmental to embrace new technology and move towards carbon neutrality. There are various options including:

- Solar pv, insulation, battery storage
- Water efficiency and harvesting
- Local sourcing of material
- Walking and cycling strategies, ebikes, automated vehicles, on and off street EV charging, electric public transport
- Soil protection and zero waste to landfill during construction
- Fibre broadband
- Real time energy and travel monitoring
- Retrofitting improvements to local homes funding – how viable?
- Net gain in biodiversity, edible planting

NS3: Land at Bobbing, West of Sittingbourne

- 4.12 The critical questions for this scheme were:

- Can you please elaborate on your proposed approach to Bobbing Village? We note there are a number of options suggested but feel it important that we can provide some clarity to the village as soon as possible? What would you think your main ‘sell’ to the existing village community?
- Can you please elaborate on the ‘future expansion land’ – how would this work alongside the New Community, what form would it take, would it follow the same principles and would the New Community provide the infrastructure upfront to enable this to come forward at a later stage?
- Can you please explain the links between the site and Newington station, the proposed car park and the cycle and pedestrian links?

Response

- 4.13 The proposal has responded to the issues by expanding the site, securing the land to the north and amending the masterplan which reflects the landscape work. Confirmation is provided that 50% open space is within the new red line area. In terms of the future expansion land, there is an opportunity for the new community to grow to another 1,000 homes to the west, in addition to the 2,500 – 3,000 homes proposed within the red line, but the issue is that all the traffic would come through and go out of the east of the site. There is some recognition that the land to the south is more difficult to develop and may not even be included. This will need to be clarified. There has been no discussions with utilities or others about any future growth opportunities. An assessment of the site and its impact is provided separately in Chapter 6.
- 4.14 There has been no formal consultation with the village yet and they recognise that there are 2 different options available, either wholly connecting the village with the new community or increasing the landscape buffer. In any scheme the 3FE primary school would be relocated to the centre of the site. These options will be put to the public and discussions are also starting with Bobbing and Keycol Parish Councils. It is envisaged that there would be a workshop held this Autumn. The promoters recognise that the pros and cons of each option needs to be better explained to the public. In addition there is more work required to address the issues and benefits of stopping up Sheppey Way and exactly where this would occur.
- 4.15 The scheme now re-focusses the transport strategy to access the railway station at Newington instead of funnelling traffic east to Sittingbourne. This is due to the congestion and air quality issues in Sittingbourne, and in recognition of the difficulties with the local road network. It is envisaged that a bus shuttle will operate in rush hour to the station. The promoters recognise that it may be necessary to include within the land all those items which are required for the site.

Affordable housing and Sustainability

- 4.16 While there is a commitment to 40% affordable there is no information provided in relation to the tenure mix. This will need to be considered further and more detail is required to ensure local housing needs are adequately addressed. There was some discussion about future proofing and the provision of electric vehicle charging points, but otherwise no further detail has been provided.

NS4: South East Faversham

- 4.17 The critical questions are:
- Can you please elaborate on your potential to secure ‘accelerated rates of delivery’? Has any progress been made in this regard and what form may this take?
 - We know that the land to the North of your site is being promoted by housing developers for promotion in the next Local Plan. While we understand that you don’t wish to ‘partner’ with other landowners, does this possibility, that your site and other in close proximity, give rise to new infrastructure issues including most

obviously, transport and network capacity? Do we need to pre-empt this possibility to help de-risk the plan going forwards?

- Can you please explain how you will treat the triangular site by Brenley Corner as it is a prominent, 'Gateway' site for Faversham? Also, how will you overcome the separation of your site that the railway line creates?

Response

- 4.18 The Duchy are producing a draft Housing Manual to guide the development and are taking forward 2 framework options. They are exploring ways to accelerate delivery, working with local housing providers, looking at private rented, retirement homes and modular housing. Further information about this is provided below.
- 4.19 In terms of the land to the north, meetings have taken place but there is not a working relationship between the different landowners. While the Duchy are open to ensuring linkages and infrastructure integration and recognise the issue of future proofing to ensure a good masterplan, no specific details or working arrangements are proposed. The promoters recognise that it may be sensible to have a design charette looking at both sites.
- 4.20 In response to the question about the treatment of the 'Gateway' site, limited information was provided, beyond the recognition that they will be upmarket sheds and not B8. The promoters recognise that there is a need for light industrial and the importance of ensuring any convenience retail does not divert from the high street. Further clarification of the uses here is required to reconcile the issues and best use of this part of the site; residential development would need a footpath; cricket and football may be appropriate, but there are benefits for the A2 traffic calming of having lorry movements on the edge. Highway issues will need to be addressed in more detail and are considered in Chapter 7 and at Appendix D.

Accelerated delivery

- 4.21 The Duchy recognises that quality can be delivered at some pace provided the right approach is adopted. They suggest that there is the opportunity to take innovations further, specifically because there are few development constraints and extensive road frontage which will enable simultaneous development of a number of different outlets. It may also be able to accelerate delivery via a greater tenure mix. They anticipate a faster rate of delivery and shorter overall period which leads to a revised trajectory of up to a peak of 240 homes per year over 15 years.

Affordable housing

- 4.22 We have asked for more information about affordable housing provision in relation to the tenure mix. The Duchy are committed to providing 40% affordable housing which is currently assumed that 50% will be affordable rent, 25% discounted market sale and 25% shared ownership; however, these percentages can be varied, and indeed other types of affordable housing could be introduced. This will be tenure blind, and distributed around the development, in the interests of community cohesion. They are actively discussing options with local registered providers and is confident that there will be considerable interest in both large scale and niche providers.

Sustainability

- 4.23 The Duchy offer is for a high-quality exemplar development which is achieved by:
- Using locally sourced natural materials where possible which benefit the local economy
 - planning walkable neighbourhoods and curating the type of uses that will ensure over time that most of your daily needs can be met on foot or bike;
 - incorporating generous greenspace of many different types, from play areas and sports fields to orchards, allotments, wetlands, wildflower meadows and other habitats that all provide net biodiversity gains, as well as providing bird boxes and bee bricks and encouraging recreation, local sourcing of food and community interaction;
 - deep intermixing of homes, workspaces and socio-economic infrastructure
 - control and minimise carbon emissions, using a fabric first approach to achieve thermal efficiency and
 - investing in sustainable construction methods and renewable energy solutions that have a proven efficacy, from the fabric first approach to build quality in order to guarantee thermal energy efficiency and reduce heat load requirements as well as the latest emerging technology and in-roof solar PV and other sound renewable technology that deliver for the consumer on price, output, and the quality of design and build

NS5: Land at Ashford Road, South of Faversham

- 4.24 The critical questions were:
- We understand that you have undertaken various landscape and heritage work (which is welcomed). Is this likely to lead to revision to the masterplan? And if so do you know how and whether this has follow on implications including site capacity and timing?
 - Has any further thought been given to the 'enveloped' local community? The Council needs to give local communities a clear view as to where any proposal may head? Have you undertaken any consultation with surrounding residents?
 - We were under the (mistaken?) assumption that Gladman were proposing to act as master builder? Is this still the case – noting the new submission suggests one will be 'appointed'

Response

- 4.25 The promoters confirmed that the highways and landscape work addressing sensitivity and enhancing AONB will feed into another masterplan. They believe the landscape character is such that the site does not contribute and can be improved by using shelter belts. However, this is not common ground. The revised masterplan will need to show what has changed, how landscape issues been treated and well as the enveloped communities. They have been meeting with Highways, have updated the

modelling and are looking at mitigation as well as cumulative impacts. It is agreed that further work is required and this is discussed in Chapter 7 and Appendix D.

- 4.26 Confirmation is provided that Gladman propose to be the master builder/ developer, but the landowners' agreement has not set this out in detail yet. An offer was made to provide members with a tour of the site and viewpoints.

Affordable housing

- 4.27 We have asked for more information about affordable housing provision in relation to the tenure mix. A discussion paper for Affordable Housing Options prepared by George Venning (August 2019) has been submitted. This considers the SHMAA together with the up to date position of housing need in relation to the housing register. It does not make definitive conclusions but does appear to suggest that the tenure mix should be 75% affordable rent, with an unspecified amount of social rent, possibly 10%, and the rest, 25% being intermediate affordable housing for sale. No detail is currently provided about the viability implications of changing this mix and further information will be required to inform this element of the scheme going forward.

Sustainability

- 4.28 The submission responds by setting out a range of actions to create low carbon energy efficient homes using 'Fabric First' principles which reduces demand for heat and power through things like orientation. In addition, active measures are to be promoted for heating and appliances through temperature controls, and the use of 100% low energy lighting as well as:
- Solar PV
 - Solar Thermal Hot Water
 - Ground Source Heat Pumps
 - Air Source Heat Pumps
 - Measures to reduce water consumption, harvesting rainwater and greywater and promote water conservation will be used.

5 RED LINE BOUNDARY ASSESSMENTS, LANDSCAPE, DESIGN AND HERITAGE

Introduction

- 5.1 As part of the ongoing assessment process the Council has taken both internal and external advice relating to design, heritage, boundary and landscape issues. These elements are an important part of this assessment because, at the moment, these issues are not fixed, and the Council can still influence them.
- 5.2 This part of the assessment has considered the previous LUC report and findings and identifies the sensitivity of the four 'red line' boundaries and looks critically at the potential treatment of communities close to, or within, the respective proposals. The practical reality of any large development is that it will be perceived to adversely affect at least some of the established Swale community.
- 5.3 It is a long-established planning principle that existing communities do not 'own' their view or outlook over undeveloped land; nor can they ensure that land remains undeveloped simply for their enjoyment or amenity value. But even though these broad principles apply the planning system still tries to balance the interests of both existing and potential new communities and mitigate or minimise the externalities of development as far as possible.
- 5.4 In addition the Council have undertaken a design assessment which identifies the strengths and weaknesses of the emerging schemes. It provides guidance and 'next steps' to allow the schemes to address the weaknesses, undertake detailed local studies to respond to the local context from an urban design and landscape perspective and to develop design codes for the sites.
- 5.5 In terms of conserving and enhancing the historic environment, almost any large development is likely to have some impact on heritage asset and Section 16 of the NPPF (2019) provides guidance on how to manage this, and how impacts may be mitigated. In practice, for many very large sites, promoters can find a mutually acceptable way to manage any impacts by carefully locating development and/or onsite mitigation and design. But obviously the first step is to know whether there are heritage assets in or around the sites in question and whether any assets can be managed within a potential development scheme.
- 5.6 Each promoter was asked to identify any potential heritage assets within their site or nearby (where development would influence the setting of an asset). The Council's conservation manager has used this information to do a light touch review of each of the four proposals working with Heritage England. The assessments are not detailed but proportionate, and as a caveat the Council officers are unable to assess the 'underground' archaeology in depth.
- 5.7 The detailed 'red line assessments', 'design assessments' and heritage advice notes are in the appendix to this report. But here we provide a summary of the assessments for the four sites, along with potential recommendations for improvement.

NS1: South East Sittingbourne

Boundary and landscape issues

- 5.8 The site is the largest we have assessed and naturally because of its size it overlaps a number of complex landscape types and character areas. Any development of this scale and scale will have some impact on these areas.
- 5.9 Landscape sensitivity has been assessed by LUC in their report Landscape Sensitivity of Four Garden Settlements: Report prepared by LUC for Swale Borough Council 2019. This considered the broad Sittingbourne wide impact and also in detail specific to the site. The conclusions about the site from LUC are that this is a very challenging site for development of a road and residential development. 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.
- 5.10 The assessment (and external and internal advice) concludes that the development may be acceptable on landscape grounds. The assessment finds that *“neither topography, national or local landscape designations nor sensitivity to residential development preclude some development from appropriate parts of the site with appropriate mitigation”*. The assessment then goes on to note that development is very likely to be unacceptable in the ‘dry valley’ and the slopes of this feature.
- 5.11 As noted elsewhere the development capacity of this site has been reduced from that originally proposed. We understand this is partly in response to landscape concerns and the need for the development to avoid the landscape constraints such as those noted in the assessment by LUC. Had this change not been made it is possible that we would, on the previous advice of LUC, have considered landscape impact a ‘showstopping issue’ for this site. But the changes made to the proposal, in light of this previous advice, has mitigated this through a reduced housing capacity and changes to the layout of the (indicative) proposal.
- 5.12 As previously raised in our earlier assessment there remains some concern that not all land, between the red line, and the urban area is within the control of the site promoters. This is reasonably inevitable – landowners on the edge of the settlement may hold out for higher ‘hope values’ given they have a possible route to either allocate their sites as ‘stand-alone’ development – or promote their sites via a 5 year land supply / ‘tilted balance’ scenario.
- 5.13 Notwithstanding this fact, any potential land allocation will need to address the management of land around the red line to ensure comprehensive development and avoid the possibility that development benefits from the new garden community proposal but does not make any contribution to the costs of any infrastructure.
- 5.14 As a very large site the proposal does encroach on established communities. The assessment addresses two possible ways to manage the ‘enveloped’ communities. As noted in the introduction any sizable development scheme will have some impact on nearby communities. But the scale of the land proposal here allows options that may not be practical or feasible should smaller sites be progressed. Here the

assessment suggests that it may be desirable to retain existing villages as discrete features with clear green spaces or green 'gaps' between each settlement.

- 5.15 Two approaches are suggested; option 1 which expands Sittingbourne southwards merging the Kent Science Park with the town and eastwards merging Bapchild with the town, retaining Teynham as a discrete settlement, or option 2, expand Sittingbourne southwards but retaining Bapchild and Teynham as discrete expanded settlements in their own right. While not concluding which possible approach may be preferable for this assessment the fact workable options exist mitigates the risk of 'showstoppers' at a possible later stage.
- 5.16 It is important to comment on the possible impact of the development on the AONB. As discussed earlier in this report the Council, with the developers, have met with the AONB Unit to discuss impact and potential mitigation. But in summary, to complete the landscape/red line analysis, we need to note that the AONB Unit do not have any fundamental concerns with the impact of the proposal on the AONB or its setting. Although there is recognition that this includes the land, within the AONB which may be needed for a new Junction, and that appropriate mitigation will be required.
- 5.17 In reaching this conclusion and others above, it is important to note that various consultees have taken a pragmatic approach and the conclusions only apply to the scale and broad format of the development in question. No inference can, or should, be made that parts of the site or proposal are acceptable in isolation – or that these comments apply should the scheme change form. In this regard we are aware that there has been pressure from Highways England for a more extensive improvement to the highways network – including a possible new local road to the south of Sittingbourne to relieve the M2 of local traffic. Should this be required then the impact on the AONB may be very different.
- 5.18 In summary – the red line assessment concludes that, on landscape policy and broader landscape considerations, there is no 'in principle' reason why the site as proposed cannot be considered suitable for development. The site is not absolutely free of constraints but the advice we have suggests the proposal can be delivered in such a way that manages these constraints with appropriate mitigation.

Design issues

- 5.19 The design assessment identifies the strengths of the scheme from a design perspective to include the commercial land close to the M2 junction and focusing on the Kent Science Park expansion, a network of green infrastructure providing links to the countryside and the retention of important views.
- 5.20 The weaknesses are the alignment of the bypass on the landscape and the fact it bisects the 2 villages compromising their integration and relationships. The use of loop roads and roundabouts inhibit orientation and give a suburban feeling and there is a lack of clarity about the integration of adjacent villages and connectivity with south Sittingbourne. It is suggested that more detail is required to understand the unique character of the place, how the landscape gaps will be used and the organisation of the community infrastructure and that a more specific commitment to Building for Life or BREEAM should be provided.

Heritage issues

- 5.21 The site promoter has provided a fair amount of technical detail and have been working closely with Historic England. The Council have reviewed this, alongside Historic England to ensure that the material is sound and also reflects their understanding of the position (which it does).
- 5.22 We understand that this information has influenced the amended masterplan area and some development parcels, between Rodmersham and Rodmersham Green have been removed and others moved to reflect the advice received.
- 5.23 The assessment notes that there are a number of heritage assets in the wider area but none are directly affected by the proposal. The key concern raised relates to the setting of listed buildings and conservation areas in proximity. The timber frame Ludgate House (AKA 2/71 as Ludgate Farmhouse) is specifically mentioned given part of its setting is open countryside. Also important is the potential treatment of listed buildings within Rodmersham although the assessment notes that the development proposal may facilitate an enhancement of these and improved 'revelment' of the listed buildings.
- 5.24 In general, the scheme promoters are actively aware of their potential heritage impacts. There is evidence that early work has taken professional advice and this has informed the most recent iteration of this proposal. While some care is needed, and more detailed evidence / mitigation / enhancement strategies are needed there is no suggestion that the scale of any potential impact should prevent the proposal coming forward.

NS3: Land at Bobbing, West of Sittingbourne

Boundary and landscape issues

- 5.25 The proposed site is relatively flat and, as noted in the detailed landscape assessment, largely constitutes 'degraded' agricultural land as a result of intensive farming.

Landscape sensitivity has been assessed by LUC in their report Landscape Sensitivity of Four Garden Settlements: Report prepared by LUC for Swale Borough Council 2019. This considered the broad Sittingbourne wide impact and also in detail specific to the site. The LUC conclusions about the site are that it does not contain any national or local landscape designations and overall is considered to be moderately sensitive. However, there may be some significant landscape and visual impacts, although these are likely to relate to local landscape features and views.

- 5.26 While the site is free of any landscape designation constraint the analysis notes that the land is bound by higher value landscapes including the higher ground to the west which forms part of the Swale Level. The analysis also suggests where, within the red line, development is more sensitive and so where greater care in master planning, or open space should be located. We would also note that high voltage

powerlines pass over the site that, while not natural features, form a noticeable feature in the landscape of this area.

- 5.27 The current proposed redline is some distance from the areas the detailed assessments suggest should be kept free of development – although we note that the ‘blue land’, land within the control of the promoter and could be possible long term expansion land, runs up to (but not within) this more sensitive landscape area.
- 5.28 The assessments conclude that development is broadly acceptable on landscape grounds – with the caveat that development needs to respond to the sensitive parts of the wider area. The site is some distance from the AONB and does not give rise the concerns in this regard.
- 5.29 The proposed site area potentially abuts the existing village of Bobbing – we say ‘potently’ because two options are offered which either incorporates or segregates the village with a ‘buffer’ around the existing village. This buffer would mean that no new development is located adjacent to existing properties. A 30-metre buffer has been mentioned as possible.
- 5.30 While the option of a buffer is helpful and positive, it does come with some downsides; it may disconnect the existing settlement from the new community, physical and social infrastructure. There is also a question of managing this buffer area. An alternative is to fully integrate the existing village into the community. We understand that, if this option is taken forward, the developers will work with the local community to secure a mutually acceptable option.
- 5.31 We also note that the proposal includes scope to develop the ‘infill’ parcels between the existing village and the A249 and these are shown within the ‘blue’ line area. But this is only a possible option. For our purposes we note that this provides the Council, and local communities, with a degree of flexibility over how the village is managed as part of any development proposal. As the land is within the control of the promoter it is possible that parcels could be developed, or not, as a detailed scheme is drawn up. This possibility avoids some of the site ‘edge’ issues other possible communities have.
- 5.32 The red line assessment notes that some of the possible development land, blue land, is south of the railway. The railway is a significant barrier to movement and permeability. This has been raised in the past and in response the promoters have removed land south the railway from the red line area. Although not a ‘showstopper’ the assessment raises reservations should the development area extend into some of the ‘blue line’ parcels. It is noted in the design assessment that these areas between the new development and Newtonington and also to Iwade are to be parkland gifted to the community, and this will need to be confirmed.
- 5.33 In summary the landscape evidence is broadly supportive of development in this area. The area is free of significant constraints and the red line area does not directly encroach on valuable landscape areas. But this does not mitigate the need to carefully, and respectfully plan any proposed development. The proposed ‘treatment’ of the existing village is unclear at the moment, but the promoters are demonstrating flexibility in how this sensitive edge is managed.

Design issues

- 5.34 The design assessment identifies the strengths of the scheme from a design perspective to include the commercial land located close to the A249 junction, the community infrastructure located around a new village green, gifting parkland to the community as a buffer between Newington and Iwade with other anti-coalescence buffers too, and incorporating a network of green infrastructure features, downgrading Sheppey Way and the provision of rapid transport to Newington Railway Station.
- 5.35 The weaknesses are the roundabout at the entrance, lack of coherence in the primary road network and use of loop roads as well as the network of secondary streets mean many parcels suffer from minimal or limited connectivity. It is suggested that this should be addressed in the development of the masterplan, that the unique character of the place should be developed and a more specific commitment to Building for Life or BREEAM be provided.

Heritage issues

- 5.36 The site promoters provided some evidence regarding their potential heritage assets. However, the Council officers consider this to be incomplete. They have identified that a number of assets are omitted. None of these are on the development site but could be impacted by the development in close proximity.
- 5.37 While it is unfortunate that these were omitted from the original material the professional officers view is that the potential impact on these assets is low, or 'less than substantial', as per NPPF paragraph 196. However, this opinion is caveated because the promoter's material was incomplete, and this cannot be confirmed until further work is undertaken.
- 5.38 The officer has provided advice on how this proposal ought to be taken forward and specifically with regards to Pheasants Farmhouse. There is scope for development to 'enhance' this asset.
- 5.39 For our assessment it is unfortunate that the promoter's evidence was incomplete. But it is proportionate to rely on the professional opinion of the officers and conclude that heritage is not, with the evidence in hand, a 'showstopping' issue. But, if this proposal is advanced, the site promoter would need to address this more comprehensively.

NS4: South East Faversham

Boundary and landscape issues

- 5.40 The site, as proposed, is not within any designated national or local landscape areas that would preclude development. The assessment notes that there are more sensitive landscape areas around the site but the impact on these more sensitive areas could be mitigated. As such there is no 'in principle' objection.
- 5.41 Landscape sensitivity has been assessed by LUC in their report Landscape Sensitivity of Four Garden Settlements: Report prepared by LUC for Swale Borough Council 2019. This considered the broad Faversham wide impact and also in detail specific to the site. 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. 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.

- 5.42 The site is in essence a further extension to Faversham. But has comparably few immediate neighbours; to date most development has been north of the A2. The proposed redline plan excludes the largely commercial ‘cluster’ at the top of Selling Road but as the outlook from this cluster into the site is mostly non-residential this makes this edge much less sensitive to new development. To the west of the site is an already allocated housing site and some land to the north of the site is also allocated for development in the adopted plan.
- 5.43 The site is visible from the AONB, so could be considered as within the AONB setting, but no fundamental concerns have been raised by the AONB Unit. We would note that this reflects the fact that the setting of the AONB does not preclude development and that a degree of pragmatism is needed when managing the setting. The AONB is visible from large parts of Swale and (this and other AONBs) from large parts of Kent.
- 5.44 The assessment notes that the railway could cause separation between the land east / west of the railway line. This has been raised as an issue in the past and we understand a flexible approach is being taken by the site promoters. One possible option to use this ‘triangle’ to accommodate employment / commercial uses. The design assessment expresses concern about any residential development here and supports the use of this part of the site for commercial / employment purposes.
- 5.45 We would note that the ‘template’ for this proposal is cited as Poundbury (West Dorset) where commercial and residential is mixed. But there are some lessons which can be learnt and, at least for some commercial uses, a degree of separation may be preferable. Even if the promoter chooses to integrate commercial within the main scheme there will always be types of commercial that will not mix and given the size of this residential proposal, we would hope some room can be found for all types of employment / commercial within the red line.
- 5.46 In summary the site is broadly acceptable on landscape grounds. Despite being adjacent to Faversham it raises few ‘edge’ issues. The railway line is a barrier to movement running through the east of the site, but the red line assessment, recommends commercial as the preferred use which best mitigates any possible issues. The design of this ‘gateway’ part of the site has been identified earlier in the report and will be an important issue to be addressed going forward.

Design issues

- 5.47 The design assessment identifies the strengths of the scheme from a design perspective to include naturally calming the A2 with new retail square and entrance to the site with legible networks of streets and clear hierarchy with human scale connected blocks. It proposes integration with Faversham and promotion of walking and cycling to the town centre and railway station and a network of green

infrastructure features. The draft 'Beauty in my back yard' (BIMBY) housing manual is a good starting point for architectural design.

- 5.48 The weaknesses are insufficient information about community infrastructure which is now being discussed at a topic group and concern about the use of land east of the railway line and its relationship with land north of the A2. It is suggested that Building for Life or BREEAM is considered at the next stage.

Heritage issues

- 5.49 The site promoters have provided initial heritage assessment evidence which the officers conclude is 'sound'. The assessment notes that despite the site being in close proximity to Faversham there are few heritage assets in the locality.
- 5.50 The advice is that there would be no direct impacts and the only concern would be on the setting of the listed buildings. There is scope to offer heritage related benefits by using some of the listed buildings to inform the masterplan, assist with placemaking and as an opportunity to influence distinctive design. This is particularly the case in relation to the oasts at Macknade Farm.

NS5: Land at Ashford Road, South of Faversham

Boundary and landscape issues

- 5.51 Unlike the other proposals this site falls within a designated high landscape value area. This designation needs to be seen in context; it is not a national designation as with the AONB and is not, in itself, a reason to preclude any development, although it is an important consideration here. This is particularly important given the scale of development proposed.
- 5.52 Landscape sensitivity has been assessed by LUC in their report Landscape Sensitivity of Four Garden Settlements: Report prepared by LUC for Swale Borough Council 2019. This considered the broad Faversham wide impact and also in detail specific to the site. The conclusions are that 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. It is likely that such a development would generate significant landscape impacts with relatively limited opportunities for mitigation.
- 5.53 The site is separated from Faversham which we note could be viewed as a positive or a negative. On the positive side development here would possibly reduce the need / pressure to continue to expand and better protect its smaller market town form and function, largely as envisaged in the Bearing Fruits Local Plan. But would be a new incursion into what is otherwise largely open countryside.
- 5.54 The red line assessment notes that the topography is not favourable to large scale development because the site is exposed to long views. In addition, the site is in very close proximity to the AONB and the scale of development is such that the AONB Unit are very concerned about the setting of the AONB. This has always been an issue with this site and in previous discussions the promoter has suggested that they

could mitigate harm to the AONB by screening and good design. But the AONB Unit have reservations about this approach; they are not as confident as the promoters that harm can be mitigated.

- 5.55 We note that arguably the negative comments, flowing from the red line assessment, landscape assessment and the AONB Unit, relate to the scale of development proposed. The scale of development and the amount of land included, makes a much more significant impact on the landscape than a smaller proposal. Consequently, a much-reduced development area may be more appropriate. However, no changes are proposed or recommended to the red line partly because the red line assessment sees benefits in including the full extent within the site area in order that the land can be managed to mitigate any possible impacts.
- 5.56 Although not discussed in the red line assessment there is a small existing community in the middle of the red line area. These parcels, excluded from the red line, would be at the core of a potential new community and as such proposals being looked at in other sites, for example large 'buffers', may not be suitable here. However, it is not yet clear how they are going to be dealt with. The promoters are aware of the Council's concerns in this regard.
- 5.57 In summary – of the four proposals assessed in the red line assessment this is by far the most problematic, because of its landscape impact. It is also the site the AONB Unit have expressed the strongest concerns over. The red line assessment recommends a very extensive 'buffer', within the red line area, to mitigate harm, but even then, this would not be a preferred option given that the (smaller) developable area is of higher landscape value than other options. It is unclear whether the full proposed development yield could be delivered on a smaller parcel and even if it could, it is still likely to attract significant landscape concerns.
- 5.58 Here we see the main 'sticking point' to be the fact that, at the moment, the AONB Unit are not confident that the scheme promoters can adequately mitigate the scale of development in this area. Unless this is addressed we would expect the AONB Unit to make strong 'in principle' objections to the allocation of this site which, for the Council, will be a significant risk should the site be taken forward. This would be of particular concern if it is relied on to meet future housing need in the Borough.

Design issues

- 5.59 The design assessment identifies the strengths of the scheme from a design perspective to include the location of the primary and secondary schools at either end of a new high street which provides community focus and footfall, a good network of green infrastructure features, the business park close to the M2 junction and other employment options promoted in different areas of the site as well as realigning A251 to remove heavy traffic from North Street village.
- 5.60 The weaknesses are an over reliance on roundabouts and winding primary roads, the lack of detail about road network and the relationship with the green infrastructure network. It is suggested that the unique character of place should be developed and a more specific commitment to Building for Life or BREEAM provided. The location

within and impact upon the area of high landscape value and AONB is a fundamental issue which will need to be addressed.

Heritage Issues

- 5.61 The site promoter identifies all the listed buildings but currently fails to explicitly reference the Whitehill and Painters Forstall Conservation Area which could have their settings affected. While the masterplan recognises the heritage assets it is suggested that the opportunity and constraints plan could be improved by comprehensively picking up all the assets.
- 5.62 The assessment concludes that despite the significant scale of the development, the professional officer view is that the potential impact on these assets is low, or 'less than substantial', as per NPPF paragraph 196. However, the setting of the assets are important and will need to be examined further. This is particularly the case with respect to 148 Ashford Road and Copton Manor farm store and oast.
- 5.63 There are opportunities for improvements from the road alignments due to the removal of heavy vehicles and reduced traffic from the A251 which would be a positive benefit to the listed buildings off North Street which could be weighed against any harm to their wider setting. In addition, there may be an opportunity to uncover and retain in situ as a feature the potential archaeological Romano British Villa which offers a good place making opportunity.

Conclusions

- 5.64 The red line boundary assessment at Appendix A have drawn together a number of evidence strands including both internal (Swale) and external (LUC) landscape advice. In this section we have also been able to interweave some more recent feedback from a meeting with the AONB Unit.
- 5.65 All four of the proposals will obviously have some form of landscape impact; all four need to carefully consider how they will integrate with the 'edge' or 'enveloped' existing communities.
- 5.66 The design assessments, also appended, provide an indication of the strengths and weaknesses of the emerging schemes and sets out useful guidance for taking the designs forward to achieve a high-quality development. While there is further work required to address the weaknesses identified in the schemes, develop the proposals and design codes, the schemes all broadly match the prospectus expectations, and align with the Town and Country Planning Association Garden Community Principles.
- 5.67 The heritage advice endorses the work that has already been done and provides guidance on further work, specifically relating to the additional heritage assets on NS3: Land at Bobbing, that has not yet been picked up. All the proposals are likely to have a less than substantial harm to heritage assets but will need to ensure that the settings are considered in the design and layout. There are opportunities for positive benefits particularly relating to NS5: Land South of Faversham in terms of improvements to the listed buildings at North Street.

- 5.68 For three of the proposals (NS1, NS3 and NS4) the collective expert opinion appears to be that the landscape issues are not so serious that the land does not represent a reasonable developable option. No 'showstopping' objections on landscape grounds are envisaged, subject to mitigation. This is despite the NS1 being adjacent to the AONB and possibly a small amount of AONB land being needed to deliver the new junction, which would need to be effectively managed and mitigated .
- 5.69 The exception to this is the risk of an objection in principle from the AONB with regards to NS5. The site promoters are confident that harm to the AONB can be managed / mitigated. But the AONB Unit are not convinced.
- 5.70 Our view is that represents a significant risk to the Council in taking forward this option. This risk can only be reduced if the AONB Unit can be persuaded not to formally object to a development proposal here. This may be through reducing the scheme in scale or more persuasive mitigation evidence – we would suggest that either actions are outside the scope of what we would expect the Borough to address.
- 5.71 At the moment, given the weight of AONB Units concerns, coupled with the local landscape designation of the land, we are not confident that, as scoped and presented to Swale, the proposal is ready to take forward through the local plan process. The AONB concerns would not appear to be capable of being mitigated while the number of dwellings remain fixed. Should the scale and shape of the proposal change it is not certain that the scheme would remain viable and other consultee comments remain valid.
- 5.72 The Council should facilitate positive discussions with the AONB Unit but ultimately, in this regard the AONB Unit is the 'gatekeeper'. We have taken a similar approach to other stands of evidence; most obviously transport where the 'gatekeeper' may not be the Council but Highways England – as the 'owner' of the strategic highways network.

6 UTILITIES INFRASTRUCTURE

Introduction

- 6.1 As part of this assessment we have asked site promoters some detailed questions about the potential utility requirements of their schemes.
- 6.2 The reason for this proactive request for data is that if utility constraints are not understood early enough, they can lead to unexpected delays and additional cost. It is important to liaise with the utility companies ahead of making any key decisions, to make them aware of the proposed sites, so that an initial assessment can be carried out to determine an estimation of the potential impact the new sites may have on the existing capacity of the utility networks.
- 6.3 It is important to understand that utilities are rarely 'showstopping' issues. Because a significant number of utility issues are the responsibility of the respective provider to address. Those providers have a statutory duty to service new development within their area. So it is not as simple as concluding that a waste water treatment plant is currently at full capacity and so no additional development can be accommodated. In this circumstance the legal duty is for the provider to develop solutions and in most cases technical solutions exist.
- 6.4 Where conflict tends to emerge between providers and developers it often relates to timing and a request for funds to speed up any remediation needed to facilitate development in a timely manner, or design remediation or network improvements in such a way that best suits the developer (over an alternative, but still technically feasible) option. So, despite the legal duty to provide utilities to a development site it is not uncommon for providers to object to development but in most cases these objections can ultimately be overcome.
- 6.5 That said it is still common sense to plan development in areas where utility infrastructure is available or where it can most easily be provided. This speeds up delivery and minimises risk. For the next Swale Local Plan, given it is likely that ~1,050 dpa will be required in a few years we need to prioritise those sites and areas with a shorter 'lead in time' than others. So, we still need to understand where constraints exist and how they may be overcome.

Method

- 6.6 Here all four site promoters have been encouraged to engage with the major utility providers as early as possible. PBA have asked to see evidence that this discussion is ongoing and have used this evidence to form a high-level view as to the risks associated with each of the four developments.
- 6.7 We have also undertaken loading calculations to estimate the electricity, gas, potable and foul water demands required to supply and serve the sites. This has enabled us to form a high-level view as to whether the costs being assumed to mitigate any constraints are reasonable in the context of the proposal.

- 6.8 Our work looks at both accessing and servicing the development sites but also at costs that may be incurred in diverting existing utility infrastructure around the development sites. If not spotted early enough this can incur abnormal costs to divert or reduce the development capacity of the site. For some infrastructure this is easy to see, for example NS3 needs to work around the high voltage powerlines but for others, for example NS4, underground networks are not so obvious and may need diversion or safety zones that could limit development capacity.
- 6.9 This process is not a substitute for the detailed work that will be needed for plan making or decision making. But is proportionate at this stage to mitigate the risk of unknown showstoppers emerging. For the developments concerned the main risk is that large cost items are identified too late in the process and developers, in order to maintain viability, look to cut other costs, such as affordable housing.
- 6.10 Before looking in detail it is useful to put a number of comments in context. Any assessment of this type often finds that there is no 'spare capacity' in the network(s). But this is not an unusual finding. Overprovision of infrastructure is wasteful, and all providers seek to align capacity with expected need – often aligned to the relevant development plan. So, it is normal that on first enquiry developers are told that there is no capacity.
- 6.11 In this area waste water capacity is already stressed – there is no capacity at various wastewater plants in the Swale area and some are already 'overcapacity'. These comments from the providers may appear decisive; they may appear to be flagging 'showstopping' issue. But in practice these are not showstopping because, as statutory providers it is the providers responsibility to overcome these constraints. Here the wastewater authority acknowledge it is their responsibility and there exist technical solutions to address these constraints. These solutions may take time and incur costs (which the provider would prefer the developer to pay, but ultimately understand they may have to pay) but they can be overcome.
- 6.12 We note there is concern about the water table. This has not been considered in this assessment because it is a whole local plan issue and should be addressed comprehensively for the whole of Swale and beyond, because it will effect all sites equally.
- 6.13 As an observation we note that comparably little information has been provided regarding the gas network. But we understand (from PBA utilities consultants) that this is likely to be because over the life of these proposals new housing is under pressure to 'decarbonise' and as part of this much less reliance is expected on the gas network than may otherwise be the case. Government policy is that new homes, post 2025, may not be heated by gas.
- 6.14 In the assessment that follows we provide a summary of the four schemes – highlighting work done, work outstanding and a headline review of risks. PBA has assessed the 'load required' to support these schemes to sense check the comments provided by the site promoters and to check whether the load is available from the current or proposed infrastructure. We don't go into technical detail about these loadings here.

NS1: South East Sittingbourne

Supplies

- 6.15 For electrical supply we understand the expected load can be drawn from the nearby 132kV Tower Network located around 4km from the site. The site promoters have been provided with an indicative cost of £9m to access this supply and provide a new major (33/11kV) substation on site.
- 6.16 Our opinion is that this estimate, and proposed solution, is credible and within costs we would consider reasonable. The cost of connecting this site is more expensive than other proposals but this largely reflects the scale of the NS1 proposal and so the higher 'per unit' cost of connecting the scheme into the network. The fact that there is a high voltage Tower Network nearby is advantage for a proposal of this size. Were this not available in the broad area costs would be much higher.
- 6.17 For water Southern Water's existing trunk mains onsite can provide sufficient potable water supplies and a more detailed feasibility study is currently being undertaken by Southern Water to ensure this remains the case.
- 6.18 For the foul water network, a new dedicated rising main is required from the development to Sittingbourne Waste Treatment works. For a scheme of this size this is not unexpected.
- 6.19 We are aware that the Waste Treatment works are at capacity and works are needed to accommodate further growth. But this constraint applies throughout the area and would need to be addressed as part of the company's statutory duty. So, it cannot be considered a showstopper here.

Diversions

- 6.20 The approximate locations of existing electricity, potable and foul water assets have been provided, however the existing gas assets are not included so far. The location of any affected gas apparatus will need to be clarified in case this poses a new constraint to the site.

NS3: Land at Bobbing, West of Sittingbourne

- 6.21 The site promoter has provided to us the relevant asset records and which confirm that there are several existing utilities within and in close proximity to the site. Most obviously electrical supply although the 400kV and 132kV cables and pylon cross various parts of the site. A high-pressure gas main also runs through the site.
- 6.22 The current proposal works around these cables but it recommended that National Grid are contacted regarding the sag and swing profiles associated with the 400kV overhead cables and that an enquiry is made to the Health and Safety Executive (HSE) to determine the consultation zones for the HP gas main. Neither set of assets could considered 'showstopping'.
- 6.23 Potable and wastewater comments are similar to NS1. Potable water supply is likely to be available; there is already a connection to local properties that may need re-enforcing. But this is a reasonably normal cost for a proposal of this scale.

- 6.24 Upgrades to wastewater treatment needed are needed to deliver the proposal. But this is an issue the providers are already aware of and expected to be addressed in due course. This constraint does not prevent development, it applies throughout Sittingbourne, but more work is needed to address the timing of this work.
- 6.25 We are not aware of a local foul water network being in place – and even it were we would not expect it to be sufficient to service the scale of this proposal. Further work is needed to connect the site to a major foul water network but given the proximity of urban Sittingbourne we would not expect this to be a significant concern at this stage.
- 6.26 New supplies and diversions budget estimates have not been received from the incumbent undertakers. Receipt of this information would confirm the associated cost estimates for the works and provide details of points of connection, available capacity, if any offsite reinforcement is required and diversion routes. But as noted above we are not aware of anything abnormal that the scheme would need to address in order to come forward. Major utility infrastructure is available onside or in close proximity.

NS4: South East Faversham

New Supplies

- 6.27 An outline power application has been submitted to the Electricity Provider for the area; UK Power Networks (UKPN). The details of site power requirements and programme of works will be shared when available. However, our initial assessment of the site power required is estimated at 6MVA which can be obtained from Faversham 33/11kV primary substation located north, or alternatively from Sittingbourne Grid 33/11kV located west of the site. We have estimated the cost of the works to be in the region of £1m based on the information UKPN has provided for a nearby site.
- 6.28 The move away from gas heated properties in favour of electricity heated supplies has been emphasised by the government recently, therefore the site could go fully electric. However, should the site adopt a gas heating strategy the cost to supply the site has been estimated at £1.7m based on SGNs requirements for a similar site in the local area.
- 6.29 The cost to supply the development with potable water has been estimated at £2.5m. This information has been taken from South East Water (SEW) budget estimate for a nearby site. SEW has given further indication that there are enough water resources for Swale to meet the current local plan housing applications.
- 6.30 The Sewage Treatment Works (STW) in Faversham is currently operating above its allowable discharge. However, there are solutions available to address the absence of capacity in the interim. The sewage discharge from the site can be temporarily pumped, for up to 2 years by the Water company, before the STW has been upgraded to sufficient capacity. We understand that this is an issue but can be managed. Further details of the upgrade costs, options and works duration are been discussed with SEW and Southern Water.
- 6.31 There is a railway line that runs through the site which could pose some issues to the connection of new utility supplies. It is recommended that to avoid, or minimise, the

number of railway crossings that the eastern parcel of the site be supplied separately from the middle and western parcels.

- 6.32 It is advised that new supplies budget estimates are submitted at the earliest convenience by the developer to gain a better understanding of the connection strategies and associated costs for site-wide utility provisions.

Diversions

- 6.33 As it is a greenfield site, we do not envisage great risks associated with the logistics of the potential diversion works required to facilitate the development. The northern area of the site can be developed out concurrently as the diversion works are undertaken to the southern section.
- 6.34 Compared to the other three proposals very limited information has been received here. PBA have needed to consider some of the technical information supporting the adjacent local plan housing allocation to provide some comment for this site. With the knowledge that the adjacent site has been connected it is reasonable to assume this site is also capable of connection. But the scale and complexity of doing so it unknown.
- 6.35 Electricity, gas, potable and foul water loadings have not been issued to us by WSP who have been liaising with the incumbent undertakers. This information is required so that we can check that the loads are of the expected magnitude.
- 6.36 An existing utilities drawing and/or asset records have not been received. Therefore, we cannot confirm if there are any affected utilities within the site boundary or in close proximity to the site.
- 6.37 New supplies and diversions budget estimates have not been received from the incumbent undertakers. Receipt of this information would confirm the associated cost estimates for the works and provide details of points of connection, available capacity, if any offsite reinforcement is required and diversion routes.

NS5: Land at Ashford Road, South of Faversham

- 6.38 An existing utilities layout has been provided within Gladman's South of Faversham Vision Document and shows electricity and gas assets within the site extents.
- 6.39 UKPN has provided a budget estimate of £3m to supply the site with electricity connecting to the existing Faversham primary substation located approximately 2.5km from the site with 4No. 11kV cables running from the point of connection to the site.
- 6.40 The new gas supplies for the site has been costed at £3.4m by SGN. At this stage SGN has estimated approximately 309m of 250mm PE of reinforcement is required to the existing medium pressure gas network. SEW has produced a budget estimate for the site which indicates a cost of £5.32m for the potable water supply.
- 6.41 The foul water requirements for the site has been priced at approximately £2.5m, however this only accounts for the residential properties and not the commercial. The preferred point of connection is the terminal Wastewater Pumping Station (WPS) at Faversham Wastewater Treatment Works (WwTW), Abbeyfields WPS, approximately

2.5km north of the site. An onsite WPS is proposed as it is assumed that a gravity connection is not feasible. A further study is required to determine the capacity details and possible upgrades to Faversham WwTW.

- 6.42 PBA's utility loading assessment has incorporated the assumptions set out in Savills (UK) Ltd. Initial Feasibility Report and Development Appraisal. We note that the electricity demand stated in the UKPN budget estimate is 18.6MVA and the PBA estimate has been calculated at 13.8MVA. The difference in these values can be investigated if we were provided with the same information that was submitted to UKPN for the budget estimate enquiry. But for this report we note that were the calculations the other way, i.e. we thought the scheme was progressing on an underestimate, we may be concerned because this would result in consequences for the infrastructure expected and available capacity.
- 6.43 The key constraints within and near the site are a 33kV overhead electricity cable route and a HP gas main. Suitable easements have been provided for the 33kV overhead route and the HSE have been contacted regarding the HP gas main and consultation zones have been incorporated into the masterplan.
- 6.44 For this assessment, the promoter has been working to agree connection costs with the providers, which have been used to assess the viability of the proposal. As with all the proposals we have assessed Water Treatment as a critical issue with it already working over capacity. But this is an area wide issue and one the providers are legally required to address. Here there is evidence of ongoing dialogue and proposed solutions to allow this site to come forward and connect the site to the treatment works. Although how the works are expanded to accommodate the additional flows is not a detailed matter for this, or any other proposal we are considering. There is no suggestion from the providers that the current network constraints cannot be overcome.

Summary

- 6.45 No 'showstopping' issues have yet to be identified and where investment is needed estimates have been provided and carried into the viability assessments we discuss later.
- 6.46 Part of the reason we don't have 'showstopping' issues is that many of the providers, and sites, can access pre-existing strategic infrastructure already in place to service the main towns or pass through Swale to service wider north Kent. Were the four proposals outside this network, for example were located on the Isle of Sheppey, then the strategic infrastructure would not be so easy to access.
- 6.47 Where there are major issues, most obviously related to water and waste water, these are not related only to the new community proposals. Any development in Swale will run against these same constraints. In this regard there is no suggestion from the providers that constraints cannot be overcome through investment. Much of this investment is within their statutory obligations.
- 6.48 For this assessment our overall conclusion is that utilities provision is not a constraint to development. It has been considered by all four proposals and capable of being addressed, subject to overall viability. However, it may impact on the timing of these

schemes should the providers not strengthen their network to accommodate future growth in line with the proposed new communities housing trajectories. Because these are strategic constraints, that will affect any major development in Swale we don't carry forward this concern when concluding on the new garden community proposals.

7 HIGHWAYS INFRASTRUCTURE

Introduction

- 7.1 Transport is a key issue for all these new garden community proposals. As part of this ongoing assessment process Kent County Council, as Highway Authority, have undertaken an analysis of the latest documents and current position. Their letter is attached at Appendix D.
- 7.2 In summary all proposals will need further work and no modelling has been made available for assessment due to the length of time modelling takes. However, in general and subject to further modelling it is likely that appropriate mitigation could be achieved. However, there are concerns about NS1 in relation to the costs and delivery of the junction and Highways England believe junction 5a cannot start before Junction 5 works have finished. There are concerns about the current scale of NS5, on the A251, for which mitigation may not be agreeable or financially viable and also concerns that NS3 will have significant implications on the local highway network which may not be capable of mitigation. The key issues and concerns are set out below for each of the emerging proposals.

NS1: South East Sittingbourne

- 7.3 The Highways Authority have assessed the updated proposal and while it is now for 8,000 dwellings it has also been considered on the basis of up to 11,250 dwellings and other uses, however, there are significant gaps and further detail of the level of uses is required. There is concern about the consequences of build out prior to infrastructure being in place and a need for an explanation on financing and phasing. This is backed up by Highways England who have confirmed that works to construct the new junction could not start until the works to junction 5 are complete, which is currently scheduled for Winter 2021.
- 7.4 Kent County Council recognise the potential for considerable traffic generation, but also welcome the opportunities for sustainable connectivity, such as the use of Highsted Road as a non-motorised use route and maximising public transport opportunities. However, there is also a considerable challenge given the size of the scheme. Further details are required about improving existing routes to and in Sittingbourne, as well as consideration of whether an express bus service which does not reach the town centre is the most appropriate approach.
- 7.5 The new Southern and Northern Relief Roads are very significant pieces of infrastructure and modelling evidence is required to understand the implications for traffic flows. It is recognised that these could be a 'game-changer', but it is necessary to clearly demonstrate the evidence for the level of development and corresponding infrastructure.
- 7.6 There is significant concern about the impact on the rural lanes surrounding the development and their use as cut throughs to reach Sittingbourne Town Centre. The model will need to demonstrate how this is to be prevented. The promoters are actively looking at ways to address this. However, Kent County Council's initial

impression is that as a completed development, through delivery of the SSRR and SNRR, there are likely to be significant transport benefits, both in journey times and removing congestion on the A249 corridor and through Sittingbourne Town Centre. However, there is also concern about the existing air quality and congestion around Sittingbourne and clear modelling evidence is required to demonstrate how development will be delivered with the corresponding necessary infrastructure. The modelling assessment and outputs are required and trip generation rates are to be agreed.

NS3: Land at Bobbing, West of Sittingbourne

- 7.7 The Highways Authority have assessed the updated proposal, and state that they have significant concerns about the impact. There is some disagreement about the number of dwellings that have been used to calculate trip movements. It is also unclear whether there is agreement to use the Swale model. It is however, presumed that these matters can be addressed.
- 7.8 The main issues are the fact that it does not have a direct relationship to an existing settlement and concern about the impact on the local highways network given the known issues about the capacity of the surrounding junctions. While mitigation proposals are already secured for improvements to address current local plan allocations, it is not clear what would be necessary to address capacity issues for this additional development. Indeed, it is possible that there is actually no scope for further enhancement. The County are concerned that the proposal would appear to impact the AQMA in Newington and it is unclear how it proposes to mitigate the impacts on the A249 corridor and routes into Sittingbourne town centre. Further clarification will be required about these concerns and any possible mitigation.
- 7.9 There are opportunities for walking and cycling within the development, but amenities of Sittingbourne are beyond recommended distances and would need improvement. It is recognised that bus infrastructure will be improved to Newington, although further detail will be required about its route.

NS4: South East Faversham

- 7.10 The Highways Authority have considered the Housing Manual and Transport Statement, but otherwise limited additional information has been provided and they request further information to understand the uses within the site.
- 7.11 The primary issue is the M2 J7 which currently operates above capacity. Greater detail is required to understand the impact and mitigation, and it is recognised that because the Duchy own the land there is the opportunity to address issues at J7, although this is not currently proposed as part of the scheme. While there is mention of the Preston Fields link, which has the potential to mitigate some impact on the A2/A251 junction, it has not yet been evaluated or agreed with the Private Finance developer.
- 7.12 There is great potential to deliver sustainable accessibility and connectivity and address walking and cycling, especially addressing the barrier of the A2.

- 7.13 There is likely to be increased traffic on the local road network and controls will be required to ensure Selling Road and Newhouse Road do not become attractive roads for commuters. There will likely be impacts on the Ospinge Air Quality Management Area (AQMA) which would require mitigation and improvements to M2 Junction 7 would be necessary. The feasibility of improvements would be a matter for Highways England however it is suggested that ownership of the adjoining lane increases the feasibility. Further modelling is required to test the impact on junctions, which are listed. In addition, trip generation rates also need to be agreed.

NS5: Land at Ashford Road, South of Faversham

- 7.14 The Highways Authority have significant concerns about the impact of this proposal and consider that it is too great in scale. They suggest a smaller new village approach in the north western side would be more appropriate.
- 7.15 The realignment of the A251 causes a number of potential issues, specifically how its role as a primary distributor route is retained and reconciled with its diversion through a new residential settlement. There are concerns about how two lanes of traffic are funnelled into one and specifically significant concern about the capacity performance of the northern section of the A251 around the M2 J6 interchange. Further modelling is required to test the alignment, and a micro simulation model to demonstrate the combined impact on junctions, which are listed.
- 7.16 There are potential significant impacts on the local road network, and specifically the relationship between the rural roads and AONB.
- 7.17 While the M2 is a significant barrier to walking, the internal walking opportunities are good. The routes via Salters Lane, Selling Road and Brogdale Road are not considered suitable for cycling and do not have pavements, therefore there is a barrier to cycling access to Faversham and its ability to access rail services. It is recognised that there is an opportunity to improve bus services and patronage.
- 7.18 An assessment of the junction proposals indicates there are issues still to be addressed, specifically:
- A2/A251: the use of third party land, operation at 90% capacity and need for non-motorised crossing facilities
 - M2 J6: the need to understand the impact of signalisation, operation at 98% capacity and need to address impact on M2, which is a matter of concern for Highways England
 - M2 J7: need to understand how minor physical amendments is leading to large levels of improvements
- 7.19 The impacts of junction 6 and junction 7 would need to be mitigated, the feasibility of this is a matter for Highways England. The development proposals would make significant changes to the A251. The current suggestion for the A251/A2 junction would require significant education land and does not appear to sufficiently mitigate this scale of development. Further work is required to understand and agree the surrounding junctions which are reaching or exceeding capacity and to agree trip generation rates. It will also need to address AQMA concerns in Ospinge.

Summary

- 7.20 This section only provides a brief overview of the complex transport issues associated with any large-scale development in Swale. It is important to remember that many of these issues, specifically in relation to the capacity issues and impact on the local road network, apply whether housing is delivered through new garden communities or smaller SHLAA sites, or a combination of both. It is likely to be more difficult to secure necessary strategic infrastructure and funding contributions from many small sites, than from large strategic sites which benefit from land value capture.
- 7.21 Of the four proposals we have examined all have major transport issues to address. In the east of the Borough Junction 7 is a large ‘unknown’ and unquantified potential showstopping issue; to the west Junction 5 and lack of capacity in the local network are of equal concern.
- 7.22 But it is the case that transport investment is one of those areas most effected a ‘chicken and egg’ dilemma. Highways England will not invest in their network unless they are required to do so and when determining where to invest the likely scale and need for investment necessary to accommodate planned growth clearly trumps investment in the network where major growth is not formally planned for.
- 7.23 It is also relevant that many of the comments about the capacity of the local road network in or around Sittingbourne would equally apply to ‘business as usual growth’. This means that should the current plan target be rolled forward and a new portfolio of ‘local’ sites be chosen to meet this need, these same concerns and comments would apply. In commenting on NS3 the County cites generic modelling that tested a similar number of homes in this general area. The impact on the local road network still needs to be assessed for all proposals through the borough wide modelling which will identify further impacts.
- 7.24 We would note that these generic (east of Sittingbourne) concerns arguably add weight to NS1 – which provides an alternative route to the M2 for some traffic flows avoiding the A249 and J5. We have not asked the County to comment on this possible scenario but it is one logical conclusion to the analysis we have so far: Sittingbourne’s future growth is largely dependent on ‘big ticket’ investment that delivers or facilitates a positive impact on local flows around the town and provides headroom capacity on the local network for additional growth of any form, scale or format.
- 7.25 The analysis also suggests, that in the absence of strategic investment in the network, the scale of these proposals offers a benefit over dispersed growth options. These large schemes have the potential to internalise the need to travel – so reducing their impact on the local network compared to other options. The site promoters have a long way to go to demonstrate how this will work in practice, but the principle of this benefit is agreed. It may therefore be that these large scale proposals are the ‘least worst’ option, compared with lots of small scale extensions, in a scenario where housing development is required by government policy but strategic infrastructure not committed.

8 VIABILITY TESTING

Introduction

- 8.1 Understandably both elected Members and the public are cautious that developers promise the delivery of 'benefits' but then, after allocation or outline permission, seek to water down their promises. This can be for understandable reasons; abnormal costs can be intended too late and/or the policy or legal expectations of development change over time. This is part of the reason we have, in this process, sought to identify critical issues early, so that the risk of unknowns later, is reduced.
- 8.2 This is a risk, that developers are unable to deliver their commitments, that Government has become increasingly aware of. In response they are attempting to mitigate this in both plan making and development management by increasing the weight given to early visibility testing of development proposals and development plans.
- 8.3 The revised NPPF (2019) includes new rules governing viability testing for both plan making and decision taking. Revisions to the online National Planning Practice Guidance concerning viability testing have also now been published.
- 8.4 The overriding objective of these changes is to allow decision makers (or plan makers) to fully understand the viability in proposed development schemes – before making decisions or making allocations.
- 8.5 Collectively these changes require those promoting sites to provide 'open' viability assessments, ideally using standardised assumptions, so that the Council can effectively assess the claims being made by promoters and/or modify policy expectations before committing to development.
- 8.6 This is very much a new change in national policy and the development industry is still playing 'catchup'. Many are still reluctant to provide fully transparent data and we understand that confidentiality clauses, between developers and landowners may have been signed prior to this shift in policy which hinders the flow of information in the short term.
- 8.7 Below we summarise the key changes to the planning system recently introduced by new policy. We address both plan making and also the decision-making process.

Plan making

- 8.8 The NPPF requires development viability to be taken into account by local authorities in the preparation of their development plans. This is reflected in the practice guidance, which emphasises that the "role for viability assessment is primarily at the plan making stage".
- 8.9 In particular viability assessments should be taken into account in strategic housing land availability assessments (to determine which sites are viable) and when setting the contributions expected from development towards provision of affordable housing and infrastructure including that needed for education, health, transport, flood and

water management, green and other infrastructure needed to deliver a sustainable development.

- 8.10 The NPPG expects this to be an iterative process informed by engagement with developers, landowners and infrastructure and affordable housing providers.
- 8.11 For most development the NPPG recognises that it would be unrealistic to require viability testing of every site or to obtain assurance that individual sites are viable at the plan making stage. Instead, it directs local authorities to adopt a "typology" approach where sites are grouped by shared characteristics and where average costs and values are used to make assumptions about how the viability of each type of site would be affected by all relevant policies. However, an exception is made for strategic sites which are critical to delivering the strategic priorities of the plan. Such sites should be subject to specific viability testing:
- “ *It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas*” - Paragraph: 005
Reference ID: 10-005-20180724
- 8.12 The scale of the new garden communities here would certainly fall into this, more detailed, viability testing scope. Although strictly outside the formal plan making process this exercise (the new garden community process) could be viewed as part of this iterative process envisaged in the guidance.

Decision taking

- 8.13 Both the NPPF and the NPPG make clear that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable so that no further viability testing should be required as part of the application. Hence why it is so important to test the viability of any new community thoroughly as part of the plan making, and pre-plan making stages. Once allocated, policy generally assumes the development is viable as allocated and the associated policy correctly specified, within the bounds of what is viable to deliver.

Standardised inputs

- 8.14 The guidance encourages all parties to adopt standardised inputs to viability assessment which are set out in the practice guidance. But in simple terms, a site will be viable if the value generated by a development is more than the cost of developing it.
- 8.15 A key factor for developers and promoters of land is that the **price paid for land is not a relevant justification for failing to accord with relevant policies in the plan**. This was previously a 'sticking point' in viability assessments. Instead, under new guidance, a "benchmark land value" should be established on the basis of the existing use value of the land plus a premium for the landowner. The premium should

be the minimum return at which it is considered a reasonable landowner would be willing to sell their land.

- 8.16 This is one of the most complex and challenging areas of the new guidance because while we may assume a benchmark value, we are aware that developers may have entered legal agreements with landowners that predate this shift in national policy. These agreements may not be flexible enough nor reflect his new 'benchmark' plus premium approach. This is a topic we will return to.

Publicly available

- 8.17 The practice guidance now stipulates that any viability assessment should be made publicly available except in exceptional circumstances. In all cases, an executive summary should be prepared and made public.
- 8.18 Here we are caught because legal agreements with landowners may predate this new guidance and we are not, at the moment, in full 'plan making' or 'decision making' mode. Owners are cautious about 'showing their hand' before they are absolutely required to do so.
- 8.19 At this stage, given we are not within the formal plan making process and so outside the scope of the NPPG, AV have prepared a redacted viability report which respects commercial confidentiality while still providing the Council with a transparent audit trail to evidence their (AVs) conclusions.
- 8.20 Should the Council choose to move one or more of the proposals into the formal process each developer has been made aware that the Council intends to apply the NPPG and the 'open book' approach. In our work so far we have not seen any evidence that 'exceptional circumstances' apply.

Summary of the approach taken

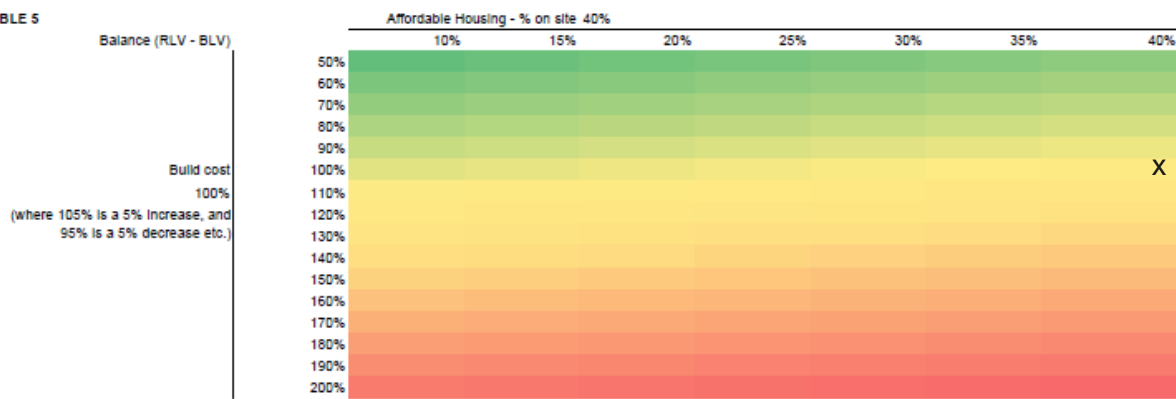
- 8.21 The Council has asked all four site promoters to provide a viability assessment of their proposed scheme. They have also been asked to share any 'land value' data, showing how much they agreed with the landowners to develop their site. This is a key part of the evidence because, as noted above, the price paid for the land is no longer a reason to discount other policy 'asks' and Councils are required to apply a 'benchmark' value when assessing viability. But pragmatically, if the promoters have overpaid for their sites this would be a hindrance to delivering the schemes.
- 8.22 Here we have received detailed evidence from one of the promoters, including their promotion agreement, an indication of land costs from two of the promoters and no comment from a fourth (due to legal restrictions over the price paid for their site). For this fourth site we have used the data we have to inform the 'benchmark value' for the land in order to test the viability. This assumption has been passed to the promoter to agree; they have confirmed that the values we have assumed reflects their assumptions.
- 8.23 As discussed in the utilities section of this assessment we are reasonably confident that there are no abnormal utility 'showstoppers' on any of the sites. Also that their assessment of utility costs are fair.

- 8.24 The main 'abnormal' costs relate to highways infrastructure. Most obviously Junction 5a. At the time of writing we understand the Highways England will not confirm these costs – partly because doing so is a considerable task and not one they can commit to outside the plan process ; but the promoter has appointed a firm of engineers, who work on behalf of Highways England, to confirm that the assumed costs are reasonable.
- 8.25 With regard to abnormal highways costs; while the viability assessment of NS1 includes the indicative cost for J5a (and the duel carriageway link road to the A2) no such provision has been made for possible improvements at Junction 7 which may require significant upgrading to deliver any development at Faversham. There is also a funding gap at J5 which is not covered in the NS3 assessments.
- 8.26 This means that care is needed comparing schemes – as a base case the two Faversham proposals make no allowance of any possible junction improvements at J7. NS3 also provides no 'strategic' funding for J5. So, for this assessment we have 'stress tested' two Faversham proposals, as sensitivity tests, to see whether they could make a contribution to offsite highways within the viability envelope of their proposals. In doing so the Council needs to be aware that there is no requirement at the moment for these sums to be required. We have also considered the need for additional funds from NS3 for strategic highway works when conclusion on the scheme.
- 8.27 Below we set out the stages of the viability assessments. These run through the 'baseline', a moderated version followed by additional sensitivity testing. In the assessments we provide a summary of the various assessments illustrated in a grid format. For reasons noted above we don't report the actual numbers and values we have used. But from the grid the reader can see how sensitive each scheme is to a variance from the core scenario being tested.
- 8.28 The detailed grids are presented appended to this report at Appendix E. These are set out for each proposal and set out the sensitivity analysis for different appraisal input assumptions.
- 8.29 AV have tested:
- Site specific s106 contributions
 - Infrastructure costs
 - Developers profit
 - Land value (BLV – or Benchmark Land Value)
 - Build costs
 - Sale values
 - Densities (dwellings per ha)
- 8.30 In each of the grids the second variable tested is the affordable housing 'yield'. For affordable housing we have, as a baseline, assumed 40% split 90% affordable rent and 10% intermediate. No 'social rent' is assumed.
- 8.31 So, for each scheme we can see that if the cost assumption increases, for example the build costs increase, then to retain the same viability the affordable 'yield' would

need to fall. But if the costs decrease viability improves and (in theory) the affordable yield could improve.

- 8.32 In the illustration below; the proposal is marginally viable (yellow in the grid) should the build costs be in line with expectations (100%) and 40% affordable homes are provided. But should build costs increase to 140% of what is assumed then the affordable yield needs to fall to 10% to maintain the same viability (i.e. the same shade of yellow in the grid).
- 8.33 Ideally a scheme would be in the green area, but in practice this is unlikely because the ‘policy asks’ in the New Garden Communities Prospectus; when balanced with the benchmark land values should not be showing strong green. If this were the case then either the land is being obtained below a reasonable cost and/or the developer could make a more significant contribution to infrastructure.

TABLE 5



- 8.34 As a summary value we look at the ‘headroom’ between the infrastructure costs and the final value of the scheme. Where there is greater headroom there is greater scope for any of the cost lines we have individually tested to increase, while maintaining viability of the proposal as a whole.
- 8.35 We consider a scheme to be fully viable where the ‘infrastructure cover ratio’ is positive – i.e. there is a surplus even after all other costs have been taken into account as well as a reasonable expectation of profit (20% on market housing, 6% on affordable).
- 8.36 A marginal scheme has a slight negative ‘infrastructure cover ratio’. Reasonably small adjustments to the assumptions (costs or values) would result in a viable scheme. This means delivery will be challenging – but with a reasonable expectation the scheme can be delivered broadly in line with what is promoted to the Council.
- 8.37 A scheme is not viable where the cover ratio is beyond the level we (or AV) consider could be addressed through changes to the proposal. Changes that still broadly reflect the scale and quality of development being promoted or tested. To make the proposal viable more radical changes would be needed which would undermine the nature of that being promoted.

Baseline assessment

- 8.38 The first step is to assess the 'baseline' for each scheme. This baseline assessment simply uses the data we (or AV) have been provided with from each of the schemes. This data has been used unquestioningly at this stage.
- 8.39 As noted above the 'grids' of each scheme are presented in Appendix E.
- 8.40 In summary, understandably given the data is provided to us by the promoters, three of the four proposals under this assessment are 'viable', even with 40% affordable.
- 8.41 Of the four schemes NS4 South East Faversham is very viable – measured using a ratio of their infrastructure costs to their development value, followed by NS3 Land at Bobbing, West of Sittingbourne, and then NS5 Land at Ashford Road, South of Faversham. NS1 South East Sittingbourne is not viable – but this is because we have assumed 40% affordable and the J5a costs.
- 8.42 While we note the findings of the baseline assessment, we don't dwell on this scenario partly because we don't consider that every developer cost and value we have been given is sound.
- 8.43 Most obviously each developer has made their own cost assumptions, some of which are much lower than we are comfortable with or are out of alignment with costs assumed by others. So, in the next round of assessments AV have prepared 'moderated' versions of the assessments.
- 8.44 In the moderated versions AV have equalised various costs, bring them into alignment with their professional option and also moderated other values – such as sales values.

Moderated assessments

- 8.45 When moderating the assessments AV made the following changes:
- Assumed equal sales values across all the proposals. In this context this is reasonable because we would expect the communities to form their own sales values. In practice this means that the Sittingbourne sites would achieve a higher sales value than the current Sittingbourne market.
 - Adjustments have been made to the S106 and infrastructure costs to reflect detailed work by Savills which was not fully reflected in the baseline assessment data passed to PBA/AV. (NS5)
 - Adjustments have been made to equalise the S106 contributions across all four sites at £14,000 per unit. In the developers own assessments some were allowing much less than this.
 - We have increased the strategic infrastructure needed at NS3 and NS4 above that originally suggested. In AVs experience of assessing schemes for Homes England developers allow around £35,000 per unit for strategic infrastructure. This is broadly in line with what is assumed at NS1 (ex 5a) and NS5 (with updated evidence from Savills). For NS3 & NS4, while increasing their strategic costs it is not appropriate to benchmark them at £35,000 per unit because both sites are similar to urban extensions and so we would expect lower strategic costs. We have assumed £20,000 per unit.

- 8.46 We have also removed the new junction costs from NS1. This has been done in this testing round so each of the four proposals are viewed on a level playing field. As noted below further sensitivity testing has been undertaken whereby this is included but the affordable yield reduced in line. We have also sensitivity tested, or more accurately, because we don't have costs and don't know whether they will be triggered, 'stress tested' the Faversham schemes should a J7 contribution be requested.
- 8.47 The results of the moderated assessments obviously result in a weaker answer; viability falls because, generally, we have increased the cost lines. NS5 moves from viable to marginal, although this is partly due to the developers own cost assumptions. NS3 & 4 remain viable, but less so because we have increased the strategic cost assumptions to bring them better into line with what we would expect for a Garden Community.
- 8.48 NS1 moves from unviable to marginal but this is mainly because J5a is excluded.

Further sensitivity testing

- 8.49 As noted above, a few further sensitivity tests are needed, partly to reflect the NS1 approach to affordable housing (where we expect the new junction, but not full affordable). And also, the risk that similar contributions for J7 would be expected from the Faversham schemes.
- 8.50 Regarding NS1 If we reduce the affordable requirement to 20% (but assume J5a is delivered) viability remains marginal; in effect the 20% reduction in affordable housing is largely offsetting the costs of the junction.
- 8.51 For the two Faversham sites we consider NS4 viable, even after increasing their strategic infrastructure costs. So, there is some scope that if this is not needed on site, and further work shows that costs are more in line with the developer's assessment, than a contribution to an 'abnormal' J7 cost is possible. It is also noteworthy that we have not considered a 'sale premium' on the sale costs, but nor have we assumed 'gold plated' infrastructure. The site promoter suggests that they will expect a sale premium on homes - because they are 'Poundbury' like. In our assessment this premium may be needed to cover higher than assumed infrastructure.

Summary and Conclusions

- 8.52 AVs 'moderated' view of viability is that two of the proposals are viable – NS3 and NS4.
- 8.53 Both result in a positive infrastructure cost ratio even where AV have chosen to revise some of the developers own assumptions. In both cases the (comparably) low strategic infrastructure requirements to deliver the proposals helps their viability case.
- 8.54 For both proposals this gives us reasonable confidence that there is sufficient viability to allow for some contingency going forwards and that they can reasonably afford to deliver a garden community, with social and physical infrastructure paid for by the development and associated land values. There is also headroom to pay more strategic infrastructure costs if required. If NS4 does benefit from a Poundbury

'advantage' and attract a premium on sale prices this is only likely to make the scheme more viable.

- 8.55 NS5 is more marginal but not outside the scope of what could become viable. In this regard we note that only small adjustments; for example, reducing the expected developers profit from 20% would allow this scheme to demonstrate that it is viable. It is obviously higher risk than NS3 and NS4 because it is more complex and costly to deliver. And that there is a risk associated with J7 and the fact no improvements are currently planned or funded. So, there is a risk that, if needed, this threatens the viability of this development. We also note KCCs concerns that more significant investment is needed to the local road network than has been assumed by the proposed developer, which again could undermine the viability of the proposal.
- 8.56 NS1 is largely as expected. The site cannot deliver its full policy 'ask' alongside the junction. But it would not be realistic to assume so and the scheme has never been promoted on these grounds. We consider that 20% affordable housing may be marginally viable. But we would note that this does not make any contribution towards the strong employment offer promoted here. It is fair to note that we don't assume any site cross-subsidises employment space. We only raise this as a possible concern with this site because the employment offer is much stronger and so the risk this is not delivered is more significant to our assessment.
- 8.57 We also note that the scale of the J5a costs means that the assessment is very sensitive to even a small percentage shift in these costs. While we do not have the confirmed costs that have been agreed with Highways England, which would be preferable, the indicative costs have been confirmed by a well-respected firm, who agree that the costs for a junction and dual carriageway that have been used by AV are appropriate. While we cannot be certain of the costs, they do provide some comfort that the figures are reasonable. It has been confirmed that this does not include any further highways works and costs for possible new running lanes or local relief road, which the promoters do not think is necessary. There is much still to clarify with Highways England and in particular it is necessary to agree the approach to Junction 5a, its design, costs and timings.

9 CONCLUSIONS

- 9.1 The approach taken by the Council has led to considerable positive engagement between the developers/promoters and the relevant stakeholders. It is emphasised that 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.
- 9.2 It is important to reiterate that the process has yielded four proposals where significant new transport and social infrastructure is paid for via land value capture. There is the opportunity 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 for a standard local plan allocation.
- 9.3 The ongoing assessment process has been used to identify and address scheme specific issues and inform the discussion with the promoters. Consequently, many of the issues, opportunities and risks raised have been addressed and in all 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. We previously identified the need to address issues such as the commitment to garden community principles, the delivery claims, the need to provide more detail and realism on lead in times and overall timescales, the need to respond to the LUC findings, specifically address the issues raised by the AONB unit, and the need to address stewardship issues and engagement.
- 9.4 The Council have undertaken additional work to assess the red line boundaries, considered landscape issues as well as design and heritage assessment. This has concluded that while all the proposals will have some form of landscape impact, for three of the proposal these can be addressed and mitigated. However, there is the significant risk of an objection in principle from the AONB unit on NS5. In terms of design all the proposals have strengths and weaknesses which can be addressed and for heritage there is only 'less than substantial harm', which can be dealt with and opportunities for positive benefits, particularly at NS5.
- 9.5 The Highways Authority have analysed the current information and provided an up to date statement identifying the key issues and areas of concern. There is considerably more work to be done, especially to understand the impact on the local highway network using the Swale wide model. The most significant risk for NS1 relates to the timing, delivery and cost of Junction 5A, for NS3 there is concern about whether any mitigation and improvement is possible, for NS4 and NS5 the lack of capacity of Junction 7 has not been properly addressed and in addition there is concern about the current scale of NS5.
- 9.6 We have undertaken an assessment of the utilities information provided and done a separate calculation of the loadings to identify what is likely to be required and check that this level of provision is being adequately provided for. There are no significant abnormal issues that have been identified that cannot be overcome. Although there is a capacity issue with Water Treatment works in the area, which applies equally to all proposals and has to be addressed as part of the water companies statutory duty.

Any upgrade works will have timing implications. Limited information is available for assessment of NS4, and it is suggested that the eastern parcel of the site beyond the railway be supplied separately from the middle and western parcels.

- 9.7 Viability was the most significant gap previously. This has now been independently tested by Aspinall Verdi. While we recognise that some information is commercially sensitive, it is important that the summary of the 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.
- 9.8 The assessment demonstrates that in the 'moderated' view of viability which sensitivity tests the schemes, two of the proposals are viable; NS3 and NS4, this is primarily due to the comparatively low strategic infrastructure requirements, and means that there is sufficient headroom moving forward to ensure they can reasonably afford to deliver a new garden community, even if additional infrastructure is required. NS5 is more marginal and consequently at risk of a requirement to fund improvements at J7, which would threaten its viability. NS1 is marginally viable delivering 20% affordable, which is not policy compliant, and it is also highly sensitive to changes in the cost of funding J5a, which means it is at risk of becoming unviable if these costs change.
- 9.9 Considerable work is being undertaken by the Council 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 on the Local Plan, through Issues and Options consultation, 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.
- 9.10 Finally; it is partly because of this process that the site promoters have been able to 'de-risk' their proposals and remove issues that may otherwise be showstopping issues. For example, decreasing the scale of NS1 and working to revise the indicative layout to address otherwise critical landscape and design concerns.

Summary

- 9.11 We previously concluded that no scheme was a non-starter and assessed the risks associated with each of the proposals. This remains the position, but there has been additional information which illustrates that the risks have largely been reduced – although we note that concerns about NS5 appear to have strengthened because of the continuing AONB and landscape impacts.
- 9.12 Considerable further work has been undertaken to continue to investigate and resolve the transport, environmental and viability issues, which continue to be a critical factor in the sites coming forward. However, concerns do still remain.
- 9.13 The assessment matrix used in the last assessment has been updated to identify the progress that has been made and what the risk is relating to each element. The key issues and risks are discussed for each site below:

NS1: South East Sittingbourne

9.14 This proposal has been changed considerably, both in terms of quantity of dwellings and the layout, which now seeks to avoid the sensitive landscapes. Although AONB issues remain in relation to the junction these should be possible of mitigation. The scheme has been improved by now including the land to the north of the A2 for development of an additional 1,250 homes so that the Northern Relief Road (NRR) can be delivered. However, it remains the highest risk due to the timing, delivery and cost of the new junction 5A which all have implications on the viability and mean it can only deliver 20% affordable housing. However, it does offer the area a real a 'significant transport benefit' in terms of transport connectivity for the wider area, which is recognised by the Highways Authority. While this is a higher risk proposal, it also offers high rewards which would deliver transport and accessibility benefits well beyond the local area. The following issues remain and need to be addressed:

- The junction its cost, delivery, financing and timing implications, specifically the extent to which the new junction can come forward before the works to J5 are completed
- Impact on housing delivery and phasing
- The type of affordable housing and tenure mix
- Development of the NRR and associated housing development options
- Landscape mitigation around the junctions and appropriateness of uses adjacent to the AONB
- Design implications and understanding character and how landscape gaps will be used
- Continued development of masterplan and design to clarify relationships with nearby communities

NS3: Land at Bobbing, West of Sittingbourne

9.15 This site is reasonably low risk and is very viable, its landscape impact can be mitigated, and it has the potential to come forward quickly. There are still outstanding concerns about the local highway network. In this regard we note Kent County Council's concerns about the local network; its inability to be upgraded to mitigate impacts and the need for J5 funding to be in place. But we are cautious because these same concerns apply to a very large part of the Borough and if taken literally would mean no development to the East of Sittingbourne – which coupled with constraints North, West and South would prevent almost all development in Sittingbourne. In this context a large, possibly self-contained proposal is probably preferable to an alternative scenario of several small sites. It is also necessary to address the issue of Bobbing and how the village is dealt with which has not yet been the subject of discussion with the local community.

9.16 The following issues remain and need to be addressed:

- Highways modelling, trip generation and capacity of the local highway network and whether it is possible to mitigate impacts through further enhancements
- Details about fast bus route link and its operation

- Relationship and engagement with Bobbing Village and how this is addressed
- Clarification about future use of blue and infill land, specifically the sites around Bobbing towards Sittingbourne and Iwade, as well as treatment of land south of the railway and exactly what will be gifted as parkland
- Comprehensive identification and assessment of all heritage assets and opportunities for enhancement
- More detail on affordable housing as well as size, type and tenure mix
- More detail on sustainability credentials and how these will be incorporated into the garden community
- Design, landscaping, and net biodiversity gain

NS4: South East Favisham

9.17 Of the four schemes promoted this is still clearly the lowest 'risk'. It is essentially an extension to Faversham and is more developed than the other three schemes, with fewer significant barriers to delivery within a short timetable. It has also been shown to be viable. There has been a commitment to accelerate the delivery rate which means the pace of delivery is more in line with the Council's objectives. However, there remains uncertainty about the Junction 7 issues and timing implications. The following issues remain and will need to be dealt with:

- Highways modelling, trip generation and capacity of junction 7
- The design and uses on the 'gateway' site
- Feasibility and cost of providing utilities on land over the railway
- More detail on uses and community infrastructure and number of schools etc
- Continued relationship with other adjacent development sites

NS5: Land at Ashford Road, South of Sittingbourne

9.18 There is an increased risk with this proposal which is the most problematic because there are landscape and AONB issues are not likely to be easily resolved. In addition, there are significant concerns about the scale of the proposal and its impact on the highways infrastructure and potential uncertainty about Junction 7 issues and timing implications. In its current scale and form the site should not be taken forward to the next stage unless these substantial concerns are overcome. The following issues remain and will need to be dealt with:

- Landscape and AONB issues, how these will be addressed, whether they can be realistically mitigated and resolved
- Whether there is any intention to adjust the proposal to address these issues and reduce the scale and reflect landscape concerns
- Highway modelling, trip generation, capacity of junction 7 and local road network implications as well as accessibility to Faversham
- Site boundary, treatment of enveloped villages, their relationship and Consultation and engagement
- setting of heritage assets, improvements to listed buildings along North Street and especially the potential archaeological features

Risk Matrix

- 9.19 The table that follows provides a simple headline view of where we understand the four schemes are. It is difficult to summarise what are complex issues; every constraint has a possible remedy and it is difficult to avoid a caveat to every statement. But overall the table shows those areas where we consider any possible risk has been adequately mitigated and addressed in the work done to date (dark green). Where risks exist but are unlikely to develop into a showstopping issue (light green) and those areas that could develop into showstopping issues (orange). Some cells are left neutral – because we don't have the evidence to assess (local highway modelling is not yet available) or they have little effect or impact.

Comparative risk matrix

	NS1 – South East Sittingbourne	NS2 – Land at Bobbing	NS4 – South East Faversham	NS5 – Land at Ashford Road
Q1: Scheme				
Mix and tenure of homes				
Site optimisation and boundary changes				
Other land uses				
Trajectory				
Q2: Abnormals				
Costs and viability				
Q3: Joint working				
Action plan				
Q4: Delivery vehicle				
Examples and model				
Stewardship				
Q5: Advice				
Further work				
Q6/7: Environmental Opportunities & constraints				

Net gains				
Constraints/mitigation				
AONB issues				
Heritage				
Q8: Design principles				
Landscape context				
Engagement				
Q9: Infrastructure				
Package & timing				
Utilities				
Q10: Transport				
Modelling and local mitigation				
Swale wide benefits/disbenefits				
Q11: Open Space				
Relationship, delivery and maintenance				
Q12: Sustainability				
Green proposals				

Low risk: **Dark green** Medium risk: **Light green** High risk: **Orange**

10 RECOMMENDATIONS

- 10.1 If the option of new garden communities is going to be supported and consulted upon, further work will be required as part of the Local Plan Issues and Options evidence. While many of our previous recommendation have been acted upon, there are still some, together with new ones which we recommend should be addressed:
- Work is progressed and discussions continue with the promoters to further clarify and remove the potential risks identified in this assessment.
 - Continued liaison with stakeholders and technical consultees, particularly relating to highway issues, Historic England, who have not yet been consulted, together with Archaeology.
 - Continuing masterplanning support to address the issues raised and facilitate the most appropriate layout in relation to the unique features of each site, 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.
 - Establishing a utility working group to address cumulative issues and timing.
 - Dedicated engagement support should be established to achieve sustained community involvement around the concepts and through to their development as possible allocations.

Can one or more sites be considered in the next version of the Plan?

- 10.2 The Council is starting to make decisions about how to take forward its new Local Plan and how best to meet the housing need that it is required to deliver. This report assessed the potential for new garden communities to effectively meet the needs of Swale for housing, as well as delivering a well planned, sustainable, high quality, well landscaped development that meets its social and economic needs and provides all the necessary infrastructure, including strategic infrastructure.
- 10.3 Below we outline whether we think, in near future, the four options could be taken forward as reasonable scenarios. The recommendations that follow should not be taken as an endorsement for allocation in the plan. That is a decision outside our control. Only whether they are reasonable options for Members and the public to consider. The objective of this work has always been to develop options for the Council consider because when this process started these proposals did not exist, or would have been promoted to Council without a land value capture model, with less affordable housing, and fewer benefits to Swale than the options 'on the table' today.
- 10.4 In forming these recommendations we are acutely aware that Swale as a Borough may have grounds not to meet housing need in full in the next plan. Highways are

the key concern with the possibility that the local network has reached saturation and/or no strategic investment is made in the M2 and its junctions. We don't underplay the fact that air quality is also a risk to the plan going forwards. But for this process we recognise that rejecting proposal on these grounds is possibly not sound because any alternative strategy would run against exactly the same concerns. Any and all new housing proposals, whether as small extensions, or large new communities, in Swale will run against these same constraints. As noted in the analysis above, given the local network constraints large proposals such as these may be preferable over small sites because these offer the opportunity to internalise trips and also provide more substantial off-site investment. For example, it is unlikely a new public transport link to Newington (as per NS3) would be achievable from a collection of smaller sites in the same broad area.

- 10.5 We would also note that for highways especially there is a 'chicken and egg' issue. Highways England (and others) are unlikely to view Swale as a priority for investment unless they can see measurable benefits of doing so – the economic reality is that net additional dwellings facilitated by investment is a key measurable used by any major stakeholder. Councils with active proposals for development in emerging plans are able to access funding not available to those who do not.

NS4: South East Faversham

- 10.6 From this assessment we see no 'showstopping' reason why NS4 cannot be considered as an option in the emerging development plan. Subject to all the issues highlighted in paragraph 9.17 being addressed.
- 10.7 But it is the slowest of all the sites to deliver new homes and there is an urgent need to address J7. The evidence suggests that in the life of the next plan, and while this site is delivering new homes, engineering improvements will be required, and funding obtained. In this regard the scheme has been assessed as being viable and it is possible the site could provide a contribution to any works later identified as needed. Especially if the site secures a 'sale premium', over and above normal market conditions.
- 10.8 In our mind J7 concerns do not warrant rejecting the site – because the same concerns would affect any alternative proposal in this broad area – including an alternative distribution of smaller sites. As a viable option, and one which could reduce the need to travel by internalising trips, it would appear to be a preferable option when compared with alternative (non-new community) options.

NS3: Land at Bobbing, West of Sittingbourne

- 10.9 For similar reasons we consider that NS3 could be considered an option, again subject to addressing the issues in paragraph 9.16. There is a risk of a 'showstopping' highways issue here – associated with the local network, A249 and the not fully funded J5 improvements. But in reaching our recommendation we do not downplay this risk but note that if these cannot be remediated these same concerns transcribe to a more dispersed option that collectively raise the same concerns. A collection of smaller sites, not using a 'land value capture model' may have more difficulty in contributing to any major offsite works subsequently required. And also,

because smaller sites cannot internalise trips, have a greater impact on the network than this proposal.

- 10.10 Strongly weighting in favour of both proposals is the lack of objections or concerns from other stakeholders we have consulted. Most obviously landscape and AONB. However, this will need to be balanced against the impact on the village of Bobbing and its local community.

NS1: South East of Sittingbourne

- 10.11 Since our last report the scheme has evolved to reflect issues raised (e.g. landscape) and the likely cost of J5a provided. The landscape impact has reduced and while it is not policy compliant in terms of providing only 20% affordable housing, it is in the realms of being viable to deliver. It however remains the riskiest because of the uncertainty around the junction timing, funding and delivery. Should the J5a costs increase, there is limited viability in the proposals to absorb these.
- 10.12 However, while it is the riskiest, if taken forward it provides the opportunity for a 'net gain' across Swale. The proposed transport improvements and benefits are of Borough wide significance and 'unlock' Sittingbourne from its current reliance on J5, which is recognised by the County Council. While this needs to be balanced against the concerns about the impact on the rural roads and rat running, further information is required from the modelling to get a better understanding of these impacts, but this is the case for all the schemes. In addition because this is the biggest scheme it will change the character of a significant area and inevitably have a significant impact on the communities concerned, this is also the case to a lesser extent for NS3 on Bobbing village, and also NS5 and the communities that are going to be enveloped there.
- 10.13 The assessment of this site, and also NS3 raises the critical issue of how the local transport issues highlighted by the County Council could be addressed to either accommodate new growth or improve the network for the benefit of the existing Sittingbourne community.

NS5: Land at Ashford Road, South of Faversham

- 10.14 NS5 has become the most challenging of the four options because of the highways concerns about the scale of the proposal and particularly its location within the most sensitive landscape. There will also be a significant impact on the character of the area and the communities that are to be enveloped. There is a significant risk that this is likely to attract an 'in principle' objection from the AONB Unit relating the scale of the proposal and its impact on the setting of the AONB.
- 10.15 This has always been raised as a concern but one the site promoters considered could be overcome by mitigation. The AONB Unit remain unconvinced. With the prospect of a 'in principle' objection we think this is too risky, as currently scoped, for it to be taken forward as a reasonable option with the Councils backing. This is particularly the case because there are other less risky sites, within less sensitive landscapes, which could be progressed.
- 10.16 To address the transport and landscape concerns could result in a very different scale of proposal. This is unlike the other three sites where we think, if taken forward, it is

likely that a proposal similar to that proposed today could be taken forward, ie with the scale of homes promoted, the general layout and package of infrastructure.

- 10.17 This does not mean that any development here cannot be supported by the Council in the next plan; but as currently configured the risks associated with this current proposal and the potential for an 'in principle objection' are such that it would not be robust to offer for consultation in the next local plan this size of development here.

APPENDICES

Swale Borough Council



New Garden Communities Assessment of Stage 2 submissions

Peter Brett Associates

October 2019

APPENDICES

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APPENDICES

Appendix A: Red Line Assessments

Appendix B: Design Assessments

Appendix C: Heritage Assessments

Appendix D: Highways Authority Analysis Letters from Kent County Council

Appendix E: Viability Grids

APPENDIX A RED LINE BOUNDARY ASSESSMENT

Red line assessment

Highsted – Quinn

The site to the east and south of Sittingbourne stretches, in the north, from the London to Margate/Dover railway line, crossing the A2, skirts Bapchild and Highsted, encompassing the Kent Science Park and bound by the M2 in the south taking in a small area beyond the M2. The site abuts the south-east of Sittingbourne in the centre and the west of Teynham in the north. The site also encompasses a number of lanes which pass through the site (Figures 1 and 2).

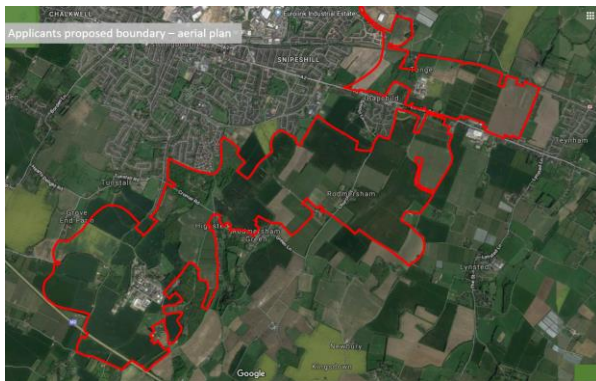


Figure 1 Proposed Boundary on Aerial

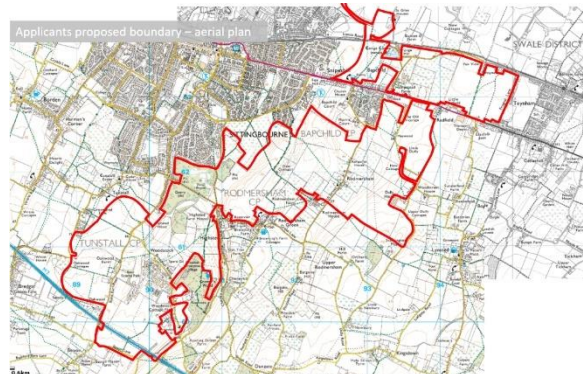


Figure 2 Proposed Boundary on Ordnance Survey Map

As the site covers a large area and extends over a long distance the topography is very varied starting at over 80m AOD in the south dropping to 5m AOD in the north. A locally significant dry valley with steep side slopes passes through the centre of the site. To the south is a high flat plateau and represents the northern fringe of the down's dip slope. Much of the centre and northern parts of the site are in slope with a rolling topography. The very northern area between the railway line and the A2 is relatively flat. The site is visible from the M2, the A2, the railway line and the local lanes. Cromer's Wood lines the steep slopes of the dry valley. Two disused quarries are located in the west of the site (Figure 3).

An area in the far south of the site is within the 'Kent Downs Area of Outstanding Natural Beauty' (KD-AONB). In addition, an extensive part of the site falls within the designation 'High Landscape Value – Kent Level' (HLV-KL) which follows the dry valley described in the topography section (Figure 4).

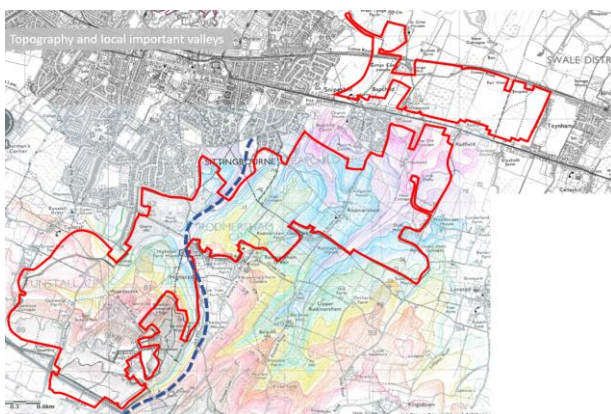


Figure 3 Topography

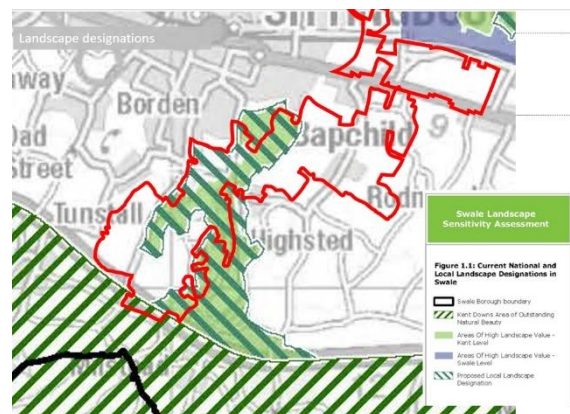


Figure 4 Landscape Designations

Landscape sensitivity has been assessed by consultants LUC both in broad terms Sittingbourne wide and in detail specific to the site*. Overall sensitivity of the site to residential development spans three designations – ‘Moderate’ in the north and south, ‘High’ in the centre following the alignment of the dry valley and ‘Moderate/High’ in the two areas in between (Figure 5). This assists with dictating where built development versus green space may be positioned.

The site falls within a number of Landscape Characters; the Lynsted Enclosed Farmlands (26), Rodmersham and Milstead Dry Valley (40) and Rodmersham Mixed Farmlands (29). The Lynsted Enclosed Farmlands feature enclosed views created by hedgerows and tree belts and traditional character created by fine historic buildings. The area may be able to absorb carefully located development. The aim for the Rodmersham and Milstead Dry Valley is to conserve the dry valley and it’s typical features following the AONB Management Plan. Steep slopes and woodland mean that development would be challenging. The evaluation of the Rodmersham Mixed Farmland identifies that the site could accommodate a degree of development subject to minimisation of local landscape and visual impacts and opportunities for enhancement.

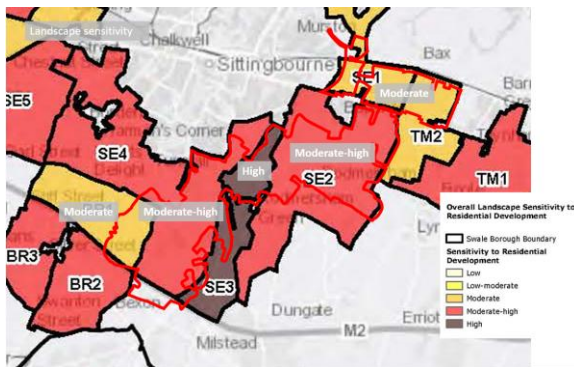


Figure 5 Landscape Sensitivity

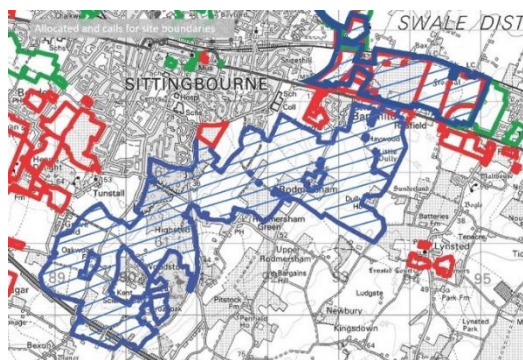


Figure 6 Boundaries of Allocated Sites and Call for Sites

Current developments located in the region include further expansion of Sittingbourne along the A2. The call for sites in 2018 include small possible future development sites to the west of the site (Figure 6).

Red line narrative

Notwithstanding transport infrastructure opportunities or constraints, neither topography, national or local landscape designations nor sensitivity to residential development preclude some development from appropriate parts of the site with appropriate mitigation. However, such sensitivities do preclude development in specific areas namely the High Landscape Value – Kent Level with the dry valley and the steep slopes associated with the valley. Direct impacts on the AONB to deliver the junction would also require mitigation.

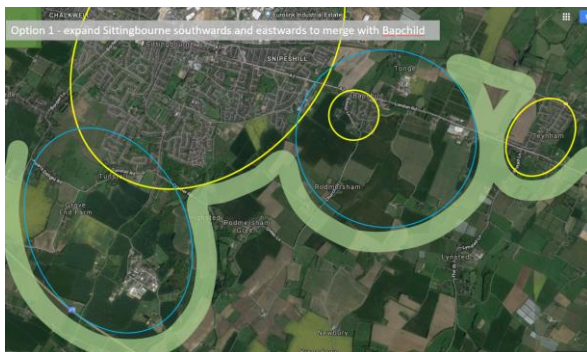


Figure 7 Expand Sittingbourne and Babchild

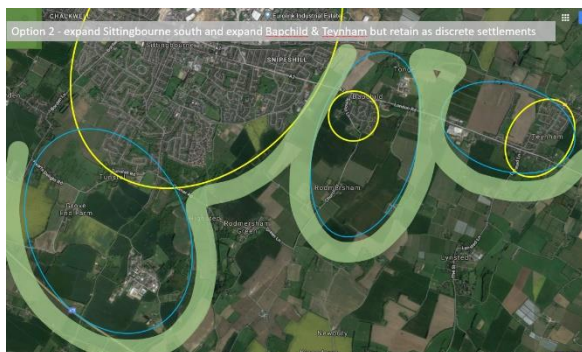


Figure 8 Expand and merge Bobbing and Hoyt Green

It may be considered desirable to retain existing villages as discrete features with clear green spaces or green 'gaps' between each settlement. Two approaches can be considered: option 1, expand Sittingbourne southwards merging the Kent Science Park with the town and eastwards merging Bapchild with the town, retaining Teynham as a discrete settlement (Figure 7), or option 2, expand Sittingbourne south but retain Bapchild and Teynham as discrete expanded settlements in their own right (Figure 8).

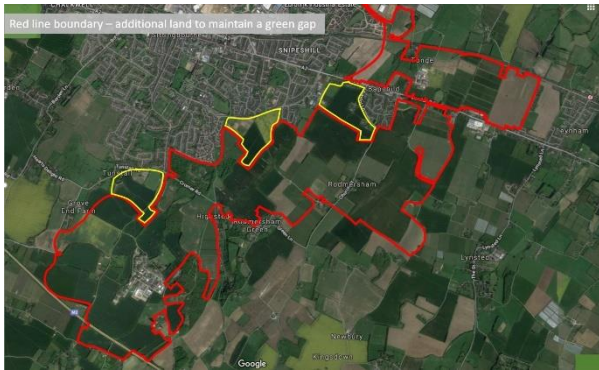


Figure 9 Red Line Boundary – additional land to maintain green gaps

With regards the red line boundary both options could utilise the submitted boundaries. However, there are small areas not within the red line which are intended as 'green gaps' providing separation from Sittingbourne but which are likely to come under development pressure. Therefore, areas identified in yellow would be better included within the red line and developed as green infrastructure. Otherwise, without any prejudice to any council decision, due to the need to preserve the dry valley and steep slopes it is considered that the red line is to remain so as to create the green space as well as create a green buffer to Bapchild and Teynham as required (Figure 9).

*

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Landscape Sensitivity of Four Garden Settlements: Report prepared by LUC for Swale Borough Council. 2019

Swale Local Landscape Designations; Review and Recommendations Draft Report prepared by LUC for Swale Borough Council, August 2018

Red line assessment

Bobbing – Appin Land

The site is presented with a red line and a blue line the latter of which is identified for future expansion but also forms part of this assessment.

The site west of Sittingbourne is bound by the A2 in the south-west and Sheppey Way, the old route to the Isle of Sheppey, along which lies the village of Bobbing bounds the south-east. The A249 runs roughly parallel with Sheppey Way and forms a junction with the A 249 and B2006 leading to Sittingbourne. The main London to Margate/Dover railway line runs through the site in the south. The large village of Newington lies to the south-west. The expanding village of Iwade lies to the north-east. Villages Keycol, Key Street and Howt Green are also adjacent to the site (Figures 1 and 2).

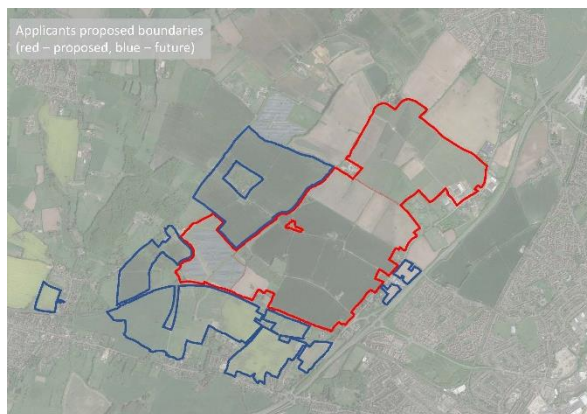


Figure 1 Proposed Boundary on Aerial

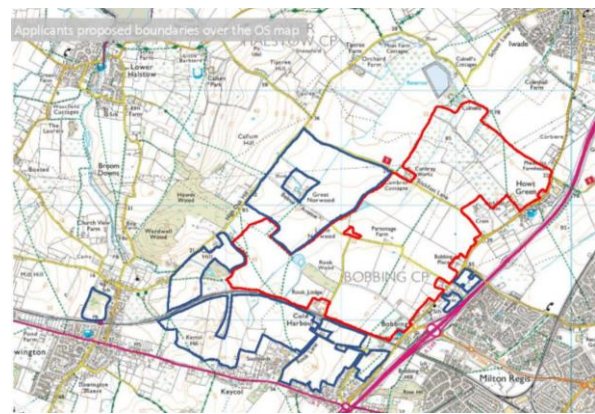


Figure 2 Proposed Boundary on Ordnance Survey Map

The site is bound by visually prominent hills known as the Iwade Ridge including Bobbing Hill, Keycol Hill, Oak Hill, Callum Hill and Tiptree Hill in the south-west and west but the itself site is relatively flat gently rising from the north-east towards the south-west descending from 60m AOD in the south to 20m AOD in the north. Wardell Wood and Hawes Wood, both ancient woodland, partially cover the southern hills. The site is visible from Sheppey Way and from within the site there are distant views towards Sheppey Crossing (Figure 3).

The site itself is not within any national or local landscape designations. However directly west of the site is an area of 'High Landscape Value – Swale Level' (HLV-SL) encompassing the hills and an area of 'High Landscape Value – Kent Level' (HLV-KL) encompassing the marshes beyond the hills (Figure 4).

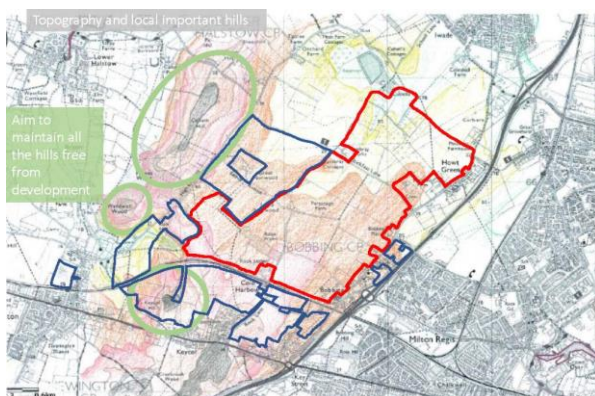


Figure 3 Topography

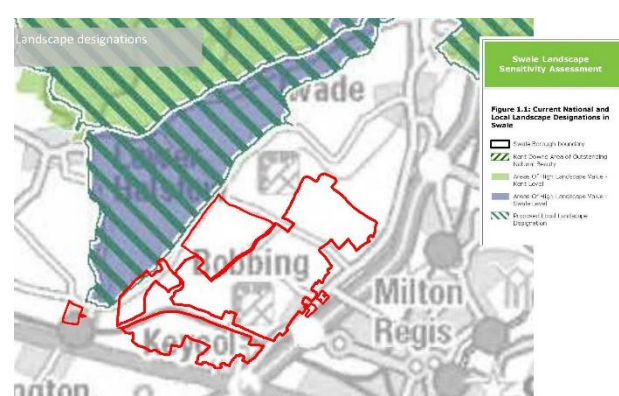


Figure 4 Landscape Designations

Landscape sensitivity has been assessed by consultants LUC both in broad terms Sittingbourne wide and in detail specific to the site*. Overall sensitivity of the site to residential development spans three designations – ‘Low/Moderate’ in the north, ‘Moderate’ in the central area and ‘Moderate/High’ in the the south-west (Figure 5). This assists with deciding where built development versus green space may be positioned.

The site falls within the Iwade Arable Farmlands (no. 24) and the area is described as being in poor condition as a result of agricultural intensification. The detailed evaluation identifies that the site could accommodate a degree of development subject to minimisation of local landscape and visual impacts and opportunities for enhancement.

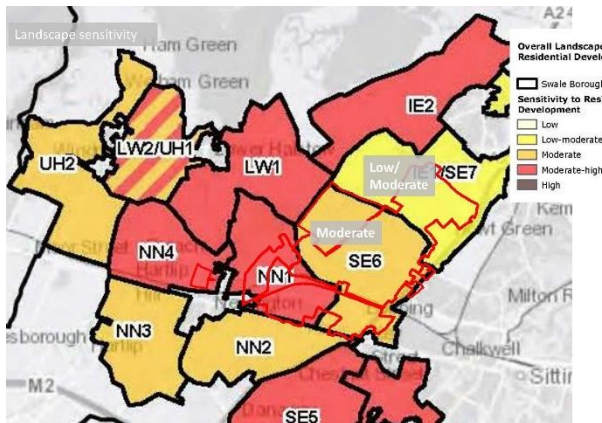


Figure 5 Landscape Sensitivity

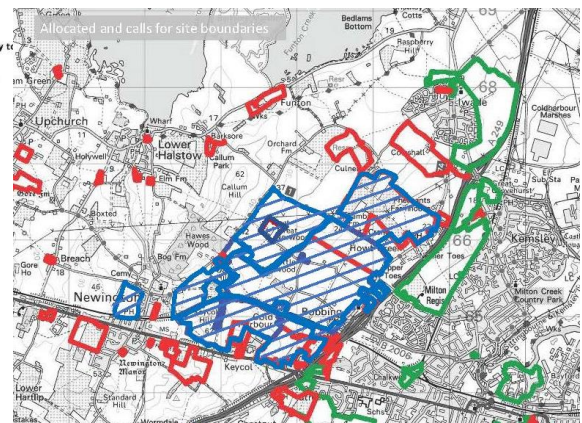


Figure 6 Boundaries of Allocated Sites and Call for Sites

Current developments located in the region include further expansion of Iwade and large allocations on the eastern side of the A249. The call for sites in 2018 include small possible future development sites directly north and south of the site (Figure 6).

Red line narrative

Notwithstanding transport infrastructure opportunities or constraints, neither topography, national or local landscape designations nor sensitivity to residential development preclude development from appropriate parts of the site.



Figure 7 Expand Bobbing only



Figure 8 Expand and merge Bobbing and Hoyt Green

It is considered desirable to retain villages as discrete features with clear green spaces or green ‘gaps’ between each settlement. Two approaches can be considered: option 1, for expansion of

Bobbing only (Figure 7), and option 2, for a wider scale expansion facilitating the merger of Bobbing with Hoyt Green (Figure 8).



Figure 9 Reduced Red Line and Retained Blue Line



Figure 10 Retain Red and Blue Line

Option 1 would require a reduction of the red line boundary (Figure 9) while option 2 could utilise the full red line boundary (Figure 10). With regards the blue line boundaries both options could utilise the blue line boundaries, without any prejudice to any council decision, as follows: Due to severance caused by the railway track a residential community to the south of the track would be isolated from the new community and therefore it is considered that the blue line site south of the railway line and the blue line site to the west leading to Newington is to remain as green space as a buffer to Newington, Keycol and Key Street. The north-western blue line site should form an integral part of the overall mixed-use community. The eastern blue line sites across Swale Way could form the location for community infrastructure serving Bobbing and the new community.

At this stage no change is proposed to the red line or blue line boundaries.

*** Refer to the following in the appendices**

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Red line assessment

South-east Faversham – Duchy

The site in south-east Faversham is bound by the A2 in the north, the M2 in the south, the M2/A2 junction to the east and the Salters Lane to the west. The Selling Road and Faversham to Canterbury and Dover railway line both cross the site running roughly north-west to south-east (Figures 1 and 2).



Figure 1 Proposed Boundary on Aerial

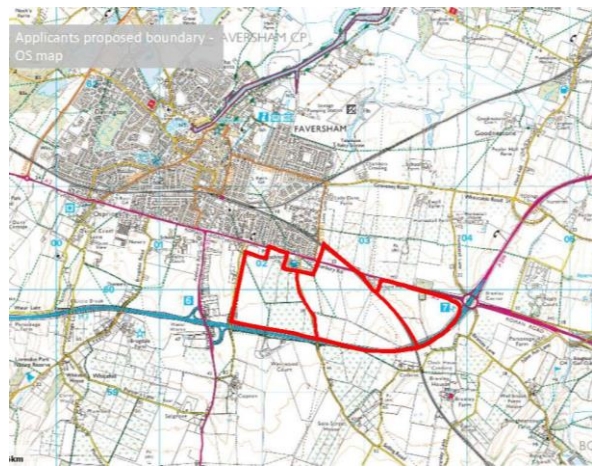


Figure 2 Proposed Boundary on Ordnance Survey Map

Land is relatively flat overall with subtle undulations and then rising to the south-east – levels increase from 25m AOD to 40m AOD. From the A2 travelling east and from the M2/A2 junction the part of the site east of the railway line is visually prominent due to this topography (Figure 3).

The site itself is not within any national or local landscape designations. However directly south of the site, south of the M2 is an Area of 'High Landscape Value – Kent Level' (HLV-KL) and to the south-east, beyond the HLV-KL, is the 'Kent Downs Area of Outstanding Natural Beauty' (KD-AONB). Although the KD-AONB is not actually adjunct to the site it is considered that the site is within the 'setting' of the KD-AONB as it is visible from the KD-AONB (Figure 4).

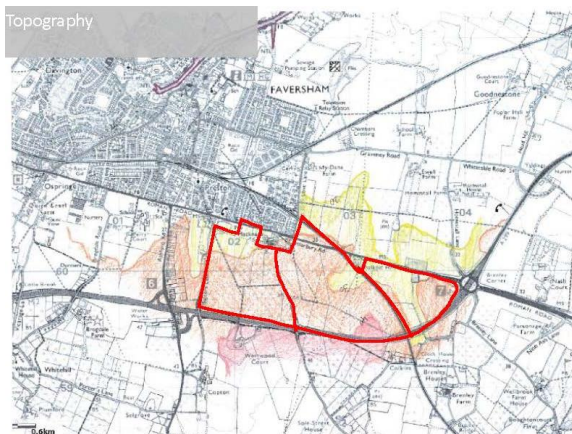


Figure 3 Topography



Figure 4 Landscape Designations

Landscape sensitivity has been assessed by consultants LUC both in broad terms Faversham wide and in detail specific to the site*. Overall sensitivity of the site to residential development is designated 'Moderate'. Surrounding Faversham, apart from the east and south-east zones, all other areas are classified as 'High' sensitivity to residential development (Figure 5). The site falls within the Landscape Character area Faversham and Ospringe Fruit Belt (no. 20). The detailed assessment of the character area identifies that impacts on landscape character and visual impact can be mitigated, providing mitigation proposals are adopted, but that impacts on local landscape features and views may still remain.

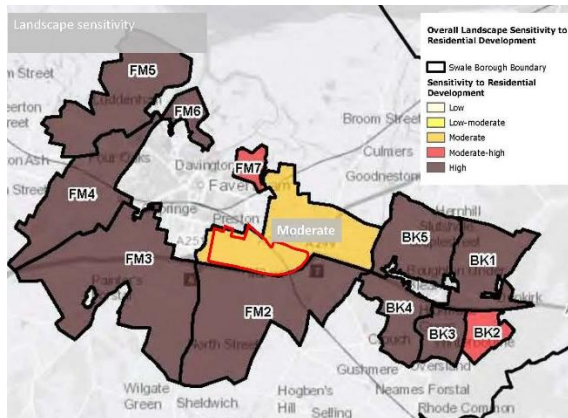


Figure 5 Landscape Sensitivity

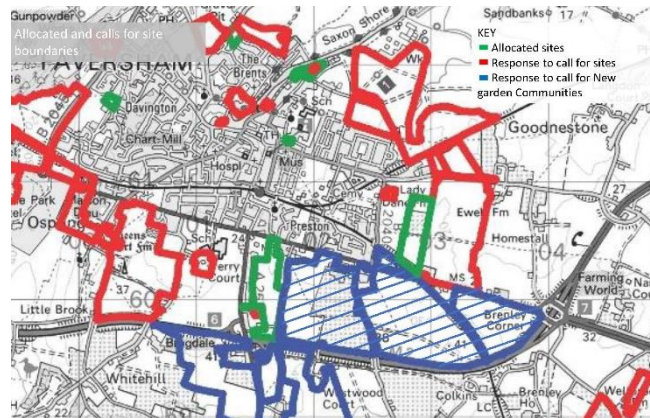


Figure 6 Boundaries of Allocated Sites and Call for Sites

Current Faversham developments located between the A2 and the M2 include Perry Court, Preston Fields and Brogdale Road. Preston Fields site is also currently designated for development in the current Local Plan. Adjacent to the site to the north of the A2 is a further allocation referred to as Land east of Love Lane. The call for sites in 2018 includes a possible future development site directly north of the site (Figure 6).



Figure 7 Land Uses



Figure 8 Red Line Boundary – No Change

Red line narrative

Notwithstanding transport infrastructure opportunities or constraints, neither topography, national or local landscape designations nor sensitivity to residential development preclude development from the site.

Due to severance caused by the railway track a residential community to the east of the track would be isolated from the new community and Faversham itself. Therefore, employment use is best suited to this gateway location (Figure 7). However, without prejudice to any council decision to expand Faversham eastwards north of the A2, if sites were to come forward there could be some reconsideration of any residential use east of the railway line.

No change is proposed to the red line. (Figure 8)

*** Refer to the following in the appendices**

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Red line assessment

North Street – Gladman

The site lies to the south of Faversham and to the south of the M2. The A251 Ashford Road passes through the centre of the site along which lies the village of North Street. The village of Sheldwich lies further south outside of the site boundary (Figures 1 and 2).



Figure 1 Proposed Boundary on Aerial

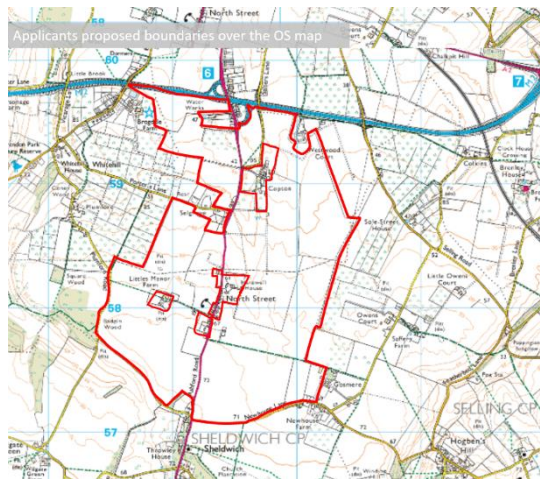


Figure 2 Proposed Boundary on Ordnance Survey Map

The site is located on an open dip slope and therefore gradually descends from 70m AOD in the south to 40m AOD in the north (Figure 3). Rice Wood, Foxburrow Wood, Badgin Wood and Church Plantation lie outside the site to the west and south.

The site itself falls within the designation 'High Landscape Value – Kent Level' (HLV-KL) and surrounding the site, abutting in the south is the 'Kent Downs Area of Outstanding Natural Beauty' (KD-AONB) (Figure 4).

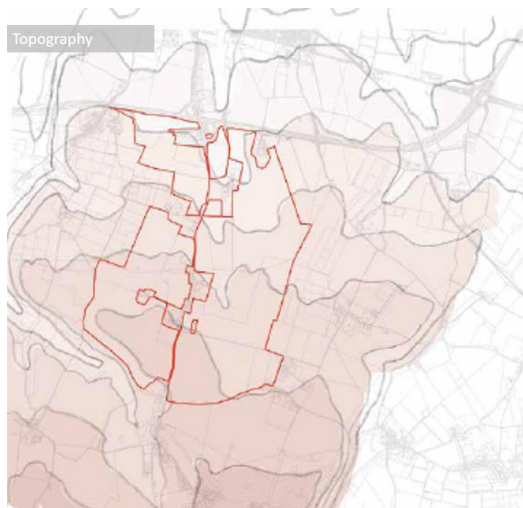


Figure 3 Topography



Figure 4 Landscape Designations

Landscape sensitivity has been assessed by consultants LUC both in broad terms Faversham wide and in detail specific to the site*. Overall sensitivity of the site to residential development is 'High' (Figure 5). The site falls within the Landscape Character area Faversham and Ospringe Fruit Belt (20). The open rural character is exposed and affords long views to the north from parts of the site. The rural landscape provides a separation between development of Faversham and the AONB.

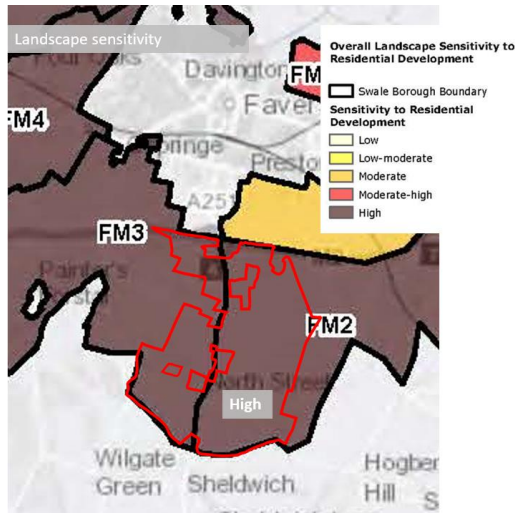


Figure 5 Landscape Sensitivity

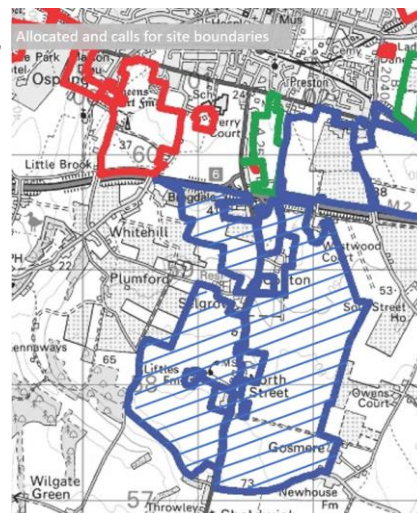


Figure 6 Boundaries of Allocated Sites and Call for Sites

Current developments located between the A2 and the M2 include Perry Court, Preston Fields and Brogdale Road which bring the Faversham up to the north of the M2. The call for sites in 2018 include no further sites south of the M2 in the vicinity of the site (Figure 6).

Red line narrative

Notwithstanding transport infrastructure opportunities or constraints, national and local landscape designations and sensitivity to residential development lead to constraints on development. Should development go ahead the mitigation may include a wide green space buffer with appropriate uses may be sufficient to reduce impacts on the AONB (Figure 7).



Figure 7 Expand Sittingbourne and Babchild



Figure 8 Red Line Boundary – No Change

With regards the red line boundary it is considered that the red line is to remain so as to be able to create the green space to create the green buffer.

At this stage no change is proposed to the red line boundaries.

*** Refer to the following in the appendices**

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Swale Local Landscape Designations; Review and Recommendations Draft Report prepared by LUC for Swale Borough Council, August 2018

APPENDIX B DESIGN ASSESSMENTS

Design assessment

Highsted – Quinns

Overall vision as set out by the promotor

The document sets out to demonstrate that the vision aligns with the Town and Country Planning Association principles for garden communities. The promoters have provided a vision, design principles and a masterplan although the masterplan in content is more akin to a development framework. Further work has been undertaken on the masterplan and in particular development has been scaled back from 11,500 dwellings to 8,000 in the latest version reducing the string of garden villages down to two.

Key design principles include:

1. green infrastructure,
2. integrated and sustainable transport,
3. employment opportunities,
4. living environment,
5. smart and sustainable living,
6. good design,
7. community engagement,
8. healthy and well-being principles, and
9. improved design through innovation.

The masterplan is offered as a landscape led proposal.

Commentary on design

Strengths of the scheme from a design perspective:

- Commercial land use is located close the M2 junction and an adjunct to the existing Kent Science Park.
- A new sub-centre for Sittingbourne is proposed focussed on the Kent Science Park business park expansion although how integration could be achieved is not clear.
- A network of green infrastructure featuring sports, existing trees and hedgerows, green grid links, landscape buffers, village green and retention of ancient woodland and orchards is proposed. The network contributes to walkable neighbourhoods and provides links to the countryside.
- Retention of important views is proposed.

Weaknesses of the scheme from a design perspective:

- There is potential adverse impact of the alignment of the southern bypass on the landscape.
- The bypass bisects both garden villages with green buffer illustrated at the sides of the bypass which compromises the integration of each of the two villages each as an entire village.
- The proposed primary roads (in the original scheme) are loop roads which do not assist with orientation.

- At this stage the network of secondary streets has not been provided and it is unclear how they will interface with the green infrastructure network.
- The unique character of the place is yet to be communicated. In addition, as there is no sense of unique character and the number of roundabouts (in the original scheme) impart a suburban feeling to the proposals.
- Organisation of the community infrastructure, apart from the proposed location of the secondary school and sports pitches, is not demonstrated.
- Proposed landscape gaps do not indicate the land use of the green infrastructure and whether it is proposed as community use or agriculture.
- No clarity of proposals for the integration of adjacent villages such as Bapchild, Rodmersham and Rodmersham Green nor connectivity with south Sittingbourne.
- The masterplan is the most broad brush of all the schemes.
- No specific commitments to Building for Life or BREEAM only commit to peer review with Design South East and reference to distinctive character.

Next steps

Address the weaknesses.

Undertake a detailed Local study to respond to the local context from both urban design, architecture and landscape perspectives.

Design Codes to ensure consistent high quality design over time and by different providers.

Design assessment

Bobbing – Appin Land

Overall vision as set out by the promotor

The document sets out to demonstrate that the vision aligns with the Town and Country Planning Association principles for a garden city. The promoters have provided a vision, masterplanning principles and illustrative framework.

Key masterplanning principles include:

1. role of settlement gap and anti-coalescence,
2. commercial hub,
3. community,
4. local retail,
5. new village green,
6. residential development,
7. local distinctiveness,
8. sustainable construction, and
9. incorporating pylons.

Two variants have been offered with regards either incorporation or segregation of the village of Bobbing within the wider new development subject to community consultation.

Commentary on design

Strengths of the latest scheme from a design perspective:

- Commercial land use is located close the A249 junction, the community and retail hub is located in the centre of the development and residential areas are distributed around the perimeter.
- Parkland gifted to the community as a buffer between Newington and the new development, between Iwade and new development and other anti-coalescence buffers are proposed.
- Options of integration or segregation available for the community to have a say with regards Bobbing village's response to new development
- Organisation of the location of the community infrastructure around a new village green provides a good community focus and maximises footfall for the local retail.
- A network of green infrastructure featuring sports, play, orchards, buffers, hedgerows, allotments, village green and enhanced biodiversity incorporating Rock Wood is proposed. The network contributes to walkable neighbourhoods and provides links to the countryside.
- Downgrading of Sheppey Way as an access only road rather than a through road is proposed.
- Rapid transport access to Newington Railway Station is proposed with land available for a station car park.

Weaknesses of the scheme from a design perspective:

- A roundabout forms the entrance to the development and there is a lack of coherence in the primary road network.
- The proposed primary and secondary roads are both loop roads which do not assist with orientation.
- In an early zoning plan the network of secondary streets illustrates that many of the development parcels suffer from minimal or limited connectivity which must be addressed in future options.
- Unique character of the place yet to be communicated.
- No specific commitments to Building for Life or BREEAM with only reference to use of local vernacular and adherence to government initiatives relating to climate change.

Next steps

Address the weaknesses.

Undertake a detailed Local study to respond to the local context from both urban design, architecture and landscape perspectives.

Design Codes to ensure consistent high quality design over time and by different providers.

Design assessment

South East Faversham – Duchy

Overall vision as set out by the promotor

The promotor's document sets out that their vision aligns with the Town and Country Planning Association principles for a garden city while stating that the development is more of a sustainable extension of Faversham. In addition, the Duchy demonstrates that community engagement (Enquiry by Design) forms the foundation for their approach to new development coupled with reference to the principles set out by the Prince of Wales as follows:

1. Development to respect the land.
2. Architecture to abide by grammatical ground rules.
3. Human scale.
4. Harmony and diversity.
5. Well designed enclosure
6. Attention to material detail.
7. Minimal signage and buried utilities.
8. Focus on pedestrians.
9. High density.
10. Flexibility to respond to change.

In addition the Duchy have published a draft Beauty in my back yard (BIMBY) Housing Manual which encompasses the results of the community consultation, sets out the principles of good placemaking and the essential qualities of place as well as including a local architecture study of Faversham which is intended to inspire the future architecture in the new development.

Commentary on design

Strengths of the latest scheme from a design perspective:

- The aim to naturally calm the A2 with a new main retail square and entrance to the site.
- A legible network of streets, spaces and local centres with a clear hierarchy.
- A committed response to mixed use development.
- A network of green infrastructure featuring sports, play, orchards, SUDs, hedgerows, allotments, public open space and enhanced biodiversity. The network contributes to walkable neighbourhoods and provides links to the countryside.
- Promotion of walking/cycling from the site to Faversham town centre and railway station with routes identified.
- Location of a primary school at a local centre provides a good community focus and maximises footfall for the local retail.
- Human scale of connected urban blocks despite the site being bound in the south by the M2 motorway.
- Integration of the new development with existing Faversham is proposed.
- The BIMBY Housing Manual is a good starting point for architectural design.
- The business park proposed in one option is located adjacent to the M2 junction.

Weaknesses of the scheme from a design perspective:

- Insufficient data on community infrastructure although this is now being fleshed out through a focussed topic group.
- Acceptability of residential development east of the railway line subject to development to land north of the A2 by third parties.
- No specific commitments to Building for Life or BREEAM which are parked for a later stage.

Next steps

Address the weaknesses.

Undertake a further Local study to respond to the local context from both urban design and landscape perspectives.

Design Codes to ensure consistent high quality design over time and by different providers.

Design assessment

North Street - Gladman

Overall vision as set out by the promotor

The document sets out to demonstrate that the vision aligns with the Town and Country Planning Association principles for a garden village. The promoters have provided a vision, concept and indicative masterplan although the masterplan in content is more akin to a development framework. Further work has been undertaken on the indicative masterplan though changes are minor.

Key features of the concept include:

1. screening
2. right of way connections
3. new highway route
4. high street
5. local neighbourhoods
6. green infrastructure network
7. walkable community
8. health and leisure
9. employment options

Commentary on design

Strengths of the scheme from a design perspective:

- Location of a secondary school and primary school at either end of a new retail and commercial high street coupled with a range of additional community functions provides a good community focus and maximises footfall for the local retail.
- A business park is located close the M2 junction, the community and retail hub is located in the centre of the development and primary schools are distributed among the residential areas.
- There is a good network of green infrastructure featuring sports, play, SUDs, community orchards, linear shelter belts, hedgerows, allotments and enhanced biodiversity. The network contributes to walkable neighbourhoods and provides links to the countryside.
- Wide range of employment options promoted in different areas of the site.
- The A251 Ashford road has been realigned to remove heavy traffic from North Street village.

Weaknesses of the scheme from a design perspective:

- There is an over reliance on roundabouts and the primary roads are winding thereby lacking orientation.
- At this stage the network of secondary streets has not been provided and it is unclear how they will interface with the green infrastructure network.
- Unique character of the place yet to be communicated.
- More work required to mitigate impacts on the Kent Downs Area of Outstanding Natural Beauty and area of High Landscape Value - Kent Level.

- No specific commitments to Building for Life or BREEAM only general statements about locally distinctive design and achieving the highest benchmark of sustainable design and construction.

Next steps

Address the weaknesses.

Undertake a detailed Local study to respond to the local context from both urban design, architecture and landscape perspectives.

Design Codes to ensure consistent high quality design over time and by different providers.

APPENDIX C HERITAGE ASSESSMENTS

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**CONSERVATION & DESIGN MANAGER:
RESPONSE TO CONSULTATION REQUEST**

To: *James Freeman*

C.C: *Natalie Earl; Alison Peters;*

Application Ref(s) - where applicable: *N/A*

Proposal: *New Garden Community proposal by Quinn Estates*

Location: *Land at Highsted Park, Kent Science Park, Sittingbourne*

Date: *6th September, 2019*

ADVICE NOTE

Introduction

- As requested, this advice note provides commentary on the appropriateness (or otherwise) of the initial heritage work submitted in respect of this garden community proposal at Highsted Park, promoted by Quinn Estates. An advice note has also been produced for the three other garden community proposals within the borough.

Heritage-related site constraints/opportunities

- The initial heritage assessment work has been carried out by Montagu Evans in consultation with Historic England, and consists of a Heritage Statement and an associated Heritage Asset Plan.
- The assessment work carried out to date appears to be sound, and I am grateful for the input of my historic environment colleague, Alice Brockway (of Historic England) in helping to ensure that this is the case.
- As indicated in the statement, there is further assessment work to do (including further fieldwork) to inform the necessary full heritage assessment document, and I look forward to seeing that in due course if the decision is taken to take this garden community proposal forward.

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Scheme assessment re anticipated heritage impacts and benefits

- In terms of known, above-ground heritage assets, there would be no direct impacts, and the key concern would be impact on the setting of the listed buildings and conservation areas referred to/shown on the Montagu Evans statement and supporting plan. Particular care would need to be given to the heritage assets which draw a degree of their heritage significance/value from their wider setting, and I note from the initial statement, that there may be a number of these, such as the isolated Ludgate House. This is therefore a matter which should be examined carefully and form part of the detailed heritage assessment.
- The proposal does appear to offer up heritage related benefits in terms of using some of the listed buildings to assist with place making and influences for distinctive design. I note that the most recent update to the masterplan has removed development parcels between Rodmersham and Rodmersham Green to preserve open views between the edge of the conservation area and the grade I listed parish church, and that the proposed new housing associated with the northern relief road is intended to be moved further east towards Teynham, which is a less sensitive location in historic environment terms.
- I concur with the Historic England advice regarding the importance of the treatment of the proposed settlement edge (re. planting and a landscape buffer) and the positive aspects of locating the proposed in the valley formation. Particularly given that the proposal area effectively encapsulates Rodmersham, I would suggest as that opportunities for the possible enhancement and/or improved revealment of the listed buildings within this hamlet be actively explored as part of the ongoing masterplan development work.
- I am unable to comment on any potential impacts to archaeological based heritage in any depth as I neither have the detailed knowledge and experience, nor the relevant data at my fingertips to be able to advise on this appropriately, and I would therefore suggest that advice in this respect is sought separately from Kent County Council's Principal Archaeologist, Simon Mason, whom is very familiar with the borough.

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**CONSERVATION & DESIGN MANAGER:
RESPONSE TO CONSULTATION REQUEST**

To: *James Freeman*

C.C: *Natalie Earl; Alison Peters; Paul Gregory; Corinna Griffiths*

Application Ref(s) - where applicable: *N/A*

Proposal: *New Garden Community proposal promoted by DHA*

Location: *Land at Bobbing, Sittingbourne*

Date: *5th September, 2019*

ADVICE NOTE

Introduction

- As requested, this advice note provides commentary on the appropriateness (or otherwise) of the initial heritage work submitted in respect of this garden community proposal at Bobbing, promoted by DHA. An advice note has also been produced for the three other garden community proposals within the borough.

Heritage-related site constraints/opportunities

- Unfortunately, the DHA letter of the 10th July, 2019 fails to pick up a significant number of listed buildings which whilst not being directly impacted by the garden community proposal, could, and would likely have their settings affected by the proposals to some degree. None of these are located within the red line area of the northern half of the proposed development area, but all of those listed below (which have not been picked up by DHA in the table shown in the letter) need to be given due, and careful consideration in terms of the impact to their respective settings:
 - (a) Bobbing Place and garden wall (grade II listed early C19 house and C17 garden wall & gate): Sheppey Way, Bobbing, ME9 8PP: List Entry ID – 1343865
 - (b) Upper Toes (grade II listed C16/18 house): Sheppey Way, Bobbing, ME9 8QP: List Entry ID – 1299595
 - (c) Nethertoos (grade II listed C16/18 house): Sheppey Way, Bobbing, ME9 8QP: List Entry ID – 1343866

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- (d) White House (grade II listed C16 house): Sheppey Way, Bobbing, ME9 8QP: List Entry ID – 1069420
- (e) Pheasants Farmhouse (grade II listed C18/19 farmhouse): Sheppey Way, Bobbing, ME9 8QX: List Entry ID – 1343861 *
- (f) Culnells Farm (grade II listed C17 farmhouse): School Lane, Iwade, ME9 8QJ: List Entry ID - 1069379

*** Note:** Whilst the matter of cumulative change to the settings of all the above mentioned listed buildings (and those picked up on the list in the DHA letter of 10/07/19) will need to be taken into account, Pheasants Farmhouse will need to be given particular attention given the form of its current immediate setting, which to the west and north consists of a mix of industrial units and a car breakers yard. A 2019 outline application to build housing on part of the area adjacent to the listed building (ref. 19/500837/OUT) was refused in part because it had '*... not been demonstrated that the proposal would not result in harm to the setting or significance of Grade II listed Pheasants Farmhouse. The proposal would not comply with para. 194 of the National Planning Policy Framework which states that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'. As such the proposal would be contrary to policy DM32 of "Bearing Fruits 2031: The Swale Borough Local Plan (2017)" and paragraphs 194 of the National Planning Policy Framework*'.

I note that we have a current pre-application enquiry to reconsider the unsuccessful outcome of the 2019 outline application, and if support is to be given to the Bobbing Garden Community proposal, it might be appropriate for the scheme promoters to liaise with the owners of the car breaker site to see if there was scope to include that additional parcel of land within the overall garden community site area, and looking to include the area close to Pheasants Farmhouse as amenity space with perhaps the compensation of more built development elsewhere in a less visually sensitive location.

- It should be noted that there are also two further listed buildings which are located within the expansion area to the west of the primary proposal area, albeit on land currently outside the control of the site promoters. These are Norwood Farm Barn (grade II C17 barn – list entry ID 1069417) and Great Norwood Farm (grade II C18 farmhouse – list entry ID 1343863), the address for both of which is: Belnor Avenue, Bobbing, ME9 8QB. Even if the expansion area (shown outlined in blue on the DHA plan) is ultimately not taken forward, I would suggest that these two listed buildings are located close enough to the proposed primary development area that potential impacts on their setting needs to be given careful, and due consideration..

Scheme assessment re anticipated heritage impacts and benefits

- Notwithstanding the significant scale of the overall development area and the fact that DHA have failed to pick up on all the designated heritage assets that could and likely would be affected to some degree by a development of this nature and scale at this location, it does appear on the face of it that the impacts on heritage interests would likely be relatively low, and falling within an NPPF 'less than substantial harm' scenario. However, given that DHA have failed to pick up on the above-stated listed buildings, we cannot be confident of this at this juncture until the necessary additional fieldwork has been carried out.
- In terms of known, above-ground heritage assets, there would be direct impacts, and the key concern would be impact on the setting of the aforementioned listed buildings, and the listed buildings already referred to in the DHA letter of 10/07/19. Particular care would need to be given to the heritage assets which draw a significant degree of their heritage significance/value from their wider setting, and particularly given the number of listed

farmhouses within the vicinity of the proposal area (the type of buildings which often draw a degree of heritage significance from their wider setting), this is a matter which should not be underplayed, and is something that would need to be examined through a detailed heritage assessment to inform the development of this proposal.

- The proposal does appear to offer up heritage related benefits in terms of using some of the listed buildings to assist with place making and influences for distinctive design. In the case of Pheasants Farmhouse, if the suggestion I have made above is taken up and can be acted upon, there is also the scope to potentially improve the immediate setting of this listed building.
- I am unable to comment on any potential impacts to archaeological based heritage in any depth as I neither have the detailed knowledge and experience, nor the relevant data at my fingertips to be able to advise on this appropriately, and I would therefore suggest that advice in this respect is sought separately from Kent County Council's Principal Archaeologist, Simon Mason, whom is very familiar with the borough.

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**CONSERVATION & DESIGN MANAGER:
RESPONSE TO CONSULTATION REQUEST**

To: *James Freeman*

C.C: *Natalie Earl; Alison Peters;*

Application Ref(s) - where applicable: *N/A*

Proposal: *New Garden Community proposal by the Duchy of Cornwall*

Location: *Land southeast of Faversham*

Date: *6th September, 2019*

ADVICE NOTE

Introduction

- As requested, this advice note provides commentary on the appropriateness (or otherwise) of the initial heritage work submitted in respect of this garden community proposal on land southeast of Faversham, promoted by the Duchy of Cornwall. An advice note has also been produced for the three other garden community proposals within the borough.

Heritage-related site constraints/opportunities

- The initial heritage assessment work carried out to date appears to be sound, and I consider that it picked up all the relevant heritage constraints (which notably are quite limited – principally consisting of the two listed buildings at Macknade, and the Faversham next Preston Conservation Area) and recognises that further work on the potential impacts on these need to be carried out to inform the evolution of the masterplan, in the event of the decision being made to move forward with this garden community proposal.

Scheme assessment re anticipated heritage impacts and benefits

- In terms of known, above-ground heritage assets, there would be no direct impacts, and the key concern would be impact on the setting of the listed buildings and conservation areas referred to/shown in the Duchy's prospectus.

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- The proposal does appear to offer up heritage related benefits in terms of using some of the listed buildings (such as the oasts at Macknade Farm) to assist with place making and/or as influences for distinctive design.
- Although I note that reference has been made to the scope for possible sites of archaeological interest within the scheme area, I am unable to comment on this in any depth as I neither have the detailed knowledge and experience, nor the relevant data at my fingertips to be able to advise on this appropriately, and I would therefore suggest that advice in this respect is sought separately from Kent County Council's Principal Archaeologist, Simon Mason, whom is very familiar with the borough.

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**CONSERVATION & DESIGN MANAGER:
RESPONSE TO CONSULTATION REQUEST**

To: *James Freeman*

C.C: *Natalie Earl; Alison Peters*

Application Ref(s) - where applicable: *N/A*

Proposal: *New Garden Community proposal by Gladman Developments*

Location: *Land south of M2 Junction 6, for Faversham*

Date: *5th September, 2019*

ADVICE NOTE

Introduction

- As requested, this advice note provides commentary on the appropriateness (or otherwise) of the initial heritage work submitted in respect of this garden community proposal by Gladman Developments. An advice note has also been produced for the three other garden community proposals within the borough.

Heritage-related site constraints/opportunities

- The opportunities & constraints plan on page 17 of the site promotion document appears to pick up all the clusters of listed buildings at the location in question, with these being shown as blue triangles on the plan. Reference is made in the text within the document to a conservation area lying just to the south of the site area. This is the Sheldwich Conservation Area which was designated in 1992 and currently lacks any form of appraisal. The key to the plan does not allow this conservation area to be identified, which is a flaw of that plan, although it is clear from the separate 2019 illustrative masterplan, that the setting of this particular conservation has been considered at least to some degree.
- There are two further conservation areas near to the proposed development area which could also have their settings affected by the proposed development, but which have not been picked up on the opportunities & constraints plan. These are Whitehill and Painters Forstall. The listed buildings shown within the former are in fact shown on the plan,

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and whilst it is accepted that Painters Forstall would be just off the plan (if revised at the current scale), the outline of Whitehill could be shown and the fact that a constraint lies just off the map in question does not mean that it should not be given due consideration.

- The opportunities & constraints plan also fails to pick up on the Lees Court Registered Park & Garden to the east of the Sheldwich Conservation Area, and this is a factor which ought to be rectified, although the general location of this designated heritage asset, and the specific location of the associated listed house and outbuildings is shown on the aforementioned 2019 masterplan.

Scheme assessment re anticipated heritage impacts and benefits

- Notwithstanding the significant scale of the overall development area, it does appear on the face of it that the impacts on heritage interests would be relatively low, and falling within an NPPF 'less than substantial harm' scenario. In terms of known, above-ground heritage assets, there would be direct impacts, and the key concern would be impact on the setting of the aforementioned listed buildings, conservation areas and registered park & garden. Particular care would need to be given to the heritage assets which draw a significant degree of their heritage significance/value from their wider setting, and this is something that would need to be examined through a detailed heritage assessment to inform the development of this proposal.
- The proposal does appear to offer up heritage related benefits in terms of using some of the listed buildings to assist with place making and influences for distinctive design. The principal new roads, as shown on the 2019 masterplan do not appear to be located too close to any of the listed buildings with the possible exception of the proposed northern roundabout junction and the associated mixed use area and business park, which might possibly need re-thinking due to the effect of these developments on the setting of the nearby listed buildings of 148 Ashford Road (grade II listed, late C19 house) and Copton Manor farm store and oast (grade II listed C19 agricultural buildings). Given the details shown on the masterplan in terms of the principal roads alignment, the listed buildings located just off the A251 at North Street would likely benefit from reduced vehicle movements, the current degree and form of which could well be detrimental to their long-term conservation, and this is a potentially positive aspect of the proposal that should be explored further, and could possibly be weighed against any anticipated harm to their wider setting.
- I am unable to comment on any potential impacts to archaeological based heritage in any depth as I neither have the detailed knowledge and experience, nor the relevant data at my fingertips to be able to advise on this appropriately, and I would therefore suggest that advice in this respect is sought separately from Kent County Council's Principal Archaeologist, Simon Mason, whom is very familiar with the borough. I note however that the opportunities and constraints plan shows a site of potential archaeological interest, which it is assumed must be the possible Romano British Villa referred to on page 15 of the document. More work may need to be carried out to ascertain if there are indeed archaeological remains at this location (if this site is to be taken forward, all other things considered) as the layout of the roads and associated development may need to be adjusted accordingly if that is the case, and unlike the scenario we were presented with at Newington, if such a feature does in fact exist at this location, it would be ideal to have the opportunity to uncover and retain the feature in-situ as a potential future scheduled monument, and very significant place making opportunity,

Simon Algar
Conservation & Design Manager
Spatial Planning Team

**APPENDIX D HIGHWAY AUTHORITIES ANALYSIS
LETTER FROM KENT COUNTY COUNCIL**



Natalie Earl
Swale Borough Council
Swale House
Sittingbourne
Kent

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD

Tel: 03000 413370
Date: 12th September 2019

By EMAIL

The below provides a summary of the Highway Authorities analysis of the recently submitted documents in respect of three of the Garden Community Proposals. Included in the summary areas of potential or concern have been highlighted.

Application -	Gladman - South Faversham Garden Community proposals
Location -	North Street, Faversham

Access Proposals

Realignment of the A251.

The document purports to create a high quality spine road through the development to divert existing traffic using the A251 through the development site allowing the downgrade of the existing central route. The A251 is a primary distributor route carrying traffic average daily flow volumes of 10645 vehicles per day. The alignment runs north to south in as direct a line as is dictated by the surrounding countryside, deviating slightly of an almost straight alignment to its southerly end towards Ashford due to the Eastwell estate. Its primary function is to facilitate commuter traffic travelling between Faversham and Ashford with very little to cause interruptions to the journey throughout its length, with only one significant junction located at Challock. The suggested diversion of this route through a new residential settlement is not only likely to add significant journey time to commuter traffic but will also be likely subject to more interruptions within the built area, which in turn impacts upon air quality, noise, fuel economy and driver frustration. Such a proposal would therefore be expected to have considerable route choice and economic impacts to a much greater geographical area. This will need testing through modelling. Both link roads could also easily become a barrier to pedestrian/cycle movements segregating the community into distinct parcels quarters and so will need careful design.

The proposals appear to include single carriageway sections with two wide Local Distributor Roads converging into one at either end, effectively funnelling two lanes of traffic into one.

Noting that the A251 North of the settlement is duelled to the M2, there remains particular concern at the sections at the Northern end between the converging loop roundabout and the A251. Heading North there is a further roundabout introducing greater levels of traffic with a relatively short distance to the M2 J6 interchange. This section includes a number of interruptions and we have significant concern on the capacity performance of the that section of the A251. A Micro-simulation model would be needed to demonstrate the combined impact on junctions.

Impact on the Local Road Network

The development appears to directly border onto the AONB and the characteristic and function of those rural lanes connecting and surrounding the development have the potential for significant harm.

Whilst it is acknowledged that the submission makes reference to directing development traffic away from the rural routes, this would be very difficult to achieve without impacts to design and existing accessibility. For example, the existing Salters Lane appears to have a very welcoming access off the North West access roundabout which may encourage development traffic along a very unsuitable road. Full assessment on the impacts to the rural road within the AONB would need to be presented.

As mentioned earlier modelling will need to demonstrate the wider geographical implications of the proposed changes to the A251 particularly in terms of journey time and congestion at the Southern end, or routing to alternatives roads. A micro-simulation mode would also seem appropriate for the A2/A251 corridor in the vicinity of the settlement. It is likely that traffic could grow through Canterbury or Selling as a result of A251 delays.

Subject to further analysis, the Highway Authority would like to see the following junctions;

- A251/A252 roundabout
- A2/A251
- A2042/Trinity Road signal controlled junction
- B2041/B2042 East St signal controlled junction
- A2/Brogdale Road priority junction
- A2/Selling Road
- A2/Western Link
- A2/Ospringe Road
- A2/Abbey School entrance

Link flows should be comparable for the following routes;

- M2 passing through J 5, 6 and 7
- A2 passing through Ospringe and by Macknades.
- A251 North of the M2, South of the M2 through Badlesmere and Sheldwich.
- Porters Lane
- Brogdale Lane
- Newhouse Lane

Walking

The assessment correctly identifies that existing facilities within Faversham are beyond the recommended walking distances. It also acknowledged that the A251 and M2 interchange represent a significant barrier to walking to Faversham.

Internally the picture presented is welcomed. The secondary school is placed at the heart of the community as is the local centre and bus hub. Primary schools are spaced out to offer walkable distances to all of the internal amenities and employment.

Cycling

It is acknowledged that the distance to Faversham and the train station are within the 5km recommended for cycling. However, the proposal suggests that “routes via Salters Lane, Selling Road and Brogdale Road offer quieter routes for cycling”. These routes are not considered suitable and cycling access to Faversham remains a notable barrier to the settlements ability to access rail services.

Masterplan proposals

The proposed Masterplan provides appropriate mixed used development to be considered as a Garden Village in transportation terms. It includes an appropriate number of amenities such as a medical centre, convenience stores, supermarket, leisure and restaurant uses along with Primary and Secondary school provision appropriate for a 5000 home development. Employment land is suggested as 60,000sqm of other employment. The suggestion is made that this would provide c4,5000 jobs.

The proposed Masterplan includes land immediately South of the M2 which may represent some opportunity for improvements. Employment use in that quarter has the potential relocation of existing local distribution centres that currently have significant impact on AQMA's and the local highway network.

There may also be potential for greater improvements to the A251 or indeed relocation of junction 6 of the M2.

Bus Service

The proposed frequency uplift to a 30min 666 service along with a new FGV circular is a positive intervention. This would provide a combined frequency of 15 min between the new settlement and the Faversham train station. It is unclear at this stage how this is to be funded and a staged strategy should be presented that is appropriate from both perspectives of viability and the propensity to encourage early modal shift. This is however seen as an opportunity to improve bus services and patronage.

Non motorised access

The internal layout described offers good opportunities for encouraging non-motorised access. It is suggested that all Local Distributor Road and Major Access Roads would include 3m wide shared footway/cycleways in accordance with Kent Design Standards. Those on the Local Distributor Roads would also include a segregating 2m grass verge.

A2/A251 Junction proposals

The applicant has suggested that they are able to deliver a scheme for this junction that operates within capacity. In the assessment made it is reported that they have diverted any modelled traffic routing around the junction on rural lanes back onto the A2/A251; this element of the assessment is welcomed.

The proposal put forward relocates the A251 to the West utilising third party land, mainly owned by KCC for education purposes. The proposals align the junction to form a signalised cross roads opposite The Mall. Aside from requiring significant amounts of land from third parties the current proposals do not appear to include any non-motorised crossing facilities and would substantially change the historic entrance to the town.

Irrespective of the modelling inputs or design being agreed there are a number of arms operating beyond 90% capacity in the option presented without pedestrian/cycling phasing.

M2 J6 junction proposals

The proposal put forward would signalise the junctions at either side of the M2 overbridge. The Highway Authority would need to understand the implications on journey time and interaction between junctions following the introduction of two sets of traffic lights in each direction of the A251. The impact of the M2 will be a matter of concern for Highway England.

Irrespective of the modelling inputs or design being agreed the Eastern junction operates at saturation levels of 98% in the AM for both the M2 and A251. This is unlikely to have the satisfactory reserve capacity for both the County Council or Highway England.

M2 J7 junction proposals

Only very minor physical amendments are being proposed to the junction, however the modelling results demonstrate very large levels of improvement. The Highway Authority will scrutinise the modelling completed here as the outputs are difficult to conceive.

Further work required.

The modelling assessments are yet to be agreed by the Highway Authority. It is noted that report suggests that modelling demonstrates that only three junctions are over capacity in a 2037 scenario. These are those of the A2/A251 and the M2 Junctions 6 and 7. The Highway Authority will need to scrutinise these findings which on the face of it appear highly unlikely. In contrast our own base and reference models are demonstrating much high numbers of junctions within close proximity reaching and exceeding capacity.

Trip generation rates will need to be agreed with the Highway Authority for both a fully developed settlement and that for an interim date at which time full discount for internalisation would not expect to be realised.

Summary

KCC Highways will continue to provide information to the applicant, in addition to that of the above, so that appropriate assessments are completed to the satisfaction of the Highway Authority.

Any new settlement, such as this, that does not have a direct relation to an existing settlement, will have significant time lags before it can reap the beneficial employment/resident ratios of

internal traffic movements. An interim study which does not include the traffic reductions relevant to an established settlement would need to be provided to demonstrate the highest levels of impact expected on the highway. The Highway Authority retain significant concerns regarding the impact of this proposal.

Aside from the concerns raised above, as currently presented, the application does not appear to address the AQMA concerns through Ospringle or that of the A251/A2 junction.

Understanding that the applicant has responded to the Borough Councils requests, our initial impression is that insufficient mitigation has been proposed for the level of traffic impacts. There may be opportunities for a smaller level of development, at its most North Western corner, to come forward which could deliver some transport advantages. Working with other landowners, may come the potential to provide an overbridge over the M2 taking westbound A251/A2 traffic away from the existing junction. The combination of a new highway bridge and changes to Salters Lane could provide greater opportunities for sustainable access and economic support to existing communities. Opportunities of larger employment or distribution centres in that most northerly quarter would also have the benefit of direct access to the strategic network, minimising impact on the local network.

The impacts of junction 6 and junction 7 would need to be mitigated, the feasibility of this is a matter for Highways England. The development proposals would make significant changes to the A251. The current suggestion for the A251/A2 junction would require significant education land and does not appear to sufficiently mitigate this scale of development.

The applicant continues to work positively with the Highway Authority and we welcome their proactive approach.

Application -	Duchy of Cornwall - South East Faversham Garden Community proposals
Location -	South East Faversham

In contrast to other submissions the summary provided by this proposal includes limited information although it is understood that further work is underway. The applicant has however undertaken considerable wider consultation with the local community, regularly engaging with KCC Highways Officers in preparation of further submissions. My evaluation has therefore considered both the submitted "South East Faversham Housing Manual" and the "Transport Statement"

Access Proposals

There would appear to be a number of priority junctions to the South of the A2 with one identifiable access to the North. A potential link to the A251 is mentioned and understood to be under review. This potential "Preston Fields" link has the potential to mitigate some impact on the A2/A251 junction however its own capacity and interaction with the M2 J6 junction needs to be fully evaluated.

Impacts on Salters Lane are highlighted with a reference to humanising the network and the Highway Authority will need greater detail as to how this, along with Selling Road, would be treated.

Primarily access focusses on the M2 junction 7 which currently operates above capacity. Greater detail is therefore needed to fully appreciate the impact and mitigation required for junction 6 and 7 of the M2. As the applicant owns land adjoining the M2 junction 7 there is

clearly an opportunity to work directly with KCC and Highways England to unlock the issues at this location.

Sustainable Accessibility and Connectivity.

The statement uses encouraging language in respect of its intentions to work with the Highway Authority to deliver high quality walking and cycling connections to Faversham Town Centre whilst also driving down vehicular trip generation. The submission has great potential to deliver such infrastructure.

Appropriate suggestions are being put forward to address any issues of the A2 being a barrier to walking and cycling.

Reference to the ability of an earlier site at Poundbury has been made, citing it as an example of good master planning to drive down vehicular trips. The Highway Authority will review the approaches and layouts of the established community to fully understand the suitability of the evidence.

Impact on the Local Road Network

In particular traffic increases would be likely to occur on those roads East of Faversham including East Street, Graveney Road and Selling Road. Control will need to be implemented to ensure that Selling Road and Newhouse Road do not become attractive routes for commuting traffic. Clearly there will be impacts on the A2 and these will need to be carefully considered.

Subject to further analysis, the Highway Authority would like to see the following junctions;

- A2/A251
- A2042/Trinity Road signal controlled junction
- B2041/B2042 East St signal controlled junction
- A2/Brogdale Road priority junction
- A2/Selling Road
- A2/Western Link
- A2/Ospringe Road
- A2/Abbey School entrance
- A2/Love Lane

Link flows should be comparable for the following routes;

- M2 passing through J 5, 6 and 7
- A2 passing through Ospringe and by Macknades.
- A251 North of the M2, South of the M2 through Badlesmere and Sheldwich.
- Selling Road
- Love Lane
- Graveney Road

Further work required

The modelling assessments are yet to be agreed by the Highway Authority and no modelling outputs are available to comment upon at this point in time.

Trip generation rates will need to be agreed with the Highway Authority for both a fully developed settlement and that for an interim date at which time full discount for internalisation would not expect to be realised.

Summary

Greater work is required to provide details on the levels of employment space, schools and community amenities to be provided within the Master plan. It is understood that there would be a mixed use local centre and potential for 1 2FE primary school and this may be insufficient to serve the demand created from the residential element. Although a comment for our education colleagues, from a transport perspective consideration should be given to the possibility that some Secondary School provision may be needed.

There are likely to be good opportunities to develop out the application sustainably. There remain significant gaps in the detail of this application for appropriate assessment.

There will likely be impacts on the Ospinge AQMA which would require mitigation and improvements to M2 Junction 7 would be necessary. The feasibility of improvements would be a matter for Highways England however it is suggested that ownership of the adjoining lane increases the feasibility.

The applicant continues to work positively with the Highway Authority and we welcome their proactive approach.

Application -	Quinn Estates – Kent Science Park Garden Community proposals
Location -	South East Sittingbourne

Our understanding is that the proposal is for a mixed-use development including up to 11,250 residential dwellings, commercial space (circa 120,000 sq m), new infrastructure to create new junctions onto the M2 and A2 joined by a new relief road, new retail and health facilities, leisure facilities, educational facilities and community facilities. Full details of the breakdown of employment, education and local community infrastructure is yet to be provided.

Sustainable Development.

The levels of mixed use would create opportunities for internalising traffic generation, reducing impacts on the wider network. It is suggested that rates of established sites such as Kings Hill, operating at 12% internalisation, could be improved upon given the options being promoted at this site. This is seen by the Highway Authority as a realistic proposition.

Opportunities to encourage sustainable access to existing education provision are possible due to the proximity of the proposed development to those facilities. The location also has the potential to offer good connectivity to health facilities at the Memorial Hospital and the mention of new facilities incorporated within the proposal will help address the current under provision and associated increased travel.

Expansion of employment areas appear to be focussed around the existing Kent Science Park. The proposed provision of a new motorway junction in the vicinity clearly provides greater opportunities for expansion and allows direct access off the strategic network. It is agreed that the location of such employment facilities and provision of strategic infrastructure provide appropriate connectivity.

The statement recognises the challenges of delivering sustainability during the build out of such a sizeable proposal. It acknowledges that many of the key sustainable factors would take time to emerge.

The development is promoted as focussing on non motorised modes of travel which is, again, welcomed. It is suggested that the provision of the Sittingbourne Southern Relief Road and M2 Junction 5a would allow existing road space to be reallocate to more sustainable modes. This statement will need to be backed up by modelling evidence as there is also clearly the potential for considerable traffic generation that could reduce any of the benefits promoted.

Walking & Cycling

Along with information in the statement, a plan of the walking strategy has been included in the submission. Reference is made to the location of routes being located away from the highway imbedded within a strong green corridor. Whilst these must be associated with the highway, this approach is welcomed.

The Masterplan includes a series of villages that would be connected both internally and externally, locating facilities within walkable distances. This approach provides opportunities to reduce car demand on the wider network.

Highsted Road is specifically mentioned as being promoted as a direct non-motorised use (NMU) access to the central areas of the proposals. This is agreed as a welcome approach and that, with appropriate design and consideration, could facilitate a vital NMU route.

The improvement to existing routes within Sittingbourne Town Centre is mentioned although no detail is provided at this time.

Some of the development would be with a walkable distance to existing facilities and amenities as suggested in the statement. Clearer isochrones would need to be provided for both walking and cycling to establish the extent of new settlement that achieves the nationally recommended distances.

Areas of the settlement would be beyond the recommended walkable distances between Sittingbourne Town Centre but likely to be within cycling distance.

Public Transport

The statement references opportunities for bus provision from internal loops to national services linking to London. A plan of suggested routes has been submitted to assist with the explanations.

The proposed Eastern loop would be a welcome addition to the bus network and given the existing population levels is likely to commercially viable. The full service relies on the completed SSRR however it may be possible for this to operate in a temporary form, prior to completion.

Comments made on improvements to the 333 service would require further advice from the operators. An express service that does not reach Sittingbourne town centre may not be the most appropriate approach.

The statement mentions commuter services and it is agreed that there is opportunity for commuter bus services to operate directly to London from the provision of a Junction 5A. This

should be seen as an opportunity to reduce demands on the strategic network. Whilst it is being promoted by this proposal it could also be considered appropriate for that of the Duchy and Gladman submissions.

Provision for facilitating a new electric bus hub is mentioned and is seen as an innovative and welcome inclusion to the proposal.

The applicants general approach seeks to maximise NMU and Public Transport opportunities and as such is likely to reduce traffic generation.

New Highway Infrastructure Delivery

This area is suggested to be the most important and challenging element of this proposal. The inclusion of a new M2 J5a, Sittingbourne Southern Relief Road and Northern Relief Road are hugely significant pieces of infrastructure that would make notable shifts in traffic flows in the local area. The modelling evidence for this will provide greater insight as to the implications.

It has been suggested that the infrastructure could unlock issues of air quality and congestion around Sittingbourne Town Centre and the A249 corridor, allowing for further opportunities for growth across the Borough. Our own modelling evidence will assist in evaluating such claims however initial indication in respect of releasing capacity on the A249 and M2 Junction would appear to be feasible.

The existing air quality and congestion of around Sittingbourne town centre are however in a volatile position. It is difficult to envisage that the highway network could operate effectively with any significant levels of interim development in this area without infrastructure. Modelling evidence must therefore be provided that demonstrates very clear evidence on the stepped levels of development and corresponding infrastructure.

Impact on the Local Road Network

There is significant concern that the rural lanes surrounding the development maybe unduly impacted by the development proposals, many of which are unsuitable as main thoroughfares. The proposed SSRR would however be likely to deter any significant use, however there would remain a significant demand to reach Sittingbourne Town Centre. Consideration will need to be given so that use of existing cut throughs are not exacerbated. These include not only those rural lanes to the East and South of Sittingbourne but also further afield towards Hollingbourne. Whilst it could be the case that the SSRR would remove the existing attraction of using rural lanes, the modelling will need to demonstrate this and physical measures to prevent such use are likely to be required.

Further work required

The modelling assessments are yet to be agreed by the Highway Authority and no modelling outputs are available to comment upon at this point in time.

Trip generation rates will need to be agreed with the Highway Authority for both a fully developed settlement and that for a series of interim dates at which time full discount for internalisation would not expect to be realised.

Summary

Greater detail is required on the levels of employment space, schools and community amenities to be provided within the Master plan.

Explanations on the financing and phasing of the proposal would be vital considerations.

The consequences of build out prior to infrastructure being in place remains a significant concern. Whilst positive approaches are being taken to reduce trip generation the proposal includes a dual carriageway connection between the A2 and M2. This would suggest that the proposal is still generating considerable traffic.

Our initial impression is that as a completed development there are likely to be significant transport benefits through delivery of the SSRR and SNRR. These are both in terms of journey time and removing congestion on the A249 corridor and through Sittingbourne Town Centre.

There remain significant gaps in the detail of this application for appropriate assessment however this is a sizeable proposal. The applicant continues to work positively with the Highway Authority and we welcome their proactive approach.

Application -	Appin and Crabtree and Crabtree - Bobbing Garden Community proposals
Location -	Bobbing, Sittingbourne

Masterplan proposals

The proposed Masterplan provides mixed used development. It is proposed that it would include an appropriate number of amenities such as a medical centre, local retail centre, leisure and restaurant uses along with 1 3FE Primary school and a nursery. This would be appropriate for a 3000 home development. Employment parameters are yet to be set however the applicant has indicatively been assessed for 69,264sqm based on single storey development.

The proposed Masterplan includes land immediately West of the A249 and North of the A2.

Access Proposals

Primary access will be served from Sheppey Way in the form of a new here arm roundabout at the approximate location of the existing Sheppey Way N/Sheppey Way W priority junction close to the A249 interchange. It is proposed that the existing Sheppey Way N arm would be stopped up and access served through the development proposals.

It is proposed that the internal roads would meet the Kent Design Guide standards and that there would be two internal Local Distributor roads with shared use cycle facilities forming a loop through the development.

Trip Generation.

The applicant has acknowledged that both trip generation and internalising discounts are yet to be agreed. The applicant has suggested that the residential element of the development would introduce 854 AM and 1,002 PM external movements. These appear to have been calculated on 2500 new homes rather than 3000. An additional 873 AM and 589 PM movements are proposed to be associated with the employment.

Impact on the Local Highway Network

A number of surveys have been carried out to inform the assessment provided and demonstrate the flows and counts through the local network.

Of the four proposals put forward this is the only one not yet to have committed to use if the Swale Borough Council/KCC SATURN model to demonstrate its impact.

There are known concerns regarding the capacity of the A2 Keycol/A249 junction, A249/Grovehurst junction, A249 Bobbing junction, the capacity of the A2 through the AQMA at Newington, junctions on the B2006 into Sittingbourne and junction 5 of the M2.

Whilst there are mitigations being proposed as part of the HIF bids and through mitigations secured from developments associated with the current local plan, all other evidence seen to date would appear to demonstrate that these improvements merely mitigate the impacts of the current local plan and do not provide capacity for such development as is being proposed here.

Walking

Existing facilities within Sittingbourne and the surrounding area are beyond the recommended walking distances. The development does include opportunities for the provision of local amenities within walkable distance. Secondary education and alternative Primary School facilities would largely fall outside of the recommended distances. Along with the obvious barrier of the A249 it is highly unlikely that many external walking trips would be made to amenities and services.

Cycling

It is mentioned that consideration will be given to improving cycle connections including towards Newington station. Through delivery of the current Local plan there would be improvements to the North of the site. Provision between the site and Sittingbourne Town Centre would need significant improvement.

Bus Service

Proposals will include improvements to bus infrastructure including a potential Fast Track type facility between the site and Newington and possibly Sittingbourne and the Eurolink estate. It is also suggested that a route to Rainham may also be possible to connect with Thameslink services. It is not clear how this would be delivered, and further details would be needed. In respect of a Fast Track bus route to Sittingbourne, it is difficult to envisage where this may go.

Further work required.

The modelling assessments are yet to be agreed by the Highway Authority and if continued we would urge the applicant to make use of our available platform.

Aside from the concerns raised above, the application would appear impact the AQMA in Newington and how it proposes to mitigate the impacts on the A249 corridor and routes into Sittingbourne town centre.

Summary

KCC Highways will continue to provide information to the applicant, in addition to that of the above, so that appropriate assessments are completed to the satisfaction of the Highway Authority.

Any new settlement, such as this, that does not have a direct relation to an existing settlement, will have significant time lags before it can reap the beneficial employment/resident ratios of internal traffic movements. An interim study which does not include the traffic reductions relevant to an established settlement would need to be provided to demonstrate the highest levels of impact expected on the highway.

Understanding that the applicant has responded to the Borough Councils requests, our initial impression is that it is not feasible to deliver the appropriate mitigation likely to be required.

The above statement is concluded from the initial evidence of our own modelling that included similar levels of development being proposed in this area. That evidence would suggest that the A249 would require three lanes in each direction and significant changes to the A249 junctions at key Street, Bobbing and Grovehurst, additional to that being proposed in the HIF applications. The mitigation being put forward for the current local plan should provide mitigation for its impact but leaves very little scope for further enhancement, particularly at the A249 junctions and local routes to the West of Sittingbourne.

Yours sincerely

Colin Finch
Principal Development Planner

APPENDIX E VIABILITY GRIDS

Scheme Ref:
No Units:
Notes:

North Street, Faversham (Gladman)
5000 Location / Value Zone: Faversham
infrastructure costs based on Savills (for Gladman)

Development Scenario: **Greenfield**

SENSITIVITY ANALYSIS

The following sensitivity tables show the balance of the appraisal (RLV-BLV) for changes in appraisal input assumptions above. Where the surplus is positive (green) the policy is viable. Where the surplus is negative (red) the policy is not viable.

TABLE 1

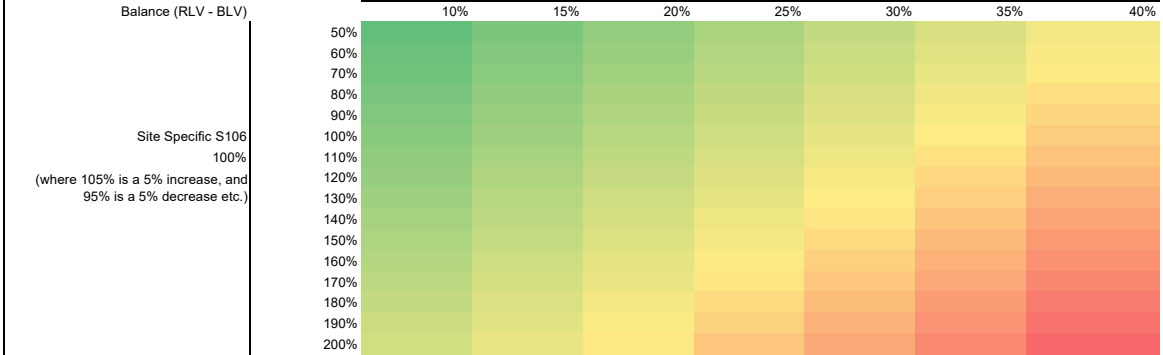


TABLE 2

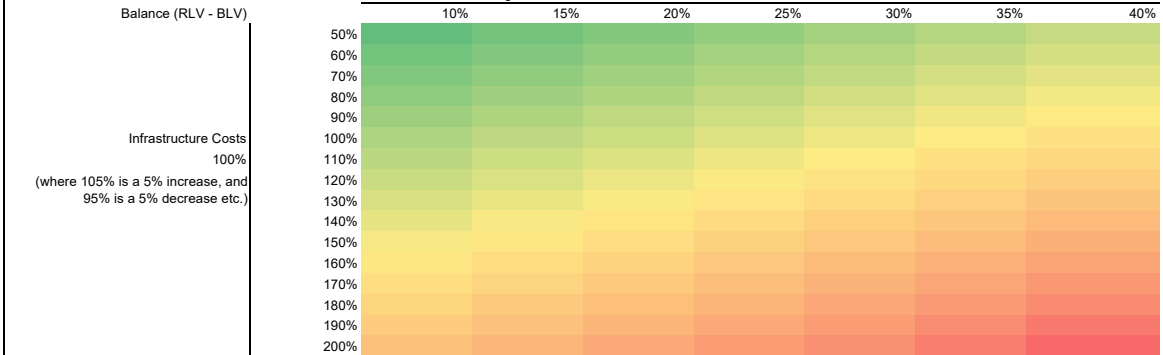


TABLE 3

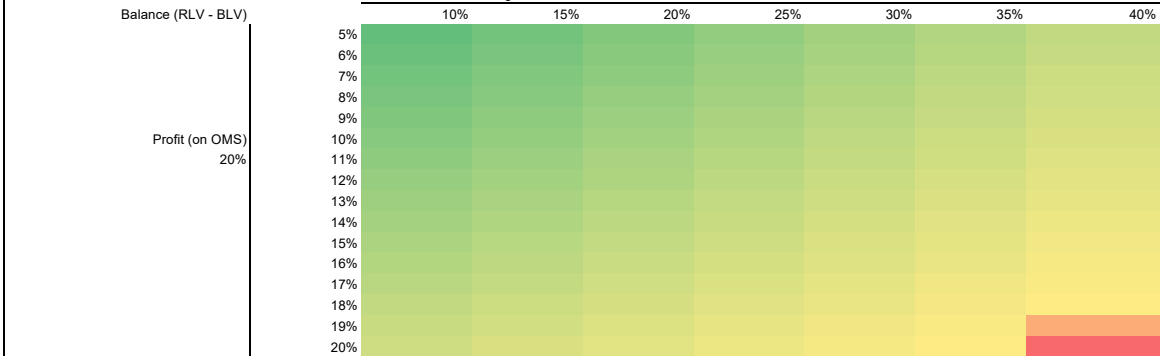
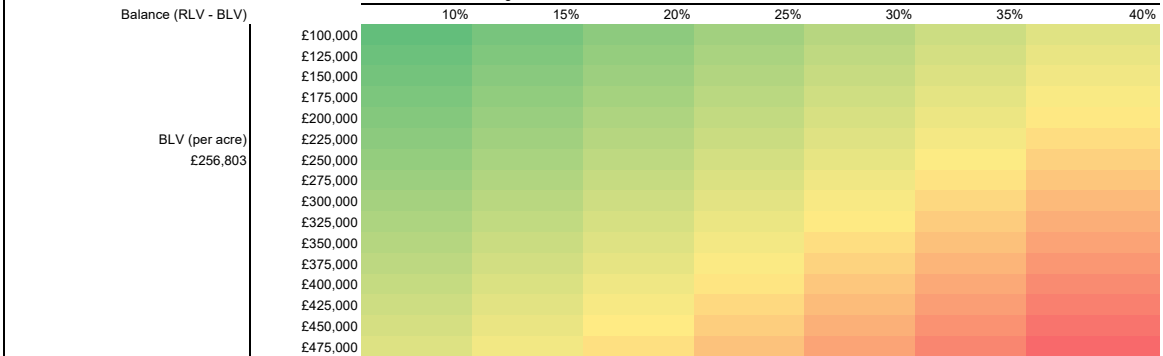


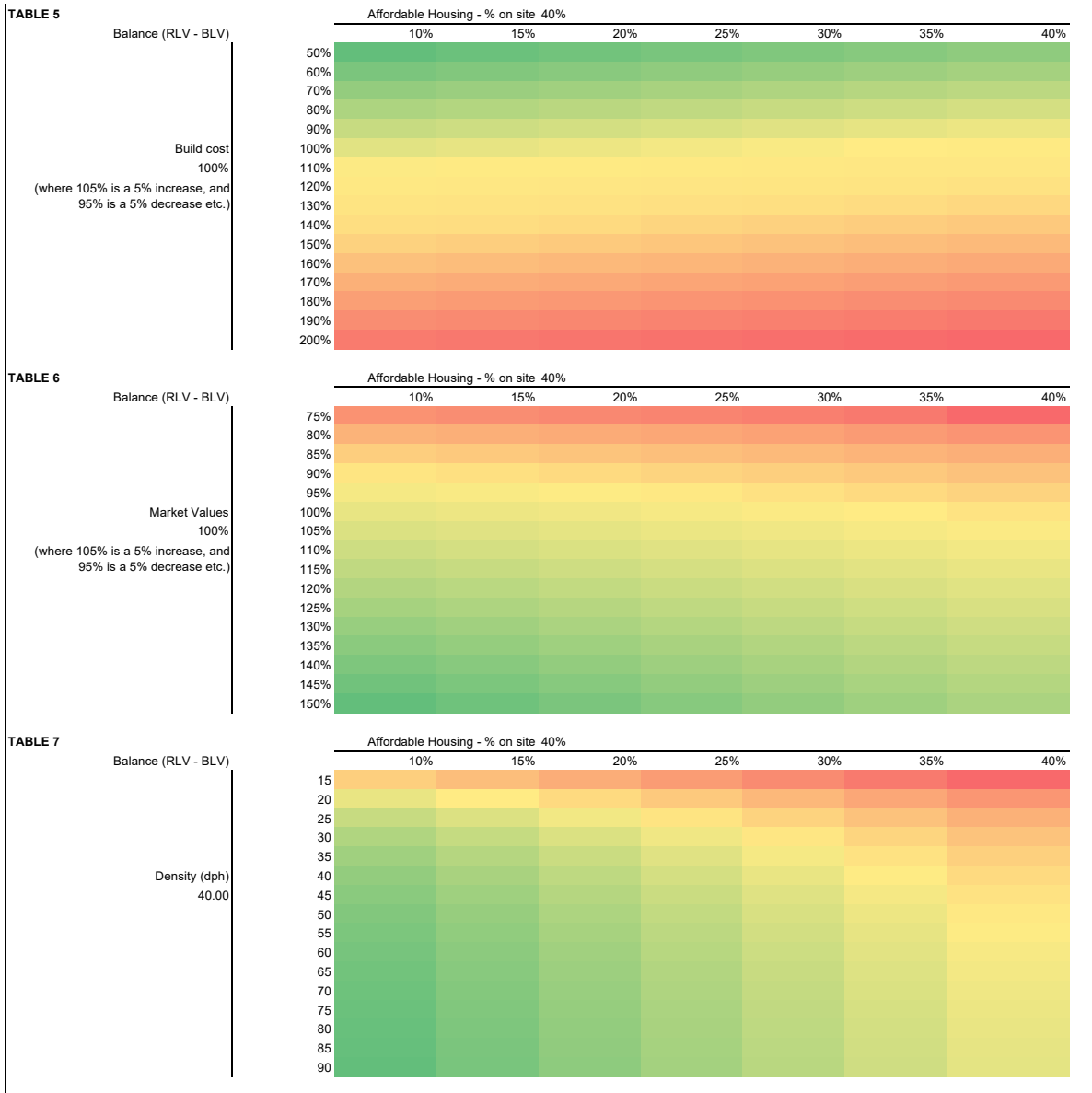
TABLE 4



Scheme Ref:
No Units:
Notes:

North Street, Faversham (Gladman)
5000 Location / Value Zone: Faversham
infrastructure costs based on Savills (for Gladman)

Development Scenario: **Greenfield**



Scheme Ref: **Highsted Park, Sittingbourne (Quinn)**
 No Units: **8000** Location / Value Zone: Sittingbourne Development Scenario: **Greenfield**
 Notes: motorway Junction excluded; but still includes policy compliant 40% AH

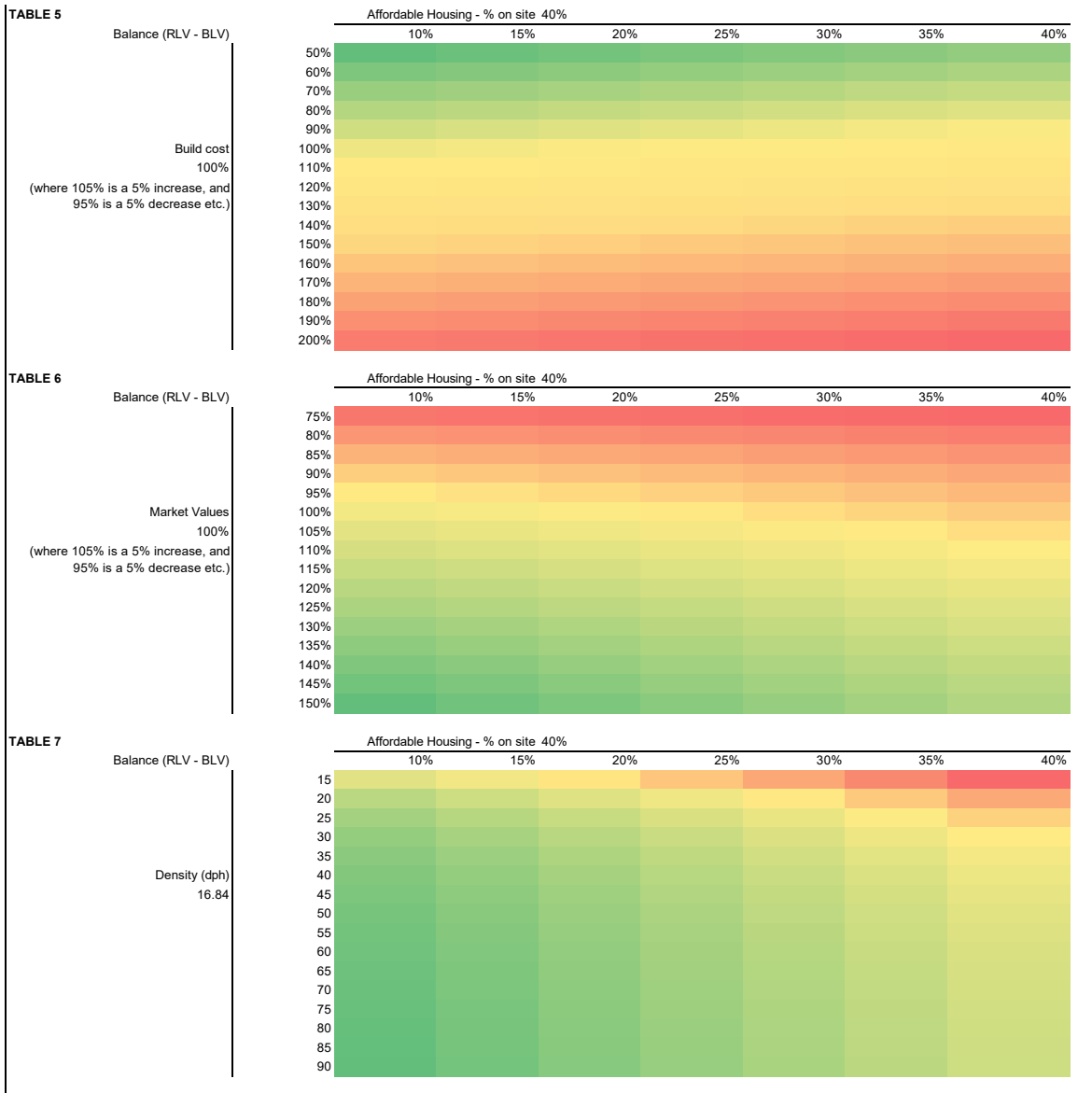
SENSITIVITY ANALYSIS
 The following sensitivity tables show the balance of the appraisal (RLV-BLV) for changes in appraisal input assumptions above.
 Where the surplus is positive (green) the policy is viable. Where the surplus is negative (red) the policy is not viable.

		Affordable Housing - % on site 40%							
		10%	15%	20%	25%	30%	35%	40%	
TABLE 1	Balance (RLV - BLV) Site Specific S106 100% (where 105% is a 5% increase, and 95% is a 5% decrease etc.)	50%	Green	Green	Green	Yellow	Yellow	Orange	Red
		60%	Green	Green	Green	Yellow	Yellow	Orange	Red
		70%	Green	Green	Green	Yellow	Yellow	Orange	Red
		80%	Green	Green	Green	Yellow	Yellow	Orange	Red
		90%	Green	Green	Green	Yellow	Yellow	Orange	Red
		100%	Green	Green	Green	Yellow	Yellow	Orange	Red
		110%	Green	Green	Green	Yellow	Yellow	Orange	Red
		120%	Green	Green	Green	Yellow	Yellow	Orange	Red
		130%	Green	Green	Green	Yellow	Yellow	Orange	Red
		140%	Green	Green	Green	Yellow	Yellow	Orange	Red
		150%	Green	Green	Green	Yellow	Yellow	Orange	Red
		160%	Green	Green	Green	Yellow	Yellow	Orange	Red
		170%	Green	Green	Green	Yellow	Yellow	Orange	Red
		180%	Green	Green	Green	Yellow	Yellow	Orange	Red
		190%	Green	Green	Green	Yellow	Yellow	Orange	Red
		200%	Green	Green	Green	Yellow	Yellow	Orange	Red
TABLE 2	Balance (RLV - BLV) Infrastructure Costs 100% (where 105% is a 5% increase, and 95% is a 5% decrease etc.)	50%	Green	Green	Green	Yellow	Yellow	Orange	Red
		60%	Green	Green	Green	Yellow	Yellow	Orange	Red
		70%	Green	Green	Green	Yellow	Yellow	Orange	Red
		80%	Green	Green	Green	Yellow	Yellow	Orange	Red
		90%	Green	Green	Green	Yellow	Yellow	Orange	Red
		100%	Green	Green	Green	Yellow	Yellow	Orange	Red
		110%	Green	Green	Green	Yellow	Yellow	Orange	Red
		120%	Green	Green	Green	Yellow	Yellow	Orange	Red
		130%	Green	Green	Green	Yellow	Yellow	Orange	Red
		140%	Green	Green	Green	Yellow	Yellow	Orange	Red
		150%	Green	Green	Green	Yellow	Yellow	Orange	Red
		160%	Green	Green	Green	Yellow	Yellow	Orange	Red
		170%	Green	Green	Green	Yellow	Yellow	Orange	Red
		180%	Green	Green	Green	Yellow	Yellow	Orange	Red
		190%	Green	Green	Green	Yellow	Yellow	Orange	Red
		200%	Green	Green	Green	Yellow	Yellow	Orange	Red
TABLE 3	Balance (RLV - BLV) Profit (on OMS) 20%	5%	Green	Green	Green	Green	Green	Green	Green
		6%	Green	Green	Green	Green	Green	Green	Green
		7%	Green	Green	Green	Green	Green	Green	Green
		8%	Green	Green	Green	Green	Green	Green	Green
		9%	Green	Green	Green	Green	Green	Green	Green
		10%	Green	Green	Green	Green	Green	Green	Green
		11%	Green	Green	Green	Green	Green	Green	Green
		12%	Green	Green	Green	Green	Green	Green	Green
		13%	Green	Green	Green	Green	Green	Green	Green
		14%	Green	Green	Green	Green	Green	Green	Green
		15%	Green	Green	Green	Green	Green	Green	Green
		16%	Green	Green	Green	Green	Green	Green	Green
		17%	Green	Green	Green	Green	Green	Green	Green
		18%	Green	Green	Green	Green	Green	Green	Green
		19%	Green	Green	Green	Green	Green	Green	Green
		20%	Green	Green	Green	Green	Green	Green	Green
TABLE 4	Balance (RLV - BLV) BLV (per acre) £202,763	£100,000	Green	Green	Green	Green	Green	Green	Green
		£125,000	Green	Green	Green	Green	Green	Green	Green
		£150,000	Green	Green	Green	Green	Green	Green	Green
		£175,000	Green	Green	Green	Green	Green	Green	Green
		£200,000	Green	Green	Green	Green	Green	Green	Green
		£225,000	Green	Green	Green	Green	Green	Green	Green
		£250,000	Green	Green	Green	Green	Green	Green	Green
		£275,000	Green	Green	Green	Green	Green	Green	Green
		£300,000	Green	Green	Green	Green	Green	Green	Green
		£325,000	Green	Green	Green	Green	Green	Green	Green
		£350,000	Green	Green	Green	Green	Green	Green	Green
		£375,000	Green	Green	Green	Green	Green	Green	Green
		£400,000	Green	Green	Green	Green	Green	Green	Green
		£425,000	Green	Green	Green	Green	Green	Green	Green
		£450,000	Green	Green	Green	Green	Green	Green	Green
		£475,000	Green	Green	Green	Green	Green	Green	Green

Scheme Ref:
No Units:
Notes:

Higsted Park, Sittingbourne (Quinn)
8000 Location / Value Zone: Sittingbourne
motorway Junction excluded; but still includes policy compliant 40% AH

Development Scenario: **Greenfield**



Scheme Ref:
No Units:
Notes:

South East Faversham (Duchy of Cornwall)
2500 Location / Value Zone: Faversham
S106 and Site Infrastructure costs increased to benchmark

Development Scenario: Greenfield

SENSITIVITY ANALYSIS

The following sensitivity tables show the balance of the appraisal (RLV-BLV) for changes in appraisal input assumptions above. Where the surplus is positive (green) the policy is viable. Where the surplus is negative (red) the policy is not viable.

TABLE 1



TABLE 2

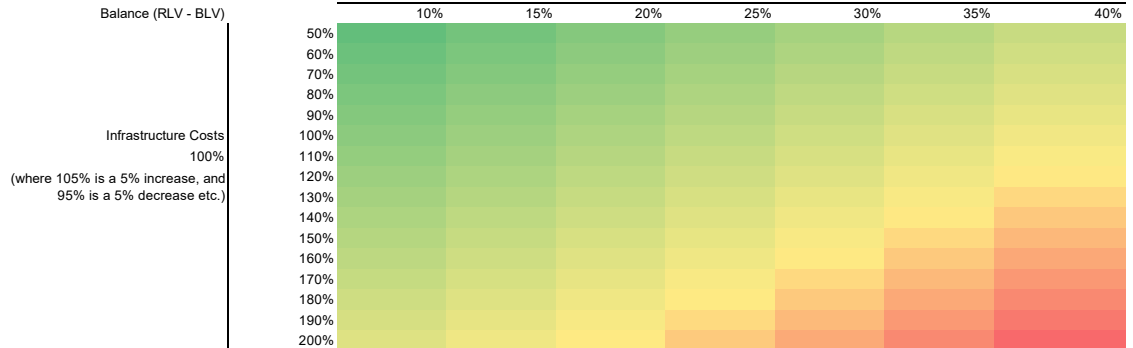
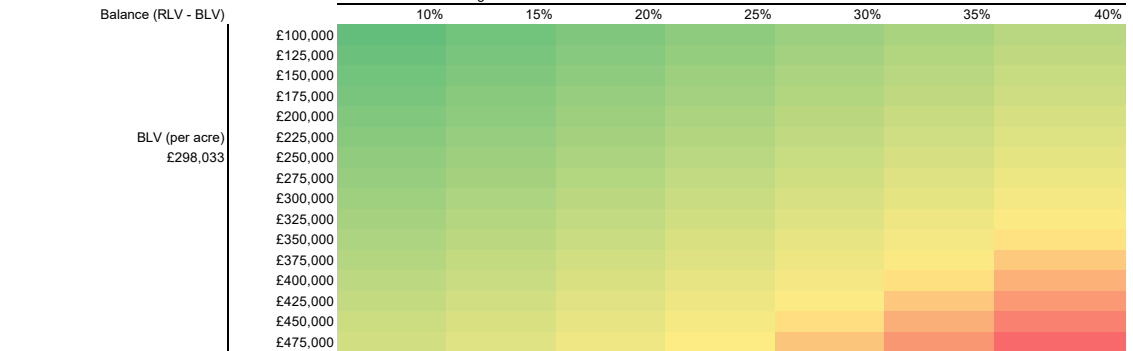


TABLE 3



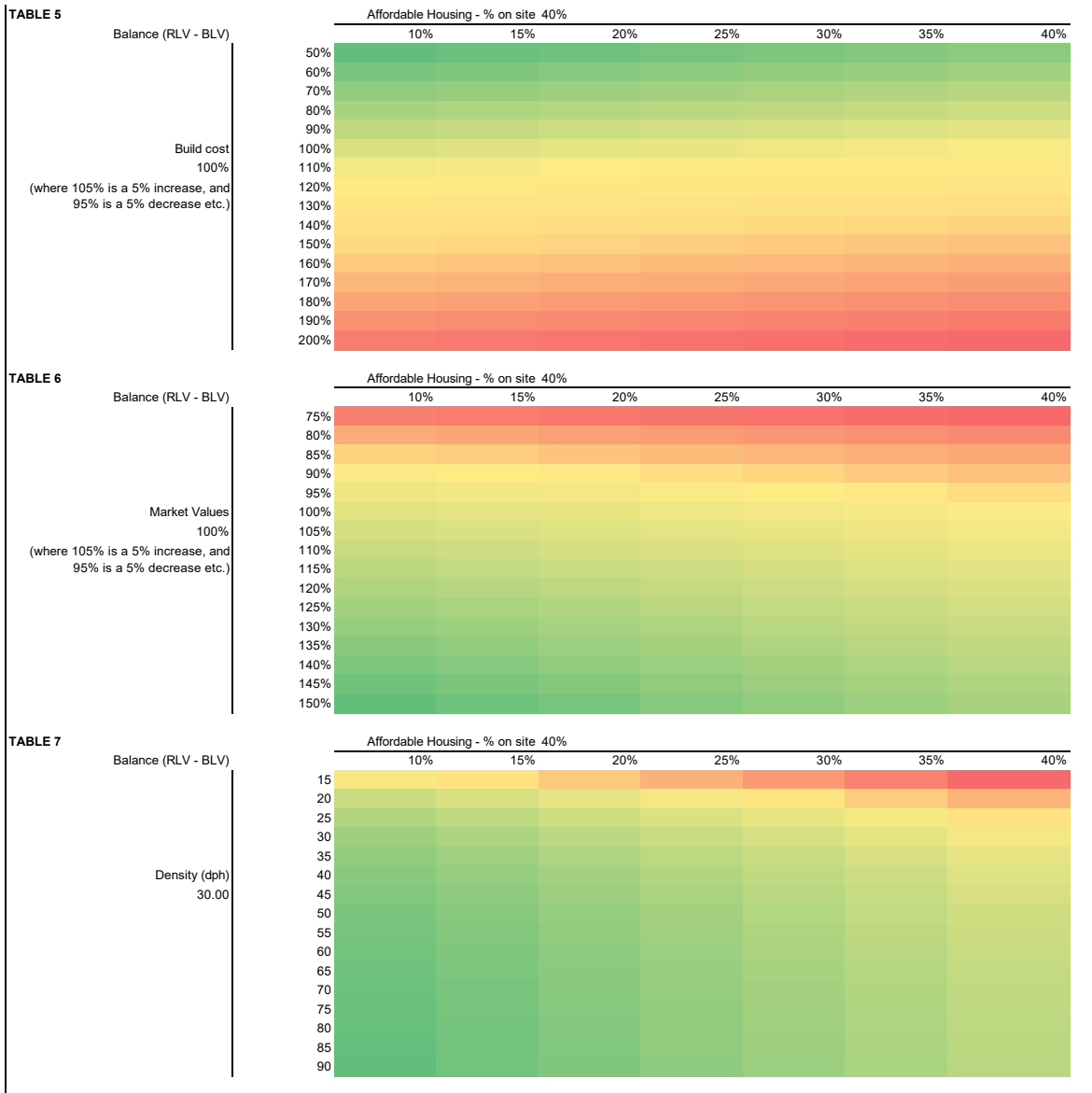
TABLE 4



Scheme Ref:
No Units:
Notes:

South East Faversham (Duchy of Cornwall)
2500 Location / Value Zone: Faversham
S106 and Site Infrastructure costs increased to benchmark

Development Scenario: **Greenfield**



Scheme Ref: **Foxchurch Bobbing, Sittingbourne**
 No Units: **2500** Location / Value Zone: **Sittingbourne** Development Scenario: **Greenfield**
 Notes: **S106 and Site Infrastructure costs increased to benchmark**

SENSITIVITY ANALYSIS
 The following sensitivity tables show the balance of the appraisal (RLV-BLV) for changes in appraisal input assumptions above.
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TABLE 1		Affordable Housing - % on site 40%						
Balance (RLV - BLV)		10%	15%	20%	25%	30%	35%	40%
50%								
60%								
70%								
80%								
90%								
100%								
110%								
120%								
130%								
140%								
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160%								
170%								
180%								
190%								
200%								

TABLE 2		Affordable Housing - % on site 40%						
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50%								
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200%								

TABLE 3		Affordable Housing - % on site 40%						
Balance (RLV - BLV)		10%	15%	20%	25%	30%	35%	40%
5%								
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19%								
20%								

TABLE 4		Affordable Housing - % on site 40%						
Balance (RLV - BLV)		10%	15%	20%	25%	30%	35%	40%
£100,000								
£125,000								
£150,000								
£175,000								
£200,000								
£225,000								
£250,000								
£275,000								
£300,000								
£325,000								
£350,000								
£375,000								
£400,000								
£425,000								
£450,000								
£475,000								

Scheme Ref:
No Units:
Notes:

Foxchurch Bobbing, Sittingbourne
2500 Location / Value Zone: Sittingbourne
S106 and Site Infrastructure costs increased to benchmark

Development Scenario: **Greenfield**

