

Local Plan Panel Meeting		Agenda Item:
Meeting Date	27 th November 2019	
Report Title	Swale Landscape Sensitivity Assessment	
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning	
SMT Lead	Emma Wiggins	
Head of Service	James Freeman	
Lead Officer	Anna Stonor	
Key Decision	No	
Classification	Open	
Recommendations	<p>Recommend to Cabinet that they:</p> <ol style="list-style-type: none"> 1. Note the findings of the <i>Swale Landscape Sensitivity Assessment</i> which will form part of the evidence base for the Local Plan Review 	

1. Purpose of Report and Executive Summary

- 1.1. This report updates the Local Plan Panel on work carried out by landscape consultants, LUC, on the *Swale Landscape Sensitivity Assessment*. The assessment itself is attached to this report as Appendix I.
- 1.2. The Assessment considers the landscape implications of possible extensions to Swale's principle settlements and in doing so looks at 46 individual assessment areas.
- 1.3. The Panel is asked to review and note the findings of this Assessment and recommend to Cabinet that the *Swale Landscape Sensitivity Assessment* becomes part of the evidence base for the Local Plan Review.

2. Background

- 2.1. As part of the Local Plan Review, the Council needs to consider how sensitive the landscapes around the main settlements of the borough are to possible future residential and employment development.
- 2.2. A similar study was undertaken to inform the adopted Local Plan. This study was carried out by Jacobs in June 2010 and was titled the *Swale Urban Extension Landscape Capacity Study*. It proved useful in the analysis of the landscape's capacity to accommodate change for sites around the principal urban areas, and was particularly useful in informing the Strategic Housing Land Availability Assessment (SHLAA) and the Sustainability Appraisal.

- 2.3. LUC are a well-established environmental consultancy with a track record in landscape planning. Since 2016 they have done similar studies around the country including in Leicestershire, Bracknell Forest, Dartmoor National Park, Sevenoaks, Hertfordshire and Gravesham.
- 2.4. LUC also recently completed the Swale Local Landscape Designation Review which was reported to Local Plan Panel in November 2018.

3. NPPF and the planning policy context

- 3.1. National planning policy, in the form of the NPPF's paragraph 23, requires strategic policies in the local plan to '**provide a clear strategy for bringing sufficient land forward**, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.'
- 3.2. Paragraph 20 explains that 'strategic policies should set out an overall strategy for the pattern, scale and quality of development', including 'sufficient provision for:.. d) **conservation and enhancement** of the natural, built and historic environment, including **landscapes** and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 3.3. Paragraph 127 states that 'planning policies and decisions should ensure that developments [are]:...c) sympathetic to local character and history, including the surrounding built environment and **landscape setting**...'
- 3.4. Paragraph 170 explains: 'Planning policies and decisions should contribute to and enhance the natural and local environment by: a) **protecting and enhancing valued landscapes**, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or **identified quality in the development plan**)...'
- 3.5. Paragraph 171 goes on to say 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; **allocate land with the least environmental or amenity value**, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 3.6. Paragraph 180 sets out that '**planning policies and decisions should also ensure that new development is appropriate for its location** taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, **as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development**'.
- 3.7. As such the Local Plan Review is required to allocate sufficient land to address need, in accordance with an overall strategy for development, whilst protecting

valued landscapes and being sympathetic to landscape setting, allocating land with least environmental value and taking account of the sensitivity of sites.

- 3.8. Planning Practice Guidance also promotes the use of assessments such as this: 'To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed (July 2019)¹. As such, this study complies with the most up to date planning guidance.
- 3.9. The Swale Landscape Sensitivity Assessment will assist in the process of allocating sites within the Local Plan Review. It could also be used by Development Management if sites come forward as planning applications.

4. Assessment Methodology

- 4.1. The assessment's methodology is set out in chapter 2 of Appendix I.
- 4.2. Using the 42 landscape character areas defined in the 2011 Swale Landscape Character and Biodiversity Appraisal as its primary evidence base, this study examined landscape sensitivity around the following settlements: Sittingbourne, Faversham, Sheerness/Queenborough and Minster (using a 2km radius) and Iwade, Teynham, Leysdown/Warden, Upchurch, Lower Halstow, Eastchurch, Bredgar, Newington and Boughton and Dunkirk (using a 1km radius).
- 4.3. Within the 2km/1km radii, the areas were defined following a desktop analysis of adopted local plan constraints (eg allocations and designations), topography, boundaries such as roads and paths and with information on sites submitted to the Strategic Housing Land Availability Assessment (SHLAA) and from the Employment Land Review as well as information from Natural England (eg National Character Areas) and the Kent Historic Landscape Characterisation Study. Following this, broad areas of land were scoped out if within Flood Zone 3 (highest level of flood risk), if made up of national or international biodiversity/geological designations or if a local green space, sports or playing field.
- 4.4. As a result of this scoping exercise 46 distinct landscape sensitivity assessment areas were identified. Each of these has been individually assessed.
- 4.5. As a point of interest, Warden, Upchurch, Lower Halstow, Bredgar are defined in the adopted Local Plan's settlement strategy as 'villages with built-up area boundaries' as opposed to the other settlements assessed which are urban or local centres, where it might be assumed that the bulk of development might be directed. However, these villages were included in the assessment due to the number of SHLAA sites received for these locations. Some SHLAA sites were also received in a number of other villages. However, due to the smaller number of SHLAA sites received in these other villages, for the constraints around these

¹ Planning Practice Guidance, Paragraph: 037 Reference ID: 8-037-20190721, Revision date: 21 07 2019

locations (eg within the AONB) and for reasons of budget these locations were not included in this study. These sites will be assessed individually by planning, conservation and landscape officers within the SHLAA process.

- 4.6. The assessment looked at two broad types of development: residential development of up to 2 hectares (typical dwellings of 2/3 storeys at a density of 40/60 dwellings per hectare) and employment development of up to 2 hectares (Use Class B - business/general industrial/storage and distribution) - typically 2 storey high warehouses.
- 4.7. The landscape sensitivity assessment is based on an assessment of landscape character using carefully defined criteria which reflect different attributes of the landscape that can potentially be affected by the proposed developments. Table 2.3 gives the detail for the six criteria used: topography and scale; natural character; sense of time/historic landscape character; visual character; perceptual and experiential qualities; and character and setting of existing settlement.
- 4.8. Following desk top assessments field verification surveys were undertaken by LUC to test and refine the outputs from the desk study. Results were also discussed in detail with planning officers.
- 4.9. The results of the assessment can be found in part 3 (Results - Appendix 1) of Appendix I. A five point rating from 'high to low' landscape sensitivity is used to illustrate overall levels of landscape sensitivity. For instance, in an area of high sensitivity the key characteristics and qualities of the landscape would be highly sensitive to change whereas in an area of low sensitivity the key characteristics and qualities of the landscape are robust and are either unlikely to be subject to change or are not sensitive to the change proposed. It should be noted that no areas assessed in Swale were assessed as having low sensitivity, which reflects the overall sensitivity of landscapes across the borough.
- 4.10. Table 3.1 on page 25 of Appendix I is a summary of the overall landscape sensitivity for the 46 assessment areas. Results are given for landscape sensitivity in relation to residential development and for employment development.
- 4.11. Figures on pages 29 and 30 of the report show the results spatially for all assessment areas in the borough.
- 4.12. The majority of the report comprises the detailed assessment profiles for the 46 assessment areas. These are grouped in relation to the settlements which they surround and comprise mapping, a description of location, landscape character and landscape value. This is followed by the assessment criteria descriptions and the overall assessment results. Spatial variations are highlighted where relevant. Each detailed profile is completed with a short section of guidance for each area should any development be proposed.
- 4.13. It should be noted that conclusions of landscape sensitivity are professional judgements, based on carefully defined criteria and refined by site visits,

discussions with officers and with reference to other professional landscape studies (eg those to inform sites for the adopted local plan).

- 4.14. Paragraphs 1.15 to 1.20 of the assessment explain the limitations of the study. In broad terms, the results of this assessment should not be interpreted as a definitive statement on the suitability of locations for development and this study is not a replacement for detailed landscape and visual impact studies for specific schemes which will be assessed on their individual merits.
- 4.15. It should also be remembered that the headline results (High, Moderate-High, Moderate, Low-Moderate and Low) should always be interpreted in conjunction with the information contained in the detailed profiles and that it should also not be assumed that all areas with lower sensitivity ratings could be considered suitable for development, as cumulative issues would need to be considered. Guidance on development is given with the proviso that it is general and should not be interpreted to the effect that residential and employment development of the scale assessed would be considered acceptable in principle in landscape terms.

5. Proposal

- 5.1 The Swale Landscape Sensitivity Assessment is a professional study carried out to inform the preparation of the Local Plan Review. The Panel is asked to:
 1. Note the findings of the Swale Landscape Sensitivity Assessment which will form part of the evidence base for the Local Plan Review

6. Alternative Options

- 6.1. An alternative option for Panel Members is not to accept the results of the *Swale Landscape Sensitivity Assessment*. However, the assessment is a professional and up to date piece of evidence, carried out to reflect the requirements of national planning policy, which has been through informal consultation (see below) and which will be useful in the assessment of sites within the Local Plan Review. As such this approach is not recommended as it would not be using the best available evidence.

7. Consultation Undertaken or Proposed

- 7.1 A consultation on the draft *Swale Landscape Sensitivity Assessment* was carried out between 26th July and 9th September.
- 7.2 All Council Members, Parish and Town Councils were written to and asked whether they would like to submit comments on the Swale Landscape Sensitivity Assessment. The consultation was also advertised on the Swale Planning Policy website.

- 7.3 In total 16 representations were received. Six of these were from Parish Councils, one from the Faversham Society and nine from developers or their agents.
- 7.4 Overall the report was well received. In essence the Parish Council representations generally argued in favour of increasing sensitivity ratings whilst developers generally argued that assessment areas were too large in relation to the sites they were interested in and sensitivity ratings should be lowered for these smaller assessment areas.
- 7.5 The full set of representations have been reviewed by Officers and LUC. A copy of these can be found in a folder in the Members Room. A summary of the representations received and the response by Officers and LUC can be found in Appendix II to this report.
- 7.6 The full comments were considered and discussed by planning officers and LUC and a number of small changes and clarifications to the Assessment report were made. No changes were made to the overall assessment area results as a result of the consultation.

8. Implications

Issue	Implications
Corporate Plan	Supports the Council's corporate priorities for a borough and a community to be proud of.
Financial, Resource and Property	Within Local Plan budget.
Legal and Statutory	None anticipated at this time.
Crime and Disorder	None anticipated at this time.
Environment and Sustainability	The Local Plan process will be subject to Sustainability Appraisal.
Health and Wellbeing	None at this time.
Risk Management and Health and Safety	None at this time.
Equality and Diversity	The Local Plan process will be subject to Community Impact Assessments at appropriate points.
Privacy and Data Protection	Any data has been processed in a manner compliant with GDPR.

9. Appendices

9.1. Appendix I - Swale Landscape Sensitivity Assessment - October 2019

9.2. Appendix II - Swale Landscape Sensitivity Consultation - Summary of responses and actions

10. Background Papers

10.1. None