

Sustainability Appraisal (SA) of the Swale Local Plan Review

SA Report (DRAFT)
Non-technical Summary

January 2021

Quality information

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Please note that this is a **draft version** of the SA Report.

The information presented in **Part 1** of the report, which deals with ‘growth scenarios’, is near complete. This information was the focus of the “Interim” SA Report presented to the Local Plan Panel’s 19th January meeting.

However, the information presented in **Part 2**, which deals with the plan as a whole, is a work in progress. Conclusions are unlikely to change significantly, but more work is needed to appraise detailed policy wording. The SA Report will be finalised in time for consultation (‘publication’) in line with the legal requirement.

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Local Plan Review (LPR). Once in place, the LPR will establish a spatial strategy for growth over the period 2022 to 2038, building on the adopted Local Plan (2017), which covers the period 2014 to 2031. The LPR will allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.

Central to the SA process is publication of an SA Report for consultation alongside the Draft Plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time the SA Report is published for consultation alongside the 'pre-submission' version of the LPR. This is the non-technical summary (NTS) of the SA Report.

The SA Report / this NTS

The SA Report is structured so as to answer three questions in turn:

1) What has plan-making / SA involved **up to this point**?

- Establishing and appraising growth scenarios

2) What are the SA findings **at this stage**?

- Appraising the draft LPR

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives, as well as an underpinning understanding of key issues, as established through evidence-gathering including consultation on a Scoping Report in 2018.¹

Taken together, this understanding of key topics, objectives and issues indicates the parameters of SA, and provides a methodological 'framework' for appraisal. A list of the topics and underpinning objectives is presented in Table 3.1 of the main report. In summary, the following topics form the back-bone to the framework:

- Air quality
- Biodiversity
- Climate change mitigation
- Communities
- Economy and employment
- Flood risk
- Heritage
- Housing
- Land
- Landscape
- Transport
- Water

¹ The Scoping Report is available at: swale.gov.uk/planning-and-regeneration/local-plans/local-plan-review/local-plan-review

Plan-making / SA up to this point

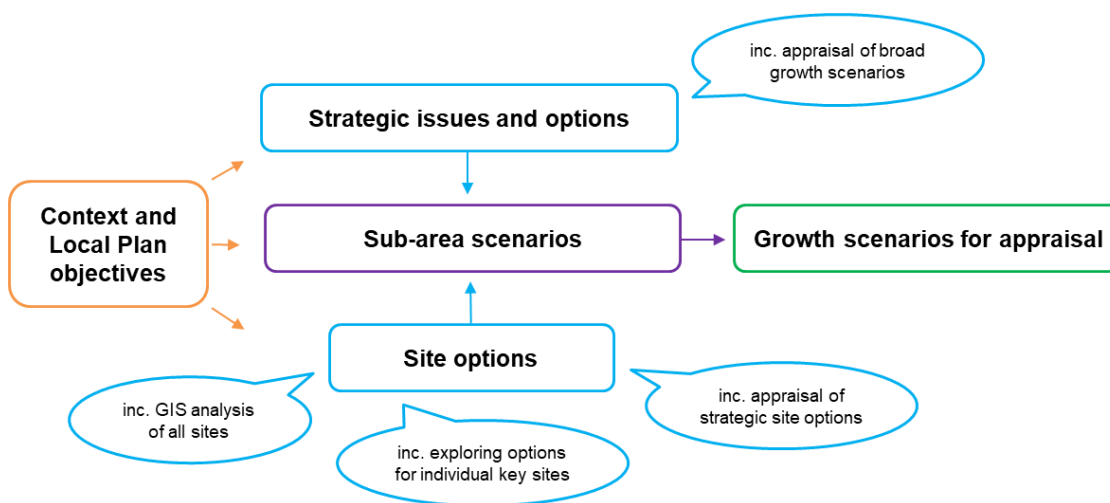
Introduction

Central to the required SA process is exploring 'reasonable alternatives' with a view to informing plan-preparation. As such, Part 1 of the SA Report explains a process of establishing and appraising reasonable 'growth scenarios'.

Establishing growth scenarios

The aim here is to explain the process of establishing growth scenarios for appraisal.

Figure A: Establishing growth scenarios – process overview



Context and Local Plan objectives

A large amount of work has been completed by the Council since commencing the LPR process in 2017. This includes: a consultation entitled Looking Ahead; publication of a Garden Communities Prospectus and subsequent detailed work to explore the four garden community options submitted by developers for consideration; an ongoing process of engagement with key stakeholder organisations; and completion of a wide range of evidence studies.

The evidence generated has fed into work to establish growth scenarios, both directly and indirectly, in the sense that evidence has informed the establishment of LPR objectives which, in turn, are an important starting point for the establishment of growth scenarios. Any growth scenario that would self-evidently not align with the LPR objectives can be deemed 'unreasonable', and not considered further.

Strategic issues and options

There is a need to discuss:

- **Quanta** (*how much?*) – there is strong evidence that the LPR must provide for Local Housing Need (LHN), as understood from the Government's Standard Methodology (as set out in the Planning Practice Guidance, as updated in December 2020), which is 1038 dwellings per annum. However, there is also a need to consider the risk (albeit small) of the LPR needing to provide for higher growth in order to meet unmet housing needs arising from West Kent, where there are constraints to growth (in particular Green Belt and AONB), pressures in respect of unmet needs arising from London and emerging Local Plans facing challenges.
- **Broad distribution** (*where?*) – firstly, there is a need to note that a wide range of evidence-base studies have been prepared of relevance to the matter of how new development (both housing and employment), should be distributed across Swale Borough, and important evidence was also gathered through the Looking Ahead consultation (2018). Appendix II of the main report presents a review.

Secondly, an important consideration is the spatial strategy reflected in the adopted Local Plan, as broadly rolling this forward is an option for the LPR. The question of whether to depart from the adopted Local Plan spatial strategy, and if so to what extent, was explored through consideration of *broad* growth scenarios in July 2020, and an appraisal of the broad growth scenarios is presented in Appendix III of the main report.

Ultimately, the conclusion reached is that there are strong arguments for focusing LPR growth at the Faversham area, as a counter-balance to the strategy in the adopted Local Plan (this is known as Broad Growth Scenario C, and elected members provided a 'steer' in support of this approach in mid-2020) and, as part of this, there is support for strategic growth at Faversham. However, in the view of Council officers (in discussion with AECOM) there is also a need to remain open to the option of a more balanced distribution of LPR growth, and the possibility of two strategic growth locations, specifically one at Faversham and another at Sittingbourne.

Site options

A large number of site options have been submitted to the Council by land-owners and developers, and a process of Strategic Housing Land Availability Assessment (SHLAA) has been completed by the Council in order to identify a shortlist of sites that are available, deliverable and potentially suitable for allocation. The SHLAA provides an important input to the process of establishing growth scenarios (i.e. alternative packages of sites).

Within Swale Borough, as within other local authority areas, there is an important distinction to be made between strategic and non-strategic sites. Strategic sites are those with a housing capacity above circa 1,000 homes and which will be associated with economies of scale that can enable delivery of a good mix of uses (e.g. retail and employment as well as a good mix of homes) and enable delivery of new or upgraded infrastructure (e.g. new road infrastructure, community infrastructure, green infrastructure).

There is a need to consider strategic and non-strategic site options in turn. In summary:

- **Strategic site options** – four strategic site (or 'garden community') options were submitted to the Council following publication of the Prospectus in 2018. These have been examined in detail since that time,² and Appendix IV of the main report presents a comparative appraisal. In light of the appraisal, Council officers (in discussion with AECOM) concluded that: one of the options is quite clearly not suitable for allocation through the LPR, namely North Street, which would involve a new settlement to the south of Faversham; another option can be ruled-out on balance, albeit recognising that the scheme could deliver transformation benefits in terms of employment land and transport infrastructure, namely Southeast Sittingbourne; and the other two options should be taken forward for detailed consideration through the appraisal of growth scenarios, namely East / southeast of Faversham and Bobbing. Further discussion is presented in Section 5.3 of the SA Report.

N.B. there is also the question of site-specific options (i.e. options for specific sites), for example alternative site 'red line boundaries' and alternative conceptual masterplans. See Section 5.3 of the SA Report.

- **Non-strategic site options** – the SHLAA is the main vehicle for considering the merits of non-strategic sites in isolation; however, a supplementary piece of analysis has been completed, with the findings presented within Appendix V of the main report. Specifically, Appendix V presents the findings of a quantitative GIS-based exercise, which has involved examining the spatial relationship (i.e. proximity to / percentage intersect) between all SHLAA sites and a range of constraint (e.g. flood zones, designated heritage assets) and opportunity (e.g. GP surgeries) features for which data is available in digitally mapped form across the Borough as a whole. The analysis does not aim to rule sites in/out, but simply aims to provide information to supplement the SHLAA, and inform consideration of site options within each of the Borough's sub-areas in turn (see below).

Sub-area scenarios

Having gone through a process of building 'top down' (quanta and broad distribution) and 'bottom-up' (strategic and non-strategic site options) understanding, the next step was to draw understanding together to establish growth scenarios for each of the Borough's sub-areas in turn. This is the focus of Section 5.4 within the SA Report.

There is no set way of dividing the Borough into sub-areas; however, for the purposes of the task at hand, it was considered appropriate to explore growth scenarios for: Sittingbourne; Faversham; West Sheppey; Teynham; Newington; Eastchurch; Leysdown; Boughton; Iwade; and Tier 5 settlements and the rural area.

² See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

For each sub-area the aim is to arrive at a conclusion on the sub-area growth scenarios that should be taken forward to the final step in the overall process (as summarised in Figure A), which sees the sub-area growth scenarios combined into a single set of borough-wide growth scenarios.

As a further point on methodology, it is important to note that this work was undertaken subsequent to a decision on an emerging preferred growth scenario by the Swale Borough Cabinet on 28th October 2020 (as informed by the Local Plan Panel steer of 8th October). As such, the emerging preferred growth scenario for each sub-area was taken as a starting-point.

In summary, the decision was to take forward the emerging preferred scenario plus:

- one or more **higher growth** scenarios for Sittingbourne, Newington, Eastchurch and Leysdown; and
- one or more **lower growth** scenarios for Faversham, West Sheppey and Teynham.

Growth scenarios for appraisal

The final task was to draw together the understanding generated in order to arrive at a single set of reasonable borough-wide growth scenarios for the LPR. In practice, this meant exploring ways of combining the **sub-area scenarios**, also mindful of housing supply from **commitments** (i.e. sites with planning permission and/or an allocation in the adopted Local Plan that are expected to deliver in the LPR plan period, i.e. post April 2022) and **windfall** sites (i.e. sites that are neither an existing commitment nor an LPR allocation).

There are many potential combinations of the sub-area scenarios; however, it is possible to immediately rule out those combinations that would deliver too few or too many homes. When seeking to understand the number of homes that must be delivered through the sub-area scenarios in combination, there is a need to take into account not only the total number of homes needed in the plan period, but also supply from commitments (11,000 homes), supply from windfall sites (1,530 homes) and the need for a supply buffer of at least 10%. On this basis, there is a need for combinations of sub-area scenarios to deliver **at least 5,740 homes**.³

Section 5.5 of the SA Report goes through a process of considering ways to combine the sub-area scenarios in order to deliver *at least* 5,740 homes, concluding that there are five reasonable growth scenarios – see Table A, Table B and the subsequent maps.

Table A: Summary of the reasonable scenarios

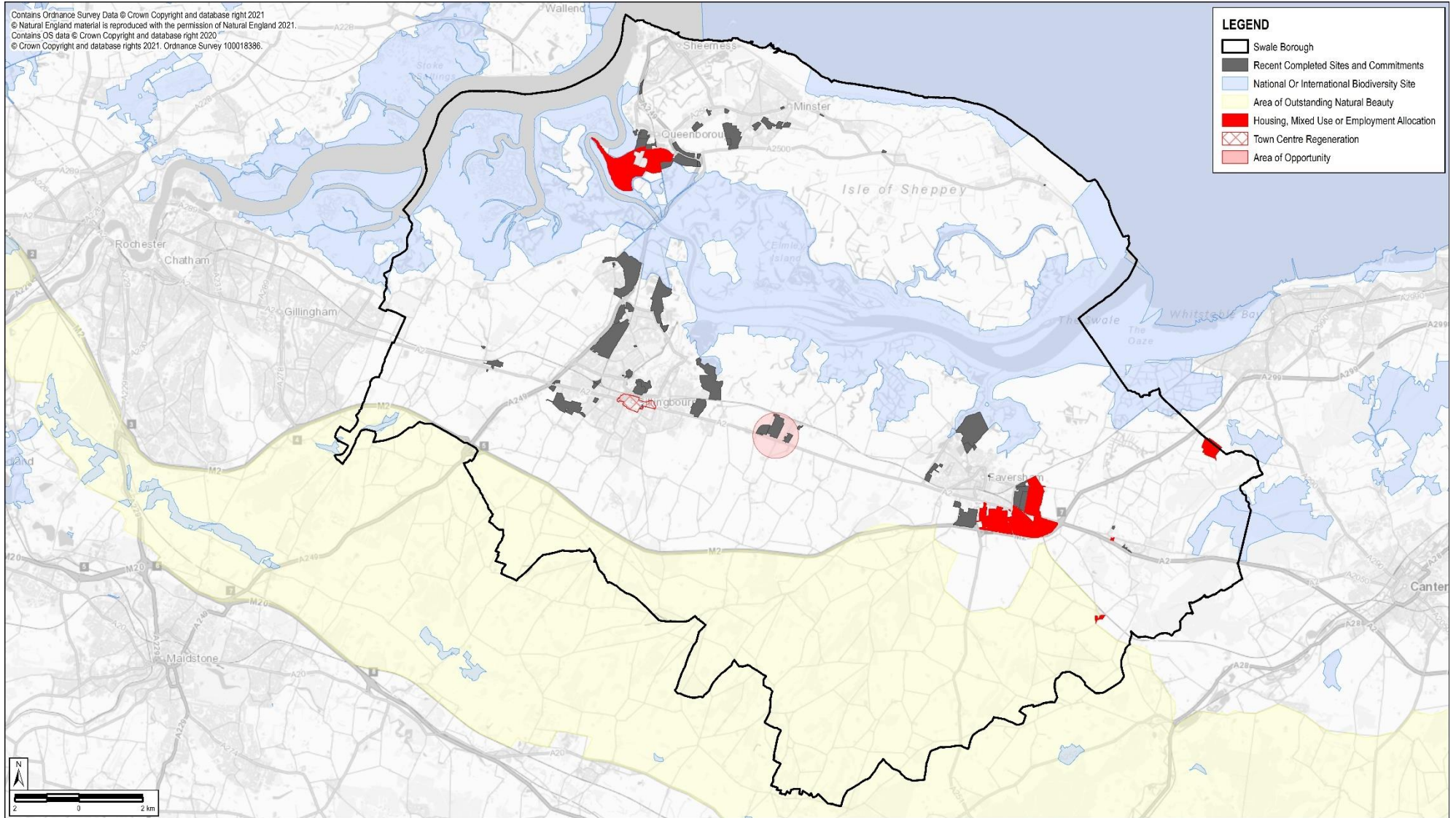
Scenario	Description	Housing requirement
1	The emerging preferred scenario	LHN
2	Scenario 1 but with higher growth at Sittingbourne (Bobbing) and lower growth at Faversham (four urban extensions in place of strategic growth to the E/SE)	LHN
3	Scenario 1 but with lower risk urban extensions (UEs) replacing higher growth strategies for Teynham and Rushenden	LHN
4	Both strategic growth locations; lower growth scenarios elsewhere	Above LHN?
5	Scenario 1 plus lower risk UEs	Above LHN

³ Calculated as: LHN (1,038 dpa x 16 years = c.16,600) + 10% buffer (1,660) – completions (11,000) – windfall (1,530)

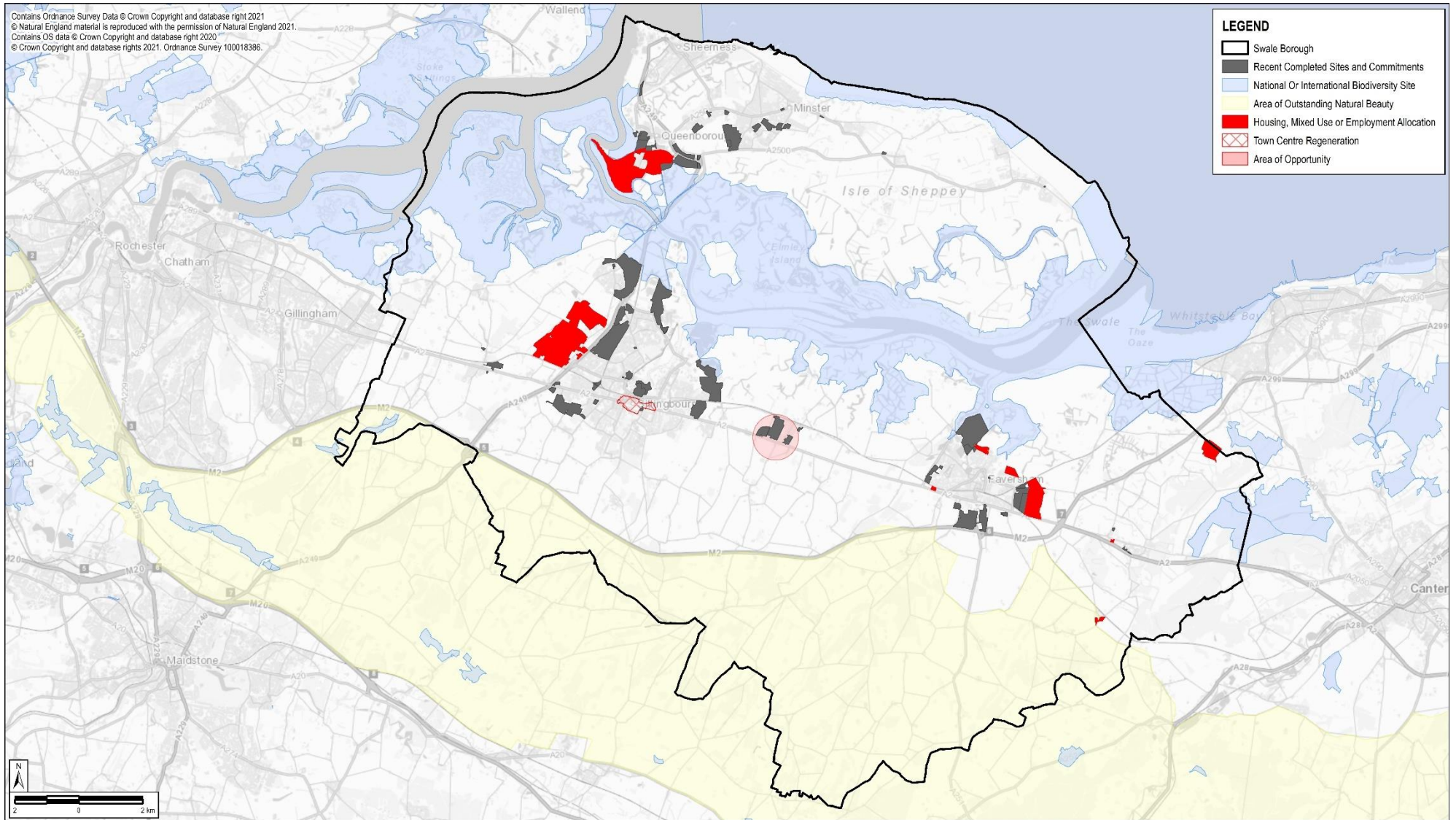
Table B: The reasonable growth scenarios (with constant elements of supply greyed-out)

Growth scenario		1 Preferred scenario	2 Bobbing Faversham UEs	3 E/SE Faversham Low risk UEs	4 E/SE Faversham Bobbing	5 Preferred scenario Low risk UEs	
Source of housing supply							
Commitments		11,000	11,000	11,000	11,000	11,000	
Windfall		1,530	1,530	1,530	1,530	1,530	
Allocations	Sittingbourne	Town centre	850	850	850	850	
		Urban extensions	-	-	500	-	500
		Garden comm (Bobbing)	-	2,500	-	2,500	-
	Faversham	Urban extensions	-	1,000	-	-	-
		Garden comm (E/SE)	3,400	-	3,400	3,400	3,400
	West Sheppey	Sheerness	-	-	-	-	-
		Minster / Halfway	-	-	650	-	650
		Q'borough / Rushenden	850	850	-	-	850
	Tier 4 settlements	Teynham	1,100	1,100	350	-	1,100
		Newington	-	-	200	-	200
		Eastchurch	-	-	65	-	65
		Leysdown	-	-	100	-	100
		Boughton	20	20	20	20	20
		Iwade	-	-	-	-	-
	Tier 5 settlements	Neames Forstal	90	90	90	90	90
Elsewhere		-	-	-	-	-	
Total homes in the plan period (2022-2038)		18,840	18,940	18,755	19,390	20,355	
Total homes per annum		1178	1184	1172	1212	1272	
% supply buffer above LHN (1038 per annum)		13%	14%	13%	17%	23%	
					Provide for LHN	Provide for higher growth	
						Provide for higher growth (unmet needs)	

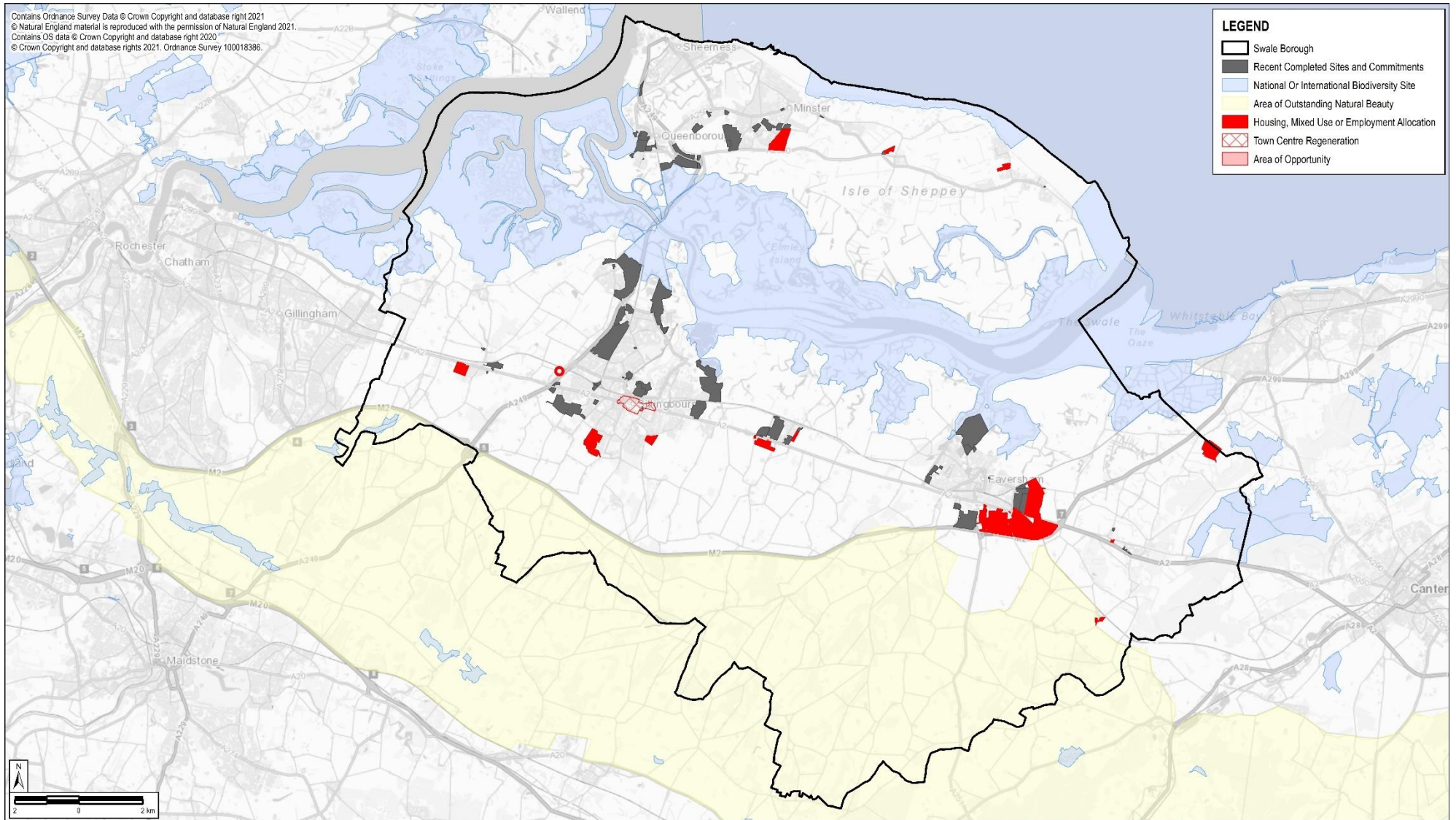
Scenario 1: The emerging preferred scenario



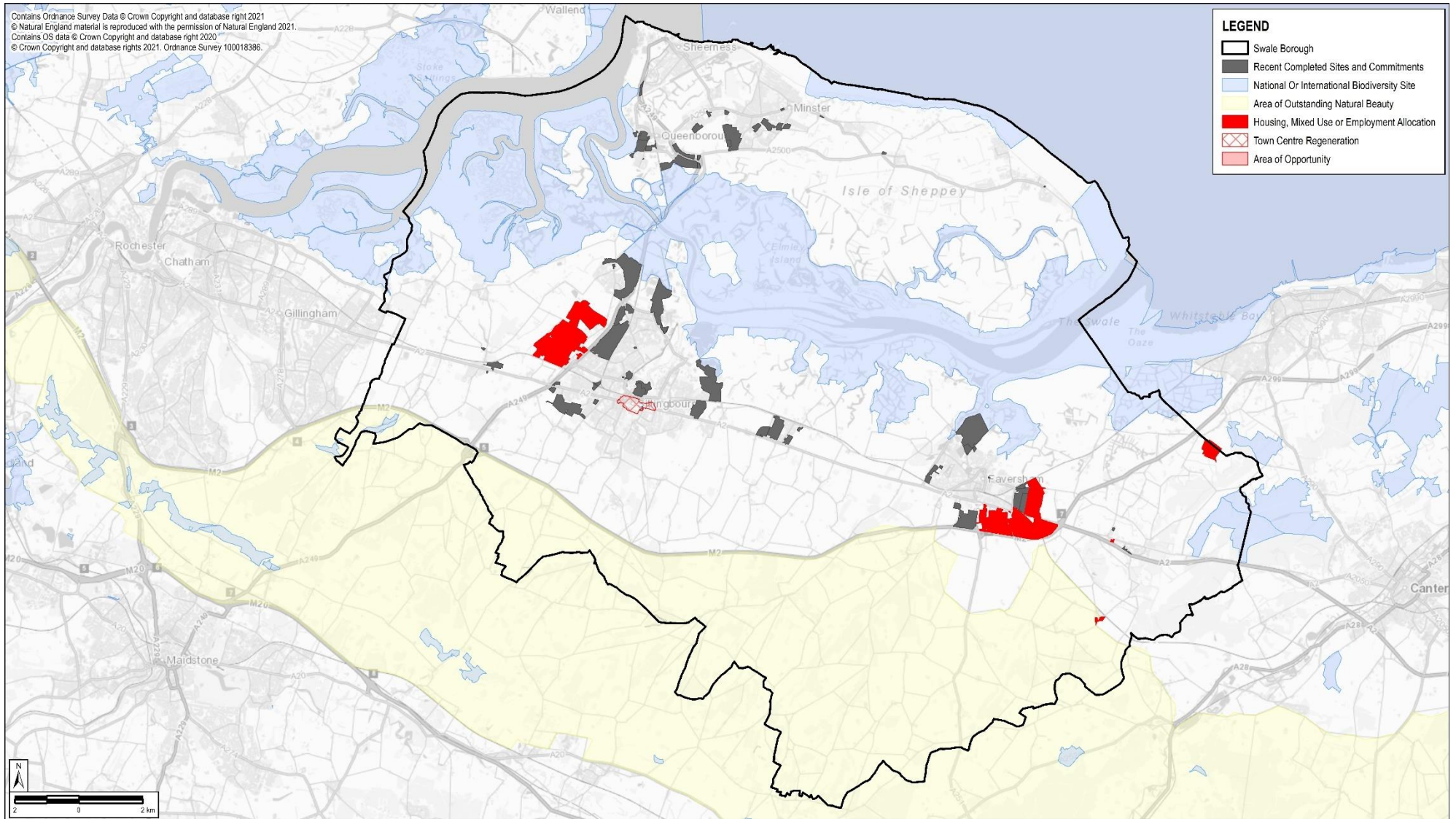
Scenario 2: Scenario 1 but with higher growth at Sittingbourne (Bobbing) / lower at Faversham



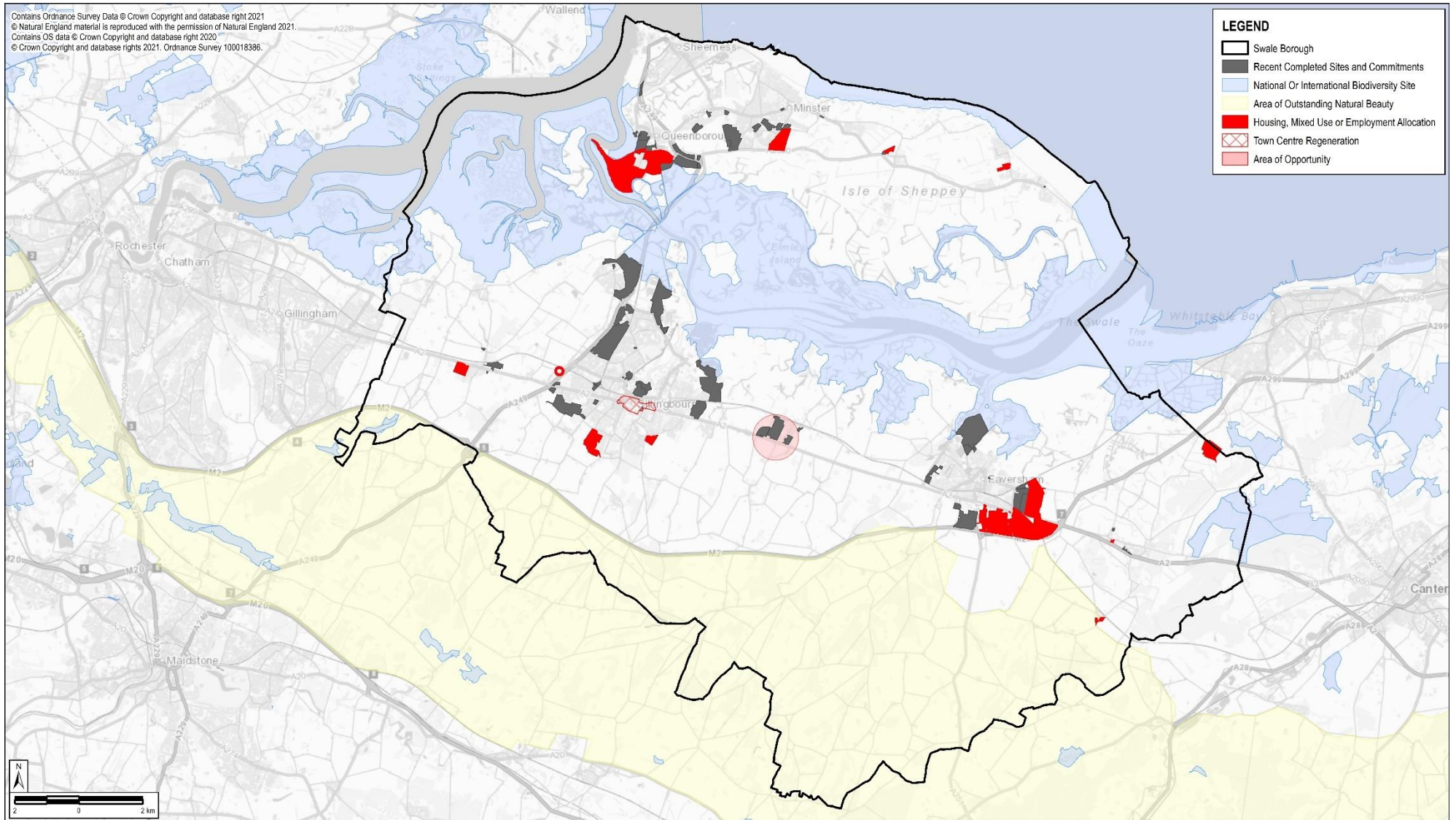
Scenario 3: Scenario 1 but with lower risk urban extensions (UEs) in place of higher risk



Scenario 4: Both strategic growth locations; lower growth scenarios elsewhere



Scenario 5: Scenario 1 plus lower risk UEs



Growth scenarios appraisal

Section 6 of the SA Report presents an appraisal of the five reasonable growth scenarios.

Summary appraisal findings are presented in Table C. Within each row of the table, the performance of each of the growth scenarios is categorised in terms of significant effects (using red / amber / light green / green)⁴ and the scenarios are also ranked in order of preference (where 1 is judged best).

Table C: Summary appraisal of the reasonable growth scenarios

Scenario	Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario 5 Preferred scenario Low risk UEs
SA topic	Rank of preference and categorisation of effects				
Air quality	1★	3	2	2	4
Biodiversity	2	3	1★	1★	2
Climate change mitigation	1★	2	2	1★	2
Communities	1★	3	3	3	2
Economy & employment	1★	3	4	4	2
Flood risk	2	2	1★	1★	2
Heritage	2	3	3	1★	3
Housing	4	3	2	3	1★
Land	1★	1★	1★	2	3
Landscape	2	3	3	1★	4
Transport	1★	2	2	2	3
Water	1★	1★	2	1★	3

⁴ Red indicates a significant negative effect; amber a negative effect that is of note but with limited or uncertain significance; light green a positive that is of note but with limited or uncertain significance; and green a significant positive effect.

Having made these opening remarks, the following bullet points summarise the performance of the broad growth scenarios in respect of each element of the SA framework in turn:

- **Air quality** – higher growth is not supported given air quality constraints affecting Swale (and neighbouring authorities), particularly along the A2 corridor and along the B2006 in Sittingbourne. Scenario 1 performs well because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns. With regards to significant effects, it is appropriate to flag a notable degree of risk under all scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period (in particular NO₂, with particulates pollution likely to prove more stubborn); however, air quality is currently a priority issue for the Council.
- **Biodiversity** - Scenarios 3 and 4 are judged to perform best, as allocation of site SLA18/113 at Rushenden would be avoided (albeit it is recognised that detailed work is underway to understand the potential to avoid and mitigate biodiversity concerns associated with the site, and HRA work has concluded no likelihood of significant adverse effects to the SPA). Scenario 2 performs poorly, on the basis that strategic growth to the east and southeast of Faversham is judged to be preferable to strategic growth at Bobbing. With regards to significant effects, it is appropriate to flag a notable degree of risk in respect of the three worst performing scenarios. It is recognised that the best performing scenarios (Scenarios 3 and 4) could lead to significant positive effects, particularly given the potential for strategic growth locations to support achievement of biodiversity net gain; however, there is no certainty at the current time, given the available evidence.
- **Climate change mitigation** – whilst it is challenging to differentiate the scenarios, on balance Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) are judged to be joint best performing. Scenario 1 may be preferable from a transport emissions perspective, whilst Scenario 4 may be preferable from a built environment emissions perspective. With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect on the baseline, with the fact that there is a highly ambitious local net zero target in place. On balance, it is considered appropriate to flag a concern with all scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor, if not *the* key driving factor, influencing spatial strategy, site selection and development of site-specific proposals.
- **Communities** - Scenario 1 is judged to perform most strongly, as strategic growth at Faversham would deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including a detailed masterplan. Scenarios 2 to 4 perform poorly, as there would either be problematic piecemeal expansion at Faversham (Scenario 2) or a missed opportunity at Queenborough/Rushenden (Scenarios 3 and 4). There is also a concern regarding growth locations in combination impacting on existing community infrastructure capacity under Scenario 5. With regards to the significance of effects, it is appropriate to highlight Scenario 1 as performing significantly better than the other scenarios. Scenario 1 is clearly designed to ensure that housing growth brings with it community benefits. The only stand-out concern, under Scenario 1, relates to the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. The other scenarios would all lead to mixed effects.
- **Economy and employment** - Scenario 1 performs most strongly given the assumed employment land supply at the proposed mixed use allocations, albeit there is some uncertainty, notably in respect of site SLA18/113 at Rushenden. Relative to Scenario 1: Scenarios 2 and 4 perform less well, as there would be a loss of 10 ha of employment land at either Faversham or Rushenden, with the resulting shortfall only partly addressed by strategic growth at Bobbing; and Scenario 3 performs least well, because there would be a loss of 10ha of supply at Rushenden (also potentially some missed opportunity at Teynham). With regards to significant effects, it is appropriate to flag a degree of risk under all scenarios, and predict that the worst performing scenario would lead to significant negative effects. These conclusions are reached in light of the headline targets set out in the Employment Land Review (ELR, 2018), albeit certain ELR targets are a range and require careful interpretation. It is also important to consider that the national and regional situation may have moved-on since the ELR.
- **Flood risk** - the key consideration is in respect of site SLA18/113 at Rushenden. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/ Rushenden; however, at the current time, it is appropriate to ‘flag’ a significant risk.

- Heritage** - Scenario 4 performs best as it would involve a focus at two strategic growth locations with relatively limited historic environment sensitivity. Scenario 1 also performs well on a similar basis, i.e. there would be a focus of growth at strategic sites; however, there is a concern around constraints at Teynham being a barrier to strategic growth. Scenarios 2, 3 and 5 perform poorly as there would be a need to allocate a number of urban and village extensions with historic environment sensitivities. With regard to significant effects, it is appropriate to take a precautionary approach, and flag a notable degree of risk under Scenario 1, and the strong possibility of significant negative effects under Scenarios 2, 3 and 5.
- Housing** - it is appropriate to highlight Scenario 5 as best performing, as it is a higher growth scenario comprising a good mix of sites. Scenario 3 also performs well, as there would be a good mix of sites, including sites assumed to be associated with relatively low delivery risk, and certain sites thought likely to be able to deliver early in the plan period. Scenarios 2 and 4 are joint third best performing. Focusing on Scenario 4, whilst there would be a major reliance on strategic sites (with associated delivery risk), there would be a 17% supply buffer (also, both strategic sites are proposing to deliver 40% affordable housing). Finally, Scenario 1 performs least well, as the scenario associated with both a lower supply buffer and a focus on sites with delivery risks. With regards to significant effects, it is certainly fair to highlight Scenario 5 as representing a highly proactive approach to responding to delivery challenges and risks. Swale's Local Housing Need (LHN) could be met under the other scenarios, although there is a degree of uncertainty in respect of Scenario 1.
- Land** - all of the reasonable growth scenarios would lead to significant negative effects, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. It is also likely that all would lead to loss of land that is currently used for fruit growing, or has been used for fruit growing in the recent past, which amounts to particularly high value agricultural land. On balance, it is appropriate to place the scenarios in an order of preference according to the total quantum of growth supported. N.B. a further consideration is the extent of minerals safeguarding areas across the Borough; however, these are very extensive, covering the majority of land along the A2 corridor. The Isle of Sheppey is less constrained; however, it is difficult to confidently differentiate the growth scenarios. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract prior to development.
- Landscape** - Scenario 4 is judged to perform best. Scenario 1 performs second best, although there are concerns associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Scenarios 2 and 3 are judged to perform on a par, with certain of the urban/village extensions in question giving rise to a degree of concern. Scenario 5 gives rise to a concern, as a higher growth option, although the effect could be to prevent a situation whereby there is a need to accept windfall development in sensitive locations and/or the effect could be to reduce pressure for growth in sensitive locations in neighbouring authorities. With regards to significant effects, it is appropriate to flag a risk under all but the best performing scenario, including on the basis of the need to allocate at least one site within a locally designated landscape.
- Transport** - Scenario 1 is judged to perform best, followed by those scenarios involving strategic growth at Bobbing, and then followed by Scenario 3, which would involve more dispersed growth. Scenario 5 (higher growth) is judged to perform least well, although there could be some potential for growth locations along shared transport corridors (e.g. the Lower Road on the Isle of Sheppey) to pool funding to deliver strategic transport upgrades, for example junction upgrades, cycle routes and improved bus services. With regards to significant effects, emerging transport modelling work is serving to suggest that Scenario 1 will not lead to severe impacts on the strategic road network, but it is appropriate to flag a degree of risk for the other scenarios, and flag a particular risk under Scenario 5, given known constraints in the west of the Borough.
- Water** - there would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events (breaches of discharge permits); however, it is not possible to highlight concerns with any particular sites, or parts of the Borough, on the basis of the available evidence. It is therefore appropriate to flag a concern with Scenario 5, as a higher growth scenario, and also Scenario 3, which involves a degree of dispersal to locations relatively distant from a WwTW. It is not possible to predict significant negative effects, because there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth; however, given the uncertainties at the current time, it is appropriate to flag a degree of risk under all growth scenarios. It will be for the Environment Agency and Southern Water to comment further.

The preferred growth scenario

Section 7 of the SA Report explains officers' reasons for supporting Growth Scenario 1, in-light of the appraisal:

Scenario 1 is judged to perform well overall in that it aligns well with a range of priority objectives, and whilst there are clear tensions and challenges, it is not possible to envisage an alternative strategy that would perform better overall. The appraisal serves to highlight Scenario 4 as potentially having a degree of overall merit, however the view of officers is that a strategy involving two garden communities would involve a high degree of delivery risk, and it is important to note that when the elected councillors of the Local Plan Panel considered broad growth scenarios on 30th July 2020 there was no support for a strategy involving two garden communities.

The appraisal highlights several stand-out risks; however, it is important to note that the appraisal is undertaken largely blind to the policy framework within the LPR that will guide delivery. In this light, officers do not judge any of the highlighted risks and drawbacks to be unacceptable ('showstoppers'). Taking key matters in turn:

- Biodiversity – the proposed policy is seeking to accord with best practice nationally, and biodiversity net gain is being prioritised as one of the key 'policy asks' of developers;
- Flood risk - latest understanding is that there is good potential to reduce risk to an acceptable level through masterplanning and design measures, and there is a need to support growth at Queenborough and Rushenden if long standing regeneration objectives are to be realised;
- Heritage – the Council's heritage specialists have been closely engaged as part of the spatial strategy, site selection and policy writing process, and there is scope for further strengthening of policy if necessary;
- Housing – the evidence suggests the proposed supply can meet needs, and whilst there are inevitably risks, these need to be balanced against a desire not to over-allocate, with resulting issues and impacts. It is recognised that Rushenden South is associated with delivery challenges, but it is not needed to deliver homes in the first five years of the plan period, i.e. it is a "specific, developable site for years 6 to 10 of the local plan" (NPPF paragraph 67).
- Landscape – a key concern relates to growth at Rushenden; however, there is confidence in the potential to address concerns through masterplanning and design.

SA findings at this stage

Part 2 of the SA Report presents an appraisal of the LPR as a whole. The following is a summary.

Air quality

Aspects of the proposed strategy are supported, in particular the focus of growth at a large-scale strategic urban extension to Faversham, and it is recognised that it is a great challenge to deliver growth in Swale whilst avoiding increased traffic through air pollution hotspots (see discussion of growth scenarios, above). Furthermore, it is recognised that a robust framework of development management policies are proposed (within the constraints of viability) with the aim of minimising increased car movements, directing car movements away from air pollution hotspots and supporting the switch-over to electric vehicles. However, it is nonetheless necessary to "flag" **a risk of significant negative effects**, ahead of further transport modelling (and potentially an update to the Air Quality Modelling Report, 2020) in Spring/Summer 2021. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period; however, air pollution is currently a priority issue for the Council.

Biodiversity

Whilst strategic growth to the east and southeast of Faversham is tentatively supported (in particular growth to the southeast), and the potential for growth at Teynham to support a biodiversity net gain (at an appropriate landscape scale) can be envisaged, there is a significant concern in respect of the proposed Rushenden South allocation, given its sensitive location adjacent to the SPA. It is recognised that detailed work has been completed, and further work remains underway, to understand the potential to avoid and mitigate biodiversity impacts. It is also recognised that there could be development options that would achieve an overall significant biodiversity net gain, in-line with the proposed borough-wide policy (and noting there have been recent experience of delivering new and enhanced habitats on Sheppey to compensate for habitat loss elsewhere (Neatscourt) on the island). However, on balance

it is considered appropriate to “flag” **a risk of significant negative effects**, at the current time, ahead of further work on site specific proposals, in collaboration with Natural England.

Climate change mitigation

The proposed strategy of targeting growth at strategic growth locations is supported from a perspective of seeking to minimise emissions from the built environment, and the proposed strategic growth locations are fairly well located, from a perspective of seeking to minimise transport emissions. There is also a robust policy framework proposed, comprising both borough-wide and site-specific policies, that seeks to ensure that built environment and transport decarbonisation is a foremost priority when bringing schemes forward through the planning application process. However, at the current time there remains a degree of uncertainty regarding how site specific proposals will capitalise on locational opportunities, and regarding the extent to which limited funds will be directed towards decarbonisation measures. This being the case, and given that the extremely stretching nature of the Borough’s 2030 net zero target, it is not possible to predict positive effects, i.e. **overall effects are judged to be neutral**.

Communities

The proposed spatial strategy performs strongly, most notably as strategic growth at Faversham will deliver a much needed new secondary school, and, more generally, there would be good potential to masterplan and deliver a new community, or series of new communities, in line with established best practice principles. However, there is some uncertainty at the current time, in the absence of detailed evidence, including a detailed masterplan. Aside from growth at Faversham, the proposal to deliver growth at Rushendon South in support of regeneration efforts for Queenborough/Rushenden is strongly supported, from a communities perspective, and there may also be a degree of strategic opportunity at Teynham. There is also a clear rationale for supporting residential growth within Sittingbourne town centre. The only stand-out concern is in respect of the proposal to support growth of 90 homes at Neames Forstal, which is a village with a very limited offer of local services and facilities. Overall, there is confidence in the LPR leading to **significant positive effects**.

Economy and employment

The proposal to support two major mixed use developments reflects a good degree of ambition, plus the LPR is supportive of the emerging regeneration strategy for Sittingbourne town centre, is seeking to capitalise on an employment land opportunity at Lamberhurst Farm and is seeking to take an ambitious approach to growth at Teynham including because of the potential to support employment growth. The strategy is certainly supportive of objectives to grow the economic role of Faversham and the Isle of Sheppey / A249 corridor; however, there is a degree of uncertainty regarding the extent to which the strategy aligns with the conclusions and recommendations of the ELR (Section 6 of the report), particularly in respect of supporting industrial land and warehousing in the west of the Borough, hence there is a need to “flag” **a risk of significant negative effects**, at the current time. There could be merit in further work to update certain aspects of the ELR, in light of changes to the national and regional context since 2018.

Flood risk

The key consideration is in respect of proposed growth at Rushenden South. Further work may find there to be exceptional circumstances that serve to justify growth in this area, taking account of the detailed nature of the flood risk and an in-depth understanding of the potential to support regeneration objectives for Queenborough/Rushenden; however, at the current time it is appropriate to ‘flag’ a **significant risk**. It will be for the Environment Agency to comment further in detail.

Heritage

The focus of growth at east and southeast of Faversham is supported, recognising that there are strong arguments for supporting growth at Faversham – including on the basis of strong viability – and that this is a direction for growth associated with relatively limited sensitivity. In addition, the focus of growth at Rushenden is strongly supported, from a heritage perspective. However, there are some potential concerns in respect of heritage constraints being a barrier to growth at the Teynham Opportunity Area. A robust framework of policies is proposed in support of the spatial strategy, comprising both borough-wide and site-specific policies, on which basis it is possible to conclude **the likelihood of neutral effects**; however, there is some uncertainty. Historic England will wish to comment further.

Housing

The proposal is to provide for LHN in full (i.e. set the housing requirement at 1,038 dwellings per annum), and there is no reason to conclude that the proposed supply will be insufficient to achieve this aim, particularly given the nature of the existing committed supply, and the proposed supply buffer of 13%. Furthermore, the proposed strategic urban extension to the east and southeast of Faversham is associated with relatively low delivery risk, for a strategic site, and is associated with strong viability, which should be supportive of delivering a good mix of housing and accommodation more widely. However, there is currently a lack of detailed evidence available in respect of the proposed housing supply trajectory and delivery risks associated with key elements of the supply. Furthermore, it is fair to highlight that the proposal to focus growth at a strategic site and sites with delivery challenges leads to a degree of overall delivery risk, i.e. a risk of housing supply, at some point in the plan period, falling below the requirement, such that there is a risk of the NPPF's presumption in favour of sustainable development applying (which would could mean that windfall sites come forward in unplanned locations, potentially serving to meet housing needs but giving rise to other issues/impacts). On balance, it is fair to **uncertain positive effects**.

Land

There is an unavoidable need to conclude that the LPR will lead to **significant negative effects**, due to significant loss of best and most versatile agricultural land, including grade 1 land that is of the highest quality nationally. However, the proposal to target growth towards Rushenden and Sittingbourne town centre is supported. N.B. a further consideration is the extent of minerals safeguarding areas across the Borough; however, these are very extensive, covering the majority of land along the A2 corridor. The Isle of Sheppey is less constrained; however, it is difficult to confidently differentiate the growth scenarios. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract prior to development.

Landscape

The proposed spatial strategy performs well overall, with efforts clearly having been made to select sites for allocation that give rise to relatively limited concerns in respect of impacts to the AONB, locally designated landscapes, important settlement gaps and landscapes judged to have moderate-high sensitivity by the Landscape Sensitivity Assessment (see discussion of growth scenarios, above). However, there is some concern associated with growth at Rushenden, and also a degree of concern associated with growth at Teynham. Alongside the proposed spatial strategy / package of proposed allocations is a robust policy framework comprising both borough-wide and site-specific policies, on which basis it is possible to conclude **the likelihood of neutral effects**. However, there is considerable uncertainty ahead of further work to confirm masterplanning proposals.

Transport

The spatial strategy performs well, from a perspective of seeking to minimise car trips and avoid increased car movements through problematic junctions and other traffic hotspots. This conclusion is supported by emerging transport modelling work, although there is a need for further model 'run' to examine the latest proposed strategy, also taking account of expected mitigation measures. There is certainly support for a focus of growth at strategic growth locations, which can support investment in road infrastructure and sustainable transport measures, as well as a mix of uses in support of self-containment/ trip internalisation. Furthermore, a very strong policy framework is proposed in support of modal shift away from reliance on the private car. On this basis, and recognising that the baseline (i.e. "no LPR") scenario is not one whereby there would be no further growth in Swale, it is considered appropriate to predict the likelihood of **moderate positive effects**. However, there is some uncertainty, ahead of further work, for example in respect of the proposed A2 mitigation strategy.

Water

There would appear to be some wastewater treatment capacity constraints locally, as evidenced by recent pollution events; however, there is little evidence to suggest that the proposed strategy gives rise to any particular cause for concern, and there tends to be good potential to deliver upgrades to wastewater treatment capacity ahead of growth. It is also noted that a robust policy framework is proposed with the aim of water efficiency, including by requiring new homes to achieve prescribed standards of the Homes Quality Mark (HQM) and, as part of this, to gain HQM credits for water efficiency. On this basis it is possible to conclude the likelihood of **neutral effects** overall, although there is a degree of uncertainty. It will be for the Environment Agency and Southern Water to comment further.

Overall conclusions

The appraisal presented above finds that the LPR will lead to significant positive effects in respect of **communities objectives**. This is primarily on the basis of support for growth at east and southeast Faversham (3,400 homes plus c.20 ha of employment) and Rushenden South (850 homes plus c.10 employment). There is also overall support for the LPR in terms of: **housing objectives**, given the proposal to provide for local housing need in full, although there is an degree of risk associated with the proposed supply; and **transport objectives**, once account is taken of the proposed focus at strategic locations and the clear policy focus on masterplanning schemes with a focus on 'sustainable transport'.

There is also a degree of support for the LPR in respect of **climate change mitigation, heritage, housing, landscape and water objectives**. For several of these topics, the proposed spatial strategy gives rise to concerns when viewed in isolation (see the appraisal of Growth Scenario 1, above), but concerns are reduced after having taken account of proposed development management policy.

However, the appraisal highlights significant concerns in respect of **flood risk** and **land** objectives, and more moderate or uncertain concerns in respect of **air quality, biodiversity** and **economy/employment** objectives. These conclusions reflect the precautionary principle, and it is recognised that further investigation, in respect of certain of these topics (not land), could well serve to allay concerns.

Next Steps

This SA Report is published for consultation alongside the 'pre-submission' version of the LPR, under Regulation 19 of the Local Planning Regulations. Following the consultation, the main issues raised will be identified and summarised, and a decision made regarding whether the plan is 'sound'. Assuming that the LPR is considered to be sound, it will then be submitted to Government, alongside the summary of issues raised through consultation and other supporting documentation, including the SA Report.

An examination in public will then be held, overseen by one or more appointed Planning Inspectors. The Inspector(s) will consider whether the plan is legally compliant and sound, in light of the available evidence, including representations received at the Regulations 19 stage, the SA Report and (in all likelihood) further evidence gathered through hearings. The Inspector(s) will then either report back on the Plan's soundness or identify the need for modifications.

Once found to be 'sound' the LPR will be adopted by the Council. At the time of adoption a 'Statement' must be published that explains the 'story' of plan-making / SA and sets out 'the measures decided concerning monitoring'.

Monitoring

The SA Report must present 'measures envisaged concerning monitoring', albeit mindful that decisions on monitoring must be taken by Swale Borough Council (the last Authority Monitoring Report was published in 2017).

At the current time it is too early to make any firm recommendations in respect of areas for monitoring / potential monitoring indicators; however, it is fair to highlight that monitoring efforts could potentially focus on:

- Emerging proposals at all LPR growth locations, ahead of planning applications, with a view to ensuring that proposals reflect strategic priorities, including in respect of:
 - the declared climate emergency and the urgent need to decarbonise ahead of the 2030 net zero target;
 - the declared local ecological emergency and the aims of the Environment Bill, including in respect of taking a strategic approach to nature recovery and environmental net gain.
- Air quality at key locations likely to see increased traffic due to LPR growth – again, monitoring in the short term could serve to inform forthcoming planning applications at LPR growth locations;
- Employment land requirements – given that the Employment Land Review is now over two years old, and the regional and national economic context and baseline situation will have evolved since that time;
- Flood risk – the Council might report annually on the number of homes in flood risk zones;
- Housing – there is a need to closely monitor affordable housing delivery, including tenure split;
- Water – ongoing consideration should be given to any risk of capacity breaches.