

Sustainability Appraisal (SA) of the Swale Local Plan

SA Report (DRAFT)

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.

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1 Introduction

1.1 Background

- 1.1.1 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 and change - in response to key issues and opportunities - over the period 2022 to 2038. The LPR will build on the adopted Local Plan ('Bearing Fruits'), 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.
- 1.1.2 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. SA of Local Plans is a legal requirement.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
- What has Plan-making / SA involved **up to this point?**
 - including with regards to consideration of 'reasonable alternatives'
 - What are the SA findings **at this stage?**
 - i.e. in relation to the draft plan
 - What are **next steps?**

1.3 This SA Report²

- 1.3.1 This is the SA Report for the Swale LPR. It is published alongside the proposed submission version of the LPR, in line with the requirements set out under Regulation 19 of the Local Planning Regulations (2012). The aim is to inform representations and subsequent plan finalisation.

Structure of this report

- 1.3.2 This report is broken down into **three parts**, according to the three questions above. Before answering the first question, there is a need to further set the scene by answering **two initial questions**:
- What is the plan seeking to achieve?
 - What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2019). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely how and where regulatory requirements are met / are being met.

2 What's the plan seeking to achieve?

2.1 Introduction

2.1.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

2.2 The plan area and plan period

2.2.1 The LPR covers the entirety of Swale Borough and aims to cover the period 2022 to 2038. The beginning of the plan period is set at 2022 in light of paragraph 33 of the National Planning Policy Framework (NPPF), which explains that Local Plans should be reviewed at least once every five years.

2.2.2 An important point to note is that there is a large supply of housing that is already committed, in that it is set to come forward at a site already planning permission and/or an allocation in the current Local plan. A small proportion of this will come forward in 2021, but the great majority is expected to deliver housing in the period 2022 to 2038. These sites will be 'rolled-forward' into the new LPR, such that the task of the LPR can be thought of as building on a baseline position characterised by existing committed supply. Indeed, committed housing supply that is expected to deliver in the LPR plan period amounts to around 2/3 of the total housing need for the LPR plan period (see discussion in Section 5.2), which leads to a good degree of flexibility when preparing the LPR, particularly in respect of selecting sites for allocation.

2.3 Legislative and policy context

2.3.1 The Local Plan is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current government policy, as set out in the National Planning Policy Framework (NPPF, 2019) and Planning Policy for Traveller Sites (2015) and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.

2.3.2 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of Kent County Council, the South East Local Enterprise Partnership (LEP) and environmental bodies including the Environment Agency, Historic England and Natural England. Swale BC must also cooperate with neighbouring areas in respect of 'larger than local' considerations, including planning for housing needs, capitalising on growth opportunities across the Thames Gateway and planning for the Kent Downs AONB.

2.3.3 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans (NDPs), with a made Neighbourhood Plan for Faversham Creek and several others in preparation. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that all NDPs will be taken into account when preparing the Local Plan.

2.4 Plan aims and objectives

2.4.1 The LPR document explains that the Council is reviewing its adopted local plan to:

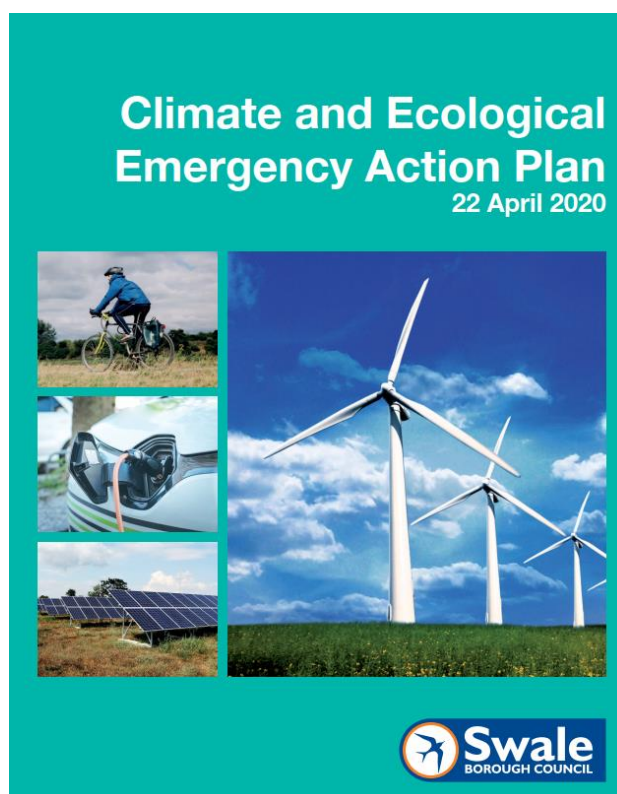
- deliver the spatial objectives of the Council's corporate strategy, including responding to the declared Climate and Ecological Emergency and subsequently published Action Plan;
- reflect changes to national planning policy and guidance, particularly the new NPPF and the requirement to review local plans every 5 years;
- extend the plan period to 2038 in order to ensure that there will a 15 year time horizon from adoption for strategic policies as recommended in the NPPF in order to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements in infrastructure; and
- provide for additional new housing, employment and other development that will be required to meet future needs over the extended plan period as required by the Government.

2.4.2 The LPR document explains that the key challenges for the LPR are:

- delivering a carbon zero Borough by 2030;
- meeting the varied housing needs of the growing population in the right places;
- supporting the needs of the local economy so that it can continue to be competitive and create quality local jobs;
- delivering the infrastructure requirements needed to support growth and create high qualities places;
- delivering sustainable growth while protecting and enhancing historic and natural assets;
- managing change in town centres so that they remain vital, competitive and attractive places to meet, live, work and enjoy; and
- embedding sustainable and active travel options and behaviour into existing and new developments to reduce greenhouse gas emissions, improve air quality, reduce traffic accidents, reduce congestion and improve the health and wellbeing of residents.

2.4.3 The objectives of the Local Plan are as follows:

- Provide for homes and jobs that are best suited to meet identified local needs;
- Support and sustain communities across the borough, big and small, by planning to meet identified needs, including needs for community facilities and infrastructure;
- Protect and manage our resources to address climate change through delivering sustainable growth that supports urban and rural economies and makes the best use of infrastructure;
- Locate development in the least constrained areas in reasonable proximity to transport hubs;
- Provide a mixed portfolio and locations of sites, big and small to meet a range of needs throughout the duration of the plan period up to 2038;
- Deliver a level of investment and growth at key locations to facilitate significant improvements to support infrastructure e.g. schools, healthcare and highways and active travel options to benefit communities;
- Focus development on the contribution that larger sites can deliver in a proportionate way to meet wider plan objectives and ensure delivery in the plan period.



Achieving a net zero Borough by 2030 is a key challenge for the LPR

3 What is the scope of the SA?

3.1 Introduction

- 3.1.1 The aim here is to introduce the broad scope of the SA, meaning the breadth of sustainability issues and objectives taken into account as part of the appraisal of reasonable alternatives and the emerging LPR.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA Report], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these organisations were consulted on the SA scope in 2019; this involved publication of a Scoping Report, which was then subsequently updated to reflect comments received.⁴

Evolution of the SA scope

- 3.2.2 The SA scope should not be ‘set in stone’ following consultation and finalisation of the Scoping Report, but rather must continue to evolve over time to reflect latest evidence, latest understanding of issues and objectives and the emerging scope of the plan / options. In this instance the SA scope has continued to evolve since 2018, including in light of the evidence review presented in Appendix II, but only evolved to a limited extent. The scope has not changed to the extent that further scoping consultation is required.

3.3 The SA framework

- 3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework established in 2018. Minor adjustments to objectives have been made since the Scoping Report.

Table 3.1: The SA framework

Topic	Objective
Air quality	<ul style="list-style-type: none"> Support the achievement of air quality improvement objectives within the Borough’s 5 designated AQMAs. Seek to minimise air pollution more generally, such as through supporting or enabling the use of low emission technologies and encouraging sustainable modes of transport such as walking and cycling.
Biodiversity	<ul style="list-style-type: none"> Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of international, national or local significance. Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats.
Climate change mitigation	<ul style="list-style-type: none"> Minimise per capita greenhouse gas emissions from transport, industry and the built environment. Deliver high standards of energy efficiency and water efficiency in new development.
Communities	<ul style="list-style-type: none"> Support good access to existing and planned community infrastructure for new and existing residents. Promote and support healthy communities, including through increasing access to green infrastructure and open space.

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

⁴ See <https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Looking-Ahead/FINAL-Swale-SA-Scoping-Report-DECEMBER-2018.pdf>

Topic	Objective
Economy and employment	<ul style="list-style-type: none"> • Support the achievement of economic growth objectives, including in targeted growth sectors and established employment sectors. • Support a strong, diverse and resilient economy that provides opportunities for all. • Support and enhance the vitality of the Borough's town centres including through the identification of further regeneration opportunities where appropriate. • Support provision of further education facilities in the Borough where practicable.
Flood risk	<ul style="list-style-type: none"> • Avoid and mitigate flood risk by directing development away from the areas of the Borough at the highest risk of flooding. • Deliver Sustainable Drainage Systems and other measure with a view to future proofing and building climate change resilience. • Support the priorities identified in the Medway Estuary and Swale Shoreline Management Plan and the Isle of Grain to South Foreland Shoreline Management Plan.
Heritage	<ul style="list-style-type: none"> • Conserve and enhance heritage assets and contribute to the maintenance of historic character through design, layout and setting of new development.
Housing	<ul style="list-style-type: none"> • Support timely delivery of market housing and affordable housing. • Promote an appropriate mix of housing types and tenures. • Cater for existing and future residents' needs as well as the needs of different groups in the community.
Land	<ul style="list-style-type: none"> • Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land.
Landscape	<ul style="list-style-type: none"> • Protect and enhance the character and quality of the Borough's landscapes and townscapes through appropriate design and layout of new development. • Protect and enhance the Kent Downs AONB where possible. • Preserve important open gaps between settlements.
Transport	<ul style="list-style-type: none"> • Promote sustainable transport use, including supporting the creation of additional walking and cycling routes, and reduce the need to travel, particularly by private vehicle. • Support strategic transport schemes.
Water	<ul style="list-style-type: none"> • Promote sustainable forms of development which minimise water consumption and wastewater flows. • Maintain and enhance the quality of both surface and ground water resources where possible consistent with the aims of the Water Framework Directive. • Promote efficient and sustainable use of natural resources.

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

- 4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: What has plan-making / SA involved up to this stage?

4.2 Overview

- 4.2.1 Plan-making has been underway since 2017. Key steps have included: a consultation entitled Looking Ahead; publication of a Garden Communities Prospectus; consultation on the SA Scoping Report (as discussed in Section 3); a wide-ranging programme of engagement with the Council's Local Plans Panel (LPP), Duty to Cooperate Partners and other select stakeholder organisations; and presentation of an Interim SA Report (focused on 'growth scenarios') to the Local Plan Panel meeting of 19th January 2020.⁵
- 4.2.2 However, the focus here, within Part 1, is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in 2020 and January 2021. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
 - present an appraisal of the reasonable alternatives - see **Section 6**
 - explain the Council's reasons for selecting the preferred option - see **Section 7**
- 4.2.3 Presenting this information is in line with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report.

Reasonable alternatives in relation to what?

- 4.2.4 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan – see Section 2.⁶ Following discussion of plan objectives with officers, it was determined appropriate to focus on spatial strategy, i.e. the spatial approach to delivering development to meet needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the Local Plan.⁷
- 4.2.5 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.
- [What about site options?](#)
- 4.2.6 Whilst individual site options invariably generate a high degree of interest, they are not reasonable alternatives, in light of the legal definition.⁶ If the LPR was setting out to allocate one site, then site options would be reasonable alternatives, but that is not the case. Rather, the **objective of the LPR** is to allocate a package of sites, hence reasonable alternatives must be in the form of alternative packages of sites.
- 4.2.7 Appraising alternative packages of sites amounts to exploring a discrete choice open to the Council, with the aim of rationalising complex choices and supporting effective debate. Debate can be hampered where there is a focus on site options without an understanding of how they would be delivered in combination.
- 4.2.8 Consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios. However, this is a proportionate level of analysis with the aim of contributing to "an outline of the reasons for selecting the alternatives dealt with" (Schedule 2 of the SEA Regulations) only.
- [What about employment land?](#)
- 4.2.9 The process of establishing reasonable growth scenarios has been housing-led; however, there is also a need to ensure sufficient supply of employment land under all scenarios, in light of the targets set by the Employment Land Review (2018). This matter is discussed further in Section 5.5.

⁵ See services.swale.gov.uk/meetings/ielListDocuments.aspx?Cid=216&Mid=2423

⁶ Regulation 12(2) requires that reasonable alternatives are defined in light of "the objectives and geographical scope of the plan".

⁷ It was also considered appropriate to focus on 'spatial strategy' given the potential to define alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. This approach is in line with the SEA Regulations, and the Planning Practice Guidance is clear that SA "should only focus on what is needed to assess the likely significant effects of the plan". More broadly, spatial strategy has implications for all or most Local Plan objectives, and invariably generates a high degree of interest.

What about development management policies?

- 4.2.10 In addition to establishing a spatial strategy and allocating sites accordingly, the LPR must also establish strategic policies on a range of key thematic issues, development management policies and site-specific policies to guide decision-making as part of future planning applications. Broadly speaking, these can be described as development management (DM) policies.
- 4.2.11 There can be the potential to establish and appraise reasonable alternatives for DM policies. However, it can be a challenge to establish DM policy alternatives that are meaningfully different, such that the appraisal would serve to differentiate between the alternatives in terms of 'significant effects'.⁷ There is a need to target time and resources, when exploring reasonable alternatives as part of any Local Plan-making process, which invariably means that it is appropriate to focus on spatial strategy alternatives ('growth scenarios') first and foremost. There is a need to remain open to the possibility of formally establishing and appraising DM policy alternatives; however, for the Swale LPR no DM policy reasonable alternatives were immediately apparent following discussion between AECOM and officers. It is worthwhile recalling that the appraisal of the draft ('proposed submission') plan presented in Part 2 presents a forum for considering adjustments to DM policies, which are essentially alternatives.

4.3 Structure of this part of the report

- 4.3.1 This part of the report is structured as follows:
- **Section 5** – explains a lengthy process of establishing on growth scenarios
 - with supplementary analysis in **Appendices II, III, IV, V and VI**;
 - **Section 6** – presents a summary appraisal of the reasonable growth scenarios;
 - with detailed appraisal findings in **Appendix VII**;
 - **Section 7** – presents a statement provided by officers setting out reasons for supporting the preferred growth scenario / spatial strategy in light of the appraisal.

Where was this information within the Interim SA Report?

- 4.3.2 The information presented in Section 5 was set out across Part 1 of the Interim SA Report (January 2020) whilst the information set out in Sections 6 and 7 was set out within Part 2.

Whose responsibility?

- 4.3.3 It is important to be clear that: selecting reasonable alternatives (growth scenarios) is the responsibility of the plan-maker (Swale BC), with AECOM acting as advisors; appraising reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

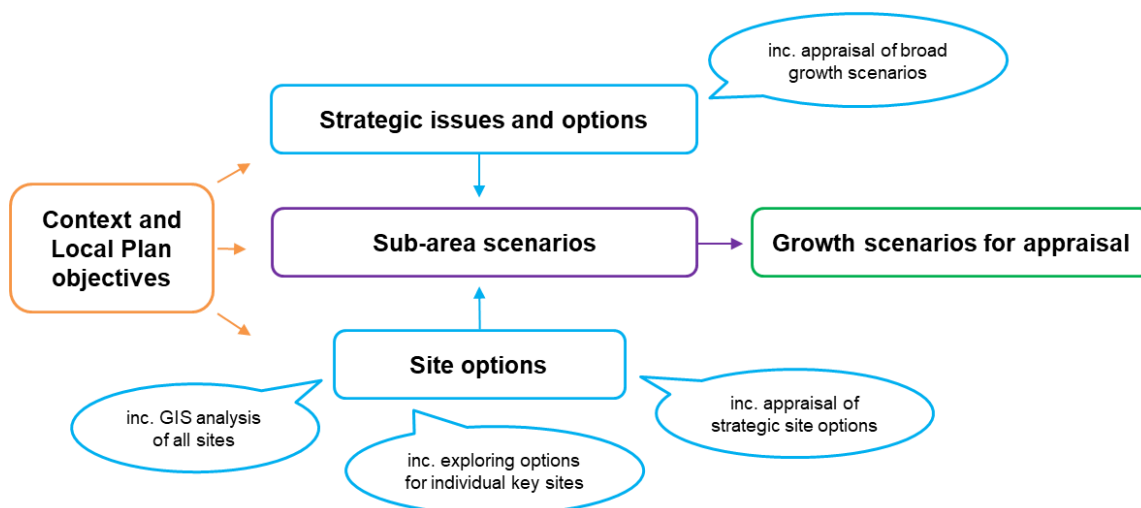
- 4.3.4 Comments are welcomed on:
- the decision to focus on growth scenarios (this section);
 - the reasonable growth scenarios selected, with reference to the selection process (Section 5);
 - appraisal findings in respect of the reasonable growth scenarios (Section 6); and
 - the Council's reasons for supporting the preferred option in light of the appraisal (Section 7).
- 4.3.5 It is important that any concerns with the process of arriving at reasonable alternatives are raised early, such that there is an opportunity to respond proactively.

5 Establishing growth scenarios

5.1 Introduction

- 5.1.1 The aim is to explain a lengthy process that led to establishment of the reasonable growth scenarios that are a focus of appraisal in Section 6. Specifically, the aim is to explain the process set out in Figure 5.1.

Figure 5.1: Establishing growth scenarios – process overview



Structure of this section

- 5.1.2 This section of the report is structured as follows:
- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios
 - with supplementary analysis in **Appendices II and III**;
 - **Section 5.3** – explores site (and site-specific) options with a bearing on growth scenarios;
 - with supplementary analysis in **Appendices IV and V**;
 - **Section 5.4** – explore growth scenarios for individual sub-areas within the Borough;
 - with supplementary analysis in **Appendix VI**;
 - **Section 5.5** – draws upon the preceding sections to establish reasonable growth scenarios.

Limitations

- 5.1.3 Limitations to the analysis presented in this part of the report, and the supporting appendices, include:
- **GIS analysis** – the GIS analysis of site options presented in Section 5.3 and Appendix V is inherently limited and does not aim to be a formal appraisal of reasonable alternatives;
 - **Sub-area scenarios** – the analysis presented in Appendix VI stops short of appraising growth scenarios for any of the sub-areas, but the level of analysis is considered proportionate to the task;
 - **Evidence** – evidence to inform an understanding of baseline issues and opportunities. This is particularly the case in respect of detailed evidence to inform consideration of site options. Evidence limitations are discussed further within the ‘methodology’ sections within the appendices.
- 5.1.4 The analysis in this section of the report is considered proportionate to the task of arriving at reasonable alternatives / growth scenarios for formal appraisal (in Section 6).

5.2 Strategic issues and options

Introduction

5.2.1 The aim of this section of the report is explore the strategic issues and options with a bearing on the establishment of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes should the Local Plan provide for?
- Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

5.2.2 This section aims to set out the established Local Housing Need (LHN) figure for Swale, before exploring arguments for the LPR providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance explains:⁸ *“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”*

5.2.4 With regards to (A), the NPPF (para 60) is clear that establishment of **Local Housing Need (LHN)** should be informed “by a local housing need assessment, conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

5.2.5 With regards to (B), many authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver the housing requirement (at a suitable rate/trajectory over time), which will invariably mean putting in place a ‘buffer’ to mitigate against the risk of some elements of the supply not delivering in the timescales anticipated (this can be a particular risk with complex strategic sites). However, under certain circumstances it can be appropriate to set a housing requirement that is above or below LHN.

LHN for Swale Borough

5.2.6 A standard method for calculating LHN was first published in September 2017 and at the time writing remains largely unchanged.⁹ However, there have been some notable changes to guidance in respect of the data that should be utilised as an input to the method. Specifically, following a consultation in late 2018¹⁰ the Planning Practice Guidance (PPG) was updated to require that the household growth projections used as an input to the Standard Method must be the 2014-based projections, rather than the more recent 2016-based or 2018-based projections. The PPG explains that the change was made in order to:¹¹ *“provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”* Updates to the PPG in late 2020 confirmed that the 2014-based projections should still be used.

5.2.7 The standard method derived **LHN for Swale is 1,038 dwellings per annum (dpa)**. This figure was confirmed by two studies presented to the Swale Borough Local Plan Panel on 9th July 2020.¹² It is worth noting that this is an ‘uncapped’ figure, meaning that Step 3 of the standard method (“Capping the level of any increase”) does not having any bearing; see discussion at paragraph 2.38 of the Swale Housing Market Assessment, 2020).¹³ As such, there are no arguments for exploring an ‘uncapped’ LHN figure.

⁸ Reference ID: 2a-001-20190220 at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁹ A fourth step was added to the standard method in December 2020, namely the “Cities and urban centres uplift”; however, this has no bearing on LHN for Swale (although there are feasibility implications for unmet needs; see Table 5.1).

¹⁰ See www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need

¹¹ See paragraph 4 and 5 at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

¹² See services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MIId=2321&Ver=4

¹³ See services.swale.gov.uk/meetings/documents/s14870/HMA%20for%20Swale%20Appendix%201.pdf

Providing for above LHN?

- 5.2.8 All Local Plans must consider the implications of Paragraph 010 of the PPG on Housing and Economic Needs Assessment, which explains that:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated... Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable... (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or an authority agreeing to take on unmet need from neighbouring authorities... There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need... are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

- 5.2.9 However, in the Swale context arguments for providing for ‘above LHN’ are limited:

- There is no Housing Deal, or any equivalent growth strategy in place.
- There is no evidence to suggest locally arising housing need is in excess of the LHN figure.
- With regards to “strategic infrastructure improvements that are likely to drive an increase in the homes needed locally”, there is nothing committed or ‘on the horizon’; however, strategic housing and employment growth to the southeast of Sittingbourne (including expansion of Kent Science Park), alongside a new motorway junction, is an option for consideration (discussed below). A very large number of new jobs could be supported, which could lead to problematic in-commuting from outside the Borough (Employment Land Review, 2020) in the absence of sufficient accompanying housing growth.
- With regards to unmet need from neighbouring areas, the key point to note is that statements of common ground are in place with all directly neighbouring authorities confirming that Swale is not called on to provide for unmet need. However, there is also a need to look beyond neighbouring authorities to consider the whole of West Kent, where there are extensive NPPF footnote 6 constraints,¹⁴ pressures in respect of unmet needs emanating from London and emerging Local Plans facing challenges – see Table 5.1. In this light, it is fair to conclude that there is **some risk of unmet needs** arising prior to submission, which should be factored-in when establishing reasonable growth scenarios.

- 5.2.10 A final consideration is providing for **affordable housing** needs, with the PPG stating:¹⁵ “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” It is inherently challenging to conclude that affordable needs serve as a reason for providing for ‘above LHN’, as additional affordable housing may not be deliverable in the absence of need/demand for market housing; regardless, in the Swale context there is no argument for providing for above LHN in light of affordable housing needs. As explained by the Swale Housing Market Assessment (2020): “The total annual affordable housing need in Swale of 287 per year represents 27.7% of the annual dwelling growth of 1,038 in the Borough as assessed using the Standard Method. Subject to viability, it is reasonable to presume the affordable housing need identified in the model will be addressed by the dwelling growth identified by the Standard Method and no adjustment is required... to increase affordable provision.”

¹⁴ NPPF footnote 6 lists protected areas or assets of particular importance that can provide a strong reason for restricting the overall scale, type or distribution of development in the plan area. Green Belt and AONB are the key constraints in West Kent.

¹⁵ See paragraph 024 at: gov.uk/guidance/housing-and-economic-development-needs-assessments

Table 5.1: Progress on neighbouring Local Plans

Area	LPA	Commentary
London		The Publication London Plan (2020) provides for 52,000 dpa, a reduction on the Draft London Plan (2017) and below the need figure of 66,000 dpa established by the London Strategic Housing Market Assessment (SHMA).
West Kent (Green Belt)	Dartford	A Preferred Options consultation document was published in January 2020, setting out (paragraphs B7 and B8) that it should be possible to meet and possibly even modestly exceed the established LHN figure.
	Gravesham	A Regulation 18: Stage 2 consultation document was published in October 2020, setting out that it may be possible to meet LHN, but that this would require significant Green Belt release, and hence discussions are ongoing with neighbouring authorities that share a housing market area - namely Dartford and Medway – in respect of capacity to provide for unmet needs (para 1.6.9).
	Sevenoaks	The District falls entirely within the Metropolitan Green Belt (as per Dartford and Gravesham), is also heavily constrained by the Kent Downs AONB, and has limited capacity within settlements. This led the Council (following a Green Belt Review) to submit a Local Plan providing for below LHN. However, the Inspector's Report (2020) concluded that the Plan could not be adopted due to a failure of the Duty to Cooperate in respect of unmet needs.
West Kent (Partial GB)	Medway	The Development Strategy consultation document (2018) presented four 'scenarios', none of which would provide for LHN (although there was uncertainty at the time regarding whether to plan for LHN or a lower 'OAHN' figure). However, the Strategic Land Availability Assessment (SLAA, 2019) serves to identify <i>potential</i> capacity to provide for LHN.
	Tonbridge and Malling	Following submission of the Local Plan in January 2019, the Inspectors wrote to the Council in December 2020, suggesting a likelihood that the Council had failed the Duty to Cooperate in respect of providing for unmet needs arising from Sevenoaks. It is also important to note that, should the plan need to be withdrawn, or should it be found unsound, any new Local Plan will need to provide for an LHN figure of c.840 dpa, as opposed to the OAHN figure of 696 dpa used as the basis for the submitted plan (because it was submitted in the transitional window following publication of the new NPPF in 2018).
Mid-west Kent	Tunbridge Wells	In short, there is confidence that the emerging Local Plans for Tunbridge Wells and Maidstone, which together with Swale might be considered to comprise a 'Mid-west Kent' cluster, will provide for LHN, specifically: <ul style="list-style-type: none"> Tunbridge Wells – despite 75% of the Borough comprising Green Belt and/or AONB, the Draft Local Plan (2019) proposed providing for LHN (by identifying a supply amounting to LHN plus a buffer of 9%);
	Maidstone	<ul style="list-style-type: none"> Maidstone – the north of the Borough falls within the AONB, but there are large parts not subject to NPPF footnote 6 constraints.¹⁴ The Draft Local Plan (December 2020) proposes to provide for LHN, and notably includes a new Garden Settlement on the boundary with Medway, very closely linked to the Medway Towns, serving to highlight the close links to Medway.
East Kent	Ashford	In short, there is no risk of unmet needs from East Kent: <ul style="list-style-type: none"> Ashford - the Local Plan was adopted in 2019, and large parts of the Borough are not subject to NPPF footnote 6 constraints.¹⁴
	Canterbury	<ul style="list-style-type: none"> Canterbury - the Local Plan Review is at a very early stage of preparation, with an initial consultation on 'Issues' held in 2020.¹⁴ There are parts of the Borough not subject to NPPF footnote 6 constraints, hence there can be confidence that the Local Plan will provide for LHN in full. Furthermore, whilst it is recognised that Canterbury City itself relates quite closely to the eastern part of Swale (where there are constraints), there are also good transport links to parts of Thanet District and Dover District to the east, where there are few NPPF footnote 6 constraints.

Providing for below LHN?

- 5.2.11 Paragraph 11 of the NPPF states: "... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." [emphasis added]
- 5.2.12 In the case of Swale, there are parts of the Borough that are constrained by the "assets of particular importance" listed by the NPPF; however, there are also parts of the Borough that are not constrained by these assets. Furthermore, there is a need to consider that a lower growth strategy would lead to 'unmet need' having to be provided for elsewhere within a constrained sub-region (see Figure 5.1), for example:
- Medway Council is partly constrained by Green Belt and AONB, whilst the Hoo Peninsula is not well connected to Swale. There is also a need to consider the possibility of Medway being asked to provide for unmet need from neighbouring authorities to the west that are more constrained.
 - Those parts of Maidstone Borough and Ashford District that relate most closely to Swale Borough are constrained by the Kent Downs AONB.
 - The western part of Canterbury City Council is constrained by the Blean Woodlands complex.
- 5.2.13 A further consideration is the inherent transport and traffic constraints affecting Swale, as a coastal authority traversed by two dominant east-west routes (i.e. without the benefit of radial routes taking traffic in a variety of directions), plus with the Isle of Sheppey inherently constrained in transport terms. The significance of this constraint was recognised by a report prepared by Stantec in 2019, which stated:¹⁶ "... 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."
- 5.2.14 However, the latest situation is that the need to provide for LHN in full is accepted. Notably, the officers report to the October 6th Local Plan Panel meeting began with the following statement: "*The Local Plan Review will update the adopted Local Plan 'Bearing Fruits' and will need to include enough additional land to meet the development needs of the Borough for the period 2022 to 2038.*"¹⁷

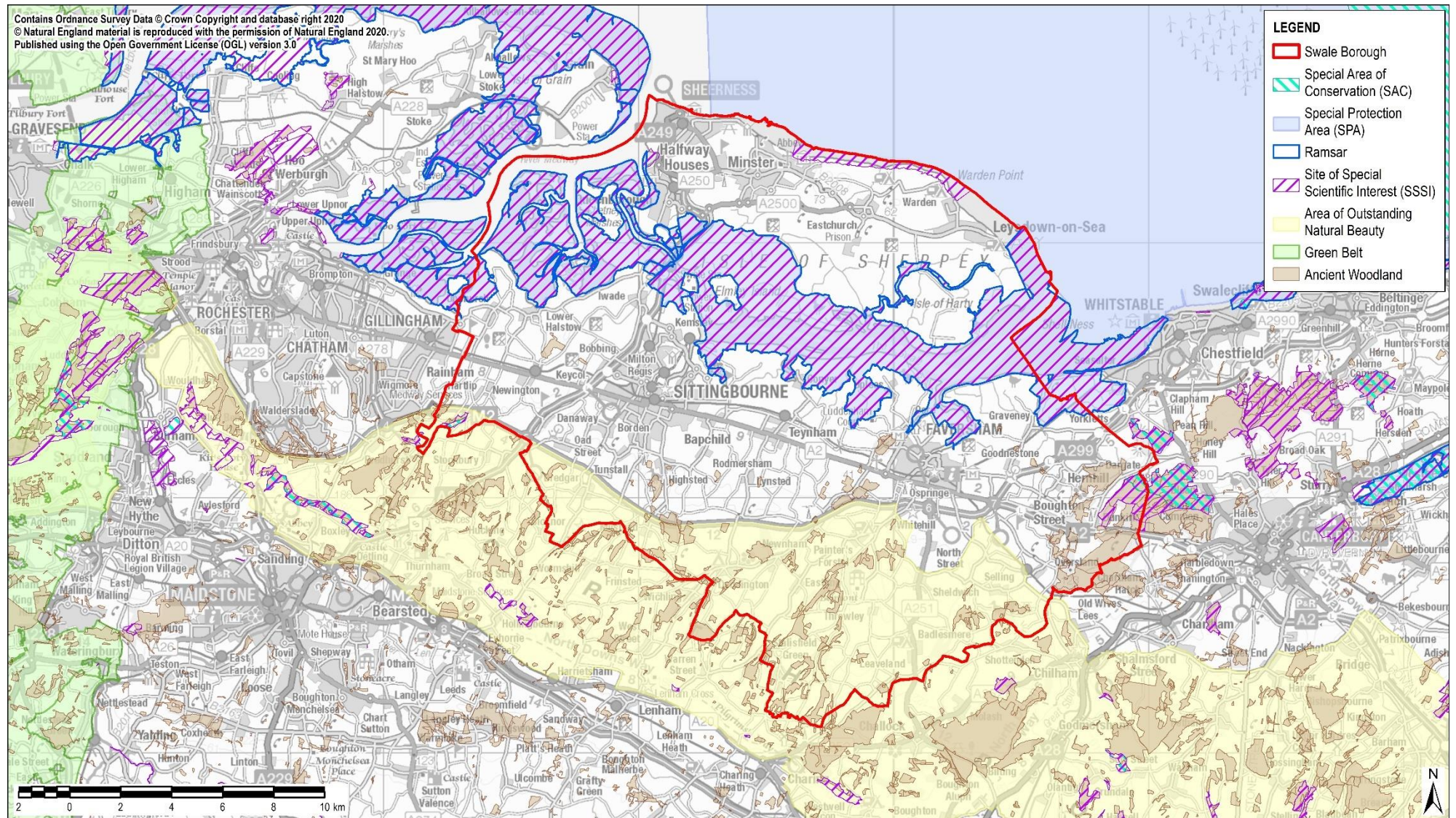
Conclusion on housing quanta

- 5.2.15 When seeking to establish reasonable growth scenarios there is a need to focus attention on provision for the established **LHN** figure. As for higher growth, there is little reason to suggest that any of Swale's neighbouring authorities will request that Swale provides for unmet need; however, it is nonetheless prudent and proactive to explore modest higher growth. This matter is returned to below, within Section 5.5. As for lower growth, there is no reasonable need to explore this matter further.

¹⁶ See <https://services.swale.gov.uk/meetings/documents/s13308/Appendix%20I%20-%20PBA%20REPORT%202nd%20stage%20assessment%20Sept%202019.pdf>

¹⁷ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2323>

Figure 5.1: Key strategic barriers to exporting unmet needs to other authorities in the sub-region



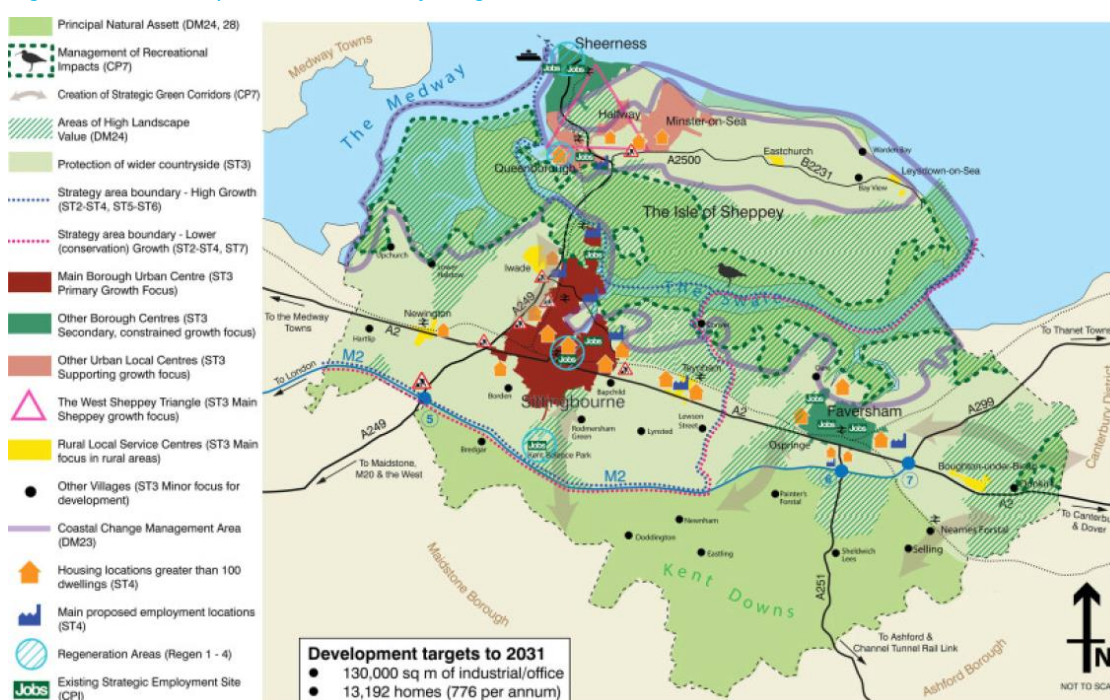
Broad distribution

5.2.16 This is a second section examining strategic issues and options relevant to establishing reasonable growth scenarios. This section considers: the adopted Local Plan; the 2018 Looking Ahead consultation; recent targeted evidence-gathering; the July 2020 'steer' on a preferred broad growth scenario; and work to appraise alternative broad growth scenarios in late 2020.

The adopted Local Plan spatial strategy

5.2.17 Sections 3 and 4 of the adopted Local Plan set out the spatial strategy and key diagram. The spatial strategy is described as responding to priorities including: building a strong, competitive **economy**; ensuring the vitality of **town centres**; supporting a prosperous **rural economy**; promoting sustainable **transport**; supporting high quality communications **infrastructure**; delivering a wide choice of high quality **homes**; promoting healthy **communities**; meeting the challenge of **climate change**, flooding and coastal change; and conserving and enhancing the **natural environment** and **historic environment**.

Figure 5.2: The adopted Local Plan Key Diagram



5.2.18 Importantly, Table 4.2.1 of the Local Plan splits the Borough into two planning areas and sets out that growth in the plan period should be directed primarily to one of these areas – see Table 5.2.

Table 5.2: Split of growth in the plan period (2014 to 2031) between the two planning areas

Planning area	Proportion of housing growth 2014-2031
Thames Gateway (Sittingbourne and Isle of Sheppey)	85%
Faversham and the rest of Swale	15%

5.2.19 Within this broad framework, the spatial strategy within the adopted Local Plan also takes careful account of the settlement hierarchy set out in Table 4.3.1, with the top four tiers of the hierarchy as follows:

- Tier 1 – Sittingbourne
- Tier 2 – Sheerness and Faversham
- Tier 3 – Minster / Halfway and Queenborough / Rushenden (the 'West Sheppey Triangle')
- Tier 4 – Boughton, Eastchurch, Iwade, Leysdown, Newington, Teynham.

2018 consultation on Looking Ahead

- 5.2.20 The consultation posed 46 questions, with a total of 3,308 responses received from 283 parties. Responses were received from several organisations with a borough-wide interest/remit, including the Environment Agency, Historic England and Natural England. A brief response was received from Maidstone Borough (confirming that the aim should be for both authorities to provide for LHN in full), with no responses received from other neighbouring authorities or Kent County Council. Detailed responses were received from several Parish Councils, primarily those associated with Sittingbourne area, including Teynham and Newington. Officers reported the findings of the consultation to the Local Plan Panel in October 2018.¹⁸ Issues and opportunities raised through the consultation are discussed in **Appendix II**.
- 5.2.21 A **Garden Communities Prospectus** was also published at this time, which led to developers submitting four garden community (or 'strategic site') options, as discussed below in Section 5.4.¹⁹ It is also important to note that the decision to publish the Prospectus was made in light of an earlier report on **Choices for housing growth**.²⁰ This report, amongst other things: went through a 'sieving' process to identify locations potentially suitable for a new settlement; constructed and tested growth scenarios; and recommended setting out a 'design brief' for a new settlement, to inform site-specific proposals.

Recent targeted evidence-gathering

- 5.2.22 A range of evidence studies have been prepared to inform the LPR, many of which serve to identify strategic spatial issues and opportunities relevant to the task of establishing reasonable growth scenarios. These evidence studies have been reported to the Local Plan Panel over the past two or more years.²¹
- 5.2.23 **Appendix II** presents a review under the following headings:
- Air quality – drawing on the Air Quality Modelling Report (2020);
 - Biodiversity - drawing on a Biodiversity Baseline Study (2020);
 - Climate emergency – noting that Swale BC declared a Climate and Ecological Emergency in 2019, followed by publication of a Climate and Ecological Emergency Action Plan (2020), followed by publication of a Kent and Medway Energy and Low Emissions Strategy (2020);
 - Economy and Employment – drawing on the Employment Land Review (2018) and more recent evidence published at sub-regional and national scales;
 - Flood risk – drawing on the Level 1 Strategic Flood Risk Assessment (2019) and a subsequent report on applying the 'sequential test' (2020);
 - Green and blue infrastructure – drawing on the Green and Blue Infrastructure Strategy (2020);
 - Heritage – drawing on the Heritage Strategy and Action Plan (2020);
 - Housing – drawing on the LHN Study (2020) and the Housing Market Assessment (2020);
 - Infrastructure – drawing on the Infrastructure Delivery Plan Scoping Study (2020);
 - Kent Downs AONB – drawing on the draft AONB Management Plan (2020);
 - Landscape – drawing on the Landscape Designation Review (2018); the Landscape Sensitivity Assessment (2019); and the Important Local Countryside Gaps report (2020);
 - Neighbourhood Planning – drawing on the regular updates presented to the Local Plan Panel;
 - Settlement hierarchy – drawing on the Settlement Hierarchy Study (2020);
 - Transport – drawing on the Local Plan Transport Model Re-run (2020); and
 - Viability – drawing on the Viability Report (2020).

¹⁸ A review of responses is available here: services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2094&Ver=4

¹⁹ See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

²⁰ See services.swale.gov.uk/meetings/documents/s8862/Appendix%20to%20PBA%20Report%20Item%208Feb18.pdf

²¹ Details of the Panel meetings are available at: services.swale.gov.uk/meetings/ieListMeetings.aspx?CommitteeId=216

The 2020 'steer' on a preferred broad growth scenario

- 5.2.24 In July 2020 the Swale Borough Local Plan Panel considered a report by officers entitled “Vision and Development Growth Options”,²² central to which was analysis of five **broad growth scenarios**, which essentially varied in respect of the extent to which there would be a departure from the strategy set out in Bearing Fruits (see Table 5.2). The officers’ report also presented a discussion of the sites that could possibly deliver each of the broad distribution alternatives, drawing upon the evidence provided by the: Strategic Housing Land Availability Assessment (SHLAA, 2020; discussed further below).
- 5.2.25 A key assumption of the officers’ report was a need to plan for a good **mix of sites**, both in respect of type (e.g. large versus small) and location. As explained in the report: “A strategy dominated by small to medium sized sites may not generate the critical mass required for significant improvements to infrastructure... which could benefit existing communities as well as new residents... A strategy dominated by a few larger sites would bring in to question whether the short to medium term housing needs of the borough would be adequately addressed given the long lead in times for significant delivery to come forward and the impact this has on meeting shorter term five year supply of housing. A supply of small/medium sites would also need to be allocated to maintain the rolling five year target.”
- 5.2.26 The broad growth scenarios set out in the officers’ report are summarised below. The scenarios benefited from being mutually exclusive, such that members were presented with a discrete choice; however, the corollary is that there were limits to the number of supply variables and options that could be reflected across the scenarios. The following bullet points discuss the **limitations** of the broad growth scenarios:
- The scenarios reflect a degree of emphasis on one of the four strategic site options (Southeast Faversham), as opposed to testing all of the potential combinations of strategic site options. The report explained a planning basis for this, namely that Southeast Faversham directly adjoins the settlement whilst the other three options are technically located within the Borough’s rural area (albeit closely related to either Sittingbourne or Faversham). Also, by this point in the process officers had begun to focus on Southeast Faversham as the best performing of the four strategic site options, in light of much detailed evidence gathering and analysis over the preceding two years (as discussed further below).
 - Scenario E could feasibly have been broken down to reflect all of the potential/reasonable strategic site combinations. However, this was considered unnecessary, given the amount of attention given to the various competing strategic site options over the preceding two years.
 - The scenarios lend themselves to exploring options for Sittingbourne and Faversham, but less to options for Sheerness / Queenborough / Rushenden / Minster / Halfway and the tier 4 settlements.
- 5.2.27 Ultimately, the Local Plan Panel provided a clear “steer” in support of **Scenario C** – see Table 5.4.

Table 5.3: Summary of the July 2020 broad growth scenarios (TG = Thames Gateway; Fav = Faversham)

Broad growth scenario	Choice between small sites ²³	Strategic site(s)
A Roll forward Bearing Fruits (BF)	<ul style="list-style-type: none"> • TG – very little choice • Fav – good choice 	<ul style="list-style-type: none"> • None
B Faversham focus ... to begin to counter-balance BF	<ul style="list-style-type: none"> • TG – little choice • Fav – little choice 	<ul style="list-style-type: none"> • None
C Further Faversham focus ... to mostly counter-balance BF	<ul style="list-style-type: none"> • TG – good choice • Fav – good choice 	<ul style="list-style-type: none"> • SE of Faversham
D Further Faversham focus still ... to fully counter-balance BF	<ul style="list-style-type: none"> • TG – very good choice • Fav – little choice 	<ul style="list-style-type: none"> • SE of Faversham
E Strategic sites	<ul style="list-style-type: none"> • TG – good or very good choice • Fav – good or very good choice 	<ul style="list-style-type: none"> • One or two out of the four options (no more than one in each planning area)

²² See services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2372&Ver=4

²³ It was not possible to define the approach to small sites with any certainty. We define a ‘good choice’ as a situation whereby there would be the potential to select only the best performing of the SHLAA ‘suitable’ sites for allocation, whilst ‘little choice’ is defined as a situation whereby all ‘suitable’ SHLAA sites are required as well as potentially certain ‘unsuitable’ SHLAA sites.

Table 5.4: Local Plan Panel views on the July 2020 broad growth scenarios (preferred scenario in bold)

Broad growth scenario	First choices	Second choice
A Roll forward Bearing Fruits (BF)	2	1
B Faversham focus	1	2
C Further Faversham focus	6	0
D Further Faversham focus still	0	4
E Strategic sites	0	0
Combination of scenarios	2	2
None	0	2

5.2.28 The Local Plan Panel “steer”, in respect of Broad Growth Scenario C was then accepted by the Swale Borough Council Cabinet on 23rd September 2020.²⁴

Broad growth scenarios appraisal

5.2.29 Subsequently, in late 2020, AECOM completed an appraisal of the five broad growth scenarios – see **Appendix III**. In light of the appraisal, the Council (in discussion with AEOCM) decided that, in addition to taking forward Scenario C (as per the Cabinet decision), there was also a need to give further consideration to scenarios involving: a more even distribution of LPR allocations across the two broad planning areas; and two strategic site options (one in each planning area), as per Scenario E.

Conclusion on broad distribution

5.2.30 This section has reviewed strategic spatial influences, as understood from the adopted Local Plan; the 2018 Looking Ahead consultation; recent targeted evidence-gathering; the July 2020 ‘steer’ on a preferred broad growth scenario; and work in late 2020 to appraise alternative broad growth scenarios.

5.2.31 There is a range of sometimes competing spatial priorities; however, certain key messages do come through quite strongly, which can feed into work to explore site options (Section 5.3), settlement/sub-area scenarios (Section 5.4) and, ultimately, the establishment of reasonable growth scenarios (Section 5.5).

5.2.32 Headline considerations include:

- There is a clear need to allocate a range of sites, in terms of both size and spatial distribution.
 - There is a strong argument for supporting one or more strategic growth locations, given the potential to realise wide ranging sustainability benefits over-and-above more piecemeal growth. There is currently an opportunity to deliver one or more strategic growth locations because of the extent and diverse nature of the existing committed housing land supply (around 2/3 of the LHN figure), recalling the lead-in times and risks associated with delivering strategic growth locations.
 - With regards to tier 5 settlements, whilst there is a need to support village vitality, there are limited arguments for Local Plan allocations, where poor transport connectivity serves to suggest a need for modest growth only, such that Neighbourhood Plans are well placed to allocate sites.
- With regards to the broad balance of growth between the two planning areas, there is a clear need to give considerable weight to Broad Growth Scenario C; however, the appraisal presented in Appendix III serves to highlight, firstly, that there is also a need to explore options that would involve a more even spread of allocations across the two planning areas, and, secondly, the possibility of supporting two strategic allocations / garden communities (one in each of the two planning areas).
- There are a range of infrastructure and environmental issues and opportunities to respond to through the spatial strategy, including with a view to supporting strategic infrastructure upgrades and responding to the declared climate and ecological emergency. There is also a need to deliver new employment land and employment opportunities more widely, in line with the findings of the Employment Land Review (2018) and latest understanding of national and sub-regional objectives.

²⁴ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=129&MId=2308>

5.3 Site options

Introduction

- 5.3.1 A large number of site options have been submitted to the Council, and a process of Strategic Housing Land Availability Assessment (SHLAA) has been completed in order to identify a shortlist of sites that are available and 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).
- 5.3.2 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 enable delivery of a good mix of uses (also a good mix of homes), potentially to include employment land, and/or enable delivery of new or upgraded infrastructure (e.g. new road infrastructure, community infrastructure, green infrastructure).
- 5.3.3 This section firstly considers in detail the pool of available and potentially suitable **strategic sites**, before giving more light-touch consideration to the pool of available **non-strategic sites**.

Strategic site options

- 5.3.4 This section explains a lengthy process of identifying and appraising strategic site options.

Background

- 5.3.5 Close consideration has been given to the possibility of allocating one or more strategic sites since commencement of the LPR. An early step, on the part of the Council, was to commission and consider a report on *Choices for Housing* (February 2018),²⁵ which was followed by publication of a *Swale New Garden Communities Prospectus* (April 2018), which was a call for land-owners to submit sites for schemes in line with the Council's expectations. This was concurrent with the *Looking Ahead* consultation (discussed in Section 5.3), which sought views on the role that new garden communities might play in the LPR. Further garden community / strategic site focused work completed in 2018 included: workshops with landowners/developers, infrastructure providers and environmental bodies; a Member Q&A session with scheme promoters; and a Member coach tour to Cambridgeshire, to view new community examples.
- 5.3.6 Ultimately four strategic site options were identified necessitating detailed consideration in 2018, and all four have continued to evolve since that time. Figure 5.5 shows the current proposed 'red line boundaries' for each strategic site, and the following bullet points aim to present an introductory overview:
- **Southeast Sittingbourne** (also known as Highstead Park) – comfortably the largest of the strategic site options, with the proposal in 2018 being for 11,500 homes plus other uses,²⁶ although this was reduced to 8,000 in 2019 (at the 'Stage 2 Submissions' stage)²⁷ and the subsequently revised upwards to 9,250 homes.²⁸ A key aspect would be a new motorway junction and M2/A2 link road.
 - **North Street** (south of Faversham) – this is the second largest of the submitted schemes, proposed for circa 5,000 homes plus other uses to include a secondary school.²⁹ This site is notable for limited work having been progressed / presented to the Council by the site promoter since 2019.
 - **East / Southeast Faversham** – a smaller site proposed for circa 2,500 homes plus other uses was submitted in 2018 and examined in 2019;³⁰ however, latest understanding is that the scheme would be brought forward alongside additional land to the north (of the A2), and also in combination with the committed Preston Fields scheme to the west, leading to a combined scheme of c.3,400 homes.³¹
 - **Bobbing** – also proposed for circa 2,500 homes plus other uses.³² Since 2018 the site boundary has evolved significantly (essentially shifting to the north); however, the proposal remains for 2,500 homes.³³

²⁵ See services.swale.gov.uk/meetings/documents/s8862/Appendix%20to%20PBA%20Report%20Item%208Feb18.pdf

²⁶ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Sittingbourne-Prospectus-Submission.pdf

²⁷ See discussion at: swale.gov.uk/planning-and-regeneration/local-plans/sd-options

²⁸ See highsteadpark.co.uk/

²⁹ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/North-Street-Sheldwich-Faversham-Prospectus-Submission.pdf

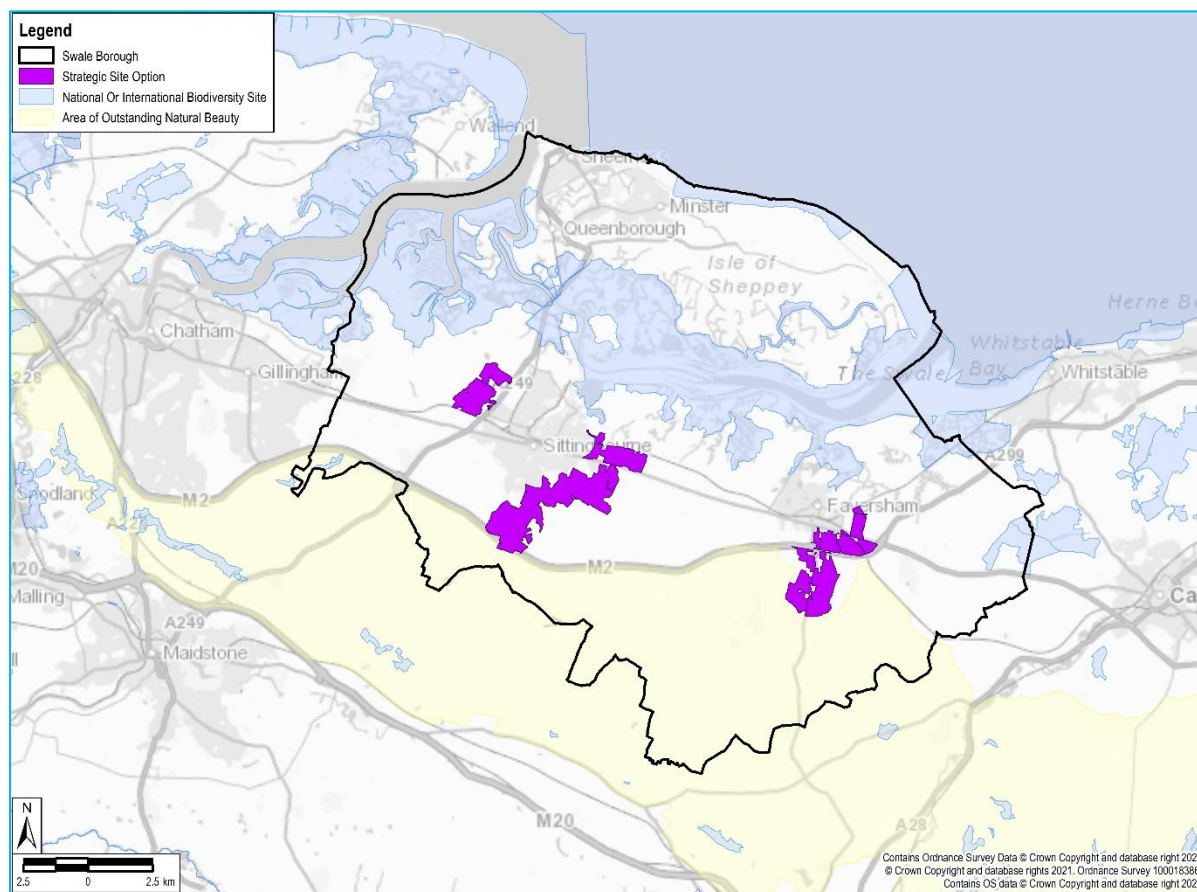
³⁰ See services.swale.gov.uk/assets/planning-general/prospectus-submissions/SE-Faversham-Prospectus-Submission.pdf

³¹ See services.swale.gov.uk/meetings/documents/s15712/LPR%20site%20selection.pdf

³² See services.swale.gov.uk/assets/planning-general/prospectus-submissions/Bobbing-Prospectus-Submission.pdf

³³ See bobbingplans.uk/masterplan

Figure 5.3: The strategic site options



Stantec reports

- 5.3.7 A work-stream led by Stantec forms an important evidence-base for the examination of the four competing strategic site options. The work has led to two outputs, namely:
- Assessment of submissions (February 2019) – examined the four schemes submitted following the Prospectus in turn, and recommended a range of further work;³⁴
 - Assessment of Stage 2 submissions (October 2019) – considered changes made to the four schemes following the earlier assessment, and reached overall conclusions on each of the four schemes.³⁵
- 5.3.8 The process was notable involving ongoing dialogue with scheme promoters to obtain further information and clarification, with a view to elaborating the schemes to a point where they could be assessed on a reasonably level playing field, whilst recognising that some schemes were more developed than others. There was a particular focus on ensuring clarity and realism in respect of viability and deliverability.
- 5.3.9 Two headline conclusions from the September 2019 Report were as follows:
- North Street – stands out as performing relatively poorly. As stated at paragraph 10.15 of the report: “... 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.”
 - Southeast Sittingbourne is associated with risks and drawbacks over-and-above Bobbing and Southeast Faversham. This is evident from the summary “Comparative risk matrix” presented at paragraph 9.19.

³⁴ See services.swale.gov.uk/meetings/documents/g2142/Public%20reports%20pack%2014th-Mar-2019%2019.00%20Local%20Plan%20Panel.pdf?T=10

³⁵ See <https://services.swale.gov.uk/meetings/documents/s13308/Appendix%20I%20-%20PBA%20REPORT%202nd%20stage%20assessment%20Sept%202019.pdf>

Appraisal of strategic site options

- 5.3.10 Despite the Stantec work serving to suggest that North Street and potentially also Southeast Sittingbourne perform relatively poorly, and hence are not likely to be suitable for allocation in the LPR, the decision was made in late 2020 to subject all four strategic site options to appraisal – see **Appendix IV**.

N.B. the appraisal considers the latest “East and Southeast Faversham”, as opposed to the smaller “Southeast Faversham” scheme considered through the Stantec work.

Conclusion on strategic site options

- 5.3.11 In light of the appraisal presented in Appendix IV, the Council (in discussion with AECOM) was able to reach the following conclusions:

- An immediate conclusion is that **North Street** can be ruled out at this stage in the process, i.e. it need not feed into work to consider sub-area scenarios in Section 7 (or, in turn, borough-wide growth scenarios in Section 8). This is because East and southeast Faversham is a preferable option, and there is no potential to allocate both sites within the LPR, given their proximity.
- A second conclusion is that both **Bobbing** and **E/SE Faversham** warrant being taken forward for further consideration (Section 7). Both options are associated with pros and cons, but are judged to have a sufficient degree of merit overall, mindful of the drawbacks to alternatively delivering growth at Sittingbourne and/or Faversham via piecemeal urban extensions.
- Finally, there is a need to consider **Southeast Sittingbourne**. This is a more marginal conclusion; however, on balance the option of strategic growth at Southeast Sittingbourne can be ruled-out at this stage. This is because Bobbing is a preferable option, and there is no potential to allocate both sites within the LPR, given their proximity and the risk of in combination impacts.

Options for strategic growth in at Southeast Sittingbourne have been subject to detailed consideration since 2018,³⁶ and latest proposals are given detailed consideration through the appraisals presented in Appendices III and IV of this report, which serve to highlight that growth could deliver transformational benefits in respect of transport and economy/employment objectives. However:

- there are risks and uncertainties around viability and therefore deliverability;
- the viability challenges mean that no more than 20% affordable housing can be expected;
- the scale of growth necessary to fund the new strategic link road and motorway junction leads to concerns in respect of landscape objectives; and
- the required scale of growth is beyond that necessary for the LPR, particularly given the need to also deliver growth at Faversham and elsewhere in the Borough, and arguably focus growth at Faversham.

A note on site-specific options

- 5.3.12 As discussed, schemes for each of the four strategic site options evolved through 2018 and 2019, and continued to evolve through 2020 to varying extents. In particular, “Southeast Faversham” became “East and Southeast Faversham” in late 2020, which is considered a positive step, including as this evolution appears to have unlocked the potential to make land available for a secondary school.
- 5.3.13 Whilst there is a pragmatic need to ‘draw a line’ at some point in what is already a lengthy process, there is also a need to question whether certain of the schemes could continue to evolve, or even transform into something significantly different. No site-specific ‘reasonable alternatives’ have been proposed, or are evident to the extent that they warrant formal appraisal; however, within Appendix III, Appendix IV and within sections below (including their associated appendices) there is some discussion of how alternative site boundaries and/or alternative development configurations within current site boundaries could potentially lead to benefits in terms of certain sustainability objectives. The discussion reflects a view that there can be merit to ‘comprehensive’ planning at landscape scales and with a long-term perspective, rather than planning with a focus on land ownership scales.

³⁶ There is also a longer history to exploring options for a Sittingbourne Southern Relief Road, see highstedpark.co.uk/timeline.

Non-strategic site options

- 5.3.14 This is the second of two sections where the aim is to give consideration to individual 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**.

N.B. this section is a work in progress, and will be finalised ahead of publication.

Methodology

- 5.3.15 Appendix IV 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.

Analysis of non-strategic site options

- 5.3.16 The following is a brief discussion of key findings:
- 70% of SHLAA sites intersect either grade 1 or grade 2 agricultural land.
 - Air quality management areas - four SHLAA sites intersect or abut an AQMA, and a further five are within 50. The average distance is c.3,400m.
 - Special Protection Area - eight SHLAA sites intersect an SPA, and a further 14 are within 400m. The average distance is c.2,400m.
 - Special Areas of Conservation - one SHLAA site is c.280m from an SAC, with the next closest site over 1km distant. The average distance is c.7,200.
 - SSSI – ten SHLAA sites intersect or abut a SSSI, and a further ten are within 200m. The average distance is c.2,100m.
 - GP surgery – 41 SHLAA sites are within 400m of a GP surgery (19%). The average distance is c.1,350m.
 - Primary school – 155 SHLAA sites are within 800m of a primary school (72%). The average distance is c.660m.
 - Secondary school – 37 SHLAA sites are within 800m of a secondary school (17%). The average distance is c.2,900m.
 - Rail station - 44 SHLAA sites are within 800m of a rail station (21%). The average distance is c.2,200m.
 - Flood zone 2 – 51 SHLAA sites intersect flood zone 2, of which 22 intersect by more than 50%.
 - Conservation areas – 51 SHLAA sites intersect or abut a conservation area, and a further 21 are within 100m. The average distance is 932m.
 - Grade 1 listed building – eight SHLAA sites are within 50m of a grade 1 listed building, and a further 10 are within 100. The average distance is c.1,150m.
 - Grade 2* listed building – 11 SHLAA sites are within 50m of a grade 2* listed building, and a further 10 are within 100. The average distance is c.1,130m.
 - Grade 2 listed building - 82 SHLAA sites are within 50m of a grade 2 listed building, of which 54 are within 25. The average distance is c.219m.
 - Area of Outstanding Natural Beauty – 24 SHLAA sites intersect the AONB, and a further 23 are within 1km. The average distance is c.4,200m.

Conclusion on non-strategic site options

- 5.3.17 It is not possible to sift out site options purely on the basis of GIS analysis alone; however, all constraints highlighted through the GIS analysis feed into the discussion of site options by sub-area, below.

5.4 Sub-area scenarios

Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' considerations around housing quanta and broad distribution; and B) 'bottom-up' consideration of site options (see Figure 5.1). The next step is to consider each of the Borough's sub-areas in turn, exploring how sites might be allocated in combination.
- 5.4.2 For each sub-area the aim is to arrive at a conclusion on sites and growth scenarios that should be taken forward to Section 5.5 of this report, where the final step in the overall process sees the sub-area growth scenarios combined into a single set of borough-wide growth scenarios.
- 5.4.3 This section presents summary conclusions, supplemented by more detailed analysis in **Appendix VI**.

What sub-areas?

- 5.4.4 Sub-areas considered here are: Sittingbourne; Faversham; West Sheppey; Teynham; Newington; Eastchurch; Leysdown; Boughton; Iwade; tier 5 settlements and the rural area. This structure reflects a view that the West Sheppey settlements can be considered collectively, and that there would be relatively little to be gained from individually examining tier 5 settlements or sub-divisions of the rural area.

When was this work undertaken?

- 5.4.5 This work was undertaken subsequent to a decision on an emerging preferred growth scenario by the Swale Borough Cabinet on 28th October 2020. As such, the emerging preferred growth scenario is the starting-point for each of the sub-area discussions, below.

Sittingbourne

- 5.4.6 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate Sittingbourne Town Centre as a broad area for the delivery of around 850 homes. There also is a need to explore higher growth scenarios, recognising that Sittingbourne is the Borough's main settlement, and in light of the discussion of high-level issues and options presented in Sections 5.2 and 5.3, above.
- 5.4.7 A first port of call is the two urban extension options to the south of Sittingbourne (sites 18/017 and 18/021) that were presented as options at the Local Plan Panel meeting of 8th October, which together would deliver around 380 additional homes.³⁷ Furthermore, there is considered to be the potential for modest growth at Bobbing,³⁸ to the west of Sittingbourne, where most land is available and the SHLAA finds three sites to be potentially suitable (one for employment). The precise site(s) to allocate can reasonably be left undefined at this stage (site selection would be suited to a Neighbourhood Plan); however, on balance, it is considered appropriate to assume delivery of circa 120 homes. This brings the total number of additional homes under this scenario to 500. This is **higher growth scenario 1**.
- 5.4.8 Secondly, there is the option of strategic growth at Bobbing (i.e. support for the strategic site option discussion in Section 5.3, above). This would deliver c.2,500 homes (in the plan period), over-and-above the emerging preferred growth scenario. This is **higher growth scenario 2**.
- 5.4.9 In conclusion, **three growth scenarios** should be taken forward to Section 5.5.

Faversham

- 5.4.10 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support strategic growth to the east / southeast of the town, delivering c.3,400 homes. There is a need to explore scenarios involving smaller scale urban extensions, in place of strategic growth to the east / southeast, which in practice means exploring lower growth scenarios.

³⁷ Two further urban extension options were presented to 8th October meeting, but these are located to the east of Sittingbourne, which is a more challenging direction for growth.

³⁸ Borden is also notable as a small village closely linked to Sittingbourne where there is a high density of promoted sites, including one site that is found to be potentially suitable through the SHLAA.

5.4.11 Five urban extension options have been identified that are judged to perform relatively well, for the purposes of arriving at growth scenarios, namely sites 18/030, 18/062, 18/077, 18/091 and 18/135. The combined yield of these sites, according to the SHLAA, is 1,065 homes; however, it is considered appropriate to round this figure down to 1,000 homes. This is **lower growth scenario 1**.

5.4.12 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

West Sheppey

5.4.13 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate site 18/113 for 850 homes. Whilst this site has the potential to support regeneration objectives for Queenborough/Rushenden, it is subject to a range of constraints and delivery challenges. As such, there is a need to explore scenarios involving non-allocation.

5.4.14 One other site has been identified as performing relatively well, for the purposes of arriving at growth scenarios, namely site 18/038, to the southeast of Minster, albeit it might involve somewhat piecemeal expansion, with resulting 'planning gain' opportunities missed. The capacity of this site is c.650 homes, hence its allocation in place of site 18/113 would mean lower growth. This is **lower growth scenario 1**.

5.4.15 Additionally, there is the option of nil allocations, particularly given concerns regarding junction capacity under scenarios where there is also higher growth at Sittingbourne. This is **lower growth scenario 2**.

5.4.16 In conclusion, **three growth scenarios** should be taken forward to Section 5.5.

Teynham

5.4.17 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support an 'area of opportunity' at Teynham, expected to deliver around 1,100 homes. There is a need to explore lower growth scenarios involving one or more discrete allocations, in place of an area of opportunity.

5.4.18 Four site options have been identified that are judged to perform relatively well, for the purposes of arriving at growth scenarios, namely sites 18/106, 18/116, 18/122 and 18/123.³⁹ The combined yield of these sites is c.350 homes. This is **lower growth scenario 1**.

5.4.19 Additionally, there is the option of nil allocations, given: committed growth; A2 traffic and air quality issues; and few clear infrastructure opportunities short of delivering a bypass. This is **lower growth scenario 2**.

5.4.20 In conclusion, **three growth scenarios** should be taken forward to Section 5.5.

Newington

5.4.21 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There is a need to explore higher growth scenarios, recognising that Newington is a tier 4 settlement that is well connected by road and rail.

5.4.22 One site has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site 18/229, with a capacity of c.200 homes. This is **higher growth scenario 1**.

5.4.23 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

Eastchurch

5.4.24 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Eastchurch, recognising its rural location; however, as a tier 4 settlement there is a need to remain open to the option of allocation.

5.4.25 One site option has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site 18/063, which would yield c.65 homes. This is **higher growth scenario 1**.

5.4.26 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

³⁹ There are three other sites supported by the SHLAA, but judged to be less preferable on balance.

Leysdown

- 5.4.27 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Leysdown, as per Eastchurch; however, there is an argument for housing growth in support of village vitality objectives, e.g. with a view to supporting shops and services outside of the tourism season.
- 5.4.28 One site option has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site 18/121. The SHLAA records the yield of this site as 135 homes; however, parts of the site is constrained by flood risk, hence it is considered appropriate to assume a lower yield of c.100 homes. This is **higher growth scenario 1**.
- 5.4.29 In conclusion, **two growth scenarios** should be taken forward to Section 5.5.

Boughton

- 5.4.30 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate one site for 20 homes. This site is relatively firmly supported (there is a history of unimplemented planning permissions), hence there is no reasonable need to explore scenarios involving non-allocation of this site.
- 5.4.31 As for possible higher growth scenarios, there is only one site highlighted by the SHLAA as potentially in contention; however, on balance, there is not considered to be a reasonable need to explore a higher growth option involving additional allocation of this site, for the reasons set out in Appendix VI.
- 5.4.32 In conclusion, **one growth scenario** should be taken forward to Section 5.5 (i.e. growth can reasonably be held constant across the borough-wide growth scenarios).

Iwade

- 5.4.33 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. Three sites at Iwade are identified as potentially suitable for allocation by the SHLAA; however, there is considered to be a strong case for non-allocation at Iwade through the LPR, on the basis that Iwade is set to see significant growth through committed sites.
- 5.4.34 In conclusion, **one growth scenario** should be taken forward to Section 5.5.

Tier 5 settlements and the rural area

- 5.4.35 The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate three adjacent sites at Neames Forstal to deliver 90 homes in total. These sites were not supported by the SHLAA, and there remain question-marks regarding suitability for allocation, as discussed in Appendix VI; however, there would be relatively little to be gained through exploring non-allocation further through the appraisal of borough-wide growth scenarios. As such, and on balance, there is not considered to be a reasonable need to take forward scenarios involving non-allocation of any of these sites to Section 8.
- 5.4.36 With regards to higher growth scenarios, attention focuses on the possibility of additionally allocating one of the sites identified as potentially suitable for allocation by the SHLAA. However, on balance, it is not considered appropriate to explore a higher growth scenario involving additional allocation of one or more of these sites, given that: there are limited strategic arguments for growth at any of the lower order settlements in question; there are question-marks regarding the suitability of certain of these sites; and there is the potential to allocate sites at lower order settlements through Neighbourhood Plans.
- 5.4.37 Finally, there is a need to give special mention to site 18/154 (Lamberhurst Farm), which is proposed as an employment allocation, following the Cabinet decision of 28th October, but which is being promoted as a mixed use scheme involving 300 homes. It is noted that there was some support for a mixed use scheme at the 8th October meeting; however, on balance the site is considered more suitable for employment, and it is not considered necessary to take forward the option of a mixed-use scheme (see further discussion of a possible mixed use scheme in Box 9.1).
- 5.4.38 In conclusion, **one growth scenario** should be taken forward to Section 5.5 of the main report.

Conclusion on sub-area scenarios

5.4.39 Table 5.5 presents a summary of the sub-area scenarios taken forward to Section 5.5.

5.4.40 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.

Table 5.5: Summary of sub-area scenarios (number of homes; emerging preferred scenario highlighted)

Sub-area	Sub-area scenarios taken forward to Section 5.5		
Sittingbourne	850	1,350	3,350
Faversham	1,000	3,400	-
West Sheppey	0	650	850
Teynham	0	350	1,100
Newington	0	200	-
Eastchurch	0	65	-
Leysdown	0	100	-
Boughton	20	-	-
Iwade	0	-	-
Tier 5 settlements	90	-	-

5.5 Reasonable growth scenarios

Introduction

5.5.1 Having gone through a process (as summarised in Figure 5.1) involving consideration of strategic issues/options, site options and sub-area scenarios, the final task was to draw together the understanding generated in order to arrive at a single set of borough-wide reasonable growth scenarios.

5.5.2 In practice, this involved exploring ways of combining the **sub-area scenarios** that emerge from Section 5.4, 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).

What about employment land supply?

5.5.3 The process of establishing reasonable growth scenarios has been housing-led; however, there is also a need to ensure sufficient supply of employment land under all scenarios, in light of the targets set by the Employment Land Review (2018). This matter is discussed further in Box 5.1, at the end of this section.

Combining sub-area scenarios

5.5.4 This section considers ways of combining the sub-area scenarios to form reasonable growth scenarios.

Parameters

5.5.5 There are many potential combinations of these sub-area scenarios; however, it is possible to immediately rule out those combinations that would deliver too few or too many homes.

5.5.6 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 (as discussed in Section 5.2), but also supply from commitments (11,000 homes),⁴⁰ supply from windfall sites (1,530 homes)⁴¹ and the need for a supply buffer of at least 10%.

5.5.7 On this basis, there is a need for combinations of sub-area scenarios to deliver **at least 5,740 homes**.⁴²

Reasonable growth scenarios to provide for LHN

5.5.8 The first port of call is the emerging preferred growth scenario, following the Cabinet decision of 28th October. The sub-area scenarios in combination (see highlighted cells in Table 8.1) would deliver 6,310 homes (in total, and all more-or-less in the plan period), which would lead to a total supply of 18,840 homes, which amounts to LHN (c.16,600) plus a supply buffer of 13%. This would likely mean that the housing requirement is set at LHN. This is **reasonable growth scenario 1**.

5.5.9 The next step is to vary the emerging preferred growth scenario by supporting the lower growth scenario for Faversham, namely 1,000 homes through urban extensions in place of 3,400 homes through strategic growth to the east and southeast. Given the sub-areas scenarios presented in Table 8.1, an immediately apparent way to make up for the decreased number of homes at Faversham would be to support high growth at Sittingbourne, namely 2,500 homes via strategic growth at Bobbing. Assuming that growth at the other sub-areas remains as per the preferred scenario, then the total supply would amount to 18,940 homes in the plan period, which amounts to LHN plus a supply buffer of 14%. This would likely mean that the housing requirement is set at LHN. This is **reasonable growth scenario 2**.

5.5.10 The next step is to vary the emerging preferred growth scenario by supporting the lower growth scenarios at West Sheppey and Teynham, on the basis that the emerging preferred growth scenarios here give rise to a degree of delivery risk and sustainability challenges. Supporting the lower growth scenarios at West Sheppey and Teynham results in 950 fewer homes, and there is logic to addressing this shortfall by supporting: the higher growth scenarios at Newington, Eastchurch and Leysdown; and the middle growth scenario at Sittingbourne. This is on the basis that growth at Sittingbourne, Newington, Eastchurch and Leysdown, under these scenarios, would involve a collection of more 'traditional' urban extensions thought likely to be associated with fairly low delivery risk (overall). This is **reasonable growth scenario 3**.

Reasonable higher growth scenarios

5.5.11 Under the above three scenarios it would likely be appropriate to set the housing requirement as LHN, i.e. 1,038 dwellings per annum. However, as discussed in Section 5.2, there is also a need to consider modestly higher growth options, given a risk (albeit small) of the LPR needing to provide for unmet needs.

5.5.12 A first port of call is to support the highest growth scenarios for both Sittingbourne and Faversham. This is a reasonable option to explore; however, it is difficult to decide what growth scenarios to assume for other sub-areas. On balance, it is considered appropriate to assume the lowest growth scenario for all other sub-areas, leading to a total supply of 19,390 homes, which amounts to LHN plus a supply buffer of 17%. This *could* enable a housing requirement set at a level slightly above LHN; however, this is uncertain, as a large supply buffer would be called for. This is **reasonable growth scenario 4**.

5.5.13 Secondly, there is a need to explore a scenario involving the emerging preferred growth scenario, following the Cabinet decision of 28th October, plus the additional modest urban extension options identified at Sittingbourne, Minster, Newington, Eastchurch and Leysdown, leading to a total supply of 20,355 homes, which amounts to LHN plus a supply buffer of 23%. This could well enable the housing requirement to be set at a level slightly above LHN. This is **reasonable growth scenario 5**.

The reasonable growth scenarios

5.5.14 The five reasonable growth scenarios that emerge from the discussion above are set out in summary in Table 5.6 and in detail in Table 5.7 and across the subsequent maps. Many other growth scenarios can be envisaged, but are judged to be unreasonable in light of the analysis set out above – see Box 5.2.

⁴⁰ At the time of writing the precise commitments figure is still under review, but is known to be c.11,000 homes.

⁴¹ Calculated as 127 dwellings per annum for last 12 years of plan.

⁴² Calculated as: LHN (1,038 dpa x 16 years = c.16,600) + 10% buffer (1,660) – completions (11,000) – windfall (1,530)

Table 5.6: Summary of the reasonable growth 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

Box 5.1: Discussion of employment land supply under the reasonable growth scenarios

As discussed in Section 5.2, there is a need to provide for around 15 ha of new land for offices and light industrial uses in the east of the Borough, plus there is a need to consider allocation of 40 ha for warehousing.

Under **Growth Scenario 1** new employment land supply would be delivered at Faversham (at least 20 ha); Rushenden (10 ha) and Lamberhurst Farm (at least 2 ha), such that the 15 ha target would be exceeded. The warehousing target would not be met, but this leads to limited cause for concern, as the target is described in the ELR as 'marginal', plus the target is for the longer term and need only be met if suitable sites are available.

Employment land supply would be tighter under **Growth Scenario 3** because there would be a loss of 10ha of supply at Rushenden; however, the 15 ha ELR target would still be exceeded. There would be an argument for allocating one or more additional employment sites, but it is not clear what site(s) might be allocated in practice, hence this is left as an open-ended possibility, for the purposes of defining growth scenarios.⁴³

There is also a need to consider **Growth Scenarios 2 and 4**, under which there would be a loss of 10 ha of employment land at either Faversham or Rushenden, but with the shortfall partly addressed by strategic growth at Bobbing. The current proposal for Bobbing is to deliver a fairly modest area of "flexible employment space" at the southeast corner of the site; however, there might feasibly be potential for additional employment land, should it be required. This might be either within or outside of the current red line boundary. An employment hub stretching either side of the railway might be envisaged, potentially to include site 18/007.

Box 5.2: Unreasonable growth scenarios

As discussed in Section 4, there is a need to arrive at growth scenarios in the form of alternative packages of sites. This creates an inherent challenge for the SA process, because there are many feasible site packages. The process discussed in this section (as summarised in Figure 5.1) is designed with the objective of addressing this challenge, and arriving at discrete site packages that are demonstrably 'reasonable'. However, there is inevitably a significant amount of planning judgement involved when arriving at reasonable growth scenarios for appraisal, and the need to ensure a manageable number of scenarios – to the benefit of consultees – is a factor.

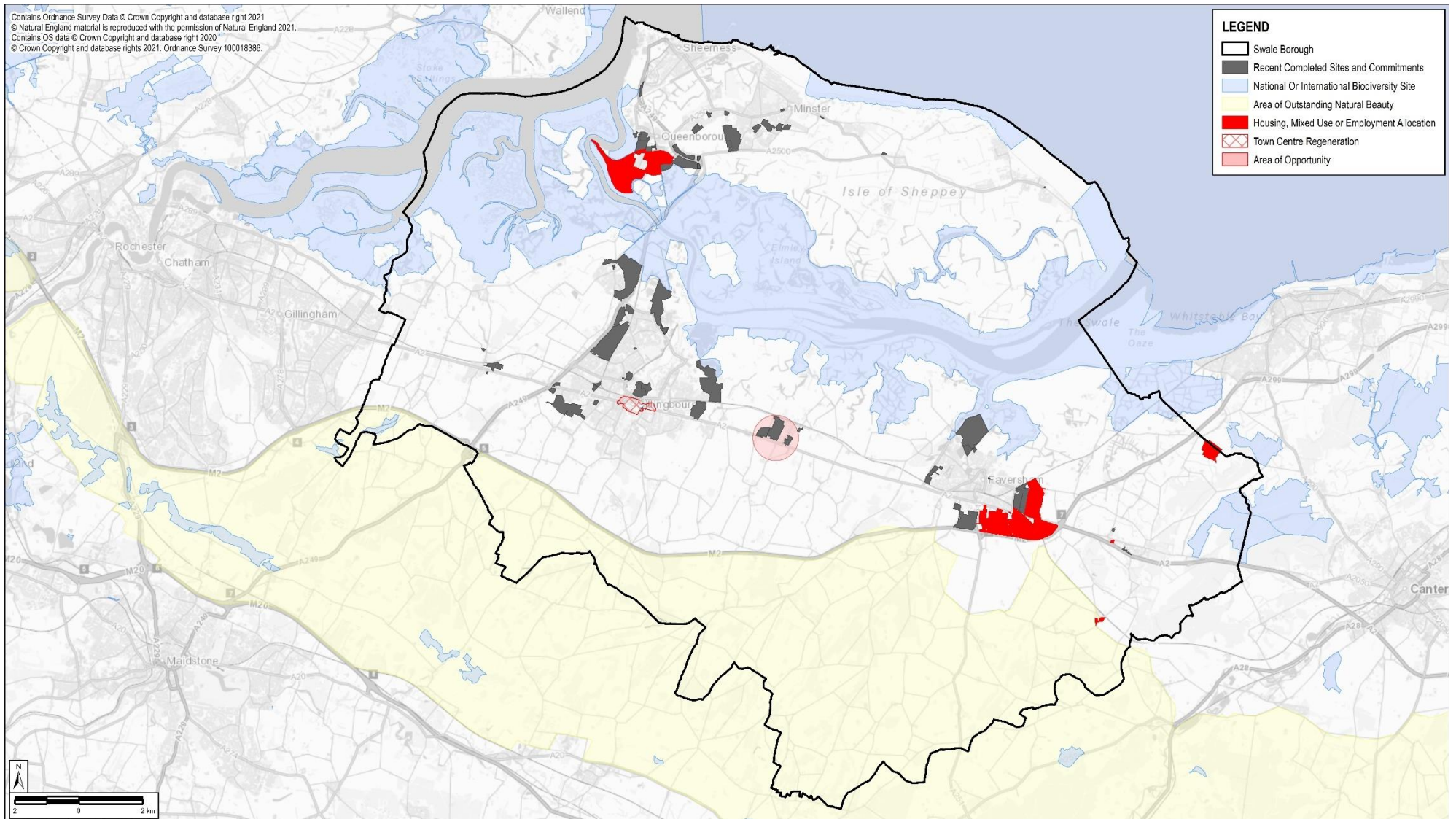
It is not necessary to list unreasonable growth scenarios, including because the list could never be comprehensive. However, it is appropriate to highlight that a stand-out "near-miss" growth scenario would see support for the 'urban extension' scenarios at Sittingbourne and Faversham (i.e. no strategic growth location / garden community) alongside the high growth scenarios elsewhere. This would deliver a total supply of 17,955 homes (LHN + 8%); however, officers (in discussion with AECOM) judged this scenario to be unreasonable because there are strong arguments in support of delivering a garden community (see Section 5.2).

⁴³ Sites that might be considered for allocation include: **18/007** (Land east of Sheppey Way, Bobbing; 1 ha) – however, suited to offices rather than industry; **18/018** (Land off Lower Road, Minster; 4 ha) – however, viability / deliverability on Sheppey is challenging; **18/105** (Halfway Egg Farm, Featherbed Lane, Sittingbourne; 2.9 ha) – promoted for retail, but the option of employment land might be explored, given its location adjacent to the A249 Grovehurst junction.

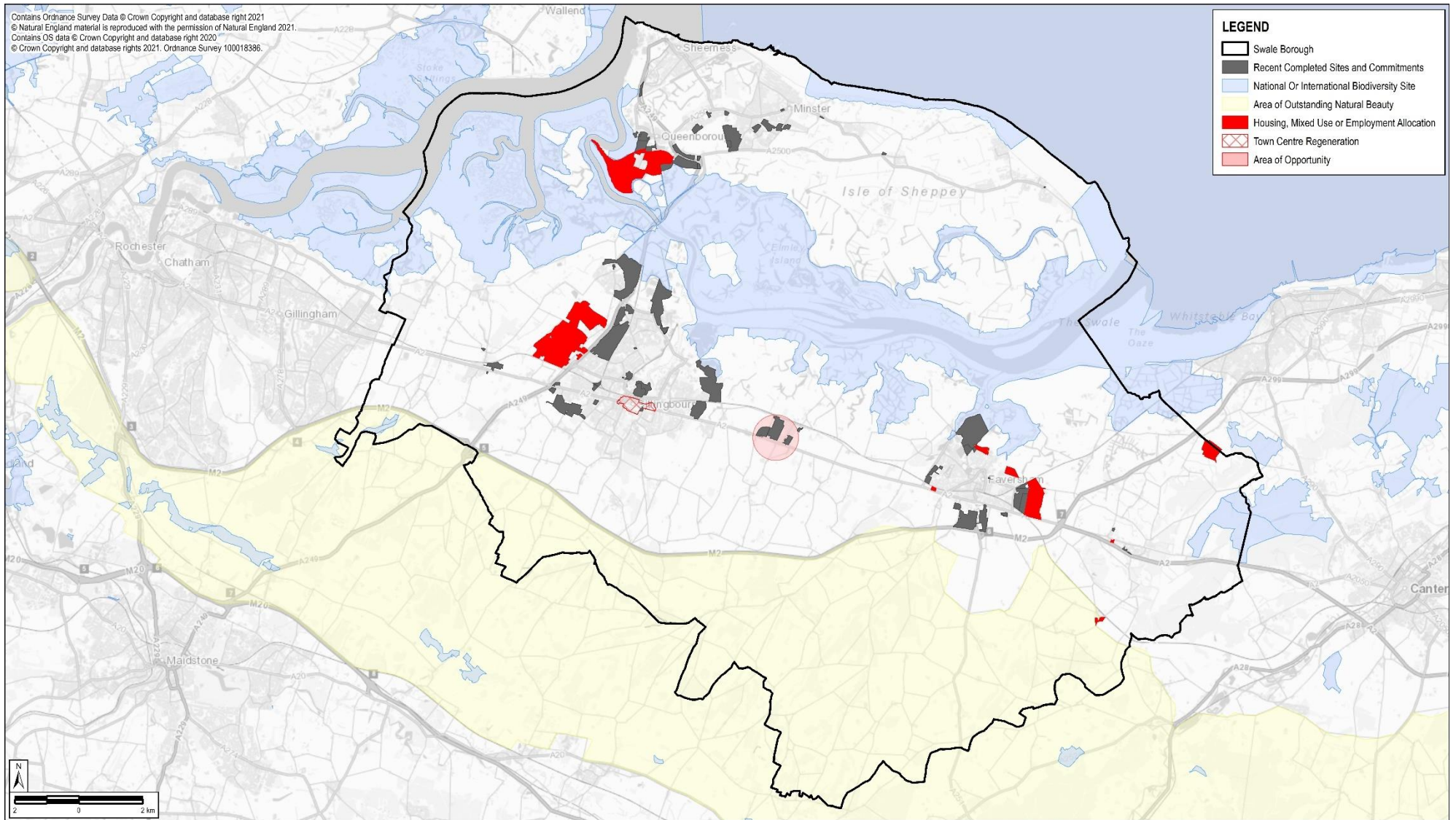
Table 5.7: The reasonable growth scenarios (with constant elements of supply greyed-out)

Growth 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	
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%	
What housing requirement would be set?		LHN	LHN	LHN	Above LHN?	Above LHN	

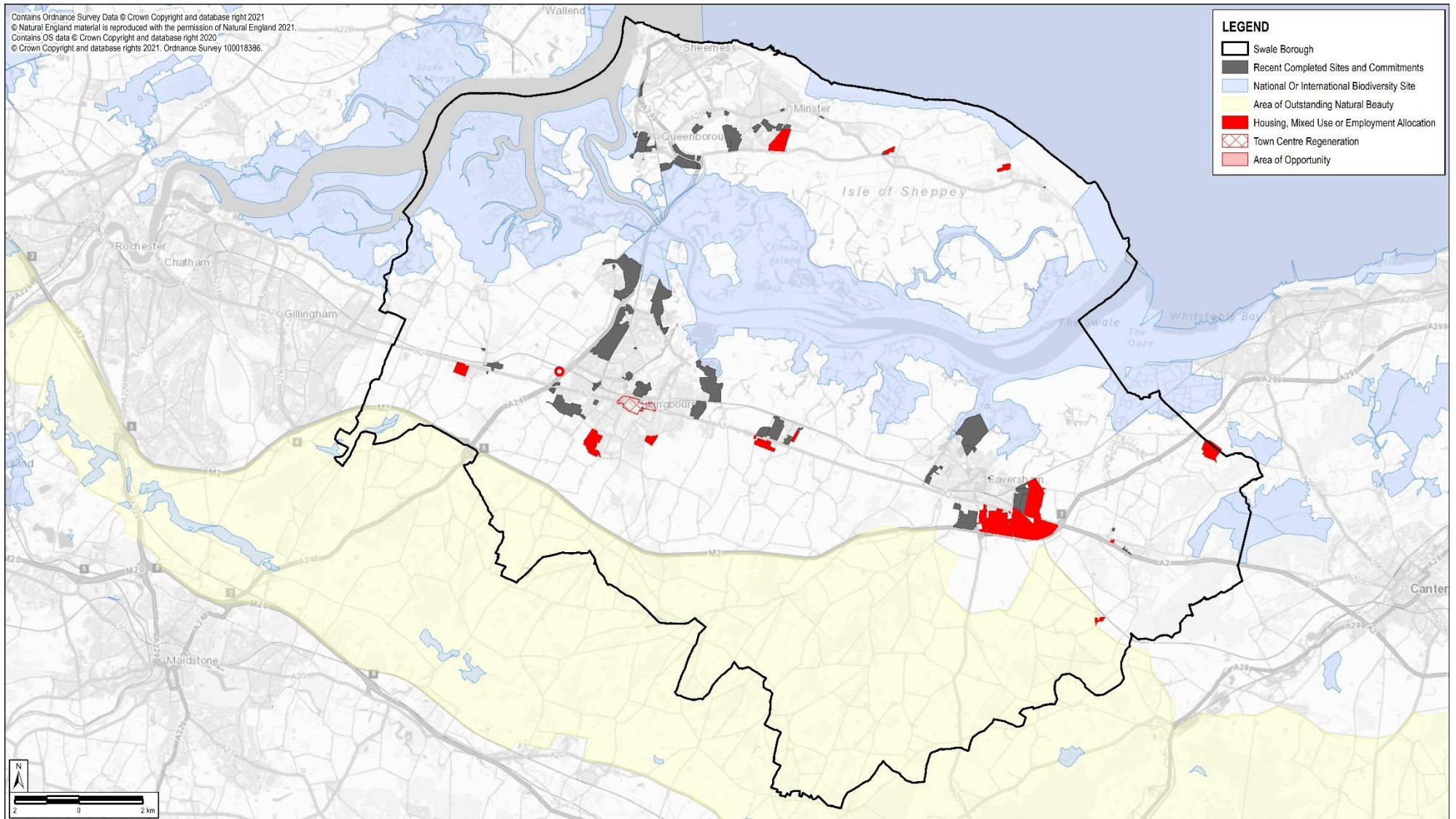
Reasonable growth scenario 1: The emerging preferred scenario



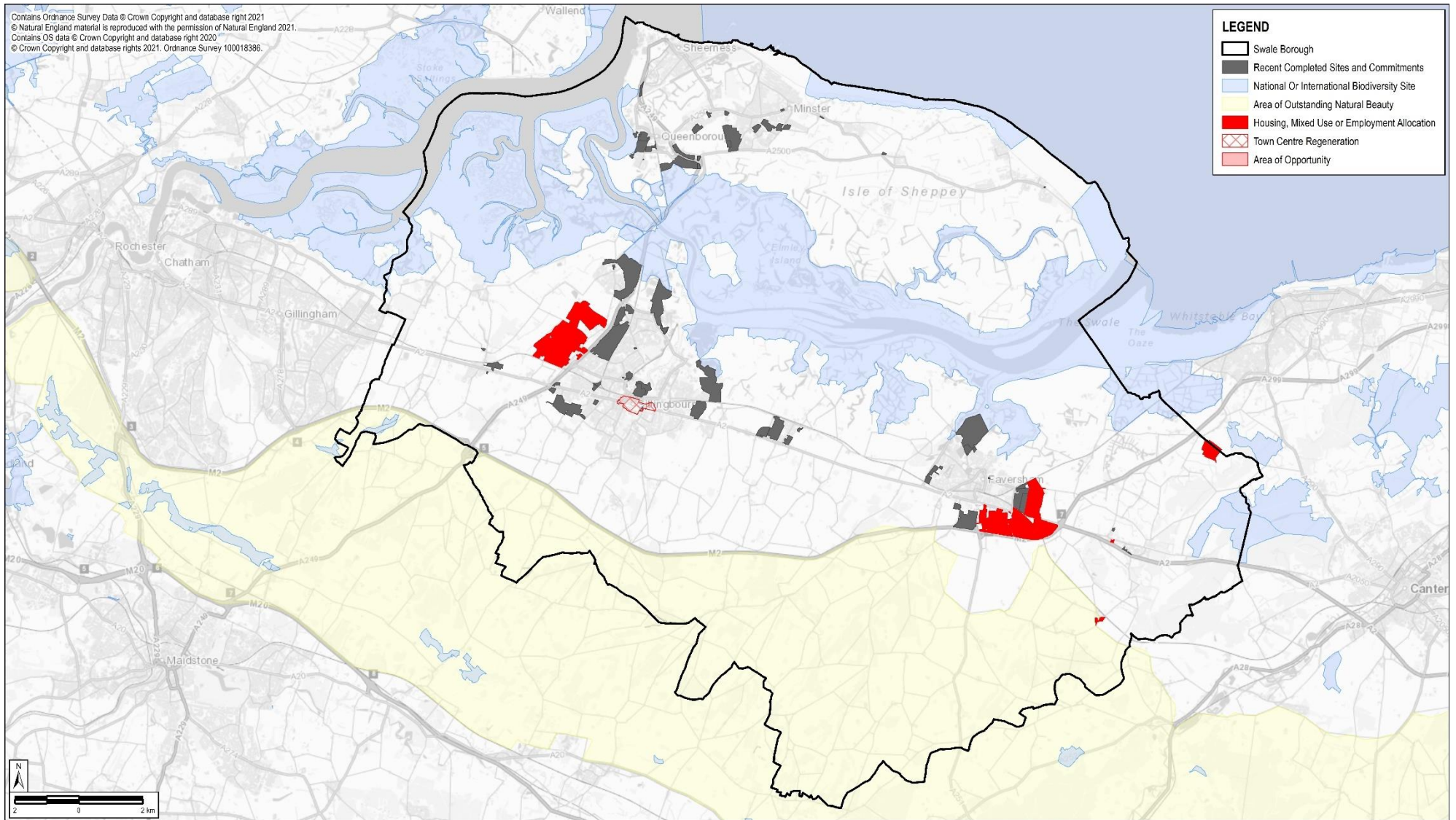
Reasonable growth scenario 2: Scenario 1 but with higher growth at Sittingbourne (Bobbing) / lower at Faversham



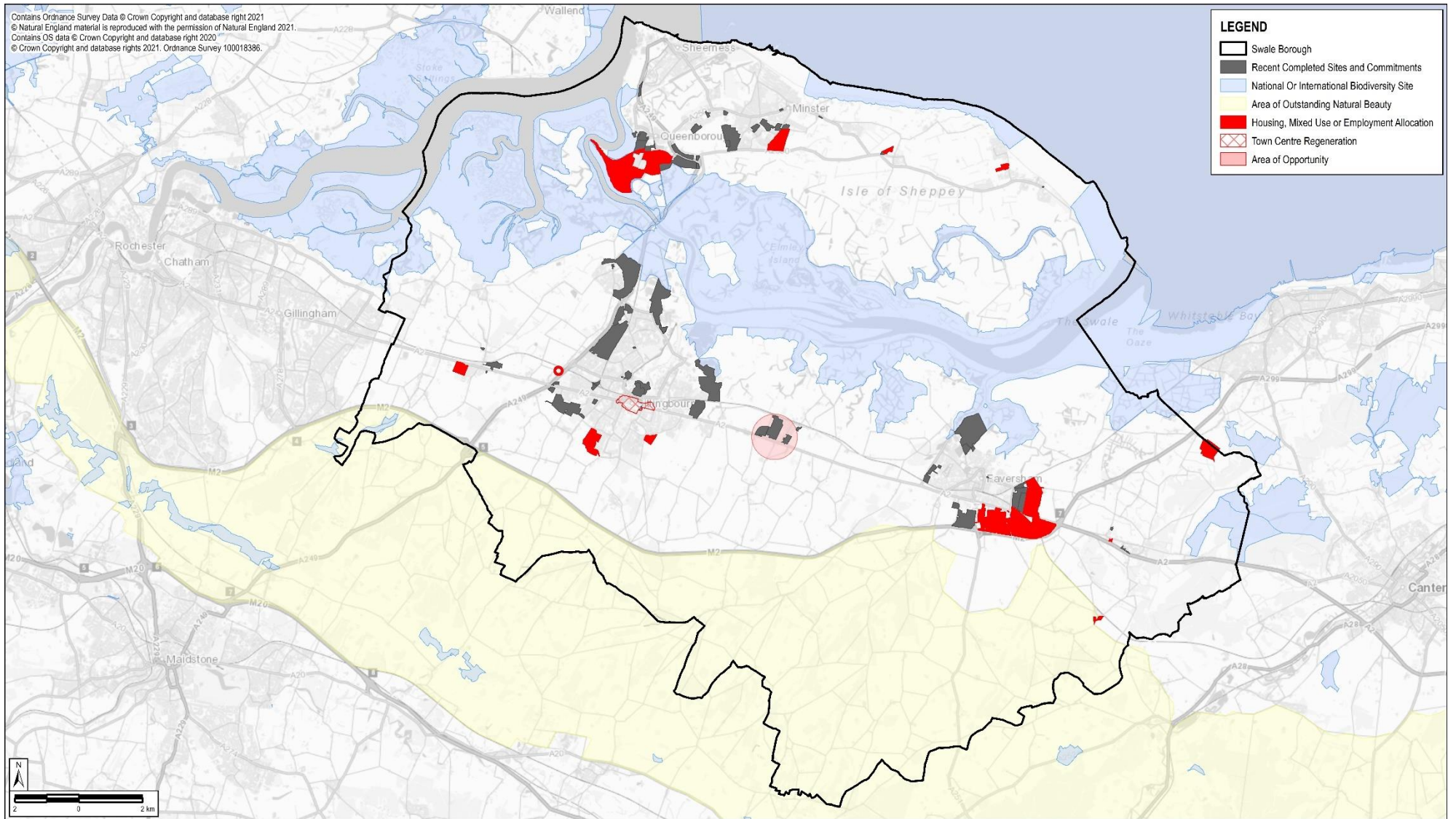
Reasonable growth scenario 3: Scenario 1 but with lower risk urban extensions (UEs) in place of higher risk



Reasonable growth scenario 4: Both strategic growth locations; lower growth scenarios elsewhere



Reasonable growth scenario 5: Scenario 1 plus lower risk UEs



6 Growth scenarios appraisal

6.1 Introduction

- 6.1.1 The aim of this section is to present a summary appraisal of the reasonable growth scenarios. Detailed appraisal findings are presented in **Appendix VII**, which also includes a detailed discussion of methodology.
- 6.1.2 The reasonable growth scenarios are set out (in summary) in Table 6.1, for ease of reference.

Table 6.1: Summary of the reasonable growth 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

6.2 Summary appraisal findings

- 6.2.1 Summary appraisal findings are set out in Table 6.1, which comprises:
- 12 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and
 - five columns (one for each of the reasonable growth scenarios).
- 6.2.2 For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁴⁴ and rank the reasonable growth scenarios in order of preference.

⁴⁴ **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.

Table 6.1: 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

Summary discussion

It is immediately apparent that Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) perform well in a number of respects, as indicated by the number of stars and green scores assigned (particularly Scenario 1) and the relatively low number of red scores assigned (particularly Scenario 4).

However, it does not necessarily follow that it is a straightforward choice between Scenarios 1 and 4, when deciding which is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to housing objectives, which could mean favouring Scenario 5.

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.

7 The preferred growth scenario

Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of reasonable growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal.

Officers response/reasons

- 7.1.2 The following statement 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.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

The aim of this part of the report is to present an appraisal of the current version of LPR, which is known as the ‘proposed submission’ or ‘pre-submission’ version (henceforth pre-submission). This introductory section presents an overview of the LPR and then discusses appraisal methodology.

8.1 Overview of the LPR

- 8.1.1 The LPR comprises: 12 strategic policies including policy ST1 and ST2, which set out the spatial strategy; XX policies specific to sites or areas; and 44 development management policies.
- 8.1.2 The housing land supply strategy is set out in Table 8.1 (employment land supply strategy is set out in Section 9). The strategy is also reflected in the LPR Key Diagram, which is reproduced as Figure 8.1.

Table 8.1: Summary of the spatial strategy (housing only)

Source of housing supply		Number of homes
Commitments and windfall		12,530
Allocations	Sittingbourne Town centre (area of search)	850
	East / southeast of Faversham	3,400
	Rushenden south	850
	Teynham Opportunity Area	1,100
	Former Garden Hotel, Boughton	20
	Neames Forstal (three linked sites)	90
Housing supply (2022-2038)		18,840
Housing requirement		16,608 (1,038 per annum)
Supply buffer above requirement		13%

Figure 8.2: The LPR key diagram



8.2 Appraisal methodology

- 8.2.1 The appraisal identifies and evaluates 'likely significant effects' of the plan, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the SA framework (see Table 3.1).
- 8.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the LPR in more general terms.
- 8.2.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the LPR to impact on the baseline when implemented alongside other plans, programmes and projects that are 'in the pipeline'. These effect 'characteristics' are described within the appraisal as appropriate.

A note on evidence

- 8.2.4 It is not possible to list all of the evidence sources that are drawn-upon as part of the appraisal; however, it is appropriate to highlight that extensive use has been made of: the evidence-base studies commissioned by the Council since 2017; materials submitted and made available (on websites) by strategic site promoters; and two reports prepared by Stantec in 2019, namely *Assessment of Submissions* (Feb 2019)³⁴ and *Assessment of Stage 2 Submissions* (Oct 2019).³⁵
- 8.2.5 A key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and 'planning gain' (e.g. affordable housing). The Stantec work is notable for exploring site specific proposals in detail, and there is certainly a need to take site specific proposals into consideration here; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

Adding structure to the appraisal

- 8.2.6 Whilst the aim is essentially to present an appraisal of the LPR 'as a whole', it is appropriate to also give consideration to individual elements of the plan in isolation. As such, each of the topic-specific appraisal narratives is broken-down under sub-headings – see Table 8.2.

Table 8.2: Structure of each topic-specific appraisal narrative

Sub-heading	Aims of the narrative
Commentary on the spatial strategy	Discuss the preferred spatial strategy option taking account of site specific proposals / site-specific development management policy
Commentary on other policies	Discuss the thematic, borough-wide policies
Appraisal on the plan as a whole	Predict and evaluate likely significant effects of the LPR

N.B. Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

9 Appraisal of the Local Plan Review

9.1 Introduction

9.1.1 The aim of this section is to present an appraisal of the LPR under the 12 SA topics, drawing on available evidence and understanding of key issues and objectives established through scoping (see Table 3.1).

9.2 Air quality

9.2.1 Sustainability objectives:

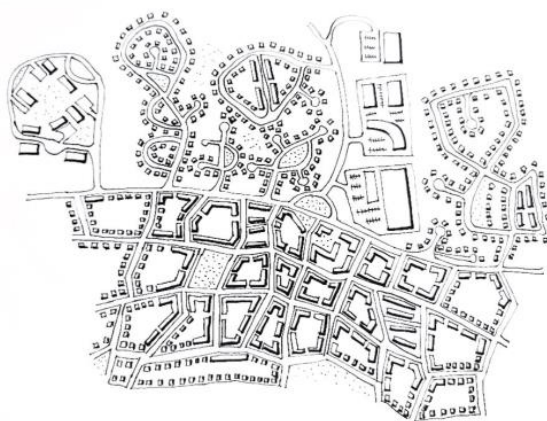
- Support the achievement of air quality improvement objectives within the Borough's 5 designated AQMAs.
- Seek to minimise air pollution more generally, such as through supporting or enabling the use of low emission technologies and encouraging sustainable modes of transport such as walking and cycling.

Commentary on the spatial strategy

9.2.2 Air quality is currently a widespread issue along the A2, given the number of homes and other 'sensitive receptors' located in proximity to this busy road, with AQMAs designated at Rainham (to the west of Swale), Newington, Keycol (declared in December 2020), Sittingbourne, Teynham and Ospringe, and other sensitive locations (typically junctions) highlighted by the Swale Air Quality Modelling Report (2020). Another AQMA is located along the B2006 in Sittingbourne, where HGV traffic is a particular issue, and the Air Quality Modelling Report also highlights the A251 (which links Faversham to Ashford) as problematic. Nitrogen dioxide is a key air pollutant, and emissions are set to decrease rapidly due to the switch-over of electric vehicles (EVs). Particulate matters (PMs, or 'particulates') are the other key air pollutant, and are also set to decrease due to the EV switch-over, although issues will remain, given particulates from tyre wear, braking and road dust (noting that EVs tend to be heavier vehicles). These matters were discussed in detail at the Local Plan Panel meeting of 19th January 2021.

9.2.3 The central feature of the proposed strategy, namely strategic growth to the **E/SE of Faversham**, is tentatively supported, from an air quality perspective, including because there would be: two motorway junctions in close proximity (such that longer distance trips via the A2 are avoided); delivery of a mix of uses onsite that supports trip internalisation; funds directed to walking and cycling infrastructure; masterplanning and design measures focused on supporting walking and cycling (see Figure 9.1);⁴⁵ good potential to support relatively fast and frequent bus services to Sittingbourne, Canterbury and Whitstable (to be confirmed); good potential to walk or cycle to Faversham railway station; and some potential to walk/cycle to the town centre (albeit it would be somewhat distant, at greater than 2km from certain points of the site, noting barriers, including the railway line).

Figure 9.1: Masterplanning in support of walking and cycling



Typical of recent Swale Pockets of 'bubbles' of development are segregated from each other and from other land uses. This approach will no longer be permitted.

Typical of old Swale All land uses are well integrated with an interconnected network of uses and streets. This approach is to be pursued in the future.

⁴⁵ There can be tensions with design measures advocated by the Police Service's Secured by Design guidance; however, Kent County Council is actively working to address these tensions through the Kent Design Guide. See securedbydesign.com/about-us/news/we-are-continually-striving-to-ensure-that-the-design-of-new-developments-always-minimises-the-opportunity-for-crime-across-kent-kent-police-host-third-designing-out-crime-seminar

- 9.2.4 However, the proposed **Teynham Opportunity Area** gives rise to a cause for concern, given Teynham's distance from a motorway junction and, in turn, its reliance on the A2 for journeys to higher order settlements that will inevitably involve passing through at least one AQMA (typically two or more). The assumption is that development along Lynsted Lane would be avoided, recognising that the junction of Lynsted Lane and the A2 is highly problematic; and the aspiration is for higher growth to support delivery of a village bypass, which is much needed from a perspective of wishing to address traffic and air pollution within the village centre, including within the designated AQMA; however, concerns remain, particularly as the potential for growth to 'unlock' land to deliver a bypass is far from clear, given the constraints that exist, including the conservation area. Furthermore, there is an argument to suggest that housing growth to unlock new road delivery will only serve to entrench car dependency and, in turn, increased traffic through air pollution hotspots along the A2 to the east and west of Teynham.
- 9.2.5 Finally, with regards to the growth strategy for the **west of the Borough**, the key point to note is that a relatively low growth strategy is proposed, which is potentially supported from an air quality perspective, given the constraints that exist. Housing growth in Sittingbourne town centre will lead to challenges; for example, there could be a need to direct increased traffic away from the problematic B2006, where the AQMA was recently (December 2020) amended to include particulate matter (PM10) after the monitoring stations registered an increase in pollution levels; however, equally, there will be very good potential to support modal shift away from car dependency. With regards to growth at Rushenden, some traffic seeking to access the Medway Towns will take the A2 route, via the Keycol Hill AQMA (designated December 2020) and Newington AQMA; however, development will certainly follow upgrade of M2 Junction 5, hence it seems likely that the great majority of longer distance trips will avoid the A2 AQMAs.

Commentary on other policies

- 9.2.6 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.2.7 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 in Section 7). 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.

9.3 Biodiversity

- 9.3.1 Sustainability objectives:

- Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of international, national or local significance.
- Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats.

Commentary on the spatial strategy

- 9.3.2 A key issue for the Borough as a whole is avoiding impacts to the Swale and Medway SPA/Ramsar sites ("North Kent Estuaries European sites"), including via increased recreational pressure, development of land that is functionally linked to the European sites (e.g. fields used for foraging or roosting by significant wildfowl or wading bird populations) and/or coastal squeeze, i.e. a situation whereby coastal habitats are not able to retreat inland in response to sea level rise. However, growth opportunities in problematic locations are quite limited (more so than was the case for the adopted Local Plan).

- N.B. all matters relating to the Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site constraints are considered through a separate **Habitats Regulations Assessment (HRA)**, which is ultimately able to conclude that the LPR will not lead to significant adverse effects, so long as certain policy provisions are put in place. The aim here is to present supplementary discussion.
- 9.3.3 Aside from the internationally designated sites, nationally designated SSSIs are a limited constraint to growth at locations potentially in contention for allocation; however, locally important habitats are a widespread constraint, and there is also a need to recognise landscape-scale constraints and opportunities. The recent Biodiversity Baseline Study (2020) notably identifies a spatial framework of landscape-scale 'Priority Areas', which will be taken forward through a Local Nature Recovery Strategy.
- 9.3.4 The central feature of the proposed strategy, namely strategic growth to the **E/SE of Faversham**, is supported, from biodiversity perspective. This land is notably unconstrained in biodiversity terms, with very limited onsite priority habitat and limited designated land in close proximity. However, the northern extent of the scheme (beyond the Graveney Road) gives rise to a degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields Local Wildlife Site (LWS); the walking route to the SPA would be c.2.25km and the driving route to the SPA could be attractive to dog walkers, via Goodnestone. Also, land here, and also land to the south of Graveney Road / east of Love Lane ("Land at Lady Dane Farm") is potentially functionally linked to the SPA, i.e. might provide habitat that supports feeding or roosting of significant bird populations. A further consideration is growth leading to a degree of increased pressure (notable air pollution, feasibly also recreational pressure) on the Blean Woodlands SAC to the east, potentially in combination with growth in Canterbury District; however, the part of the SAC in closest proximity is managed as a National Nature Reserve, and the car park is on the eastern edge, well over 10 km distant.
- 9.3.5 As a further consideration, in respect of the proposed strategic urban extension to the east and southeast of Faversham, it is important to question whether growth is set to occur at the right scale, with a view to delivering strategic biodiversity benefits. It is noted that, whilst the current proposal includes three large areas of strategic open space as part of residential neighbourhoods, there is no proposal to deliver a new country park or similar new strategic greenspace. This matter is discussed further in Section 5.3.
- 9.3.6 Greater concern is associated with the proposed mixed use scheme at **Rushenden South**, which is proposed to deliver 850 homes plus 10 ha of new employment land. The site is shown by the nationally available dataset to include significant priority wetland habitat and is adjacent to the SPA (indeed, the SPA intersects the site, to a small extent), which gives rise to a significant concern.⁴⁶
- 9.3.7 Detailed work has been undertaken by the site promoters, and through the LPR HRA process, to understand the potential to bring the site forward without impacting the SPA or functionally linked areas, and the HRA is able to conclude the likelihood of being able to avoid significant adverse effects to the SPA, on the assumption that policy is in place and prescribed steps are taken through the planning application process. However, concerns do naturally remain, in light of the need to follow the mitigation hierarchy, i.e. seek to avoid effects ahead of relying on mitigation, where possible.
- 9.3.8 A key concern to emerge, through the HRA process, is the potential for development to result in coastal squeeze, noting that the medium to long term strategy for this land, as set out in the Medway and Swale Shoreline Management Plan (SMP),⁴⁷ is managed realignment (thus enabling habitats to shift in accordance with sea level rise and climate change). In addition, the Medway Estuary and Swale Flood and Coast Management Strategy⁴⁸ identifies that the current through to 2118 management policy for BA8.5: Rushenden Marshes is "No Active Intervention", i.e. current sea defences will not be maintained. Managed realignment is key element of the biodiversity and wider 'natural capital' vision for the entire Swale and Medway Estuaries area and, indeed, the entire Thames Estuary, and saltmarshes are also important from a carbon sequestration and therefore decarbonisation perspective; however, recent discussions with the Environment Agency (EA) have confirmed that there are sufficient locations elsewhere for managed realignment:

⁴⁶ The Biodiversity Baseline Study (2020) states: "This entire site falls within the Swale Nature Recovery Priority Area. A large portion of the site is classified as Open Mosaic Habitat on Previously Developed Land, Floodplain Wetland Mosaic and coastal saltmarsh priority habitats. The portion of the site not classified as priority habitat is of high strategic significance for connecting areas of priority habitat and should be prioritised for habitat restoration through [biodiversity net gain] projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver [biodiversity net gain]."

⁴⁷ See <https://se-coastalgroup.org.uk/shoreline-management-plans/medway-estuary-to-swale/>

⁴⁸ See <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy>

“The SMP policy for this area of Managed Realignment (MR) has largely been superseded by the MEASS policy of No Active Intervention. MEASS has determined the required area of habitat creation based on an assumption of Hold the Line everywhere. Therefore we have a ‘worst case’ scenario, and then have proposed sites across the strategy area to allow for this amount of compensatory habitat creation through MR. This site at Rushenden is not required for Managed Realignment.”

- 9.3.9 An early version of the HRA (specifically, that version presented to the Local Plan Panel meeting of 19th January 2021) recommended that managed realignment options should be explored within the site boundary alongside development; however, that recommendation has now been removed, to reflect discussions with the EA. Nonetheless, the possibility of managed realignment within the site should still be considered (albeit past landfill of dredging materials would likely be a constraint), with a view to supporting biodiversity and wider environmental (including carbon sequestration) net gain.
- 9.3.10 A final consideration, in respect of Rushenden South, is the possibility of Maidstone-bound traffic along the A249 leading to nitrogen deposition affecting parts of the North Downs Woodlands SAC within 200m of the road; however the HRA Report concludes that the effect of the LPR will be “barely perceptible”.
- 9.3.11 There are also issues and potentially opportunities associated with the **Teynham Opportunity Area**. Teynham is historically very strongly associated with fruit growing, and there remain remnant patches of traditional orchard priority habitat, including a significant cluster at the east and southeast extent of the village. This includes a patch that now an available site option (site 18/153) found to be ‘suitable and deliverable’ by the Strategic Housing Land Availability Assessment (SHLAA, 2020), and the cluster as a whole could well be impacted by any southern bypass to the village. However, none of patches of traditional orchard priority habitat at Teynham, as understood from the nationally available dataset (magic.gov.uk), are designated as a Local Wildlife Site (LWS), and the patches immediately to the east of the village now appear to be have been lost.⁴⁹ Furthermore, a strategic approach to growth at Teynham could support a strategic approach to achieving biodiversity net gain at an appropriate landscape scale. For example, the aim could be to deliver a north-south green and blue corridor linking the traditional orchard priority habitat at the southeast extent of the village to the grazing marsh priority habitat at Teynham Street, via the Lyn Valley (which includes PROWs).
- 9.3.12 The proposed allocation at **Neames Forstal** for a total of 90 homes is also of note, because the proposal is to deliver a small community orchard, which would be located just outside of two of the Priority Areas identified by the Biodiversity Baseline Study (2020), specifically the North Downs Priority Area (which extends north as the southern edge of Selling) and the Blean Woodlands Priority Area (not far to the east).
- 9.3.13 Finally, there is a need to consider the proposed employment allocation at **Lamberhurst Farm**, which is adjacent to common land (Victory Wood, a Woodland Trust nature reserve, not shown by the nationally available dataset to comprise priority habitat) and in close proximity to the Blean Woodlands SAC. The LPR HRA Report does not raise any concerns, because of the proposed use for employment; however, supporting text to the proposed policy notes that: *“The Council will work with Canterbury City Council, as the area straddles the borough boundary, during a future plan review to explore opportunities to deliver a new, sustainable settlement.”*

Commentary on other policies

- 9.3.14 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.3.15 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).

⁴⁹ Historic aerial imagery (from Google Earth) shows an orchards until quite recently, but these have now been lost to development (an allocation in the adopted Local Plan that is currently building out) and to arable farming.

- 9.3.16 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.

9.4 Climate change mitigation

9.4.1 Sustainability objectives:

- Minimise per capita greenhouse gas emissions from transport, industry and the built environment.
- Deliver high standards of energy efficiency and water efficiency in new development.

Commentary on the spatial strategy

9.4.2 There is a need to consider greenhouse emissions from both transport and the built environment.

9.4.3 In respect of **transport emissions**, issues and opportunities are quite well understood, and the recent Energy White Paper (2020) presents a helpful overview of strategic priorities, namely: modal shift to public and active transport; place based solutions (“*why emissions occur in certain locations*”); decarbonising how we get goods (including transforming “last mile deliveries”); and decarbonisation of vehicles, including charging infrastructure and energy system readiness. A national Transport Decarbonisation Plan is due in spring 2021 and, ahead of that, a recent study has explored national priorities, with a focus on the links between planning and transport, and ensuring effective collaboration between local planning authorities and transport authorities at the county and sub-regional level.⁵⁰ Also, the TCPA has recently prepared a guide setting out the particular opportunities associated with ‘garden communities’.⁵¹ There are certainly opportunities associated with strategic growth locations in more viable locations over-and-above piecemeal growth in less viable locations; however, it is also crucial to consider proximity and existing ‘sustainable transport’ links between new homes and key destinations.

9.4.4 With regards to **built environment emissions**, there are strong arguments for supporting a focus of growth at one or more strategic sites and focusing growth where viability is highest, with a view to facilitating: low and zero carbon (LZC) infrastructure, including heat networks (which require strategic planning and typically necessitate higher densities and a fine grained mix of uses); buildings designed to achieve net zero regulated emissions (or otherwise ambitious levels of regulated emissions);⁵² an ambitious approach to unregulated emissions, including embodied and other non-operational emissions, including by supporting modern methods of construction (e.g. offsite construction of modular homes); and ‘smart energy systems’ – seen as a priority within the Energy South 2 East Local Energy Strategy (2020) and the recent Energy White Paper (2020), which includes a major focus on delivering a ‘Smart Electricity System’. Another consideration, in respect of built environment emissions, is the need to consider the possibility of locating growth in proximity to strategic heat sources (also locations with strategic heat demand, e.g. leisure centres), with a view to facilitating delivery of heat networks; however, no particular opportunities are known to exist in the Swale context. A further consideration, in respect of built environment emissions, is the possibility of strategic growth locations supporting the use of hydrogen, including potentially for heating. Hydrogen is a major focus of the recent Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and a Hydrogen Strategy is due in 2021; furthermore, the Thames Estuary is currently being discussed as a potential national focus for hydrogen;⁵³ however, opportunities remain uncertain at the current time, and are likely to be longer term.

⁵⁰ See [tps.org.uk/news/tps-launches-its-state-of-the-nation-report](https://www.tps.org.uk/news/tps-launches-its-state-of-the-nation-report)

⁵¹ See [tcpa.org.uk/guidance-for-delivering-new-garden-cities](https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities)

⁵² Regulated emissions are those covered by the building regulations. It is common for Local Plan policies to require levels of emissions below the Building Regulations requirement, and potentially even to require net zero regulated emissions for major schemes (which almost invariably necessitates offsetting).

In 2019 the Government consulted on a Future Homes Standard, which would be a national requirement set out in the Building Regulations. The Government’s proposal was also that Local Plan policies would no longer be able to require levels of emissions below the Standard; however, latest understanding (January 2021; see [gov.uk/government/consultations/the-future-buildings-standard](https://www.gov.uk/government/consultations/the-future-buildings-standard)) is that Local Plans will retain the ability to set policy of this nature, at least in the immediate term. Government state:

“We recognise that there is a need to provide local authorities with a renewed understanding of the role that government expects local plans to play in creating a greener built environment; and to provide developers with the confidence that they need to invest in the skills and supply chains needed to deliver new homes from 2021 onwards... To provide some certainty in the immediate term, the government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes”.

Regardless of national or local policy, there is always the potential for individual developers to seek to deliver flagship low carbon schemes, including by achieving net zero regulated emissions.

⁵³ See [environmentjournal.online/articles/thames-estuary-invests-in-new-hydrogen-infrastructure/](https://www.environmentjournal.online/articles/thames-estuary-invests-in-new-hydrogen-infrastructure/)

- 9.4.5 In light of the above discussion, strategic growth to the **E/SE of Faversham**, is tentatively supported, because strategic growth locations give rise to an inherent opportunity to minimise built environment emissions, and because there is good potential to minimise transport emissions, as discussed above under 'air quality'. However, concerns and questions remain:
- Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (albeit possibly supportive of relatively fast and frequent bus services to Canterbury, Whitstable/Herne Bay and other locations to the east; unconfirmed);
 - There is uncertainty regarding potential to deliver growth to the north and south of the A2 in combination, as a combined scheme that leads to additional economies of scale and greater potential to deliver sustainable transport and LZC infrastructure, and other climate change focused measures; and
 - Site specific proposals are in the early stages of development, with little evidence available in respect of decarbonisation ambition, including the extent to which decarbonisation would be masterplanning / design / funding priority. See further discussion below, under 'Communities'.
- 9.4.6 The second element of the proposed strategy to consider is proposal to deliver around 850 homes as part of the regeneration of **Sittingbourne town centre**. Focusing on built environment emissions, higher densities and mixes of uses within the town centre could feasibly help to facilitate one or more heat networks; however, there is little reason to suggest that this would be achievable, with no obvious strategic heat sources to explore (Milton Creek and the industrial areas could feasibly represent an opportunity).
- 9.4.7 With regards to **Rushenden South** and the **Teynham Opportunity Area**, perhaps the key point to note is that both locations benefit from a rail station. Also, both proposals will involve the achievement of economies of scale to an extent, potentially supportive of low carbon infrastructure, for example rapid electric vehicle charging, potentially linked to solar PV and battery storage. Other points are as follows:
- Rushenden South - is thought to be quite well connected to Sheerness and Sittingbourne by bus and cycle routes (and/or there is good potential for enhancement). Also, Queenborough/Rushenden is an employment growth and regeneration area, such that the potential to reach destinations by walking/cycling is set to improve over time. However, growth here is likely to face delivery and viability challenges, which could potentially constrain funds available for low carbon measures.
 - Teynham - there is a possibility – albeit highly uncertain - of strategic growth supporting the aspiration of delivering a cycling link between Sittingbourne and Faversham. There is also a need to question the approach of directing housing growth to a location in order to enable delivery of a new road (namely a Teynham bypass), as this could run counter to encouraging modal shift away from the car (albeit it is recognised that the switch-over to electric vehicles is underway and picking up pace).
- 9.4.8 Finally, there is a need to consider the proposal for 90 homes at **Neames Forstal**, which is a village that benefits from a rail station (also a bus service), but which has a very limited offer of local services and facilities. Three adjacent sites are being promoted as a combined scheme that would also deliver a new footpath link to Selling (c. 1.5km to the west), where there is a primary school and other facilities; however, there is a need for further work to confirm deliverability of the footpath link (which will be within the AONB). On balance, it could be fair to assume that Neames Forstal residents will have quite high car dependency. Also, a modest village extension of this nature would be unlikely to deliver low carbon infrastructure (e.g. a heat network), and might not be well-suited to achieving building-level emissions standards over-and-above Building Regulations (albeit it is recognised that viability at Neames Forstal is strong).

Commentary on other policies

- 9.4.9 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.4.10 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.

- 9.4.11 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**.

9.5 Communities

9.5.1 Sustainability objectives:

- Support good access to existing and planned community infrastructure for new and existing residents.
- Promote and support healthy communities, including through increasing access to green infrastructure.

Commentary on the spatial strategy

- 9.5.2 There is a need for growth to avoid creating or exacerbating issues around community infrastructure capacity, and support growth strategies that would deliver new or upgraded community infrastructure, both to 'consume the smoke' of new communities, and in response to existing known issues or opportunities. Beyond this, there is a need to support *high quality* community infrastructure provision; for example, there is a focus nationally on masterplanning and designing new communities with health and wellbeing as a central consideration, including via access to gardens, sports facilities, greenspace and countryside.⁵⁴ In this light, perhaps the key consideration relates to support for growth via strategic sites well suited to delivering new and upgraded community infrastructure, as opposed to growth via more 'piecemeal' urban extensions, where opportunities can be missed, despite mechanisms for gathering funds.⁵⁵
- 9.5.3 Beyond the matter of ensuring access to high quality community infrastructure, there are also wide ranging other 'communities' considerations, for example, supporting regeneration in the west of the Borough. Also, traffic congestion is often a key issue for many communities. However, it is considered appropriate for this section to focus primarily on matters relating to capacity of / access to community infrastructure.
- 9.5.4 In this light, the proposed **E/SE of Faversham** strategic urban extension is supported, particularly as the scheme would certainly enable delivery of a new secondary school (specifically, serviced land in an appropriate location would be made available). Following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, given limited surplus capacity at the two existing secondary schools (one grammar and one non-selective), limited potential for expansion (particularly the grammar school, which is in a constrained central location) and committed growth (noting that catchment areas extend to Canterbury District). KCC has been actively exploring potential locations for a new secondary school, but options are limited. Latest understanding is that the secondary school would come forward at the site directly to the east of Faversham.
- 9.5.5 Beyond the secondary school, the proposal is to deliver two local centres (although only one is currently shown on the concept map), two primary schools (the location of one of the schools is not entirely clear from the concept map) and a range of other measures; for example, it will be possible to design the road layout around the proposed schools to be 'school street' compliant (see [schoolstreets.org.uk](https://www.schoolstreets.org.uk)). There should also be good potential to deliver high quality walking and cycling infrastructure, as discussed above under 'air quality', and high quality green infrastructure within the site (although the current percentage of the site area proposed for green infrastructure is not clear; and there is a need to account for the possibility that 'structural screen planting' along the motorway may have limited appeal as a destination, e.g. for dog walking). A further consideration is the possibility of noise pollution associated with the motorway and high speed railway, with the current proposal being to use employment land to buffer these sources of noise pollution only to a limited extent. Finally, there is a need to note the football and cricket club facilities currently adjacent to the A2, which may need to be relocated further to the south (away from the centre of Faversham); however, this could prove acceptable, subject to discussions with Sport England.

⁵⁴ E.g. see [england.nhs.uk/ourwork/innovation/healthy-new-towns/](https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/); and [tcpa.org.uk/guidance-for-delivering-new-garden-cities](https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities)

⁵⁵ Infrastructure funding by developers is most often secured through planning obligations (either through a Section 106 agreement or Section 278 highway agreement) or the Community Infrastructure Levy (CIL); however, there is no CIL for Swale.

- 9.5.6 Another important consideration, in respect of strategic growth to the E/SE of Faversham, relates to engagement, joint working and stewardship. Focusing on Southeast Faversham, the Stantec *Assessment of Stage 2 submissions* (2019) finds: *“The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail... As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards... Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust, which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues.”*
- 9.5.7 This finding of the Stantec work is in many ways encouraging; however, there is perhaps a concern regarding an early focus on detailed design to the detriment of effective planning to realise strategic infrastructure, environmental and socio-economic objectives, including at the Faversham scale and wider scales. It is also noted that limited proposals or evidence has been made publicly available to update the August 2018 submission following the Garden Communities Prospectus (although the promoter engaged fully with Stantec as part of the ‘assessment of submissions’ process). There is no scheme website.
- 9.5.8 There are also significant ‘communities’ related considerations associated with **Rushenden South**. The aim is for a major mixed use development here to support regeneration at Queenborough/Rushenden, which is a well-established regeneration priority area (Policy Regen 2 of the adopted Local Plan). In addition to new high quality homes and employment opportunities, growth at this scale (850 homes) will enable delivery of targeted new community infrastructure, and there is understood to be the potential for a new primary school to *“sit in the heart of the new residential community and on a key new pedestrian axis linking Queenborough and Rushenden”*. There is also an opportunity around new green/blue infrastructure delivery, as understood from the Green and Blue Infrastructure Strategy (2020). However, details of the proposed scheme are not known at the current time, and are subject to change given the need for further work to address constraints and delivery challenges.
- 9.5.9 With regards to the **Teynham Opportunity Area**, as discussed under ‘air quality’ and ‘climate change’, the aspiration to deliver a village bypass, and there is also the possibility of growth delivering a new A2 cycle link. More generally, there is a need to consider the possibility of achieving a critical mass of housing growth at Teynham alongside new employment land (in particular, the committed new employment land at Frogнал Land) and improvements to the village centre. The Settlement Hierarchy Study (2020) serves to suggest that Teynham is already the best served of the tier 4 settlements (see the Settlement Audit Matrix), and the possibility of Teynham moving up a tier in the hierarchy can be envisaged.
- 9.5.10 The next point to comment on is the proposed strategy for **Sittingbourne town centre**, namely a strategy of supporting significant residential growth (850 homes). This is an approach to town centre regeneration that is increasingly common nationally as retail trends lead to challenges for high streets, and given a need to maintain the vitality of town centres and also encourage higher densities in locations where residents have the greatest potential to walk and cycle to key destinations and access public transport. Also, in the Swale-specific context, there is a need to recognise that regeneration of the town centre is needed, with a view to delivering benefits to existing communities and addressing issues of relative deprivation, but is challenging on viability grounds, hence there is an argument for supporting residential. However, there is a need to balance the “pros” of high density residential development in town centres with the potential “cons”, including around delivering homes with good space standards and access to gardens, green spaces and the countryside – increasingly seen as important in light of Covid-19.
- 9.5.11 There is also a need to briefly comment on **Neames Forstal**, where the proposal leads to a degree of concern in respect of access to community infrastructure, as discussed above, but where the current proposed scheme should also deliver a new community orchard, and potentially a new walking/cycling route to Selling, which would be to the benefit of existing as well as new residents.

- 9.5.12 Finally, there is a need to consider **Lamberhurst Farm**, which is proposed as an employment allocation, but in terms of which supporting text explains: “*The Council will work with Canterbury City Council, as the area straddles the borough boundary, during a future plan review to explore opportunities to deliver a new, sustainable settlement.*” There is potentially an opportunity to deliver community infrastructure to the benefit of Dargatem, Highstreet and Yorkletts (there is notably no primary school in this area); however, it is difficult to envisage a scheme of sufficient scale.

A note on locations with no proposed allocations

- 9.5.13 It is not the aim of this section to comment in any detail on the implications of decisions taken to *not* allocate growth to particular settlements; rather, that is a focus of discussion as part of work to explore growth scenarios (Section 6 and Appendix VII). However, in brief, key considerations include:
- Sittingbourne – the proposed low growth strategy can be questioned, given that Sittingbourne is the Borough’s main urban centre; however, there is high committed growth, and also an anecdotal concern that recent and committed growth will lead to pressure on community infrastructure.
 - Minster – Thistle Hill has been a focus of growth over the past thirty years, with significant new community infrastructure delivered alongside housing, and Bearing Fruits allocated significant additional growth. On this basis, there is a rationale for no further allocations through the LPR.
 - Leysdown – there is an argument for housing growth in support of village vitality, e.g. with a view to supporting shops and services outside of the tourism season. The Settlement Hierarchy Study (2020) explains: “*Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services.*”

Commentary on other policies

- 9.5.14 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.5.15 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**.

9.6 Economy and employment

- 9.6.1 Sustainability objectives:

- Support good access to existing and planned community infrastructure for new and existing residents.
- Promote and support healthy communities, including through increasing access to green infrastructure.

Commentary on the spatial strategy

- 9.6.2 The Employment Land Review (ELR) sets out the amount of new employment land that must be delivered through allocations in the LPR (having factored-in existing committed supply and likely future losses of existing employment land, e.g. loss to housing), breaks down the overall requirement according to a series of employment land types and indicates where in the Borough delivery of each type of employment land should be focused. The headline recommendation of the ELR is as follows:

“A) Up to 40ha of new land for industrial uses is allocated. This should be in the West of the Borough (Sittingbourne, Isle of Sheppey) on sites that are market attractive for larger warehouses.

B) Up to 15 of new land for offices and light industrial uses is allocated. This should be focused to the east of the Borough in or around Faversham on one or more sites.”

- 9.6.3 However, it is important to note that there is a considerable range that underpins recommendation (A). Specifically, the figure decreases if a lower “5-year ‘margin’” is assumed, meaning an assumption that future losses of industrial land will not follow past trends. There is a strong argument for assuming a lower 5-year margin, because past trends (see Table 5.2 of the ELR) are skewed by an abnormally large loss in 2011 (Sittingbourne Paper Mill). Furthermore, the ELR is clear that if the margin does need to be provided for, then it *“does not necessarily need to be provided today because the logic of the margin is that it may only be needed towards the end of the plan period”*. The ELR is also clear that, given that the need is not in the early years of the plan period, the LPR should not rush to allocate sites to meet the need, because the effect could be to allocate sub-optimal sites (see further discussion below).
- 9.6.4 In response to the ELR recommendations (which are essentially targets/requirements for the LPR), a central element of the proposed strategy is the proposed mixed use urban extension to the **E/SE of Faversham**. Specifically, there is the potential to deliver c.10ha of new employment land to the east of Faversham and another c.10ha to the southeast (adjacent to M2 J7), as well as smaller scale ‘pockets’ of employment throughout the scheme (this aligns with the emerging design ethos). There has been discussion of delivering 1 new job onsite for every new home, at least for the Southeast Faversham part of the site (see Stantec Assessment of Stage 2 Submissions, 2019), which reflects a good degree of ambition, although it is perhaps worth noting that the Thames Estuary 2050 Vision (2018) proposed a ratio 1.3 new jobs to every new home over the period to 2050.
- 9.6.5 The 10ha to the east (i.e north of the A2) will contribute towards meeting ELR recommendation (B), as will additional pockets of employment land interspersed within the site. As for the 10ha to the southeast, this is proposed to deliver industrial and/or warehousing; however, there is a need to question the extent to which this aligns with ELR recommendation (A), i.e. the extent to which it will meet the needs of footloose strategic warehousing and distribution operators serving London and the Southeast. The land could well prove attractive to warehousing, but there is some uncertainty. The ELR explains:
- “Although Faversham is an untested market for larger unit demand (which fuels the need for additional land) such a highly accessible area is likely to be in demand. The part of the area (closest to the motorway unction) would be particularly attractive to strategic warehouse operators (min area 10 ha), because of the excellent access to the M2. But should areas in the west of the Borough come forward these are likely to be preferable given they are closer to the M25 and benefit from better north / south access (A429).”*
- 9.6.6 The other key employment land allocation is at **Rushenden South**, which is expected to deliver 10 ha of new employment land, over-and-above existing employment land within the site, potentially complimenting the existing/ committed employment area at Neats Court. It is not entirely clear which of the ELR recommendations the employment land here will relate to most closely. The location could be suitable for warehousing in certain respects, given good links to the A249; however, there are landscape constraints and there is a desire to *“provide a more diverse and higher density range of employment uses, recognising that the existing open storage land uses around Cullet Drive provide very low level employment density.”*
- 9.6.7 The next allocation to consider is **Lamberhurst Farm**, which is the only employment only scheme that is proposed by the LPR. The allocation is for a 3.2 ha extension to the existing employment area, creating a 5.5 ha employment allocation, that should contribute to meeting ELR recommendation (B).
- 9.6.8 There is also support for new office space in **Sittingbourne town centre** within Policy Regen 2, which specifically proposes: *“Maintain and increase office floorspace provision above commercial premises within the town centre area with a focus on creative industries”*. This provision should further contribute to meeting recommendation (B) of the ELR, albeit the recommendation is for a focus in the *east* of the Borough. There is also a need to factor-in other aspects of the regeneration plans for the town centre, including support for 850 new homes (likely to support new mixed used schemes to include new employment space) and the proposal the proposal of Policy Regen 2 to consolidate the retail offer, which will have implications for employment opportunities, including for younger people and other groups.

- 9.6.9 Overall, the proposed new employment land supply (over-and-above existing committed supply) will likely be sufficient (or near sufficient) to meet ELR recommendation (B), whilst recommendation (A) should be met in part. There will certainly be a shortfall against, the 40 ha target figure in recommendation (A); however, it is important to recall that this figure is “caveated”, including on the basis that: *“while it is preferable to [allocate] now in order to offer a wider choice to the market, the land [required] does not necessarily need to be deliverable in the short or even medium term. This is an important consideration where new sites may become available for development following transport investment in the mid plan period and where newly accessible sites or areas of search are preferable to those which can be delivered on the short term.”* In light of this comment, it is important to highlight the work to explore growth scenarios set out in Part 1 of this report, which serves to highlight limited realistic/reasonable options for delivering additional employment land, in order to meet ELR recommendation (A) more fully. The primary option for consideration would involve very large-scale strategic growth to the southeast of Sittingbourne, which might well deliver transformational transport upgrades and employment growth (including benefits to Eurolink and Kent Science Park); however, the option of allocation through the LPR is ruled-out as unreasonable given a range of environmental and wider sustainability concerns (see Section 5.3).
- 9.6.10 Finally, there is a need to comment on three wider aspects of the employment and economy strategy:
- Kent Science Park – the option of major expansion, potentially to include non-science park employment uses, is discussed in detail in the ELR. LPR Policy A2 is a modest evolution of Policy Regen 4 in the adopted Local Plan. LPR Policy A2 *“is intended to provide parameters and the policy framework to support proposals that are compatible or complementary with the use of the site as a ‘Science Park’ as defined by the UK Science Park Association.”*
 - Port of Sheerness – is also a focus of the ELR, plus there is a need to consider the recent national context in respect of support for expansion of port operations and associated uses. Proposed LPR Policy Regen 1 is very closely aligned with Policy Regen 3 in the adopted Local Plan. The adopted Local Plan states that “potential longer term options will be considered via a review of the Local Plan”; however, at the current time, it is difficult to envisage options for the LPR. The ELR concludes: *“Given land within the port is outside of [planning] control it is very difficult to estimate how much land outside the port may be needed. There is, and will continue to be, land allocated for ‘general’ employment nearby which could absorb additional demand as it emerges. But in summary the future of this part of the economy is dependent on continued close working between the port operator and the Council.”*
 - Agriculture – following a study completed in 2015, it is well established that best and most versatile agricultural land contributes significantly to local Gross Value Added (GVA), and this is particularly the case for land that is farmed for soft fruits. The study was a focus of discussion when preparing the adopted Local Plan, and remains an important consideration for the LPR; however, the only realistic strategic growth options that avoid best and most versatile agricultural land are on the Island of Sheppey, yet it is difficult to envisage a reasonable high growth strategy for the Island (see Section 5).

Commentary on other policies

- 9.6.11 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.6.12 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.

9.7 Flood risk

9.7.1 Sustainability objectives:

- Avoid and mitigate flood risk by directing development away from the areas of the Borough at the highest risk of flooding.
- Deliver Sustainable Drainage Systems and other measure with a view to future proofing and building climate change resilience.
- Support the priorities identified in the Medway Estuary and Swale Shoreline Management Plan and the Isle of Grain to South Foreland Shoreline Management Plan.

Commentary on the spatial strategy

9.7.2 Large parts of the Borough are constrained by flood risk, as set out within the Strategic Flood Risk Assessment (SFRA, 2019); however, most proposed growth locations suitably avoid the flood risk zones.

9.7.3 Strategic growth to the **E/SE Faversham** gives rise to limited concerns, from a flood risk perspective. Perhaps the key point to note is that Preston Fields - an existing Local Plan allocation that would see intensification of development as part of the E/SE Faversham scheme - is associated with a shallow valley, within which there is a band of surface water flood risk associated with 'pools' to the north of the site (due to linear infrastructure in the form of the A2 and railway), and which becomes an area of fluvial flood risk further to the north (i.e. downhill), affecting the Cyprus Road area of Faversham.

9.7.4 However, flood risk is a significant constraint to growth at **South Rushenden**, as it is for much of the western part of Sheppey, with the notable exceptions of Rushenden itself and the historic core of Queenborough, where the land is slightly raised (see 9.2). Some parts of the site are somewhat raised; however, this is due to past use as a landfill for dredged materials.

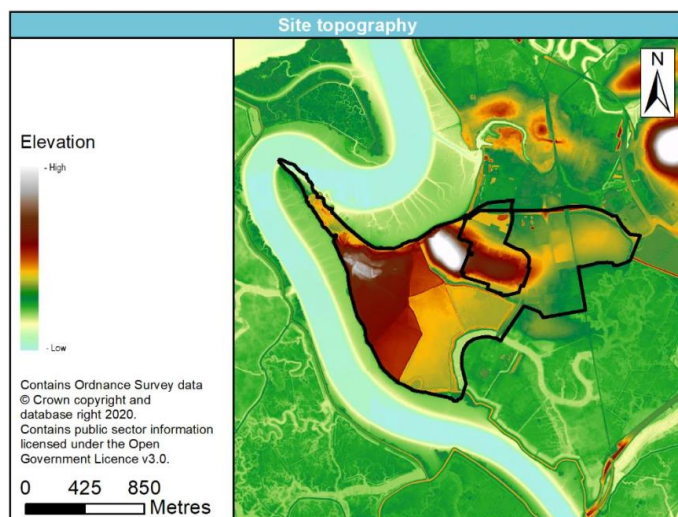
9.7.5 The site has been the subject of a Level 2 SFRA (currently in draft), which concludes *"part of the site is within Flood Zone 3b where more vulnerable development is not permitted. However, the site area is quite large and it may be possible to adopt a sequential approach to the site layout with more vulnerable development located outside of Flood Zone 3a or 3b."* The following are further select quotes:

- *"... the majority of the site flooded in February 1953 as a result of the overtopping of defences... This dataset has been used to define Flood Zone 2 at this site, however it should be noted that changes in both sea level and ground levels since 1953 are likely to have resulted in a change to flood risk..."*
- *"The site is shown to be very sensitive to the impacts of climate change in comparison to the present day, with significant increases in flood extents across the site for both the 2080 and 2120 epochs for both higher central and upper end allowances for climate change. Flooded areas of site also include the existing industrial estate along Argent Road with depths indicated to be in excess of 1m... The 2120 epoch shows the most significant increase in flood extent, with the majority of the eastern side of the site and a large proportion of the centre of the site indicated to be within these flood extents in addition to areas where there are existing dwelling in Rushenden. The centre of the site is not within these extents, however it is unclear whether safe access and egress would remain in the event of flooding and there is a risk that development could be cut off from surrounding infrastructure. A commitment would be required to the improvement in the standard of existing defences so that proposed development would be safe for its intended life."*
- *The provisions should seek to improve the safety of the existing community in Rushenden."*

9.7.6 In parallel with the Level 2 SFRA, detailed work is being undertaken by the site promoters to understand flood risk in detail and to respond accordingly. The emerging conclusion of this work is that flood risk could be dealt with within the proposed masterplan through the application of minimum floor levels and minimum access road levels such that these areas are set above the predicted flood levels and provide safe access and egress in times of flood. At a broader level, there is a need to consider the emerging proposed spatial configuration of housing growth within the site, with the proposal being to concentrate most new housing to the south-southwest of the existing Rushenden settlement confines (mainly 'yellow land' in Figure 9.2), but also to deliver some new housing to the northeast ('green land' in Figure 9.2).

- 9.7.7 There are also commitments to undertaking further detailed work at the planning application stage. This approach is potentially appropriate (precautionary yet proportionate), with the NPPF recognising that it is appropriate to allocate sites through Local Plans ahead of detailed work being completed at the planning application stage (see paragraph 163, which sets out a list of detailed matters that must be considered through site specific flood risk assessments in support of planning applications). However, there are question-marks around whether further modelling taking account of climate change allowances (“the H++ allowance”) should be undertaken now, rather than at the planning application stage.

Figure 9.2: Elevation of land at Queenborough and Rushenden⁵⁶



- 9.7.8 With regards to the Teynham Opportunity Area, there is a degree of surface water flood risk, with notable channels flowing from south to north and issues around surface water pooling where its flow is hindered by the A2 and the railway; however, there will be good potential to deliver green and blue infrastructure within site boundaries in response to any flood risk that is found to exist, following detailed assessment at the planning application stage.

Commentary on other policies

- 9.7.9 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.7.10 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.

9.8 Heritage

- 9.8.1 Sustainability objective:

- Conserve and enhance heritage assets and contribute to the maintenance of historic character through design, layout and setting of new development.

Commentary on the spatial strategy

- 9.8.2 A key consideration is directing growth away from parts of the Borough associated with one or more conservation areas or clusters of listed buildings indicating historic settlement, with a need to take into account the grade of listed buildings and also the extent of their setting, for example parish churches are often in prominent locations, and rural farmsteads can also have an extensive setting. Furthermore, there is a need to consider ways in which designated assets relate to one another as part of historic landscapes.

⁵⁶ This figure is one of a range of figures presented as part of the draft Level 2 SFRA for site 18/113 (JBA, 2020)

- 9.8.3 Other important designated heritage and historic environment assets in the Borough include scheduled monuments and registered parks/gardens, and both can be associated with extensive settings or clear positions within historic (or ancient) landscapes; however, these assets tend to be located in parts of the Borough unlikely to come into contention for growth. Another important consideration for planning is the location of non-designated assets and archaeology, as understood from the Kent Historic Environment Record; however, it is difficult to use this dataset for strategic planning, because the dataset shows a very large number of assets and does not categorise assets according to significance.
- 9.8.4 In light of these introductory remarks, strategic growth to the **E/SE of Faversham** is tentatively supported, from heritage perspective. Faversham is highly sensitive to growth, with the Swale Heritage Strategy (2020) explaining: *“It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough”*. However, in this context, there is potentially merit to a strategic urban extension to the E/SE of the town, as the effect should be to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the E/SE of Faversham is relatively unconstrained in historic environment terms, given 20th and 21st Century expansion focused in this direction (although it is important to recognise the presence of the small Preston-next-Faversham Conservation Area, at the junction of Salter’s Lane and the A2). Also, there could be good potential to deliver a new community that supports Faversham as a thriving market town and visitor/tourist destination. However, there are other risks and uncertainties, including around:
- Traffic (including through the Ospringe Conservation Area);
 - A new retail offer competing with Faversham town centre;
 - Impacts to the historic agricultural and horticultural landscape setting of the town, including as experienced by motorists approaching along the A2 from the east, with the Swale Landscape Sensitivity (2020) explaining: *“The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area.”*
 - Impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. Key considerations include views from footpaths and cycle routes, and the rural landscape setting of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone. One of the farmsteads is associated with a grade 2* listed building and another associated with two grade 2 listed buildings. The third farmstead is not associated with any listed buildings, but is visible on the pre-1900 OS map.
- 9.8.5 Other significant considerations relate to the Teynham Opportunity Area, given:
- the likelihood (on the basis of the Strategic Housing Land Availability Assessment, SHLAA) modest housing growth within and/or abutting the conservation area;
 - the risk a village bypass impacting on the conservation area, although a bypass might also reduce traffic in that part of the conservation area associated with the A2.
 - two grade 2* listed buildings, to the west of the village (outside of the conservation area), that are adjacent to large potential development sites (supported by the SHLAA). Both are farmhouses likely be associated with an agricultural setting, and there is a need to consider views of the farm buildings – within their setting – from rural lanes and public rights of way; however, it is noted that the farmland surrounding these two listed buildings is currently in use for arable, as opposed to fruit growing (the traditional land use of the Teynham area, as discussed below).
- 9.8.6 Also, in respect of Teynham, it is noted that two sites supported by the SHLAA appear to be currently in use for fruit-growing (historic aerial imagery indicates that others have been in the past); however, these are both modest sites that are closely associated with the conservation area, such that sympathetic development, to include retention of valued trees, might be assumed. The Landscape Sensitivity Assessment (2020) explains:

“The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic minor settlements and farmsteads, including Conservation Areas at Cellarhill, Bogle, Lewson Street (partially within the area) and Lynsted (adjacent to the area), with an associated concentration of listed buildings. The presence of pasture and traditional orchards within the area also contributes to its time depth. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger fields, particularly in the north of the area.”

9.8.7 With regards to **Rushenden South**, the site in question appears to have limited sensitivity (although there are landscape sensitivities), and regeneration of Queenborough/Rushenden is supported from a heritage perspective. The Queenborough Conservation Area is the only conservation area on Sheppey outside of Sheerness, with the Swale Heritage Strategy describing Queenborough as a ‘planned medieval town’ with a castle (the castle mound is a scheduled monument). The Strategy also describes Sheerness and Queenborough as “*beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey*”.

9.8.8 Finally, there is a need to note that:

- Lamberhurst Farm (proposed for employment) includes one grade 2 listed building; and
- the Former Garden Hotel, Boughton (proposed for 20 homes) falls within the conservation area and includes a grade 2 listed building (with several others in close proximity), although there is understood to be good potential to bring forward a scheme that is sympathetic to the heritage sensitivities. As noted by the SHLAA, there is a history of unimplemented planning permissions.

Commentary on other policies

9.8.9 [To be completed ahead of publication]

Appraisal on the plan as a whole

9.8.10 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.

9.9 Housing

9.9.1 Sustainability objectives:

- Support timely delivery of market housing and affordable housing.
- Promote an appropriate mix of housing types and tenures.
- Cater for existing and future residents’ needs as well as the needs of different groups in the community.

Commentary on the spatial strategy

9.9.2 A housing land supply is proposed in excess of Local Housing Need (LHN), with the ‘supply buffer’ amounting to circa 13%. A supply buffer is important given the risk of unforeseen delays to supply, i.e. the risk of sites not coming forward for development as anticipated and/or not delivering homes at the rate anticipated. The size of buffer required is dependent on the ‘riskiness’ of the sites that make-up the supply, with strategic sites tending to be at relatively high-risk of delay, due to the range and complexity of the issues involved, for example around delivering required infrastructure upgrades.

- 9.9.3 Also, in addition to the question of how many homes are provided for over the plan period, there is a need to ensure a steady (or otherwise acceptable) trajectory of housing delivery across the plan period, including in the early years of the plan period. This necessitates a supply comprising a good mix of sites, both in terms of size/complexity and geographic location. In this respect, it is important to recall that there is a very good mix of committed sites following the adopted Local Plan (and windfall sites that have come forward since the adopted Local Plan). As discussed in Section 5, committed sites are expected to deliver around 11,000 homes in the LPR plan period (2022 to 2038).
- 9.9.4 On one hand it is difficult to conclude that delivery risk is a 'housing' consideration for this assessment, as the NPPF puts in place mechanisms to redress unanticipated shortfalls in housing delivery (the presumption in favour of sustainable development); however, on the other hand, delivery risk is an important issue in Swale, with a desire to resist windfall schemes in unplanned locations. As stated within the officer's report to the 29th October 2018 Local Plan Panel (which reported back on the Looking Ahead consultation):⁵⁷ *"Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations."* Viability need not necessarily constrain delivery if development costs are kept low, but this can lead to tensions with wider objectives, for example affordable housing and decarbonisation.
- 9.9.5 In light of these introductory remarks, the proposal to focus growth at a **strategic site and sites with delivery challenges** leads to a degree of risk; however, the nature of the existing committed supply, and the proposed supply buffer of 13% serves to reduce concerns.
- 9.9.6 Also, **E/SE of Faversham** is thought to be associated with relatively low risk, for a strategic site of this scale. The Stantec Assessment of Stage 2 Submissions (2019) drew the following conclusion in respect of Southeast Faversham: *"Of the four schemes promoted this is 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 Junction 7..."* Strong viability should also enable delivery of a good mix of housing, potentially to include:
- 40% affordable housing, with a good mix of affordable housing tenures, to include affordable rented housing, in line with the recommendations of the Housing Market Assessment (HMA, 2020);
 - housing for particular groups - the HMA discusses older persons, people with disabilities, family households, private rented households and people wishing to build their own homes; and
 - Gypsy and traveller accommodation – there is currently no proposal to deliver pitches within the site, but this could be an option to consider, given a need for new pitches in Swale, and an understanding that strategic sites can be suitable locations (although this may apply less to Swale, where there are over 60 existing sites, suggesting good potential to deliver new pitches through site extensions).
- 9.9.7 Another important consideration is that **Rushenden South** is expected to deliver only c.10% affordable housing, reflecting viability challenges on Sheppey and anticipated site specific development costs. This is an important consideration for housing needs on the Island of Sheppey, where the policy in the adopted Local Plan is to require no affordable housing; however, it is not necessarily a barrier to achieving the 28% affordable housing delivery target for the Borough as a whole, as understood from the HMA (2020), as some sites, in locations where viability is stronger, will be expected to deliver 40% affordable housing.
- 9.9.8 Finally, in respect of the spatial strategy, it is important to consider that a lower growth strategy for the **west of the Borough**, through the LPR, partly reflects housing delivery considerations. Specifically, a number of existing allocations have been delayed, largely on account of delays to M2 J5, and are now expected to come forward in the early years of the LPR plan period, such that there could be limited further 'space' in the market for additional sites, recognising that the market here is not as strong as at Faversham.

Commentary on other policies

- 9.9.9 [To be completed ahead of publication]

⁵⁷ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2094>

Appraisal on the plan as a whole

- 9.9.10 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**.

9.10 Land

- 9.10.1 Sustainability objective:

- Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land.

Commentary on the spatial strategy

- 9.10.2 A key consideration is the need to avoid loss of best and most versatile (BMV) **agricultural land**, particularly grade 1 land that is of the highest quality nationally. Swale has an extensive resource of grade 1 land, known as the fruit belt, which is centred on the A2 corridor, hence it is very challenging to deliver growth whilst avoiding loss of BMV land, including grade 1. Sheppey is relatively unconstrained, with low-lying land shown by the nationally available dataset as being non-BMV (grade 4) and higher ground shown as grade 3 (which may or may not be BMV); however, there are barriers to growth.
- 9.10.3 Strategic growth at **E/SE Faversham** would result in the loss of high quality agricultural land, with the national low resolution dataset indicating that virtually all of the land is likely to be of grade 1 quality. None of the land has been surveyed in detail, other than the committed Preston Fields part of the site (it is typically the case that detailed survey work is undertaken as part of planning applications, but it can be undertaken to inform Local Plans), which was found to mostly comprise grade 1 land.
- 9.10.4 There are also concerns regarding growth at **Teynham**, which is strongly associated with grade 1 quality land (although detailed survey work at Teynham has found there to be some grade 2 quality land) and historical imagery (available for 1940 and 1960)⁵⁸ shows near ubiquitous fruit growing; however, of the land in contention for allocation, very little (if any) now appears to be in use for commercial fruit growing.
- 9.10.5 Finally, with regards to **Sittingbourne town centre** and **Rushenden South**, growth here is strongly supported, from a 'land' perspective. With regards to Rushenden South, the national dataset indicates that the site is a mixture of grade 4 and grade 5 quality land, and part of the site comprises a former landfill (dredged materials, as opposed to waste), hence development could enable remediation and therefore represent a good use of despoiled or contaminated land.

Commentary on other policies

- 9.10.6 [To be completed ahead of publication]

⁵⁸ See <https://webapps.kent.gov.uk/KCC.KLIS.Web.Sites.Public/Default.aspx> or Google Earth

Appraisal on the plan as a whole

- 9.10.7 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.

9.11 Landscape

- 9.11.1 Sustainability objectives:

- Protect and enhance the character and quality of the Borough's landscapes and townscapes through appropriate design and layout of new development.
- Protect and enhance the Kent Downs AONB where possible.
- Preserve important open gaps between settlements.

Commentary on the spatial strategy

- 9.11.2 There is a wide range of evidence to take into account, when considering landscape issues and impacts. In addition to avoiding impacts to the Kent Downs AONB, and its setting, there is a need to avoid impacts to locally designated landscapes and countryside gaps, as understood from the Landscape Designation Review (2018) and the Important Local Countryside Gaps study (2020). Additionally, the Landscape Sensitivity Assessment (2019) examines the sensitivity of all landscape parcels surrounding the main settlements. More broadly, there is a need to consider topography across the Borough, historic landscape character and important views, including from roads and public rights of way. There is also a need to be mindful of wide ranging ecosystem services delivered by landscape units (see discussion in Appendix II).
- 9.11.3 Strategic growth to the **E/SE of Faversham** is supported, from a landscape perspective, in light of the Landscape Sensitivity Assessment (2019), which finds the entire site to fall within a parcel of moderate sensitivity (parcel FM1), which equates to relatively limited sensitivity in the context of the Borough and, in particular, Faversham. The assessment notes that the "presence of major road infrastructure and heavy traffic" has a significant impact on "the sense of rurality and tranquillity". Despite this, however, the assessment also finds that the area "retains a strongly agricultural character" and that this character together with the "visual exposure of the area" results in a degree of sensitivity. It is important to recognise that development would breach a longstanding settlement boundary feature to the southeast of the town, namely the A2 which has historically marked the limit of the southern extent of the town (with the town centre focused on the creek, more so than the road and railway); however, existing Local Plan allocations have already breached the boundary of the A2 to the south of the town. Furthermore, expansion to the southeast has the benefit of being able to draw upon the M2 (with the AONB beyond) as a new strong/defensible long-term boundary. Having said this, the current proposal falls short of comprehensively planning for land as far as similarly defensible boundaries to the east (either the A299 or, should employment be a suitable use surrounding the motorway junction, the need to maintain a landscape buffer to Boughton) and the northeast (flood risk and heritage including farmsteads and the Goodnestone Conservation Area). The current proposal to deliver employment land to the east of the proposed 'structural screen planting' is questionable, from a landscape perspective, and there is a need to consider the possible landscape merits of a single main employment hub adjacent to M2 J7.
- 9.11.4 As a final consideration, there is a need to note the proposal to deliver 70 homes within the southern part of the committed Preston Fields site, which comprises land at the southwest extent of the E/SE Faversham site, namely land falling between the A251 in the west and Salters Lane in the East. The adopted Local Plan proposed that this land should be left as "accessible natural greenspace to maintain rural character".
- 9.11.5 The second most significant consideration relates to **Rushenden South**, which is associated with considerable landscape sensitivity, as it forms the western extent of the North Swale (Sheppey) Marshes locally designated landscape, with the land visible in the middle ground from the A249 Sheppey Crossing. Furthermore, there is a likelihood of a mixed use scheme, and the Landscape Sensitivity Assessment identifies this area as having a *high* sensitivity to employment development. However, the site comprises

a former landfill, which is thought to limit landscape value as experienced from close quarters, e.g. as experienced by the residents of Rushenden. There is one public footpath adjacent to part of the site, and there is understood to be the possibility of development supporting delivery of the England Coastal Path, alongside wider green/blue infrastructure enhancements to increase accessibility to the landscape, to the benefit of residents of Queenborough/Rushenden, which is an area associated with significant levels of multiple deprivation.

- 9.11.6 With regards to the **Teynham Opportunity Area**, sensitivities associated with the fruit growing heritage have been discussed; however, the Landscape Sensitivity Assessment (2019) serves to indicate that, in the Borough context, there is a degree of relative landscape capacity to the west of the village. Specific considerations include:
- East – land here has higher sensitivity; however, the assumption is that any further expansion would not break the prominent north/south ridgeline (associated with public footpaths);
 - West - there is a need to maintain a settlement gap to Bapchild (this is explored within the Local Countryside Gaps study, 2020), and the possibility of delivering the final section of the Sittingbourne Northern Relief Road is a related consideration; and
 - Southwest - there is a degree of sensitivity, given views across this land from footpaths and Claxfield Road, which is designated as a rural lane, and a route to the Lynsted via historic farmsteads.
- 9.11.7 Finally, there is a need to consider the proposed allocation(s) at **Neames Forstal**. Three adjacent sites are being promoted for a combined scheme of 90 homes, plus there is a proposal to deliver a new footpath link to Selling (c. 1.5km to the west). The SHLAA judges these sites to be unsuitable, including due to the AONB constraint; however, the proposal is to deliver a combined scheme that responds to the AONB constraint. The two sites adjacent to the AONB are not considered likely to contribute significantly to the setting of the AONB, whilst the site within the AONB would only be developed in part, so as to round-off the village edge. There could also be a need to consider AONB sensitivities associated with the footpath link (which would be within the AONB), particularly if it is to be hard surfaced and have lighting.

Commentary on other policies

- 9.11.8 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.11.9 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 in Part 1). 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.

9.12 Transport

- 9.12.1 Sustainability objectives:
- Promote sustainable transport use, including supporting the creation of additional walking and cycling routes, and reduce the need to travel, particularly by private vehicle.
 - Support strategic transport schemes.

Commentary on the spatial strategy

- 9.12.2 Transport connectivity and traffic congestion is a key issue in Swale, given the inherent constraints that exist. The Borough is very well connected by rail; however, main settlements and potential growth locations feed onto a limited number of strategic road corridors, including the A2 which passes through the centre of settlements (the only bypasses are at Sittingbourne town centre and Boughton). Enabling longer distance trips via the M2 rather than the A2 is an important objective, but there are junction constraints, and just three junctions serving the Borough, which contrasts to four serving Medway BC.
- 9.12.3 Strategic growth to the **E/SE of Faversham** is tentatively supported, from transport perspective. Focusing on *Southeast Faversham*, key statements made by the *Stantec Assessment of Stage 2 Submissions* (2019) include:
- “The primary issue is the M2 J7 [Brenley Corner] which currently operates above capacity. Greater detail is required to understand the impact and mitigation... 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.”*
- “The proposal appears to rely on the upgrades to Brenley Corner, however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated...”*
- “While there is mention of the Preston Fields link [to M2 J6], which has the potential to mitigate some impact on the A2/A251 junction, it has not yet been evaluated or agreed with the... developer.”*
- “The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any ‘calming’ may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved and secured as part of this scheme.”*
- 9.12.4 In short, there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6. It may be that the latest proposal, which involves bringing forward a combined scheme involving growth both to the east and southeast of Faversham, leads to greater potential to deliver timely road infrastructure upgrades, but there is no certainty in this respect.
- 9.12.5 Additional evidence, in respect of E/ SE Faversham, comes from the April 2020 re-run of the Swale Transport Model (discussed in Appendix I), which serves to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I).
- 9.12.6 With regards to **other proposed growth locations** (the Teynham Opportunity Area, Rushenden South, Sittingbourne town centre, Neames Forstal), a detailed discussion is presented above, under ‘air quality’ and ‘climate change mitigation’. It is difficult to draw an overall conclusion as to whether growth in these locations is supported, from a transport perspective, with the next transport model run awaited, which will take account of detailed proposals for mitigation measures, e.g. junction upgrades. In respect of Rushenden South, the key point to note is that the site benefits from good access onto the A249, and will not increase pressure on the problematic A2500 Lower Road. In respect of Teynham, a key question is whether growth here, in combination with strategic growth at Faversham, might support upgrades to the A2, potentially to include a new cycle route between Sittingbourne and Faversham.
- 9.12.7 Finally, there is a need to consider **Lamberhurst Farm**, which is proposed as an employment allocation, but in terms of which supporting text explains: *“The Council will work with Canterbury City Council, as the area straddles the borough boundary, during a future plan review to explore opportunities to deliver a new, sustainable settlement.”* There will be a need to carefully consider access to the expanded employment site, noting that access is via a fairly narrow lane that crosses an area of common land (Victory Wood, which is managed for accessibility by the Woodland Trust); however, it is recognised that most people accessing the common land (from the car park) would not need to walk along or cross the lane. With regards to the possible future option of a new settlement, this is a fairly isolated location, between Faversham and Whitstable, and not well linked to Canterbury; however, as discussed under ‘communities’, there is potentially an opportunity to deliver community infrastructure to the benefit of the existing small villages in the vicinity, which could support walking and cycling. The possibility of growth here, alongside growth at Faversham, leading to an improved bus service along the A299 could be another possibility.

Commentary on other policies

9.12.8 [To be completed ahead of publication]

Appraisal on the plan as a whole

9.12.9 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.

9.13 Water

9.13.1 Sustainability objectives:

- Promote sustainable forms of development which minimise water consumption and wastewater flows.
- Maintain and enhance the quality of both surface and ground water resources where possible consistent with the aims of the Water Framework Directive.
- Promote efficient and sustainable use of natural resources.

Commentary on the spatial strategy

9.13.2 An important strategic consideration is waste-water treatment capacity. The Stantec Assessment of Stage 2 Submissions (2019) includes a section on utilities, which highlights limited concerns, concluding:

"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."

9.13.3 However, there is a need to apply caution, in the sense that there is a need to minimise any residual risk of capacity breaches (in respect of either treated or untreated effluent), with resultant water quality impacts.⁵⁹ In turn, there are arguments for directing growth to locations where there is existing capacity at the receiving Wastewater Treatment Works (WWTW), as opposed to relying on timely upgrades.

9.13.4 There is some evidence to suggest that capacity at Faversham WWTW is a particular concern. In particular, the Kent Water Sustainable Growth Study (2017) noted that headroom capacity at Faversham WWTW would be exceeded by planned growth to 2031 (as set out in the adopted Local Plan), hence there would be a need for upgrades. However, as part of the assessment of the Southeast Faversham strategic site option, the *Stantec Assessment of Stage 2 Submissions* (2019) explains:

"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... costs, options and works duration [are being discussed]."

⁵⁹ N.B. as discussed within the Swale LPR Habitats Regulations Assessment (HRA) report, there are relatively limited concerns around sewage effluent impacting the North Kent Estuaries European sites from treated sewage effluent. This is because these estuaries have a high sediment load, low water temperatures and high wave action. As such, smothering macroalgal growth, which has caused issues for European sites on the south coast, is not considered a threat to achievement of conservation objectives for these European sites.

9.13.5 Further considerations are as follows:

- There are WwTWs at Rushenden and Teynham, but Neames Forstal is somewhat distant from the nearest WwTW at Boughton, and local sewer network infrastructure can sometimes be a constraint to growth in rural areas.
- In March 2020 Southern Water pleaded guilty to 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events alleged to have taken place between 2010 and 2015, and it is understood that another investigation by the Environment Agency is under way that covers pollution incidents after 2015.⁶⁰

9.13.6 As for other 'water' considerations:

- Pollution to surface water in the vicinity of growth locations – whilst there may be variation in water quality across the Borough's surface water bodies, it is inherently difficult to differentiate the growth scenarios, because there is very good potential to deal with water pollution arising from development schemes through Sustainable Drainage Systems (SuDS). Water pollution from breaches of capacity at WwTWs is considered to be a much more important strategic consideration for the LPR.
- Pollution to groundwater in the vicinity of growth locations – groundwater source protection zones are associated with the parts of the Borough associated with a chalk geology, with Sheppey, Bobbing, and most land at Faversham (bar land directly to the south) falling outside of a source protection zone. However, it is again the case that there is very good potential to suitably avoid/mitigate impacts through the development management process. Groundwater source protection zones can be a particular constraint for polluting developments (e.g. heavy industry, petrol stations).
- Water resources – water scarcity is an issue that applies across the Borough as a whole, hence it is a challenge to differentiate the growth scenarios. It would not be appropriate to highlight a concern with scenario 5 on the basis that it is a higher growth strategy, as genuine higher growth (as opposed to aiming to provide for LHN by supporting a strategy that involves a large supply buffer) would only be supported if there are unmet needs arising from elsewhere within the sub-region where water scarcity is equally an issue.

Commentary on other policies

9.13.7 [To be completed ahead of publication]

Appraisal on the plan as a whole

- 9.13.8 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.

⁶⁰ See <https://www.ft.com/content/3efb3e7b-3388-4f27-85ac-44b00aa1fd37>

9.14 Overall conclusions

The Local Plan Review

- 9.14.1 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'.
- 9.14.2 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 in Section 6), but concerns are reduced after having taken account of proposed development management policy.
- 9.14.3 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.

Cumulative effects

- 9.14.4 Cumulative effects are those effects that become apparent once the LPR implementation is considered alongside implementation of other plans, programmes, strategies, projects etc. Giving consideration to cumulative effects is a way to ensure that the appraisal 'casts the net wide', both spatially and temporally.
- 9.14.5 The following bullet points highlight some of the key issues discussed as part of the appraisal:
- Air quality – increased traffic on the A2 corridor is an issue for existing air pollution hotspots not only in Swale but also in neighbouring the neighbouring authorities of Medway and Canterbury.
 - Biodiversity – a key consideration is the need to collaborate with Canterbury District Council in respect of planning for the Blean Woodlands and the Graveney Marshes / Sea Salter levels. Delivering coordinated managed realignment schemes within the Swale and Medway Estuaries is another important larger-than-local consideration, discussed above as part of the appraisal.
 - Climate change mitigation – there is a need to work closely with Kent County Council and other stakeholders in respect of supporting strategic transport infrastructure upgrades (e.g. in support of fast and frequent bus services), as well as potentially a carbon offsetting scheme. The Thames Estuary is also potentially a wider scale at which climate change mitigation is of relevance to the LPR.
 - Communities – a key consideration is secondary school provision in the east of the Borough, where catchments extend into Canterbury District. Strategic health infrastructure can also be another consideration, but no particularly opportunities are known to exist.
 - Economy and employment – this is a key larger-than-local consideration for the LPR, as new employment land in Swale has the potential to support not only the local economy but the wider regional economy, particularly given Swale's links to ports and to London. There is also a need to consider Swale's role within the Thames Estuary sub-region, mindful of the Thames Estuary 2050 vision (2018).
 - Housing – as discussed in Part 1 of this report, Swale Borough has not been asked to provide for unmet needs arising from any neighbouring authority; however, there remains a degree of residual risk.
 - Landscape – as per under biodiversity, a key consideration is thought to be in respect of collaborating with Canterbury District Council (and others) in respect of landscapes to the east of the Borough. There is also a need to work closely with the AONB board, particularly regarding growth at Neames Forstal.
 - Transport – there is a need to work with Kent County Council and others to plan for the key road and rail corridors with a long-term perspective.

Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 This SA Report is published for consultation alongside the 'pre-submission' version of the LPR, under Regulation 19 of the Local Planning Regulations.
- 10.1.2 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.
- 10.1.3 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. If there is a need for modifications these will be prepared and then subjected to consultation, alongside SA if necessary.
- 10.1.4 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 process and sets out 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 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)
- 11.1.2 At the current time it is too early to make 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 hydraulic capacity breaches or risks to the status of receiving water courses.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C presents a discussion of more precisely how the information within this report reflects the SA Report requirements.

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented – in an updated form - within Section 3 ('What's the scope of the SA').
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of appraisal of alternatives ('growth scenarios')
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/consultation), whilst Section 9 presents an appraisal of the LPR as a whole. All appraisal work naturally involved giving consideration to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The appraisal has served to highlight a wide range of issues and impacts that could be addressed as part of plan finalisation, with a view to improving the performance of the plan in respect of sustainability objectives.

Regulatory requirement	Information presented in this report
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on certain issues / options. Also, Section 7 explains the Council's 'reasons for selecting the preferred option'. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 11 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the pre-submission LPR in order to inform the consultation and subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the LPR, as part of the examination in public process.

Appendix II: Review of evidence

Introduction

The aim of this appendix is to present a review of key evidence gathered through evidence-base studies prepared in order to inform the Local Plan Review. In particular, there is a focus on evidence with implications for spatial strategy.

This section is structured under a list of thematic topics reflective of evidence work undertaken. Evidence gathered through the Looking Ahead consultation (2018) is also discussed, as appropriate.

Air quality

An Air Quality Modelling Report was presented to the Local Plan Panel on 8th October 2020. The study modelled 'air quality dispersion' for two Local Plan scenarios, essentially a lower growth and higher growth scenario, where the latter scenario would involve a quantum of homes broadly in line with local housing needs (LHN).

With regards to methodology, the study

- Focuses on impacts at 'sensitive locations', defined as *"locations outside buildings or other natural or man-made structures above or below ground where members of the public are regularly present and might reasonably be expected to be exposed over the relevant averaging period of the objectives."*
- Draws upon the Swale Highway Model (SHM), which developed by Sweco for 2017 (base year), 2027 and 2037 reference case (forecast years) to test the traffic impacts of both new developments and transport infrastructure across Swale.
- Has clear limitations, including in respect of the sites assumed to deliver the two growth scenarios. The conclusion of the study also explains: *"Overall, the model performed well but overall, the model could be improved by model adjustment..."*

Key conclusions include:

- Air quality is improving, with the 2027 reference case scenario – which assumes no new growth through the LPR – showing that, by 2027, there will be no locations where there are exceedances of the NO₂ annual mean air quality objective.
- However, at the current time air quality remains a concern at several locations – see Table A.
- The higher growth Local Plan scenario would lead to a worsening of air quality at 116 of the 155 sensitive receptors (compared to 90 under the lower growth scenario), including all ten of the locations where air quality is of greatest concern (see Table A).

However, the impact is small (below 1% at 63 of the 116 sensitive receptors that see a worsening). The highest worsening (4.7%) would be along the A2 at Teynham; however, air quality in this location (18.4 micrograms per cubic metre) would be well within the 'air quality standard' (40 micrograms per cubic metre).

Table A: Summary of locations where air quality is of greatest concern

Known air pollution hotspots	Designated AQMA?	Includes a top ten problematic sensitive receptor, as identified by the Air Quality Modelling Report?	
		2019	2037 Local Plan scenario
East Street, Sittingbourne (A2)	Yes	Yes (49)	Yes (27)
Ospringe Street, Faversham (A2)	Yes	Yes (42)	Yes (26)
Ashford Road, Faversham (A251)	No	Yes (37)	Yes (21)
Water Lane, Ospringe	No	Yes (36)	Yes (19)
Canterbury Road, Sittingbourne (A2)	No	Yes (35)	Yes (20)
St Paul's Street, Sittingbourne (B2006)	Yes	Yes (34)	Yes (20)
Newington (A2)	Yes	Yes (33)	No
Teynham (A2)	Yes	Yes (33)	Yes (19)

Key messages for spatial strategy

Whilst air pollution is decreasing at an increasing rate, and all areas in the Borough will likely meet the nationally defined 'air quality standard' for nitrogen dioxide at the end of the plan period under any reasonably foreseeable scenario, there remain air pollution hotspots that should be addressed. In addition to the five AQMAs (four along the A2; one along the B2006 at Sittingbourne), the Air Quality Modelling Report identifies hotspots at other locations, notably including the A251 south of Faversham. The two stand-out problematic locations in the Borough appear to be the A2 in Sittingbourne (east of the town centre) and the A2 at Ospringe. The B2006 AQMA at Sittingbourne is also of note, as this is a route taken by HGV travelling to/from the Eurolink industrial estate, on route to/from the M2.

Biodiversity

A Biodiversity Baseline Study was presented to the Local Plan Panel on 8th October 2020. The study aims to inform preparation of a Local Nature Recovery Strategy (LNRS), which will soon be a requirement following enactment of the Environment Bill. Under the Environment Bill the intention is that LNRSs should, in turn, be used to inform delivery of Biodiversity Net Gain (BNG) and the national Nature Recovery Network (NRN). The report recommends that:

"In anticipation of the Environment Bill, SBC should develop a LNRS to guide the formulation of its Local Plan, particularly for the allocation housing sites, specific policy for delivering BNG, and general policy on biodiversity..."

A central finding of the study is that the LNRS *"should cover three Nature Recovery Priority Areas centred on the Swale Estuary, the North Downs and Blean, with an additional Borough-wide strategy for Traditional Orchard Priority Habitat."*

The implication is:

- Site options intersecting or associated with a Priority Area must be closely scrutinised; however, such sites can be suitable for development where there is confidence that site will *"include provisions to avoid negative impacts on habitat networks and [deliver on] opportunities for creating and enhancing habitat through onsite BNG and Green Blue Infrastructure in order to meet LNRS targets."* It is fair to say that this is quite a stringent test, which will lead to implications for development density and lead to costs, which could potentially lead to viability implications and, in turn, delivery challenges.⁶¹

⁶¹ The study discusses a good practice example of taking a proactive approach to development within a Priority Area, explaining: *"KWT are currently undertaking work at the site "Land East of Iwade" [a Bearing Fruits allocation], which represents a good example of how, with carefully considered master planning to maximise opportunities, a development on the edge of an identified Nature Recovery Priority Area can provide substantial benefits for biodiversity."*

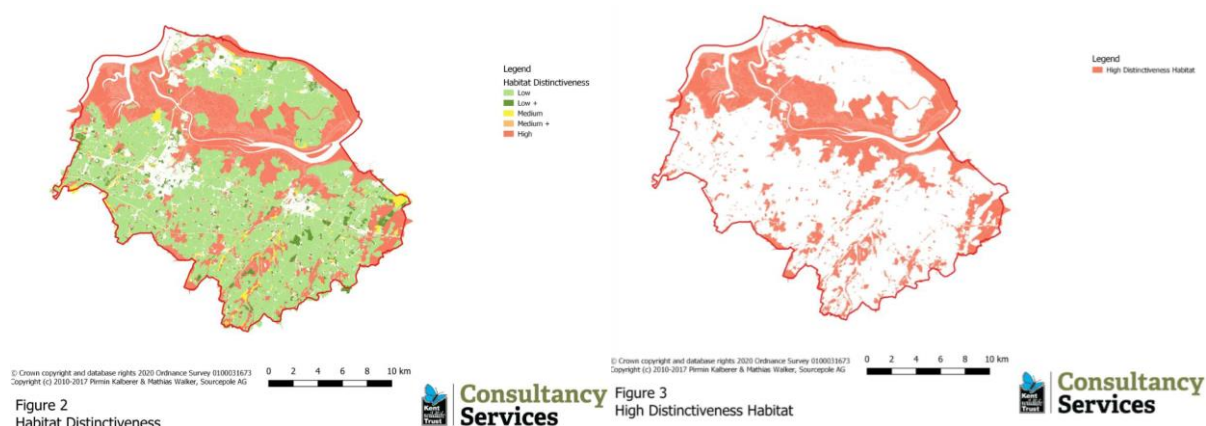
- Where there BNG cannot be achieved onsite, and hence there is a need for offsite habitat enhancement, or creation, in order to deliver BNG, these offsite measures should be targeted so as to deliver LNRS objectives for the Priority Areas. Importantly, the study recommends that the Borough Council prepares “a register of potential BNG sites, analysis of likely demand for offsite BNG and identification of where BNG can be used to meet other policy targets relating to climate change and green and blue infrastructure.”

The spatial framework of Priority Areas is important; however, these areas affect a small proportion of SHLAA sites, and an even smaller proportion of those SHLAA sites that are genuinely in contention for allocation. When considering the merits of site options not associated with a Priority Area there is a need to avoid impacts to habitats and habitat networks, in particular those identified by the study as higher priority (particularly on the basis of higher ‘distinctiveness’). Targeted growth away from priority/distinctive habitats and habitat networks will lead to greater potential to achieve BNG onsite and, in turn, less need for offsite measures to achieve BNG. This represents a suitability precautionary approach at the current time, recognising that a LNRS has not yet been prepared, nor has work been undertaken to identify a register of BNG sites.

Figure A shows all habitats classified according to distinctiveness. It is difficult to generalise about potential growth locations that potentially give rise to a cause for concern in light of these figures; however, it is considered appropriate to highlight:

- Land to the north of both Sittingbourne and Faversham – constrained by the Swale Priority Area (PA); however, in practice these areas are constrained in several respects (including flood risk) such that there is limited or no growth potential;
- West Sheppey ‘Triangle’ – as above;
- Boughton - is constrained by the Blean Woodlands PA to the east;
- North downs – the PA stretches north to constrain land to the SE of Sittingbourne and S/SW of Faversham.
- Sittingbourne area – outside of the Swale PA (which contains land to the north) and North Downs PA (which constrains land to the southeast) there is a notable density of distinctive habitat patches (including but not limited to Traditional Orchard habitat, which is a priority) that may function as one or more ecology networks, such that intervening land may have a degree of sensitivity even where the onsite habitat is itself low distinctiveness. However, it is noted that limited land in this area is locally designated as a Local Wildlife Site.

Figure A: Habitats classified according to distinctiveness



Key messages for spatial strategy

Ahead of preparing a Local Nature Recovery Strategy (LNRS) and, as part of this, establishing a register of Biodiversity Net Gain (BNG) sites, there is a need to take a precautionary approach to spatial strategy and site selection. This should involve avoiding impacts to priority/distinctive habitats and ecological networks, such that there will be greater potential to achieve BNG onsite when the BNG metric is applied at the planning application stage and, in turn, there will be less call for offsite habitat enhancement and creation as a means of delivering BNG. Many of the more constrained parts of the Borough are not in realistic contention for growth; however, it is considered appropriate to highlight the following areas of sensitivity that could potentially be impacted: north of Sittingbourne and Faversham (the Swale Priority Area (PA)); West Sheppey ‘Triangle’ (the Swale PA); Boughton (the Blean Woodlands PA); southeast of Sittingbourne (North Downs PA); south / southwest of Faversham (North Downs PA); and the broad area around Sittingbourne (outside of the Swale PA and the North Downs PA there is a notable density of distinctive habitat patches, including Traditional Orchard habitat, which is a priority).

Climate emergency

Swale Borough Council declared a Climate and Ecological Emergency on 26 June 2019, with the aim of the Borough achieving net zero emissions by 2030.⁶² A Climate and Ecological Emergency Action Plan was then published on 22 April 2020, and a Kent and Medway Energy and Low Emissions Strategy was published in June 2020.

The Action Plan (2020) includes a table of ten priority actions, with one identified as being a matter for planning. This relates to setting policy for achieving building emissions standards over-and-above the requirements of Building Regulations, with a 75% improvement required from 2025 and a 100% improvement (i.e. net zero regulated emissions) required from 2028. This is a matter for spatial strategy and site selection primarily in so far as it is a matter for development viability (discussed below), and in so far as there is a need to realise opportunities to deliver heat networks (discussed below).⁶³

It is also important to note that two 'transport' priority actions are identified, which are clearly of relevance to the LPR, namely: 1) Install EV charging points across the Borough; and 2) Improve facilities and incentives for walking and cycling. With regards to (1), this is a matter for spatial strategy and site selection primarily in so far as it is a matter for development viability (discussed below). With regards to (2) this is clearly a matter of paramount importance for spatial strategy and site selection.

Moving on to the Kent and Medway Energy and Low Emissions Strategy (2020), the Strategy:






- Draws heavily on the Energy South 2 East Local Energy Strategy (2020) – see Figure B; and then
- Identifies ten priorities.

A good proportion of the priorities are of relevance to the LPR spatial strategy – see Table B.

Finally, Figure C presents existing large scale renewable heat/power generation installations in the Borough (N.B. the recently consented 350 MW Cleeve Hill Solar Park scheme is not shown). Swale is something of a 'hotspot' for wind and solar farms; however, there are limited implications for spatial strategy / site selection (recalling that wind and solar farms feed into the national grid, rather than powering local communities).

Finally, it can be seen that Sittinbourne (Kemsley Paper Mill) is home to Kent's largest CHP scheme, which is fuelled by both waste and gas. Latest understanding is that there is a very limited role for gas CHP moving forward (at least for heating homes), because decarbonisation of the national grid now favours electric heating solutions.

Figure B: Overview of the Energy South 2 East Local Energy Strategy (2020)

FIVE PRIORITY THEMES	PROJECT MODELS
 LOW CARBON HEATING	#1 District Heat Networks rollout #2 Off-gas grid homes #3 Hydrogen injection into the Natural Gas grid #16 New-build homes on hydrogen grid
 ENERGY SAVING AND EFFICIENCY	#2 Off-gas grid homes #9 Energy Efficiency in homes #10 SME Support Programme
 RENEWABLE GENERATION	#4 Offshore wind development #5 Solar and microgrid on landfill sites #6 Biomass fuel supply chain development #7 Solar energy for Network Rail #8 Car parks - solar potential #17 Biofuel evolution
 SMART ENERGY SYSTEM	#5 Solar and microgrid on landfill sites #11 Housing and community microgrids #12 EV charging & hydrogen-fuelling infrastructure #15 Setup of ESCO / MUSCO infrastructure #18 Support developments in CO2 capture
 TRANSPORT REVOLUTION	#12 EV charging & hydrogen-fuelling infrastructure #13 CNG fleet fuelling #14 Ports - modernisation of energy infrastructures

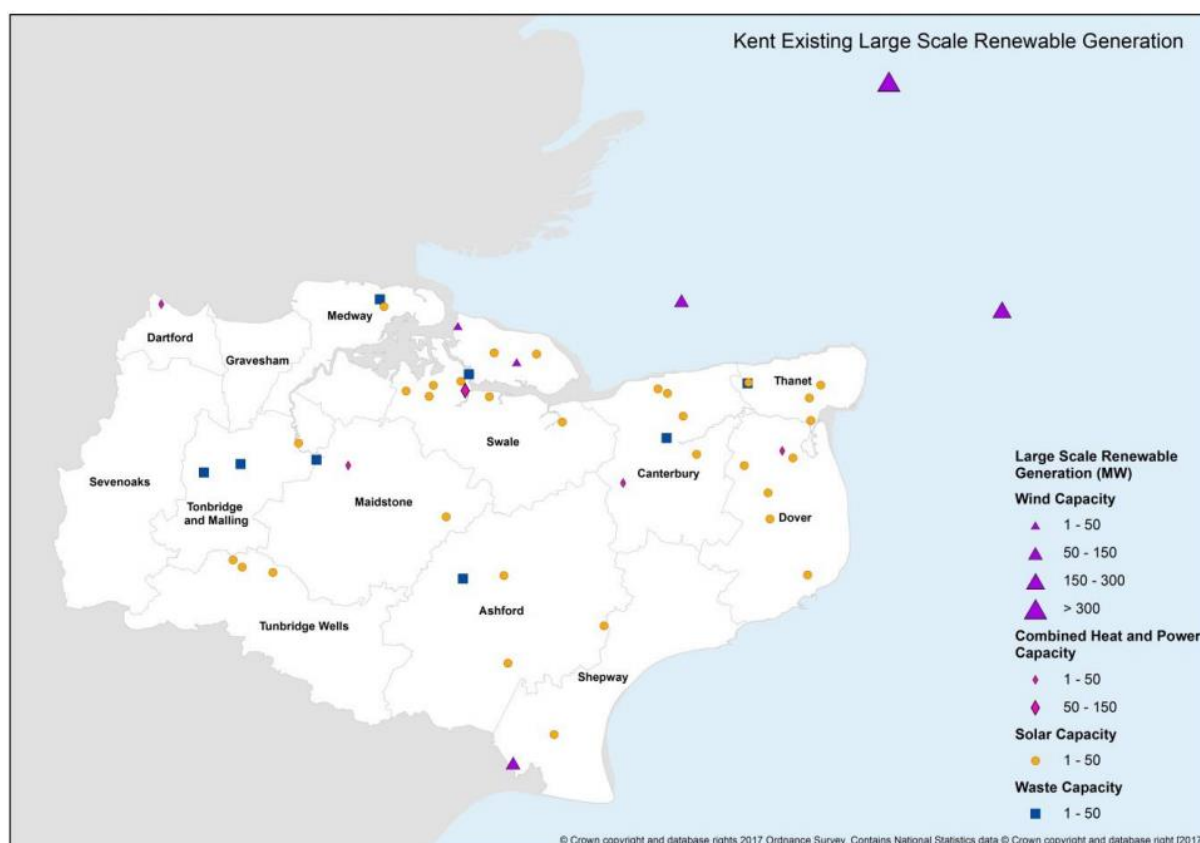
⁶² See swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/cee-update

⁶³ Also, it is important to note that the Government consulted on a Future Homes Standard in October 2019 which, if implemented, would see a rapid ratcheting-up of the CO2 emissions standards required through Building Regulations alongside a change to the Planning Practice Guidance removing the ability of Local Plans to require standards over-and-above Building Regulations.

Table B: Links between K+M Energy and Low Emissions Strategy priorities and the LPR spatial strategy

Kent and Medway priority	Links to Energy S 2 E themes?	Relevance to LPR spatial strategy and site selection?
Set an emission reduction pathway to 2050 (inc. 5 year carbon budgets), so that decision makers understand where action and resources should be targeted.	All	Yes. Whilst there is no short term carbon budget for Swale, or agreed decarbonisation trajectory, there is undoubtedly an urgent need to decarbonise in the short term if the Borough is to remain on course to achieve net zero by 2030 (twenty years ahead of the national and county-wide target). Opportunities missed in the short-term will result in the need for a steeper decarbonisation trajectory later in the 2020s, which might become unachievable.
Public sector decision-making	All	Limited. The Borough Council is well placed to deliver and facilitate delivery of low carbon interventions, potentially leading to spatial opportunities to be realised through the LPR spatial strategy. The regeneration of Sittingbourne town centre potentially represents a decarbonisation opportunity of note, e.g. a higher growth strategy could potentially be supportive of delivering a heat network.
Ensure integration into Local Plans and planning ; develop a clean growth strategic planning policy and guidance framework.	All	<p>Yes. The Kent and Medway framework is yet to be developed; however, in the interim, the Energy South 2 East list of priority themes and project models provides a good framework for LPR spatial strategy and site selection. In particular:</p> <ul style="list-style-type: none"> • Heat networks – require a strategic approach to concentrating growth in proximity to heat sources and heat demand loads; • Off-gas grid homes – only small scale schemes delivering in the short term are likely to seek gas connection. • Hydrogen – is a focus of the Ten Point Plan for a Green Industrial Revolution (2020), with demonstrator communities sought. • Energy efficiency – this has implications for spatial strategy in so far as it has implications for viability, which varies spatially. • Renewable energy – beyond supporting heat networks and renewable energy (heat pumps and solar PV) at the development scale, the LPR could identify sites or areas suitable for large scale renewables (solar farms); however, there are limited implications for spatial strategy / site selection. Solar car parks are another consideration of strategic importance. • Smart energy systems – in order to reduce the pressure on the national grid that will result from renewables, EVs and the electrification of heating there is a need for localised whole system approaches linking renewable heat/power, battery storage, EV charging and demand management. The Energy Superhub Oxford initiative represents current best practice. • Transport revolution – of great relevance to LPR spatial strategy.

Kent and Medway priority	Links to Energy S 2 E themes?	Relevance to LPR spatial strategy and site selection?
Establish a trusted Kent and Medway carbon offset scheme and renewable energy investment fund	Heating; Renewable generation; smart energy systems	Limited. In the absence of an investment fund the LPR spatial strategy must seek to realise opportunities as far as possible. The absence of a trusted carbon offset fund also serves to highlight the importance of seeking to minimise reliance on offsetting.
Building retrofit programme	No (outside scope)	Limited. Retrofitting existing buildings for energy efficiency and electric heating solutions is of crucial importance to achieving net zero; however, there is little or no role for LPR spatial strategy.
Set up a smart connectivity and mobility modal shift programme.	Transport revolution	Yes. Beyond minimising need to travel and maximising accessibility to destinations by 'sustainable transport' modes, there is a need to support strategic growth locations supportive of smart connectivity and 'future of mobility' objectives.
Set up an opportunities and investment programme for renewable electricity and heat energy generation.	Heating; Renewable generation; smart energy systems	Yes. As discussed, heat networks require strategic planning, and the same can be said for realising local 'whole system' approaches that will be crucial in order to minimise pressure on the national grid.
Green infrastructure	No	Yes. Discussed below.
Support low carbon business	Energy savings and efficiency	Limited. The LPR must provide new employment space suited to local needs, including the needs of low carbon businesses. The LPR should also support low carbon infrastructure, for which there is expected to be a great demand nationally for skilled labour (e.g. builders, engineers, fitters, assessors).
Communications	No	Yes. The LPR could support flagship net zero schemes supportive of the borough-wide net zero aspiration.

Figure C: Existing large scale renewable heat/power generation in Kent⁶⁴

Key messages for spatial strategy

The Local Plan spatial strategy must proactively seek to minimise per capita emissions from both transport and the built environment, given the ambitious target of achieving net zero emissions at the Borough-scale by 2030. There is no target decarbonisation trajectory / carbon budget in place; however, it seems clear that opportunities missed early in the 2020s could lead to a required decarbonisation trajectory later in the decade that is unachievable. The LPR will have an effect on only a very small proportion of the Borough's emissions in 2030; however, there are important opportunities to be realised. Strategic planning for decarbonisation is a fast moving policy area;⁶⁵ however, at the current time, the five priority themes of a recent strategy document prepared by the three Local Enterprise Partnerships (LEPs) that cover the southeast of England present a useful framework for testing the LPR. In summary, these are: heating; efficiency; power; systems; and transport.⁶⁶ The Kent and Medway Energy and Low Emissions Strategy (2020) also provides an important framework, although it equally serves to highlight that the LPR is progressing in advance of work to establish county-wide strategies, programmes, investment frameworks etc (also a carbon offsetting fund) that will feed into Local Plans in years to come. Within this context, the LPR spatial strategy must distribute growth with a view to minimising per capita transport and built environment emissions, and, as part of this, consideration should be given to concentrations of growth / growth at scale, which can lead to particular opportunities, as explored through a recent study for the TCPA as part of their series on Garden City Standards.⁶⁷

Economy and employment

Firstly, by way of background, the adopted Local Plan summarises the strategic employment locations as follows:

- Town centres - with Sittingbourne town centre a particular focus of growth and change (Policy Regen 1);
- Sittingbourne - Ridham, Kemsley and Eurolink associated with the Milton Creek area to the north of the town and linking to the M2 primarily via the A249, including via the recently delivered Sittingbourne Northern Relief

⁶⁴ Renewable Energy for Kent: Baseline carbon emissions and projected domestic electricity and gas demands (AECOM, 2017)

⁶⁵ The Ten Point Plan for a Green Industrial Revolution explains that the Government will soon publish strategies and plans including the following: Net Zero Strategy; Heat and Buildings Strategy; Energy White Paper; Transport Decarbonisation Plan; Hydrogen Strategy.

⁶⁶ See southeastlep.com/our-strategy/energy-south2east

⁶⁷ See tcpa.org.uk/guidance-for-delivering-new-garden-cities

Road (although HGV traffic through Sittingbourne and along the A2 remains an issue); and Kent Science Park in a rural location to the south of the town, linking to M2 J5 via minor roads (the focus of Policy Regen 4 of the adopted Local Plan).

- Isle of Sheppey - Neatscourt located on the A249 to the east of Queenborough and forms part of the Queenborough and Rushenden regeneration area (Policy Regen 2); and Port of Sheerness, a “major” port and the focus of Policy Regen 3 of the adopted Local Plan.
- Faversham - the main industrial area is at the north west extent of the town, with the brewery complex toward the centre of the town another employment hub, and several other smaller existing and committed hubs around the edge of the town.

An immediate point to note is the limited potential to further expand the Borough’s largest employment hubs to the north of Sittingbourne and Faversham, because of flood risk and environmental constraints. This potentially suggests a need to consider new locations well linked to the strategic road network.

Issues and opportunities were explored through the Swale Employment Land Review (ELR, 2018), with findings including:⁶⁸

- Port of Sheerness - the Port has added space to its portfolio in recent years and there is unmet demand for new port related uses. However, the port land is outside of normal planning controls, and it is difficult to estimate how much land outside the port may be needed. In summary the future of this part of the economy is dependent on continued close working between the port operator and the Council.

There is also a need to consider recent changes to the national context, e.g. support for ports through the National Infrastructure Strategy (2020; including a Port Infrastructure Fund) and the Freeports consultation and prospectus (2020).⁶⁹

- Kent Science Park at Sittingbourne – is a highly constrained site and unable to grow. There are active proposals being promoted by the owners to address these constraints, including a new junction of the M2 and new local access, supported by major housing growth. It is important to consider these aspirations; however, an expanded Science Park would face “fierce” competition from elsewhere (new ‘non-Science Park’ uses would be deliverable). The ELR also finds: *“The scale of new jobs being promoted in this one area (>10,000)... may require a shift in commuting to fill all jobs envisaged.”*
- Existing employment land - existing sites generally remain attractive for ongoing employment use. For industrial property, whilst the vacancy rate is so low there is no rationale to proactively release property. For office demand vacancy rates are higher, but not so high to suggest that there is an oversupply of property which needs to be addressed by proactively releasing sites from the stock.
- Warehousing and distribution – the study concludes that *“if Swale is able and willing to identify new sites for this market, it is quite likely to attract demand”*, and it is important to note that demand may have increased since 2018. However, there are concerns, including in respect of low employee densities.
- Targets for new land –
 - Strategic industrial land – the ELR recommends 40 ha of new land mostly on sites capable for accommodating large unit demand (i.e. warehousing) with a focus on the west of the Borough. However, should sites not be available then the evidence suggests circa 20 ha is needed to meet local needs (i.e. excluding strategic warehousing), given the existing pipeline of committed supply.

Also, the figure decreases if a lower “5-year ‘margin’” is assumed, meaning an assumption that future losses of industrial land will not follow past trends. There is a strong argument for assuming a lower 5-year margin, because past trends (see Table 5.2 of the ELR) are skewed by an abnormally large loss in 2011 (Sittingbourne Paper Mill). Furthermore, the ELR is clear that if the margin does need to be provided for, then it “does not necessarily need to be provided today because the logic of the margin is that it may only be needed towards the end of the plan period”.
 - Offices and light industrial uses - up to 15 ha of new land focused to the east of the Borough in or around Faversham. There is scope for Faversham to compete with Canterbury by providing a quality supply, including flexible edge of town ‘courtyard’ type developments as per the two recent schemes (the Foundry and Eurocentre). There may also be some small scale warehouse demand to cater for last mile delivery to service the growing population in Faversham and possibly Canterbury.

⁶⁸ See services.swale.gov.uk/assets/planning%20policy%202019/employmentlandreview.pdf

⁶⁹ See gov.uk/government/publications/freeports-bidding-prospectus

- Roads infrastructure – the ELR concludes: *“For Sittingbourne; as part of our consultations, we have repeatedly been told that the western side of the Borough is a good location for growth partly because it is a cost efficient location to buy and develop land. But, also because firms can still access markets outside of Swale. A robust transport network has been vital to securing a new generation of warehouses in Swale. But this transport network is reaching capacity with access onto the M2 acting as strategic ‘pinch point’ at Sittingbourne. Improvements are planned at Junction 5 which may relieve the junction and benefit both Sittingbourne sites and also those on the Isle. However, this will not automatically address the local network and the lack of any ‘orbital’ route around the town that avoids the town centre. Consultees noted that Eurolink is a market attractive site but is effectively a ‘cul de sac’.... In the longer term a new M2 junction and southern link road may be part of the solution. This will certainly open up the Science Park which cannot be expanded without major investment in the local network. But we also note that should this be developed then it opens a large amount of market attractive land for commercial development which is highly likely to attract additional logistics demand. Faversham does not, as yet, suffer the same transport and connectivity problems. It is also the case that commercial development here tends to be smaller scale, meeting local needs, and less dependent on the strategic network. However, there are concerns that the network here will struggle to absorb demand for housing and commercial growth without some improvements to the local junctions – with accessibility to Canterbury being important given we think that Faversham could attract more demand for commercial property from Canterbury should additional land be allocated in the town.”*

Following on from the point made above regarding attracting demand from Canterbury, another point made by the ELR is that Swale has traditionally been seen as a more affordable location for businesses to locate relative to neighbouring Medway and Maidstone. In this respect it is also important to note that Maidstone BC has shown an interest in the economic ambitions of Swale BC,⁷⁰ in the sense that the option of unmet needs from Maidstone BC being provided for in Swale BC might be explored. However, the latest situation is that the draft Maidstone Local Plan (2020) proposes to provide for employment needs in full, including through a “prestigious business park at Junction 8 of the M20”. As for Medway Council, a statement of common ground is in place setting out that Swale BC is not being asked to provide for unmet needs; however, it is recognised that there is background pressure, with the possibility of unmet needs emanating from London and West Kent.

Further important recent context comes from the Kent & Medway Economic Partnership’s Economic Renewal and Resilience Plan (2020).⁷¹ The Plan focuses on responding proactively to the Covid-19 Pandemic over the period to 2020, concluding a need to focus on renewal and resilience.

Renewal	<p>The crisis is likely to lead to some permanent changes, as markets change, new technologies, ways of working and patterns of consumer behaviour become embedded: the future will not simply be about ‘recovery’ to the position that the economy was in before March.</p> <p>So as well as mitigating the negative impacts of the crisis, our response must support adaption, innovation and new ideas, renewing the economic environment and driving the growth of a cleaner, fairer and more productive economy.</p>
Resilience	<p>The crisis has highlighted the need for economic resilience – and has demonstrated both strengths and vulnerabilities.</p> <p>While our immediate priority is to respond to the current crisis, the actions that we take in the short to medium term must support our economic capabilities in the longer term. That means building in resilience to longer term change: taking action now to respond to the climate emergency and ensuring that our businesses and workforce are resilient and responsive to changing markets (especially following Brexit transition) and technologies.</p>

The Kent & Medway Economic Partnership is also supportive of the South East Local Enterprise Partnership’s Economic Strategy Statement (2019). The Statement includes a focus on the Thames Gateway, explaining: *“Parts of the South East also have particularly strong links to London’s future growth. In particular, a shared strategy for the Thames Gateway has been advanced for many years, most recently within the recent report of the Thames Estuary 2050 Growth Commission and with the development of more recent initiatives such as the Thames Estuary Production Corridor.”* The Statement goes on to explain that there is a need to: *“Work with partners to develop a new economic narrative for the Thames Estuary”.*

There is a focus on decarbonisation, and also the future of mobility *“with implications for... the way in which we plan towns, cities and transport systems.”* There is also a notable focus on ‘creating places’, including so as to put settlements *“on the ‘front foot’ in responding to new technology and changing work patterns”*, and there is also a focus on delivering “quality of life and quality of place”, including:

- Develop the ‘economic narrative’ both for our Garden Communities and other major settlements,
- Maximise investment in those assets that deliver long term quality of place and distinctiveness.

⁷⁰ See paragraph 2.67 at:

services.swale.gov.uk/meetings/documents/s11009/FINAL%20Looking%20Ahead%20consultation%20results%20Covering%20Item%20DP%20amends.pdf

⁷¹ kmp.org.uk/documents/Renewal_and_Resilience_Plan_-_August_2020.pdf

- Create places that will be successful for the long term, valuing the ‘natural capital’ and environmental quality that we enjoy in the South East, embedding it in place making and making the best use of technology to ensure that our communities are smart, resilient and sustainable.

Finally, the following are key statistics on unemployment locally, taken from the LPR document:

“Unemployment levels in Swale in October 2020 were 6.6%, above the South East average of 5.2% and Kent’s 6%. For comparison, as these figures will be affected by Covid-19, Swale’s unemployment in February 2020 was 3.6% compared to 2.9% in Kent and 2.1% in the South East.”

Key messages for spatial strategy

A primary objective for the LPR spatial strategy is to allocate new land for employment. As a minimum there is a need to provide for around 15 ha of new land to the east of the Borough, including around Faversham, for offices and light industrial uses. However, there is also a need to consider allocation of a significant amount of land in the west of the Borough to respond to the ‘larger-than-local’ need for warehousing in locations well linked to ports and London. It is difficult to conclude on the basis of the evidence available that there is an objective need for the LPR to allocate land for warehousing; nevertheless, there is a need to consider whether there are available and suitable sites. Finally, beyond allocating land for employment, there is a need to consider wider aims and objectives, including as set out within the Kent & Medway Economic Renewal and Resilience Plan (2020), which is focused on responding to the Covid-19 pandemic over the period to 2022; and also the South East Local Enterprise Partnership’s Economic Strategy Statement (2019), which includes a focus on the Thames Gateway, and also on “creating places” fit for the future.

Flood risk

A Level 1 Strategic Flood Risk Assessment (SFRA) was presented to the Local Plan Panel on 29th November 2019, and then a report on applying the ‘sequential test’ on 11th June 2020.

A key output of the SFRA is a map of flood zones (Figure E), which immediately serves to highlight areas unsuitable for new housing (flood zone 3b) and areas where housing could only be judged to be a suitable land use following the Exceptions Test having been passed, i.e. after it having been demonstrated that the benefits of housing in that location outweigh the flood risk disbenefit (following a detailed, site specific examination of flood risk). These zones cover much of Sheppey and most of the land to the north of Sittingbourne, Teynham and Faversham.

Also, the study identifies “surface water functional flood zones” associated with around seven dry valleys emanating from the Kent Downs, which the study treats as the equivalent to flood risk zone 3.

The study also identifies a small number of areas as falling within flood risk zone 2, where housing is a suitable use so long as it can be demonstrated that the sequential test has been passed, i.e. it can be demonstrated that there are not alternative locations at lower flood risk where development would achieve broadly the same aims and objectives.

Finally, another key map output of the study shows the extent of land at risk of a 1 in 200 year tidal flooding event in 2070 under a climate change scenario, with the area at risk broadly corresponding to the area currently understood to fall within flood risk zone 3.

In light of the SFRA, a key aim for the spatial strategy is to direct growth away from flood risk zones as far as possible, mindful of risks and uncertainties associated with climate change. As part of this, there is a need to take a precautionary yet proportionate approach to taking into account site specific proposals / likely approaches to developing sites, both with respect to avoiding and mitigating flood risk and delivering benefits that might serve to outweigh residual flood risk, mindful that the NPPF (paragraph 163) sees an important role for site specific flood risk assessments in support of planning applications.

Finally, the LPR should take a proactive approach to addressing flood risk that goes beyond simply directing growth away from flood risk zones. Paragraphs 155 to 161 of the NPPF, which deal with flood risk and Local Plans, notably raise:

- *Cumulative impacts in, or affecting, local areas susceptible to flooding* – although it is inherently challenging, in practice, to suggest that any given development, let alone developments in-combination, will lead to increased downstream flood risk, given the potential to design developments so as to store water and slow surface water runoff.
- *Safeguarding land from development that is required, or likely to be required, for current or future flood management* – such land will typically be in flood zone 3b, where there is limited potential for development, but

can potentially be in flood zone 3a, where there is some potential for development, hence there can be merit in safeguarding through the Local Plan.

A related consideration is the need to fund such flood management interventions and, in particular, new Flood Storage Areas (FSAs) in the flood plain, which can be a spatial strategy / site selection consideration, in that strategic growth in proximity may be able to fund interventions of this nature, in particular where the effect is to create a new area of open / green space that is of recreational value. However, it is not clear that opportunities present themselves in the Swale context (in particular, it is not clear that FSAs could be an appropriate response to the surface water functional flood zones shown in Figure E).

Managed coastal retreat / coastal realignment essentially equates to creation of an FSA, and there are opportunities in Swale Borough; however, there are limited implications for the LPR, as potential locations will invariably be some way distant from locations under consideration for growth. A further consideration is the possibility of growth supporting investment in coastal defences; however, it is not clear that this is an appropriate objective for the LPR spatial strategy.

Key messages for spatial strategy

Extensive flood risk affects the Borough's coastline and that part of the Borough associated with the Swale, and there are also around seven dry valleys emanating from the Kent Downs associated with surface water functional flood zones. There is a need to avoid flood risk as far as possible, taking account of the risks and uncertainties associated with climate change, albeit mindful that steps can be taken to avoid and mitigate flood risk at the site level. There is also a need to recall that development in areas at risk of flooding can be appropriate in exceptional circumstances, which is an important consideration on the Isle of Sheppey, where there can be a need to balance flood risk and regeneration objectives. Finally, there is a need to be mindful of proactive approaches to addressing flood risk through Local Plans, for example supporting investment in new flood storage areas; however, it is not clear that any opportunities present themselves that might serve to have a bearing on the LPR.

Figure D: Watercourses in Swale (from the Green and Blue Infrastructure Study, 2020)

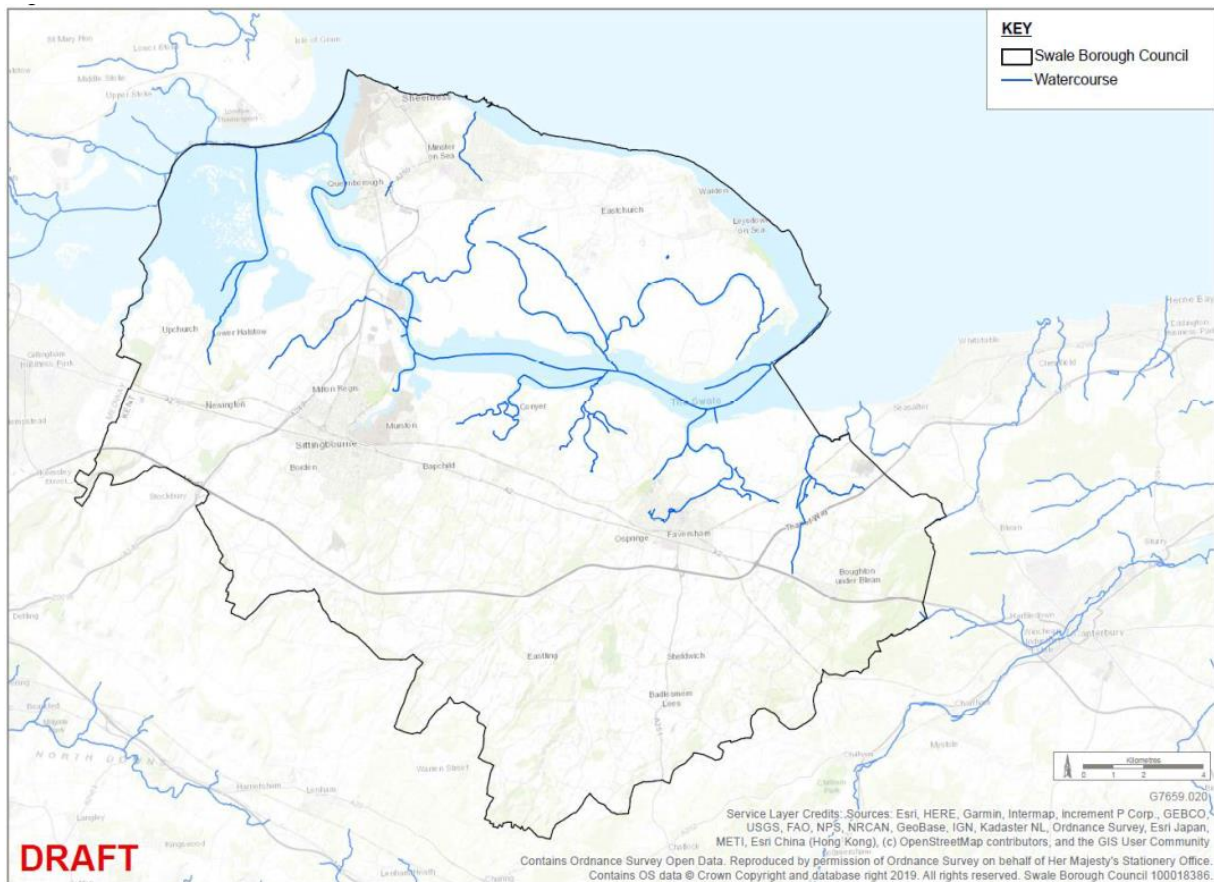
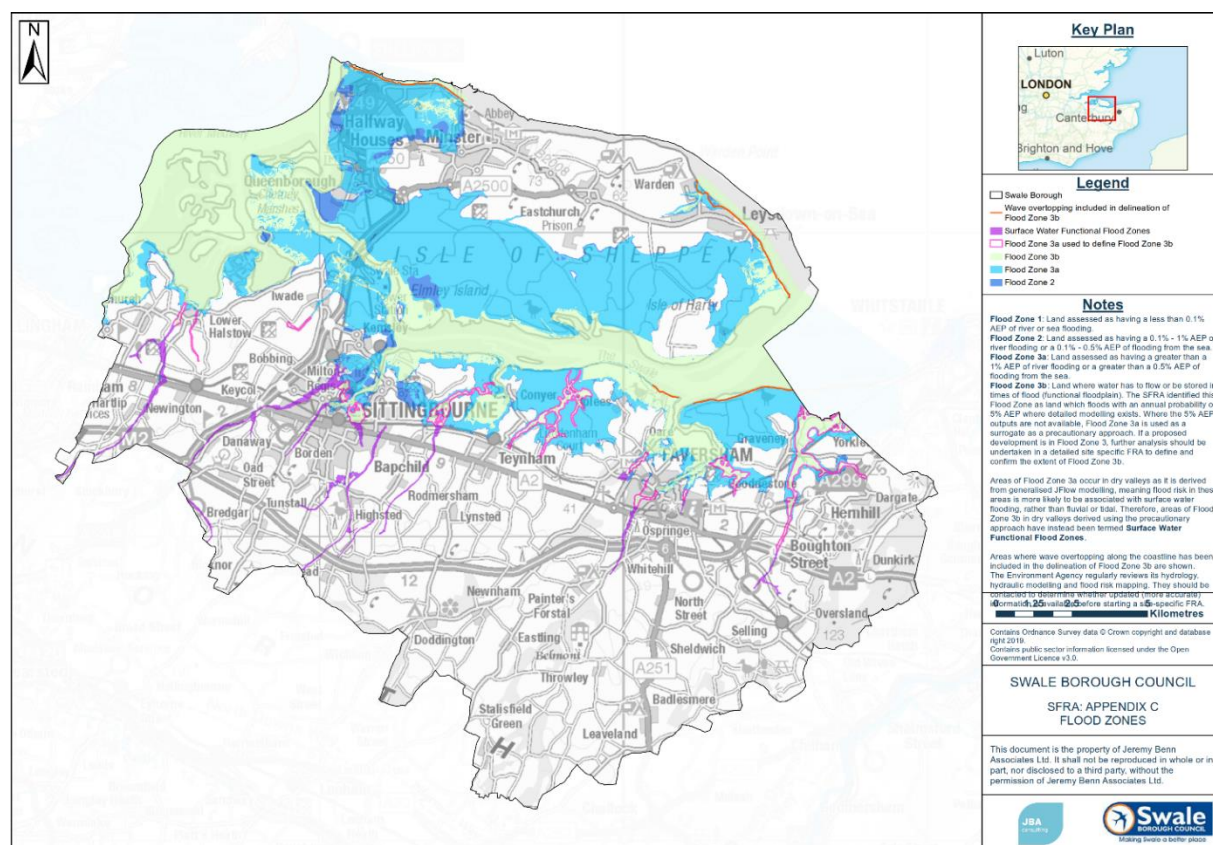


Figure E: Map of flood zones

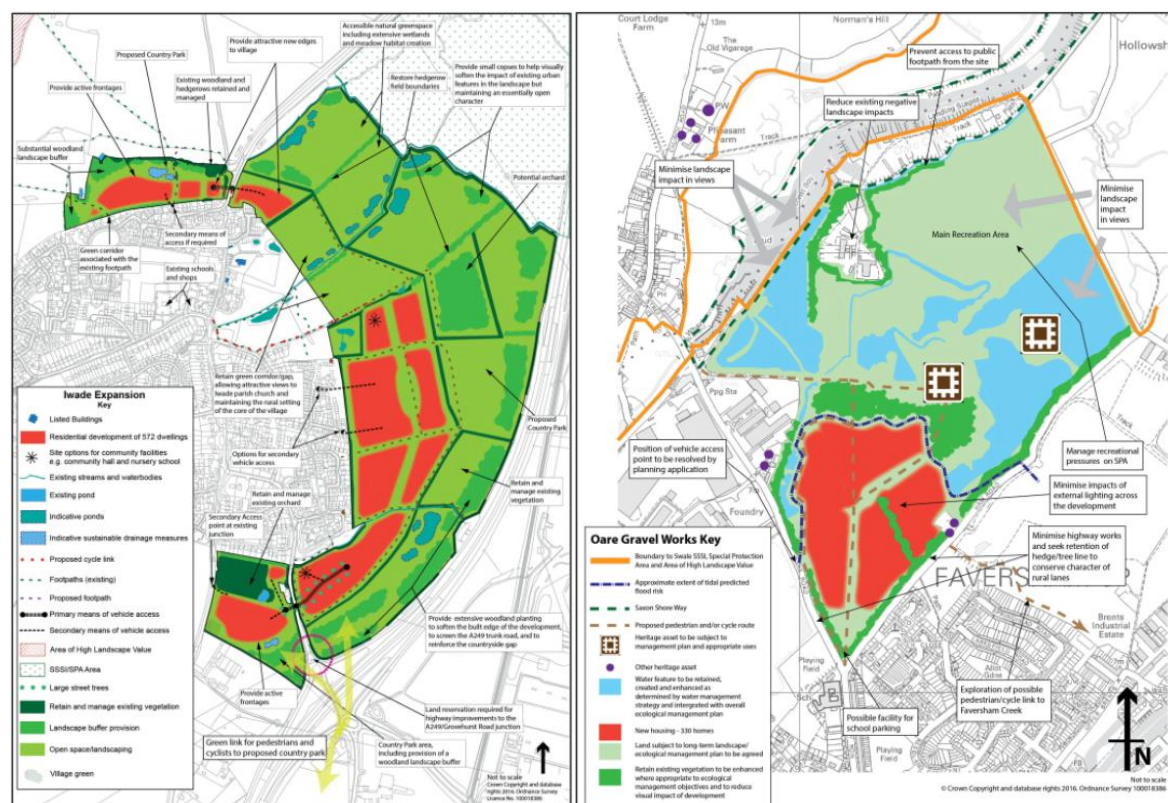


Green and blue infrastructure

A Green and Blue Infrastructure Study was presented to the Local Plan Panel on 20th September 2020. Many of the assets and initiatives discussed are of limited relevance for the LPR because they relate to the coastal zone, the AONB or the Blean Woodlands, i.e. locations that will not be a focus of growth through the LPR. Other matters discussed are considerations for masterplanning and urban design (and, in turn, development management policy) more so than spatial strategy and site selection; however, the Study does also serve to highlight a range of relevant issues and opportunities.

By way of context, it is also important to examine what was achieved through the adopted Local Plan (2017). A range of strategic green infrastructure has been delivered, or is being delivered, as a result of the Local Plan spatial strategy. Most notable is the extensive area of new country park and other accessible natural greenspace that is being delivered as a result of the strategic expansion of Iwade, and which will link to existing strategic green infrastructure (including Milton Creek Country Park) to the north of Sittingbourne – see Figure F. Also of particular note is the Oare Gravel Works allocation, to the north of Faversham, where a central aim of the allocation is “conservation, enhancement, and long term management of the site’s ecological and heritage assets”. In both cases the land that is a focus of green infrastructure enhancement could never have alternatively been developed, given the extent of constraints (including flood risk and SPA); however, it is nonetheless the case that funds raised through development will serve to deliver major green infrastructure benefits over-and-above a baseline situation whereby the land would be subject to less management and be less accessible to the public.

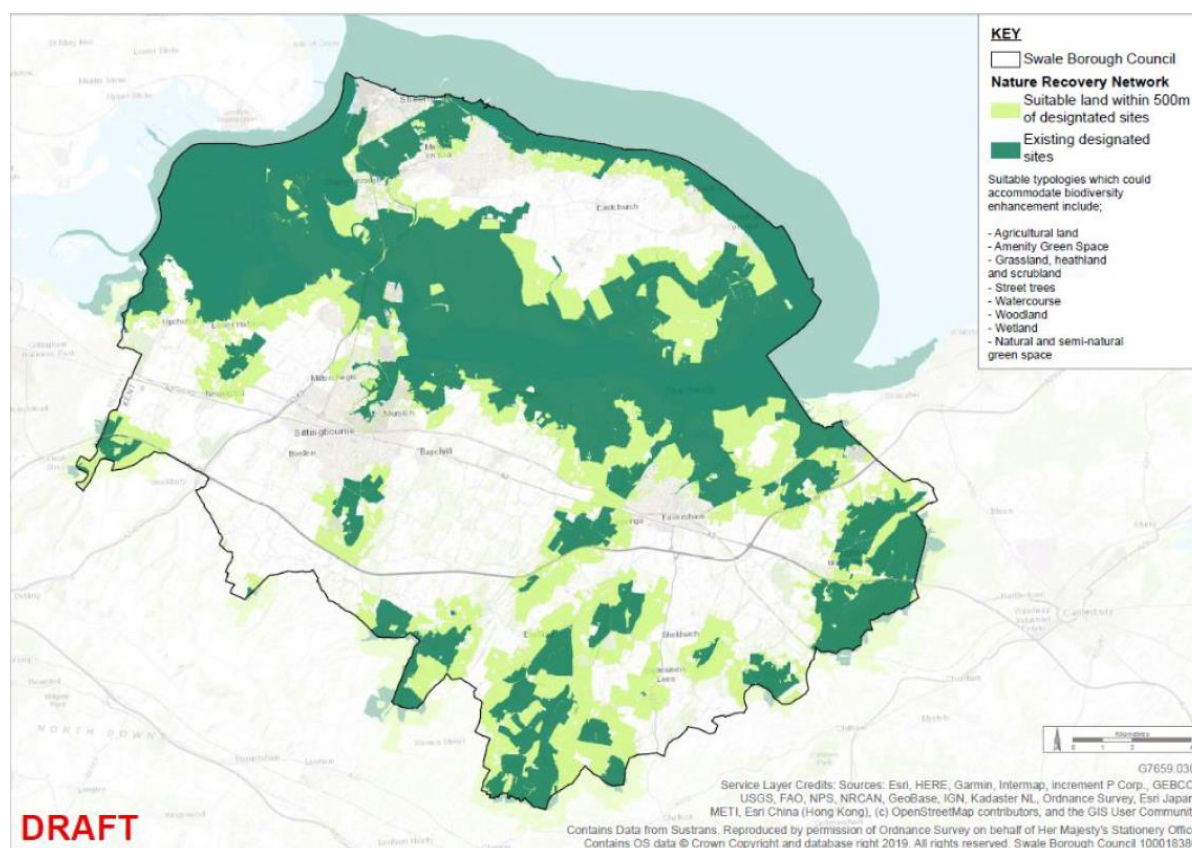
Figure F: Two key allocations in the adopted Local Plan delivering new strategic green and blue infrastructure



Potential opportunities to be realised through LPR spatial strategy and site selection include:

- New strategic green grid routes – the Swale BC Green Grid Study (2016) identified the potential for four new routes linking Newington, Sittingbourne (2) and Teynham to the AONB to the south, via villages with pubs and places of interest.
- Sheppey – stands out on the basis that A) there are extensive areas where communities experience high levels of multiple deprivation; and B) whilst there is extensive green and blue infrastructure, much of it has low multifunctionality.
- Blue infrastructure – Boughton stands out as a settlement associated with a watercourse (as opposed to a dry valley), namely the White Drain, which the Study identifies as being associated with a significant enhancement opportunity.
- Links to biodiversity and flood risk objectives – as discussed above. For example, the Study identifies a possible Nature Recovery Network for Swale – see Figure G.

Figure G: Existing international, national and locally designated sites plus adjacent land



Key messages for spatial strategy

There is a need to realise opportunities for growth to deliver or facilitate delivery of strategic green and blue infrastructure. Inspiration can be taken from the achievements of the adopted Local Plan; however, opportunities might be harder to come by for LPR, in that there will be a need to look beyond enhancing land subject to flood risk and SPA constraint, recognising limited further growth opportunity to the north of Sittingbourne and Faversham. The Isle of Sheppey could well warrant being a focus of efforts to deliver enhanced strategic green and blue infrastructure, given a prevalence of communities that experience relatively high levels of multiple deprivation, and given limited existing green and blue infrastructure offering high multifunctionality. Creation of new walking / cycling / green links between the A2 settlements and the AONB is another strategic opportunity potentially to be explored.

Heritage

A Heritage Strategy and Action Plan as presented to the Local Plan Panel on 3rd September 2020.

- Aviation & defence – with a particular focus on Shepway given the strategic importance of Sheerness Docks and the role of Eastchurch in the early history of aviation.
- Industrial heritage – including brickmaking (northern mainland part of the Borough); gunpowder manufacturing (Faversham); brewing (Faversham); and paper making (Sittingbourne).
- Maritime and transport heritage – including barge traffic and boatbuilding (widespread, but most notably Milton Regis); Cinque Port (Faversham); bridges and ferries (Sheppey); roads and pilgrims (Watling Street; the A2); Victorian and Edwardian Railway expansion (Sittingbourne and Faversham);
- Agricultural, horticultural and rural heritage – most famously fruit and hop growing and picking; but also marshland farming and mixed farming and woodland management in the Kent Downs AONB.
- Towns and high streets – for example, Sheerness developed around the Royal Naval Dockyard and in part as a Victorian and Edwardian seaside resort; and Queenborough was a planned medieval town following the building of a castle.
- Villages and hamlets – “A good example of a village and series of smaller hamlets with heritage interest can be found within the parish of Borden (immediately southwest of Sittingbourne).”

- Churches, chapels and memorials – including scheduled monuments and many grade 1 listed parish churches, often prominent within the landscape.
- Historic landscapes – including, but not limited to, the grounds of four grand houses (Lees Court, Belmont House, Doddington Place and Mount Ephraim) now on the national Register of Parks and Gardens.
- Archaeology – “Swale has an incredibly rich and varied archaeological resource. This richness is a legacy of its strategic location at the mouth of the Thames and Medway rivers, it lying astride the principle conduit of people and trade between the continent and London, together with its varied geography including coast, marshland and chalk downs which have been exploited by peoples since ancient times.”

Key messages for spatial strategy

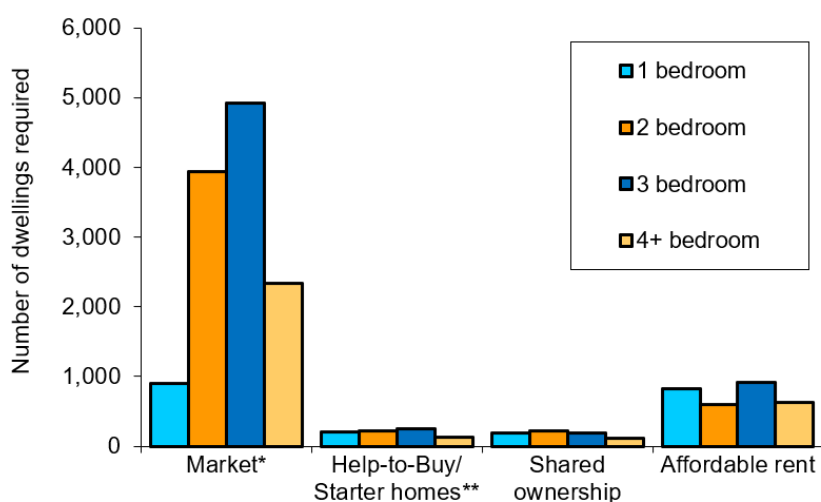
There is the potential for spatial strategy and site selection to support the conservation and enhancement of both historic assets and historic landscapes. As set out in the Heritage Strategy, there is the potential to support “positive management of the borough’s heritage, and capitalizing on the physical and economic regeneration this can bring.”

Housing

Two studies were presented to the Local Plan Panel on 9th July 2020, one dealing with Local Housing Needs (LHN), with limited implications for spatial strategy, and the other presenting a Housing Market Assessment. The Housing Market Assessment reaches conclusions on the following matters with implications for spatial strategy and site selection:

- Tenure split – around 28% of new housing delivered will need to be affordable, that is available for below market rates to those able to demonstrate that they cannot meet their needs in the market. This has implications for spatial strategy in so far as it has implications for viability, which varies spatially. It is challenging to deliver 28% affordable housing on Sheppey in particular (indeed, the Policy DM8 of the adopted Local Plan requires 0% affordable housing on Sheppey).
- House-size split – there is a clear need for family sized homes more so than flats – see Figure H. This has implications for site selection and density assumptions.
- Specialist accommodation – including for disabled and older people. Strategic sites can have the benefit of delivering specialist accommodation alongside typical market and affordable housing.

Figure H: Requirement for all new housing in Swale over the plan period



There is also a need for new Gypsy and Traveller pitches, drawing on the Swale Gypsy and Traveller Accommodation Assessment (GTAA, 2018). The GTAA concluded (for the period 2017 to 2038): “... a cultural need for 76 pitches and a PPTS need for 59 pitches (after considering the households who met the definitions of travelling set out in the PPTS). The Local Plan should acknowledge this level of need. However, taking into account turnover on local authority sites and the potential expansion/intensification of existing sites... the cultural need could be reduced to 14 pitches and PPTS need addressed (however this would be dependent on a turnover of 8 pitches on Council sites... and an additional 54 pitches becoming available on existing authorised sites).” The GTAA also identified the need for one new Travelling Showperson plot.

Key messages for spatial strategy

In addition to meeting the overall housing target, there is also a need to deliver an appropriate mix of housing, in respect of both tenure (affordable housing) and size (family housing); and there is also a need for specialist accommodation including to meet the needs set out within the Gypsy and Traveller Accommodation Assessment (GTAA, 2018). These considerations can serve to suggest a need to focus housing in locations where development viability is highest, and potentially favour strategic sites.

Infrastructure

An Infrastructure Delivery Plan Scoping Study was presented to the Local Plan Panel on 11th June 2020. As an initial point, it is important to make the distinction between:

- current infrastructure issues and opportunities that could be exacerbated or addressed as a result of the LPR; and
- the infrastructure needs / issues that will be generated as a result of the LPR.

This point is borne out from the following statement made as part of the report by officers to members reporting on the findings of the Looking Ahead consultation explains:¹³ “[T]he reality will be that the vast majority of future infrastructure provision will be developer led. The degree to which this will be a continuance of an infrastructure bolt-on approach or a more settlement wide approach will be a matter dependent upon the next Local Plan settlement strategy.”

The June 2020 report to members explains:

“The initial stage of preparation is also looking at an overview of current infrastructure quality and capacity to identify any infrastructure issues which could be barriers to growth. This is drawing from the responses to the 2018 ‘Looking Ahead’ consultation, the outcomes of a workshop held with infrastructure providers in June 2018 (see Section 5) and completed and emerging Local Plan evidence base reports, such as the ongoing traffic modelling work. The ‘Looking Ahead’ consultation and infrastructure workshop identified the following key infrastructure issues as matters to be addressed: M2 Junction 7; M2 Junction 5/A249; Sittingbourne Northern Relief Road; A2 and A249 corridors; Education provision, particularly the provision of secondary school places; Primary healthcare provision; Rail station improvements.”

Taking each of these matters in turn:

- M2 Junction 5/A249 - the National Road Investment Strategy (RIS 2, 2020) committed to commencing an upgrade, and this work is due to complete by 2024/26.⁷² The extent of headroom capacity for growth beyond that which is committed is unclear, and topography constrains and further upgrade.

There is a need to note the proposal for a new Junction 5a to the south of Sittingbourne to serve an expanded Sittingbourne Science Park and significant housing growth, which is another one of the strategic site options discussion in Section 6.

For completeness, there is also a need to note Junction 6 (A251). This is a more minor junction which operates satisfactorily. New strategic site options nearby (south of Faversham) are a consideration for this Local Plan (see Section 6), which might need to deliver non-strategic upgrades, likely in the form of signalisation.

- M2 Junction 7 (A2 / A229, known as Brenley Corner) - RIS 2 identifies upgrades as a ‘pipeline’ scheme for the future. There is also an ambition for ‘interim’ upgrades, as discussed in the adopted Local Plan; however, the timetable is uncertain. This is a national accident hotspot.⁷³
- Sittingbourne Northern Relief Road - the adopted Local Plan safeguards land within which route options might be explored to deliver the final section of the NRR, which would link the Sittingbourne industrial and commercial areas, including the Eurolink estate, to the A2 in the vicinity of Bapchild. The value of this final section in combination with a new road linking to a new M2 junction to the southeast of Sittingbourne is clear, in that it would relieve pressure on Sittingbourne town centre (the A2) and the B2006 (another air pollution hotspot), and this is an option for the Local Plan (discussed below); however, the value of the final NRR section on its own is less clear, with no plans to bring forward the scheme.

⁷² See highwaysengland.co.uk/our-work/south-east/m2-junction-5-improvements/

⁷³ See assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/600312/Kent_Corridors_to_M25_Final.pdf

- A2 corridor – the A2 is a central spine road directly serving all of Swale’s main settlements other than Iwade and those on the Isle of Sheppey. Only Boughton and Sittingbourne town centre are effectively bypassed, which leads to major issues with traffic, including HGVs, passing through town and village centres. Air pollution is one such issue, with AQMAs declared at Newington, Sittingbourne, Teynham and Ospringe (southern extent of Faversham), as well within Rainham in Medway, immediately to the west of Swale. Teynham is one location where there is an aspiration for a bypass or relief road.
- A249 corridor - the adopted Local Plan discusses committed improvements at the Key Street (southwest of Sittingbourne) and Grovehurst (northwest of Sittingbourn / Iwade) and states that the Bobbing junction (west of Sittingbourne) may also need to be reassessed.⁷⁴

For completeness, there is also a need to note the A2500 Lower Road, Sheppey, which is known for suffering problematic traffic congestion in the summer tourism season, adding to issues of rural isolation for residents of eastern Sheppey. The adopted Local Plan discusses a programme of improvements, with significant funding generated from housing growth (in particular the 620 home Barton Hill Drive scheme); however, there remains an aspiration for further upgrades.

- Education provision – following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, given limited surplus capacity at the two existing secondary schools (one grammar and one non-selective), limited potential for expansion (particularly the grammar school, which is in a constrained central location) and committed growth (noting that catchment areas stretch to include Canterbury District). KCC has been actively exploring potential locations for a new secondary school, but options are limited. Latest understanding is that the secondary school would come forward at the site directly to the east of Faversham.
- Primary healthcare provision – there is currently limited understanding of locations in the Borough where there is a need to improve access to primary healthcare; however, Newington stands out as a higher order settlement lacking a GP surgery, and that there is no GP surgery within the rural part of the Borough, to the south of the M2. There is also understood to be a desire to explore the option of a general hospital locally. A 2018 workshop with Swale Clinical Commissioning Group (CCG) found that primary care is the key issue, with GP lists in Swale significantly higher than the national average (2,500 versus 1,800), but that *“acute hospital provision [is] an issue, with travel from Swale a particular concern.”*⁷⁵
- Rail station improvements - the Borough is very well served by rail, with the nine stations mostly serving the higher order settlements, with the notable exception of Selling Station at Neames Forstall (nearby to the village of Selling). The Kent Routes Study (2018) identified the possibility of a new rail link between Faversham and Ashford, to relieve pressure on the problematic A251; however, the conclusion reached is that commuting for employment between the two towns is currently insufficient to warrant giving the link further consideration (plus there are topography and environmental challenges).

Key messages for spatial strategy

Delivering new and upgraded strategic infrastructure to ‘consume the smoke’ of new development, as well as potentially to address existing issues / realise opportunities, is a key issue for spatial strategy and site selection, and can suggest a need to concentrate growth such that economies of scale are achieved that serve to generate the required funds. Furthermore, there is a need to take careful account of the likelihood and timing of *very strategic* infrastructure upgrades that are largely outside the control of the LPR, most notably motorway junction upgrades, and also liaise with County-level, sub-regional and national organisations in respect of plans and aspirations for new *very strategic* infrastructure.

Kent Downs AONB

The draft AONB Management Plan was presented to the Local Plan Panel on 3rd September 2020.

Focusing on the section dealing with “vibrant communities”, there is a notable focus on the House of Lords Select Committee on Rural Economy, including the following quote:

“Rural communities and the economies in them have been ignored and underrated for too long. We must act now to reverse this trend, but we can no longer allow the clear inequalities between the urban and rural to continue

⁷⁴ See <https://kccconsultations.inconsult.uk/consult.ti/A249swalejunctionimprovements/consultationHome>

⁷⁵ See services.swale.gov.uk/meetings/documents/s11012/Appdx%20IIa%20Infrastructure%20Workshop%20Note%2012jun18.pdf

unchecked. A rural strategy would address challenges and realise potential in struggling and under-performing areas, and allow vibrant and thriving areas to develop further. Doing nothing is not an option."

Another highly relevant quote from the Government's Landscape Review (2019) is also presented: *"One thing stood out, talking to people in the course of this review and examining the responses to our call for evidence. They worry that longstanding communities feel under great pressure, and point in particular to house prices and jobs."*

In addition to housing and jobs, another key matter of relevance to the LPR is the maintenance of village services and facilities, with the Management Plan explaining: *"There has been long run concern about the decline in community and village services such as village shops, post offices, churches and pubs. Consequently the loss of such assets can trigger the creation of community run enterprises which in themselves are a community development catalyst and can be a vehicle to support a sustainable local economy which supports landscape character there are several examples across the AONB of successful community run facilities working alongside more 'traditional' businesses."*

The plan does not call for new market housing, let alone Local Plan allocations. Rather, it calls for (sensitively located and designed) *"affordable housing for (i) those with proven local needs, and (ii) workers whose activities directly contribute to the purposes of the AONB designation."* There is also strong support for the preparation of Neighbourhood Plans.

The section of the Plan dealing with "sustainable development" is of relevance, including discussion of remoteness, tranquillity and dark skies. These are described as recurring themes, and the Plan points out support in the NPPF (paragraph 180) for protecting areas of tranquillity. The section on sustainable development lists a range of issues and threats, including:

"Cumulative loss of landscape features, tranquillity and character and suburbanisation has been experienced in the AONB due to incremental poorly located, designed and badly screened development, leisure uses, intensive agricultural and forestry practices, pressure from traffic and significant levels of urban growth and development."

Finally, the Plan presents helpful analysis of changing attitudes to towards the AONB over time, as understood from surveys going back 15 years. The analysis serves to highlight significantly increased concern regarding maintenance of tranquillity and dark skies, and increased concern regarding rural lanes and other highways is also of note.

Looking Ahead consultation

By way of further context, it is important to note the following statement made within the 28th October 2018 report to the Local Plan Panel, which sought to communicate key messages received through the Looking Ahead consultation (2018):

"There was recognition that designations can prevent new development being located in the most sustainable areas and can put extra pressure on undesignated land. It was considered that some development in the AONB could be less damaging than outside an AONB."

Also, the detailed report presented to the Local Plan Panel, which presented a lengthy table summarising key messages received through the Looking Ahead consultation, explained:

"[The Kent Downs AONB Unit is not] opposed to any new housing in the AONB, particularly if development increased the supply of affordable housing for those with proven local needs. However, it would need to relate well to existing villages, be of a limited scale and complimentary to local character in form, setting, scale and contribution to settlement pattern. Advocate the use of landscape capacity studies to ascertain the capacity of AONB villages. Opportunities for growth at Neames Forstal are considered very limited."

Key messages for spatial strategy

There is a need to avoid major development in the AONB unless there are exceptional circumstances, and no such circumstances have been suggested in the Swale context. The LPR could consider the possibility of modest allocations in the AONB, with a view to addressing local housing needs and potentially also supporting rural employment and the maintenance of rural services and facilities; however, there does not appear to be support for this approach within the Kent Downs AONB Management Plan, given the potential role of Neighbourhood Plans. Neames Forstal is a key location for consideration, recognising that it has a rail station. Finally, there is a need to consider constraint posed by the setting of the AONB, which extends north of the M2 to include extensive areas of land to the south of A2 settlements that come into consideration as potential locations for growth.

Landscape

Three landscape studies have been prepared recently to inform the LPR: a Landscape Designation Review (2018); a Landscape Sensitivity Assessment (2019); and an Important Local Countryside Gaps study (2020). Also, an important starting point for considering landscape is topography locally and the landscape character areas – see Figures I and J.

The Landscape Designations Review examined all of the existing locally designated landscapes, which fall into two tiers (Kent level and Swale level), before concluding that all of these locally designated areas should be taken forward through the LPR, and that several of the existing local designations should be extended. The study also proposed that there should be just one level of local landscape designation (as opposed to two). Figure K shows the proposed local landscape designations.

Much of the land falling within a proposed local designation is subject to wide ranging constraint (notably flood risk and SPA); however, areas of note are:

- Blean Edge Fruit Belt – constrains land north and south of Boughton, including land east of Selling Station;
- Lower Halstow - Iwade Ridge – could feasibly serve to ‘frame’ growth to the east at Bobbing / Iwade;
- Kent Downs: Rodmersham, Milstead and Highsted dry valleys – is a constraint to growth southeast of Sittingbourne;
- Kent Downs: Syndale Valley - is a constraint to growth southeast of Sittingbourne;
- Kent Downs: North Street Dip Slope – is a constraint to the new settlement option to the south of Faversham;
- North Kent Marshes - the vast bulk of this area is not in realistic contention for growth; however, a site to the southwest of Rushenden is under consideration as a potential location for growth;
- The Blean – constrains Dunkirk and other land to the east of Boughton.

The Landscape Sensitivity Assessment examined landscape parcels surrounding the main settlements, in the knowledge that these are locations that naturally come into consideration as potential locations for growth. Findings are presented in Figures L and M, with the following points of particular note:

- East of the Borough – is highly constrained, other than land to the east / southeast of Faversham;
- Land to the west of Bobbing – is a notable area of limited constraint; also the Leysdown area.
- Newington and Teynham – area associated with a mixed picture, with some areas of limited sensitivity.

Finally, with regards to the Important Local Countryside Gaps study, this examined five *potential* Important Local Countryside Gaps that might be designated through the LPR, in addition to the existing designated Important Local Countryside Gaps, which (the study explains) can safely be rolled forward into the LPR. Figure N shows the existing and potential new designations. With regards to potential new designations, the study finds that all meet the criteria for designation, although there is a slight question mark regarding the Faversham to Ospringe gap, as this is *“a small area, and Faversham and Ospringe have to some extent already coalesced.”*

Key messages for spatial strategy

Landscape sensitivity/capacity outside of the AONB varies significantly across the Borough. Some of the more sensitive areas are also constrained in wider respects, such that they are not realistically in contention for significant growth through the LPR; however, there are some sensitive landscapes that must be considered as potential locations for growth given wider LPR objectives, perhaps most notably land to the southeast of Sittingbourne. A ‘landscape-led’ approach to spatial strategy and site selection would serve to suggest a need to focus particular attention on the Bobbing area, Leysdown, land to the east and southwest of Faversham and also potentially some areas around Newington and Teynham.

Figure I: Variation in topography across the Borough (source: SFRA)

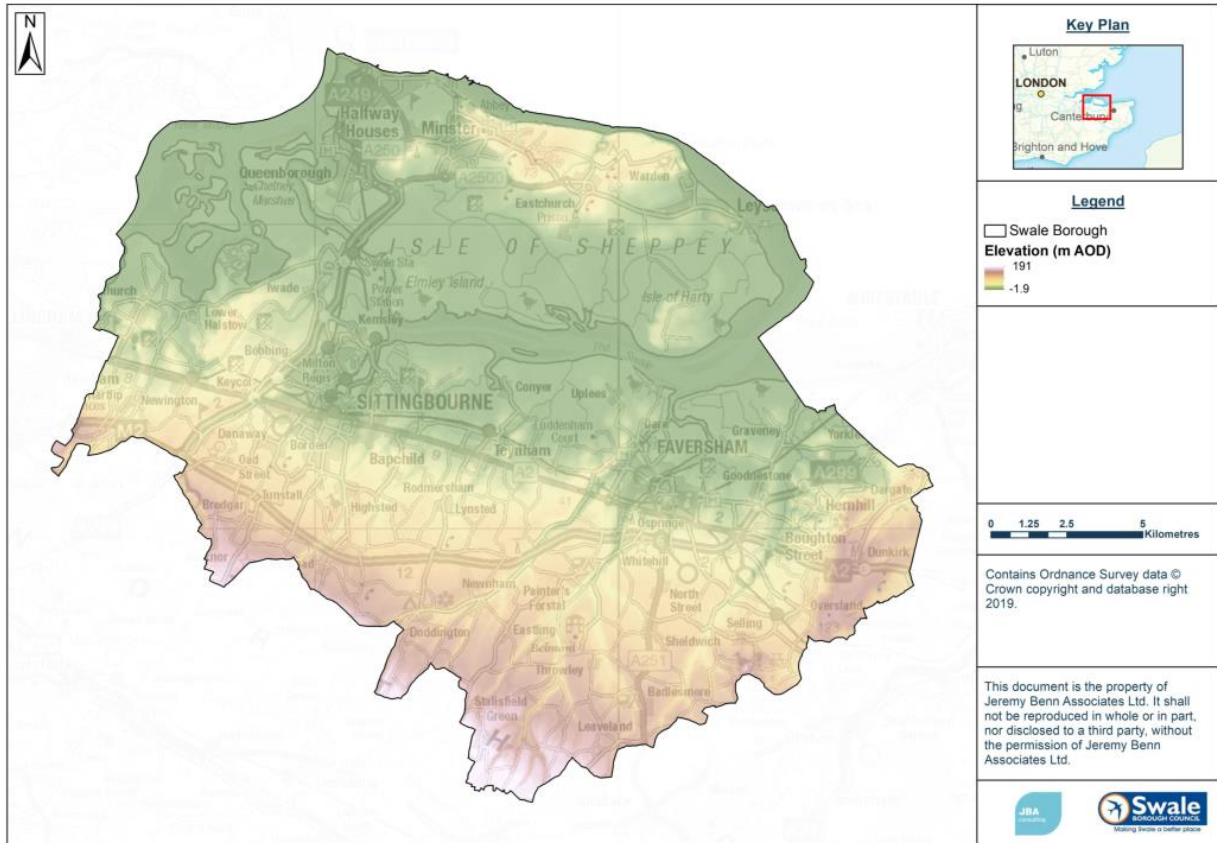


Figure J: Landscape character areas across the Borough

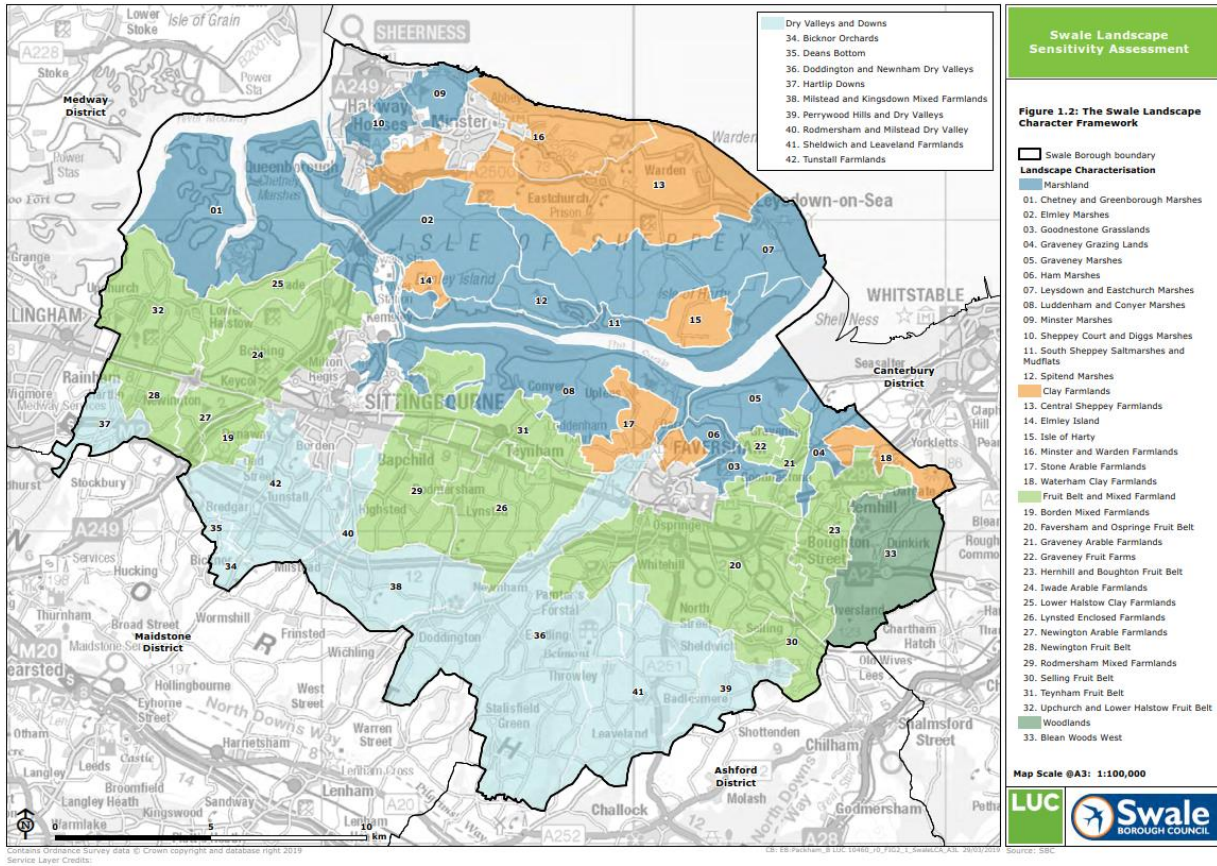


Figure K:: The AONB and proposed local landscape designations

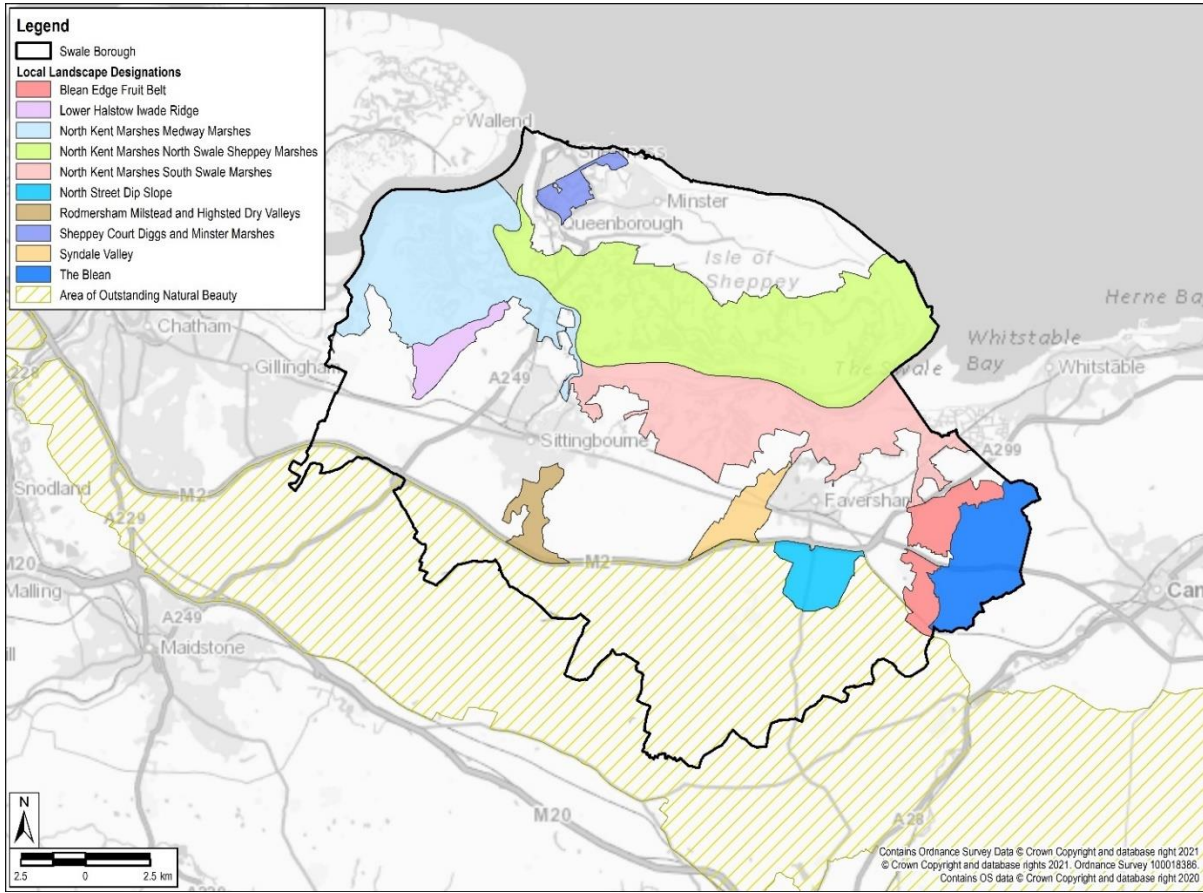


Figure L: Sensitivity to housing

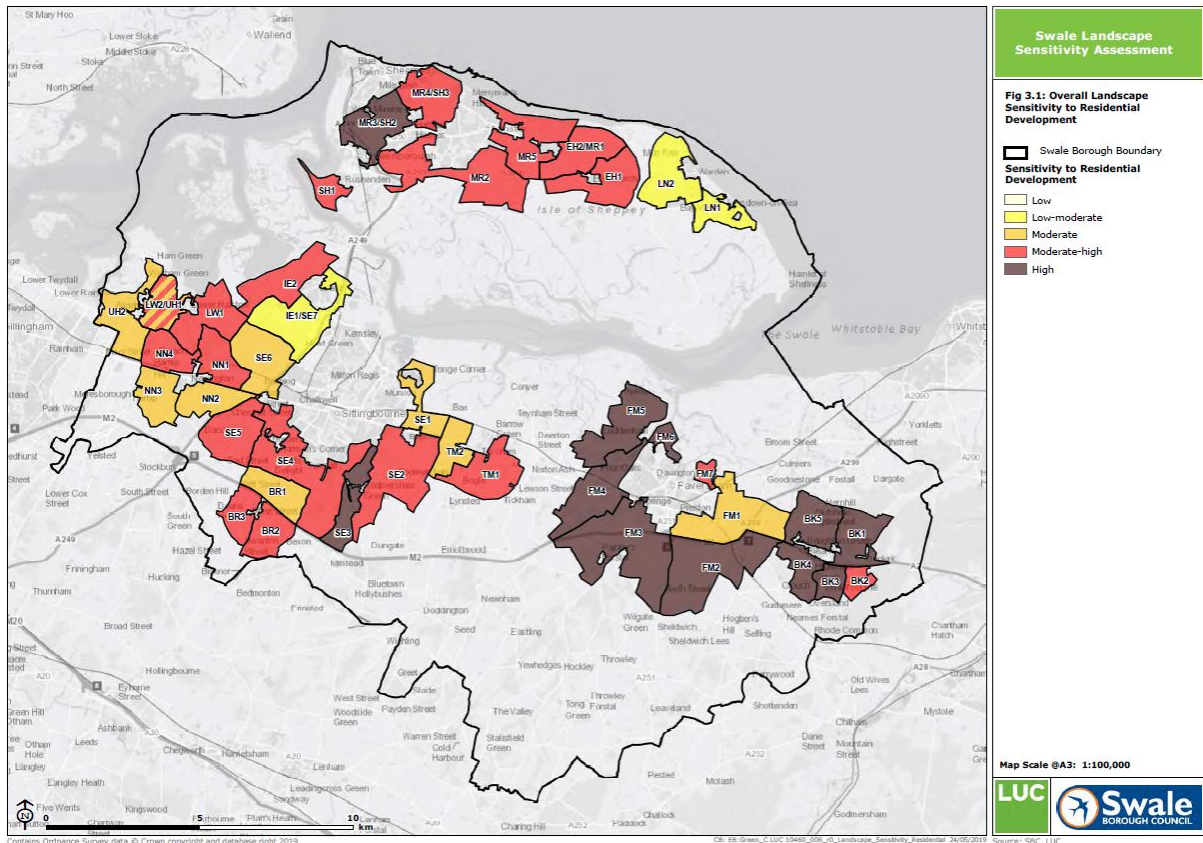


Figure M: Sensitivity to employment

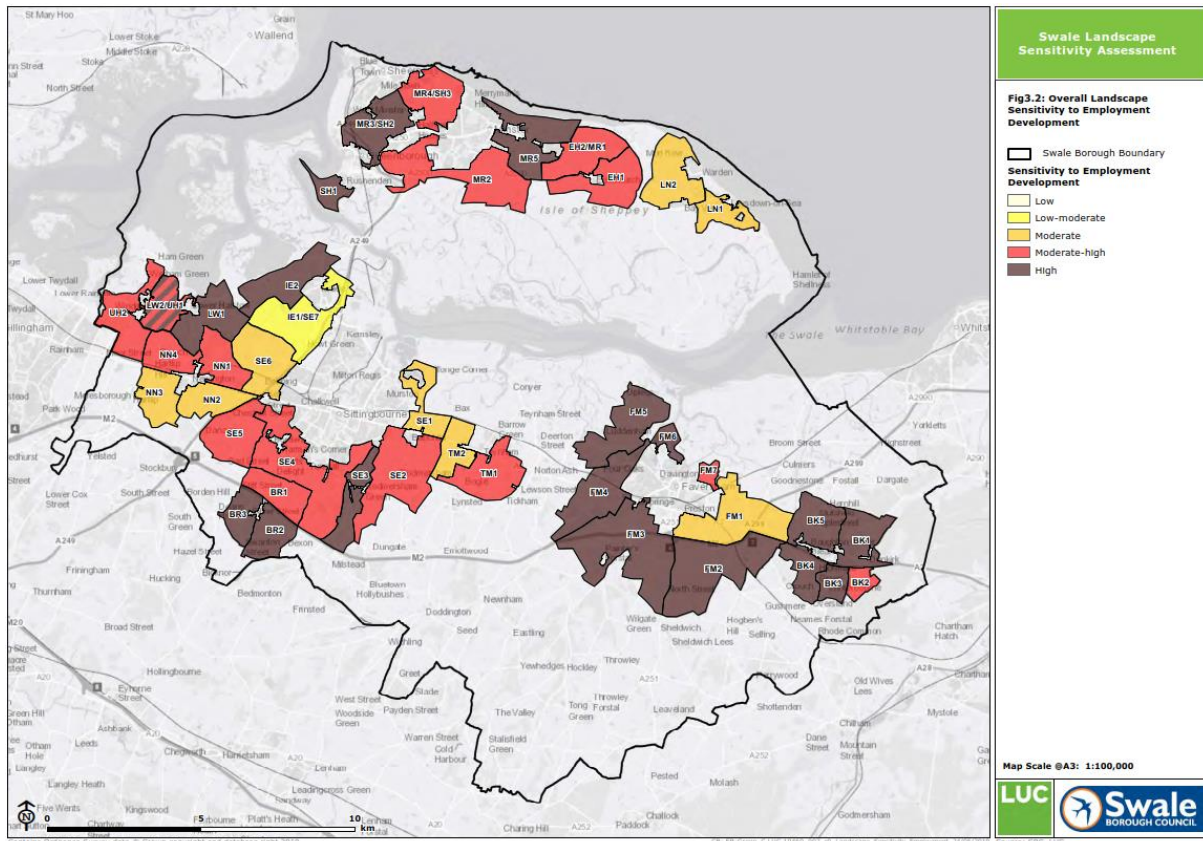
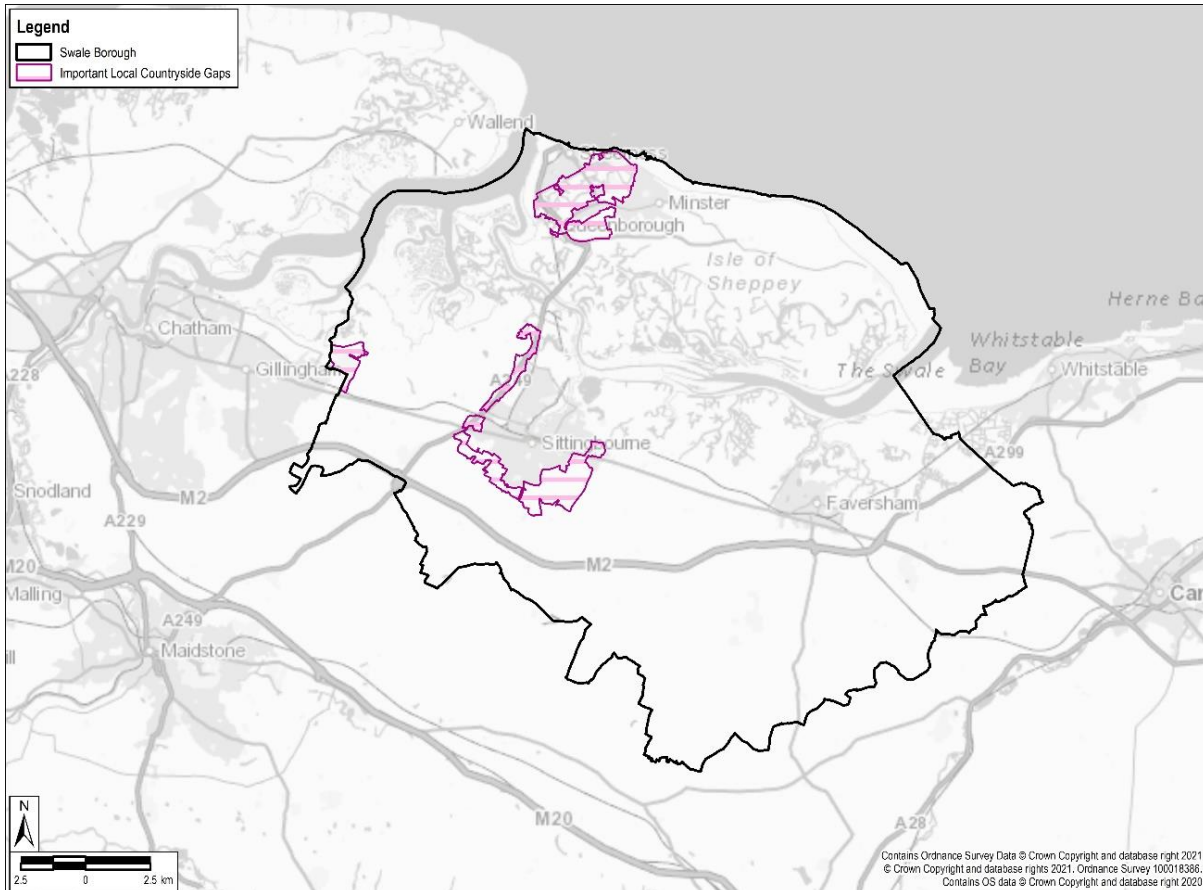


Figure N: Existing and potential new Important Local Countryside Gaps



Key messages for spatial strategy

Landscape sensitivity/capacity outside of the AONB varies significantly across the Borough. Some of the more sensitive areas are also constrained in wider respects, such that they are not realistically in contention for significant growth through the LPR; however, there are some sensitive landscapes that must be considered as potential locations for growth given wider LPR objectives, perhaps most notably land to the southeast of Sittingbourne. A 'landscape-led' approach to spatial strategy and site selection could involve a focus of attention on the Bobbing area, Leysdown, land to the east and southeast of Faversham and also potentially some areas around Newington and Teynham, which are areas that the Landscape Sensitivity Assessment finds to be relatively unconstrained in the borough-wide context.

Neighbourhood Planning

The most recent neighbourhood planning update was presented to the Local Plan Panel on 9th July 2020.

Most importantly, a Faversham Neighbourhood Plan is in the early stages of development, led by Faversham Town Council. There are a number of sites within the confines of the settlement that are available and potentially suitable for development, and there is an expectation that the Neighbourhood Plan will be well placed to allocate one or more sites, thereby providing for a significant number of homes.

A Neighbourhood Plan is also under preparation for Boughton-Under-Blean and Dunkirk. This is a constrained part of the Borough, where it is a challenge to identify larger sites that are suitable for development; hence the Neighbourhood Plan should be well placed to allocate one or more sites to deliver a modest number of homes.

Hernhill and Minster are also designated areas for neighbourhood planning purposes; however, neither Neighbourhood Plan is known to be advancing. It is perhaps surprising that no other parish councils are seeking to prepare a Neighbourhood Plan; however, it is fair to assume that interest in neighbourhood planning will continue to increase over the plan period, and that a proportion of the Parish Councils in the Borough will bring forward Neighbourhood Plans that allocate land for homes to meet local needs and support village vitality.

Key messages for spatial strategy

There is an expectation that the emerging Faversham Neighbourhood Plan will provide for a significant number of homes within the town, and it may be the case that the emerging Boughton-Under-Blean and Dunkirk Neighbourhood Plan is able to provide for some new homes in this constrained part of the Borough. It is not possible to point to any other emerging Neighbourhood Plans that are likely to deliver new homes, or that have any other implications for the spatial strategy / site selection; however, it is fair to assume that, over the plan period, a proportion of the Parish Councils in the Borough will bring forward Neighbourhood Plans that allocate land for homes to meet local needs and support village vitality.

Settlement hierarchy

A Settlement Hierarchy Study was presented to the Local Plan Panel on 3rd September 2020. The study broadly confirmed that the existing settlement hierarchy (see paragraph 5.3.4, above) remains robust.

Leysdown is of note as its current position in the hierarchy is somewhat marginal; specifically, there is an argument for moving Leysdown to tier 5. On one hand this could indicate a need to restrain growth to a level below that which might otherwise be considered appropriate for a tier 4 settlement; however, on the other hand, there is an argument for seeking to support investment in the town via housing growth, such that its tier 4 status is reinforced, given the population size of the village and the population of the rural area that it serves in combination with Eastchurch, namely the East Sheppey area, where there accessibility to higher order centres / rural isolation is an issue. The Settlement Hierarchy Study explains:

"Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services."

Key messages for spatial strategy

There is invariably a need to take the settlement hierarchy as a starting point when distributing growth, although there can be good reasons for departing from the hierarchy to an extent, including in instances where the effect of a 'high growth strategy' will be that a settlement moves up a tier in the hierarchy. Leysdown is of note as its current position in the hierarchy is somewhat marginal, with its offer possibly having decreased over time. The LPR could potentially seek to respond to this by promoting additional growth in support of retention/enhancement of services, facilities and retail.

Transport

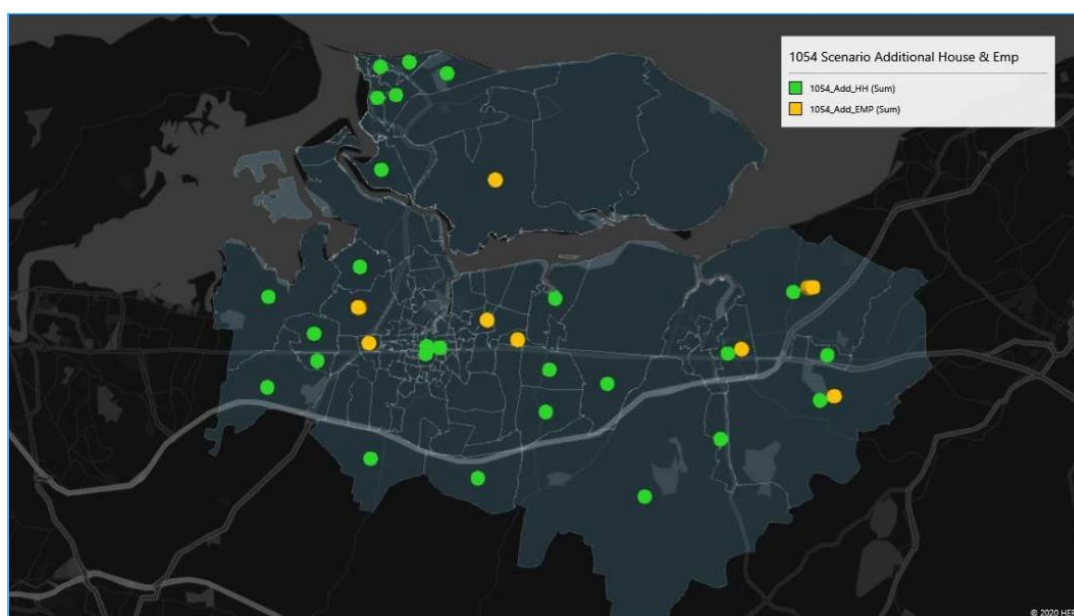
A Local Plan Transport Model Re-run report was presented to the Local Plan Panel on 11th June 2020. Two scenarios involving provision for 1,054 dwellings per annum were modelled: a 'do minimum' scenario; and a 'do something' scenario that assumed implementation of mitigation measures, including junction upgrades and trip reduction measures.

Whilst it is clearly the case the traffic hotspots identified by the model reflect the distribution of sites assumed to deliver the strategy (see Figure O), it is likely to be the case that many of the hotspots would exist under many or all of the reasonably foreseeable distribution scenarios. Problematic junctions highlighted through model are shown in Table C.

Table C: Problematic junctions highlighted through the April 2020 model re-run⁷⁶

Area	Junction	Weighted volume over capacity (V/C)			
		Do minimum scenario		Do something scenario	
		AM	PM	AM	PM
Maidstone	M20 J7	106	104	106	103
Ashford	A2042 Faversham Road/Trinity Road	104	86	105	85
Faversham	East Street/B2040	98	88	88	92
Sheppey	Minster Road/ A250 Halfway Road	97	91	80	85
Sittingbourne	B2006/ B2005	84	91	81	91
Sheppey	A249/A2500	91	68	91	71
Faversham	A2 London Road/Western Link	83	91	73	88
Faversham	A2/A251 Ashford Road	74	96	37	56
Sheppey	A2500 Lower Road/Barton Hill Drive	90	89	88	81

Figure O: Locations assumed to deliver growth in the April 2020 model re-run



⁷⁶ Junctions shown in the table are those shown to have a weighted V/C ratio of over 90 in either of the 1,054 dwelling scenarios.

When developing the model, one important consideration was the trip rate internalisation that could be assumed for strategic sites / growth locations. The model assumed:

- Rushendon - 8 -10% reduction on currently modelled car trip rates for the location;
- Sittingbourne town centre - 20% reduction on currently modelled car trip rates for the location;
- East / southeast of Faversham - 18% - 35% reduction on currently modelled car trip rates for the location.

With regards to the “do something” scenario, Figure P shows the mitigation measures that were assumed. These mitigation measures should be taken to be indicative (only) of what might prove appropriate for the LPR in practice.

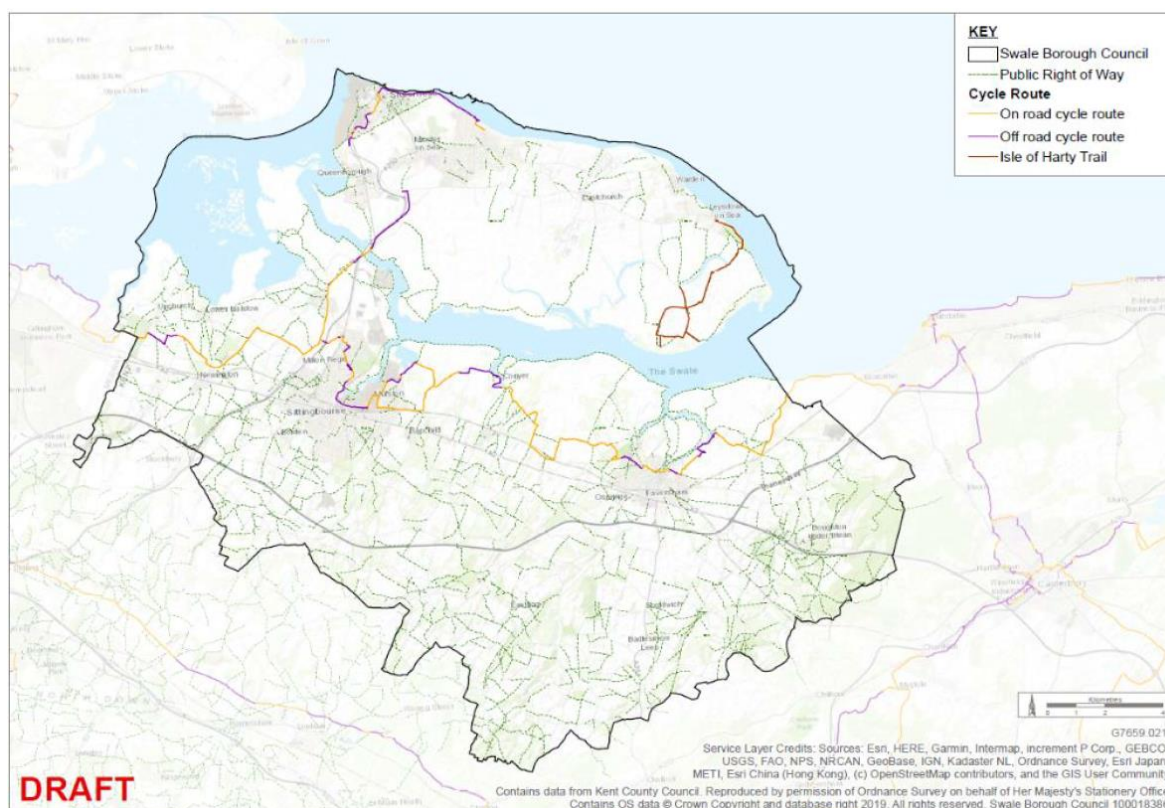
Furthermore, the report recommends a wide range of additional mitigation measures, including:

- Sheppey - build a new cycle and pedestrian crossing across the A249 to improve the connection between Rushenden / Neats Court Retail Park and the Sheppey Way / Queenborough Road cycling corridor, connecting with the ongoing cycle/walk upgrades along the A2500 Lower Road;
- Sheppey – invest in Sheerness Way walk and cycle route to improve connectivity from Rushenden/Queenborough to Sheerness and rest of the Isle of Sheppey;
- Sheppey - financial support for turn up and go level bus service (3-4 buses an hour) linking Rushenden/Queenborough to Sheerness. Potentially designate Whiteway Road as bus-only through access to Queenborough;
- Sheppey - ensure all stations on Sheerness rail branch are step free and stations are accessible to all non-car modes to enable people to connect to the local rail by non-car modes;
- Faversham - create a cohesive, comprehensive network of walk and cycle paths both within new Local Plan developments and connecting the new development to central Faversham and railway station;
- Faversham - pay for bus extension from central Faversham to new developments to provide turn up and go connection to the town centre (N.B. assumes a strategic growth location);
- Sittingbourne - develop high quality segregated cycle link along B2205 / B2006 corridor between Iwade, Kemsley, and Sittingbourne to support the local walk and cycle trips in the area;
- Sheppey / Sittingbourne - upgrade Sheppey Way to improve bus and cycle links between Sheerness and Sittingbourne;
- A2 corridor - develop an east-west cycle corridor parallel to the A2 linking Sittingbourne to Faversham. Figure Q shows the current extent of the National Cycle Network in the Borough.

Figure P: Mitigation measures assumed under the ‘do something’ scenario



Figure Q: Current extent of the cycle network (from Green and Blue Infrastructure Study)



Key messages for spatial strategy

There is a need for past transport model runs to feed into spatial strategy and site selection, and once the preferred strategy emerges, then there will be a need to run that through the model, with a view to confirming that the LPR will not lead to unacceptable traffic impacts, and also with a view to making fine tuning adjustments to the spatial strategy / mitigation strategy. Finally, it is important to note that modelling work undertaken to date highlights: M20 J7 (Maidstone) as the most problematic junction relevant to the LPR; the importance of achieving self-containment / trip internalisation at strategic growth locations (and variation in the potential to achieve this between strategic growth locations); and a wide range of opportunities to deliver enhancements to bus routes and walking/cycling infrastructure, for example an easily commutable cycle route between Sittingbourne and Faversham.

Viability

A draft Viability Report was presented to the Local Plan Panel on 2nd December 2020. Set out below are the two key maps from the report, which serve to highlight significant spatial variation in viability across the Borough. By way of further context, it is important to note the following **statement** made within the 28th October 2018 report to the Local Plan Panel, which sought to communicate key messages received through the Looking Ahead consultation (2018):

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

A spatial strategy that focuses growth at those locations with greater viability will lead to greater opportunity to fund delivery of measures including:

- affordable housing;
- building CO₂ emission standards above the do-minimum (up to 'net zero' standard);
- electric charge points;
- levels of biodiversity net gain above the do minimum;
- accessibility standards above the do minimum (e.g. wheelchair accessible).

Key messages for spatial strategy

Viability varies significantly across the Borough and, by way of context, it is important to note the following statement made within the 28th October 2018 report to the Local Plan Panel, which sought to communicate key messages received through the Looking Ahead consultation (2018): “Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations.” A spatial strategy that focuses growth at those locations with greater viability (also with least need to deliver costly infrastructure upgrades in support of growth) will lead to greater opportunity to fund delivery of measures including: affordable housing; building CO₂ emission standards above the do-minimum (up to ‘net zero’ standard); electric charge points; levels of biodiversity net gain above the do minimum; accessibility standards above the do minimum (e.g. wheelchair accessible).

Figure R: Variation in average house prices

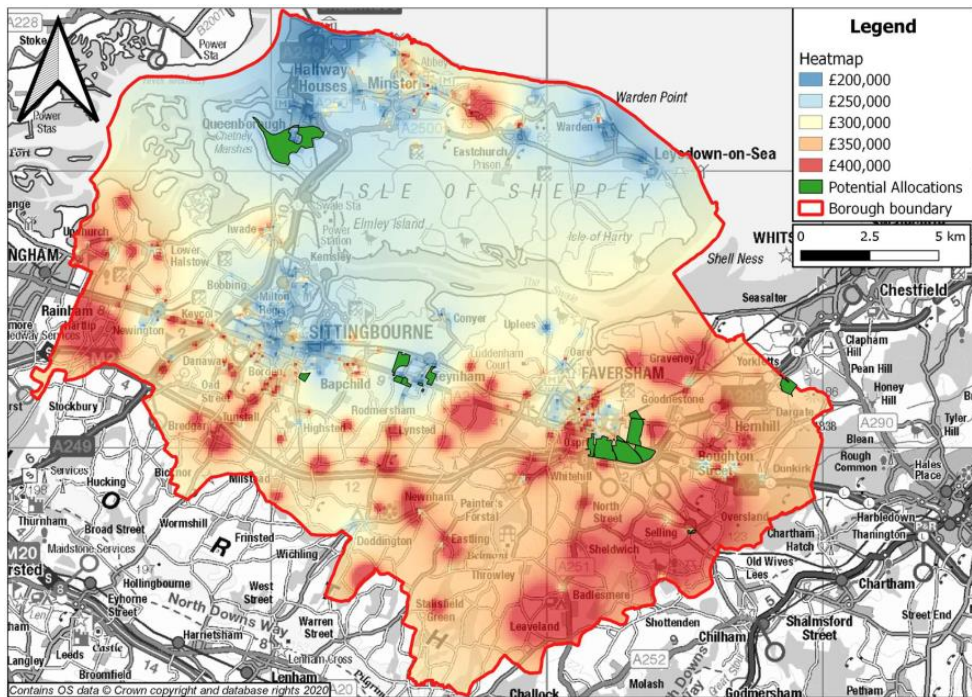
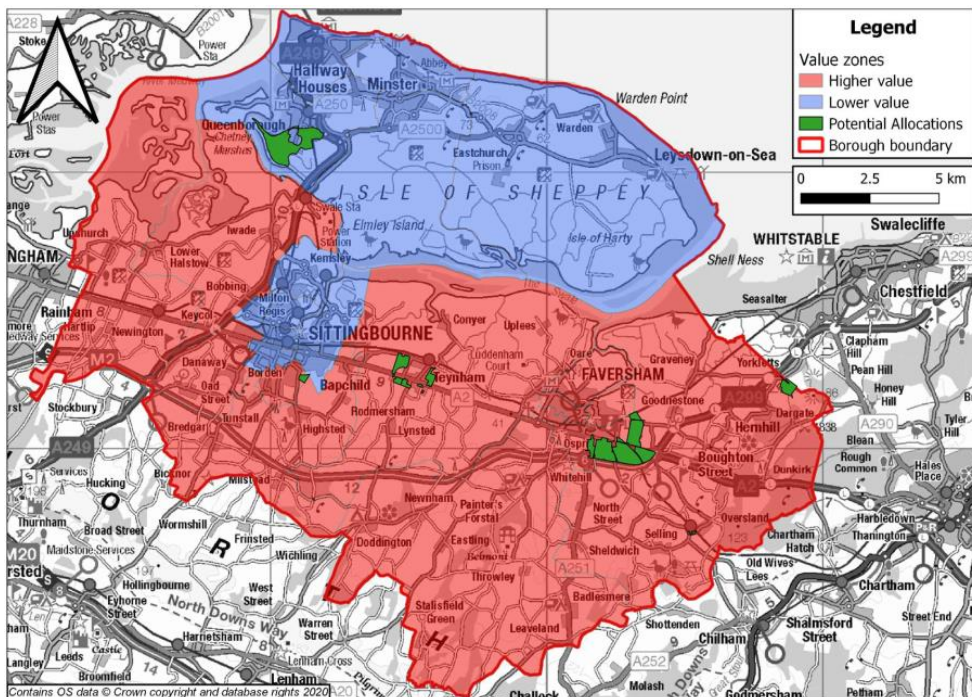


Figure S: Summary of viability zones



Appendix III: Broad growth scenarios

Introduction

The aim of this appendix is to present an appraisal of the broad growth scenarios that were considered by the Swale Borough Council Local Plans Panel on 30th July 2020, and which are discussed in Part 1 of this report (Section 5.3), as part of the wider discussion of establishing reasonable growth scenarios for appraisal (Part 2). Table A presents the broad growth scenarios.

Table A: The July 2020 broad growth scenarios

Broad growth scenario	Small sites ⁷⁷	Strategic site(s)
A Roll forward Bearing Fruits (BF) i.e. 85% focus on Thames Gateway	<ul style="list-style-type: none"> TG – very little choice Fav – good choice 	<ul style="list-style-type: none"> None
B Faversham focus ... to begin to counter-balance BF	<ul style="list-style-type: none"> TG – little choice Fav – little choice 	<ul style="list-style-type: none"> None
C Further Faversham focus ... to mostly counter-balance BF	<ul style="list-style-type: none"> TG – good choice Fav – good choice 	<ul style="list-style-type: none"> SE of Faversham
D Further Faversham focus still ... to fully counter-balance BF	<ul style="list-style-type: none"> TG– very good choice Fav – little choice 	<ul style="list-style-type: none"> SE of Faversham
E Strategic sites	<ul style="list-style-type: none"> TG– good or very good choice Fav – good or very good choice 	<ul style="list-style-type: none"> One or two out of the four options (no more than one in each planning area)

A note on Southeast Faversham

At the time of establishing the broad growth scenarios in July 2020 “Southeast Faversham” was understood to be one of the four strategic site options in consideration. Specifically, the focus was on the scheme submitted by the Duchy of Cornwall following the Garden Communities Prospectus (2018). However, latest understanding is that growth to the southeast of Faversham would be delivered in combination with growth to the east. Specifically, understanding is that landowners can and would work together to bring forward a combined masterplan and to deliver strategic infrastructure (notably a secondary school). There remains some uncertainty in respect of how this would happen in practice; however, for the purposes of this appraisal it is considered appropriate to assume a combined scheme. This is referred to as **East / southeast of Faversham**.

Appraisal methodology

Appraisal findings are presented below within 12 separate tables, with each table dealing with a specific sustainability topic (see Section 3). Within each table the performance of each of the broad growth scenarios is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁷⁸ and the broad growth scenarios are also ranked in order of preference.

Further points on methodology are as follows:

⁷⁷ It was not possible to define the approach to small sites with any certainty. We define a ‘good choice’ as a situation whereby there would be the potential to select only the best performing of the SHLAA ‘suitable’ sites for allocation, whilst ‘little choice’ is defined as a situation whereby all ‘suitable’ SHLAA are required as well as potentially certain ‘unsuitable’ SHLAA sites.

⁷⁸ **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.

- Significant effects – the aim is to identify, describe and evaluate significant effects in respect of each element of the established appraisal framework in turn.⁷⁹ A final concluding section considers significant effects ‘in the round’, but does not aim to reach an overall conclusion on the sustainability of each of the broad growth scenarios, or place them in an overall order of preference. Any attempt to do so necessitates assigning weight to each element of the appraisal framework, which is outside of the scope of SA (it is a task for the decision-maker, *informed by* SA findings).
- Methodology – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations. This is not an exact science, given the nature of the scenarios under consideration, but rather involves making assumptions and applying professional judgement. Appraisal ‘workings out’ are presented only to a limited extent, with a view to ensuring an appraisal narrative that is relatively concise and accessible.
- Evidence – it is not possible to list all of the evidence sources that are drawn-upon as part of the appraisal; however, it is appropriate to highlight that extensive use has been made of: the evidence-base studies commissioned by the Council since 2018; materials submitted and made available (on websites) by strategic site promoters; and two reports prepared by Stantec in 2019, namely:
 - Assessment of Submissions (February 2019) – examined the four schemes submitted following the prospectus in turn, and recommended a range of further work;⁸⁰
 - Assessment of Stage 2 Submissions (September 2019) – considered changes made to the four schemes following the earlier assessment, and reached overall conclusions on each of the four schemes.⁸¹

A key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward development (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and ‘planning gain’ (e.g. affordable housing). The Stantec work is notable for exploring site specific proposals in detail, and there is certainly a need to take site specific proposals into consideration here; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

Appraisal findings

The tables below presents appraisal findings in relation to the July 2020 broad growth scenarios (BGS).

Air quality

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
2	4	3	4	1

Discussion

It is very difficult to suggest that either Sittingbourne or Faversham is more constrained in respect of air quality. However, once the location of available development site options is taken into account, there is reason to suggest that a high growth strategy for Sittingbourne (**BGS-A**) is preferable to a high growth strategy for Faversham (**BGS-D**).

This is because BGS-D could necessitate a focus of growth in the Ospringe area, and it is difficult to envisage a strategic transport solution that would avoid increased traffic impacting on the AQMA (including because the largest of the Bearing Fruits allocations to the south of Faversham (Land at Perry Court) is now building-out and providing only access roads).

⁷⁹ The appraisal framework was established mindful of the list of topics suggested as potentially appropriate to include within the scope of SA at paragraph 6 of Schedule 2 within the SEA Regulations. In this way paragraph 6 of Schedule 2 has ‘fed in’.

⁸⁰ See services.swale.gov.uk/meetings/documents/g2142/Public%20reports%20pack%2014th-Mar-2019%2019.00%20Local%20Plan%20Panel.pdf?T=10

⁸¹ See <https://services.swale.gov.uk/meetings/documents/s13308/Appendix%20I%20-%20PBA%20REPORT%202nd%20stage%20assessment%20Sept%202019.pdf>

Under BGS-A high growth at Sittingbourne could involve sites that are either in quite close proximity to the railway station or can access M2 J5 without passing through an air quality problem area; however, any further expansion to the east would give rise to a concern, as this area (along with Teynham) is the part of the A2 corridor most distant from an M2 junction.

As for **BGS-B**, there would be the potential to avoid the most problematic sites at Sittingbourne; however, higher growth at Faversham (without strategic growth to the east / southeast) could necessitate growth in the Ospringe area, and hence give rise to concerns of a similar magnitude to those discussed above, in respect of BGS-D.

As for **BGS-C**, this would involve a strategic growth location to the east / southeast of Faversham, which is tentatively supported from an air quality perspective, including because there would be: two motorway junctions in close proximity; delivery of services, facilities and employment onsite that supports trip internalisation; good potential to walk or cycle to Faversham railway station, including via new walking/cycling infrastructure; and some potential to walk/cycle to the town centre (beyond the rail station), albeit it would be somewhat distant, at greater than 2km from certain points of the site.

Finally, as for **BGS-E**, there is tentative support for a strategy involving a focus at one or two strategic sites. The four competing strategic site options are discussed in detail in Appendix III, but in summary: Southeast Sittingbourne represents a considerable opportunity; Southeast Faversham performs well (as discussed); North Street gives rise to a degree of concern regarding air pollution impacts on sensitive receptors (homes; also school children) along the A251 and at the A251/A2 junction; whilst Bobbing gives rise to considerable concerns regarding increased traffic along the problematic B2006.

In **conclusion**, BGS-B and BGS-D perform poorly, as there is a strong likelihood of increased traffic through Ospringe, which is an air pollution hotspot. It is fair to highlight BGS-E as performing best, on the assumption that there would be a focus of growth at the two best performing strategic sites.

With regards to significant effects, it is appropriate to flag a notable degree of risk under all growth scenarios. The Air Quality Modelling Report explains that air quality is set to improve significantly over the plan period (for example, air pollution in the Ospringe area is set to halve); however, air pollution is currently a priority issue for the Council, with a new AQMA declared at Keycol in December 2020, and the existing AQMA at St Paul's Street in Sittingbourne amended to include particulate matter (PM10) after the monitoring stations registered an increase in pollution levels.⁸²

Biodiversity

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
★ 1	2	★ 1	2	★ 1

Discussion

A primary consideration is the risk of expansion north of Sittingbourne or Faversham impacting on the Swale and Medway SPA/Ramsar sites ("North Kent Estuaries European sites"), including via increased recreational pressure and/or development of land that is functionally linked to the European sites (e.g. fields used for foraging or roosting by significant wildfowl or wading bird populations); however, growth opportunities in these areas are very limited. This contrasts to the adopted Local Plan, which allocated significant growth at Iwade, Northwest Sittingbourne, Northeast Sittingbourne and at Oare Gravel Works.

In particular, at Sittingbourne (high growth under **BGS-A**) there is very limited potential for further significant growth in proximity to the SPA. A potential growth location that gives rise to a notable degree of concern is east of Sittingbourne, between the A2 and the railway (this was an option put to the 29th October 2020 Local Plan Panel); however, the land is subject to wide-ranging constraints/issues (e.g. settlement coalescence; heritage) and, in any case, the land is c.800m from the SPA/Ramsar at its closest point, not well connected by public right of way (PROW), and not particularly well connected by road.⁸³

⁸² See <https://swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/keycol-hill-aqma-approved>

⁸³ Little Murston Nature Reserve is a short drive from Bapchild, but there does not appear to be any car parking and, whilst there is a public right of way around the perimeter, the site itself is not thought to be publicly accessible, as it is managed for wildfowling.

Another consideration at Sittingbourne, aside from the SPA/Ramsar constraint, is the notable density of distinctive habitat patches to the south of the town (including traditional orchard habitat, which is a priority) that may function as one or more ecological networks (as discussed in Appendix I). Under BGS-A there could well be pressure to allocate one or more modest sites in this area; however, it is difficult to suggest that this would necessarily give rise to a significant concern.

A final consideration, in respect of BGS-A, is that there would be a need for modestly higher growth on the Isle of Sheppey. It is difficult to confidently discuss spatial implications; however, it is important to point out that the entire western part of the Island, where growth opportunities are focused, is subject to a degree of SPA/Ramsar constraint, and that one of the sites in contention for allocation (SLA18/113) is flagged by the Biodiversity Baseline Study (2020) as notably constrained.⁸⁴

At Faversham, under **BGS-B** and **BGS-D** there could well be a need to allocate one or two modest urban extensions to the north of the town, which would more-or-less complete the northern expansion of the town as far as the flood risk zone and/or land locally designated for its biodiversity value. This land is well connected to the SPA/Ramsar by PROW, and the fact that adjacent land is either known to be of local importance for biodiversity (Abbey Fields LWS) or managed for biodiversity (Oare Gravel Works) could potentially suggest a likelihood of the land being functionally linked to the SPA/Ramsar.

As for strategic growth to the east / southeast of Faversham (**BGS-C** and **BGS-D**), this land is notably unconstrained in biodiversity terms, in that there is very limited onsite priority habitat and limited designated land either in close proximity or easily accessible. However, if a strategic scheme were to extend north beyond the Graveney Road / as far as the railway line (to Whitstable), then this would give rise to degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields LWS; the walking route to the SPA would be c.2.25km and the driving route to the SPA would be via Goodnestone. A further consideration is the likelihood of growth leading to a degree of increased recreational pressure on the Blean Woodlands SAC to the east, potentially in combination with growth in Canterbury District; however, the part of the SAC in closest proximity is managed as a National Nature Reserve, and the car park is on the eastern edge, well over 10 km distant.

Finally, as for **BGS-E**, there is a need for caution as one of the four sites in contention - Southeast of Sittingbourne - is notably constrained. This is because there would likely be a need for a focus of growth in the Highstead / Rodmersham Green area, where there is a high density of woodland (including ancient woodland) and traditional orchard priority habitat that is shown by the Biodiversity Baseline Study (2020) to comprise a northern promontory of the North Downs Priority Area (also, the study highlights connectivity between traditional orchard habitat patches as a priority). Development is not necessarily precluded within priority areas; however, taking a precautionary approach it is appropriate to flag a risk of development in this area worsening ecological connectivity between habitat patches at the landscape scale (also potentially direct impacts to habitat patches, e.g. from recreational pressure).

There is also a degree of concern associated with strategic growth to the east / southeast of Faversham if it is assumed to be the case that growth would extend north as far as the railway, as discussed above.

Bobbing is also associated with biodiversity constraint. This is for two reasons. Firstly, the site is slightly closer to the SPA, and whilst it is not clear that this is a particularly accessible or sensitive part of the SPA, there is a need to consider in-combination impacts given committed growth at Iwade and Northwest Sittingbourne (also the potential for the Bobbing scheme to expand in the future). Secondly, the proposal is for development to largely envelop a small ancient woodland (Rook Wood). Whilst the proposal includes large areas of greenspace, within which it will be possible to deliver targeted habitat creation, there is a need to consider the possibility that having to compensate for impacts to Rook Wood could lead to a challenge in respect of achieving an overall (and sufficient) biodiversity net gain at an appropriate landscape scale.

North street is thought to be subject to lower strategic biodiversity constraint. Finally, in respect of the strategic sites, it is important to note that the summary matrix presented at page 63 of the Stantec *Assessment of Stage 2 Submissions* (2019) assigns all four proposed schemes a 'green' score in respect of potential to achieve net gain(s). However, there is a need for caution, looking beyond generic statements to question the extent to which the proposal is to direct scarce funds to biodiversity and other environmental mitigation/enhancement schemes, and

⁸⁴ The study states: "This entire site falls within the Swale Nature Recovery Priority Area. A large portion of the site is classified as Open Mosaic Habitat on Previously Developed Land, Floodplain Wetland Mosaic and coastal saltmarsh priority habitats. The portion of the site not classified as priority habitat is of high strategic significance for connecting areas of priority habitat and should be prioritised for habitat restoration through BNG projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver BNG for this proposed development and therefore alternative sites should be considered."

also ensure a focus on inherent locational issues and opportunities, i.e. recognise that not all sites are equal in respect of potential to achieve biodiversity net gain.

In **conclusion**, BGS-B and BGS-D perform poorly, as there could be a need to allocate constrained sites to the north of Faversham, and it is appropriate to flag a notable degree of a risk (however small) of SPA/Ramsar impacts. It is difficult to confidently differentiate the other scenarios. BGS-C arguably performs relatively well; however, there is a concern associated with strategic growth to the east / southeast of Faversham extending north as far as the railway line.

Climate change mitigation

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	4	1	3	2

Discussion

There is a need to consider greenhouse emissions from both transport and the built environment; however, in respect of transport there is inevitable cross-over with discussion below under the 'Air quality', 'Communities' and 'Transport' headings.

With regards to **built environment emissions**, there are strong arguments for supporting a focus of growth at one or two strategic sites and focusing growth where viability is highest, with a view to facilitating:

- low and zero carbon (LZC) infrastructure, including heat networks (which require strategic planning and typically necessitate higher densities and a fine grained mix of uses);
- buildings designed to achieve net zero regulated emissions (or otherwise ambitious levels of regulated emissions);⁸⁵
- an ambitious approach to unregulated emissions, including embodied and other non-operational emissions, including by supporting modern methods of construction (e.g. offsite construction of modular homes); and
- 'smart energy systems' – seen as a priority within the Energy South 2 East Local Energy Strategy (2020) and the recent Energy White Paper (2020), which includes a major focus on delivering a 'Smart Electricity System'.

Another consideration, in respect of built environment emissions, is the need to consider the possibility of locating growth in proximity to strategic heat sources (also locations with strategic heat demand, e.g. leisure centres), with a view to facilitating delivery of heat networks; however, no particular opportunities are known to exist in the Swale context. A more ambitious approach to growth at Sittingbourne town centre, including higher densities, could feasibly help to facilitate one or more heat networks; however, there is little reason to suggest that this would be viable or achievable, with no obvious strategic heat sources to explore (the proximity of Milton Creek and associated industrial areas could feasibly represent an opportunity).

A further consideration, in respect of built environment emissions, is the possibility of strategic growth locations supporting the use of hydrogen, including potentially for heating. Hydrogen is a major focus of the recent Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and a Hydrogen Strategy is due in 2021; however, opportunities remain uncertain at the current time, and are likely to be longer term.

Finally, there is a need to briefly review latest site specific proposals. The summary matrix presented at page 63 of the latest Stantec report assigns all four proposed schemes a 'green' score in respect of 'green proposals'. However, there is a need for caution, looking beyond generic statements / 'warm words' to question the extent to which the proposal is to direct scarce funds to decarbonisation measures, and masterplan, design and build with decarbonisation as a priority (e.g. high density development in proximity to any strategic heat sources). The Stantec report potentially serves to identify Southeast Sittingbourne as standing-out, in that funds are being used

⁸⁵ Regulated emissions are those covered by the building regulations. It is common for Local Plan policies to require levels of emissions below the Building Regulations requirement, and potentially even to require net zero regulated emissions for major schemes (which almost invariably necessitates offsetting). At the current time the Government is consulting on a Future Homes Standard, which would be a national requirement set out in the Building Regulations. The Government's proposal is that Local Plan policies would no longer be able to require levels of emissions below the Building Regulations (Future Homes Standard); however, there would still be the potential for the promoters of individual development schemes to choose take a best practice approach, including by achieving net zero regulated emissions.

to work with specialist consultants to “embrace new technology and move towards carbon neutrality”, and the scheme website makes the following encouraging statement: *“By focusing at a strategic level from the outset we can take a holistic approach to the scheme to design for a carbon neutral future. The scheme will utilise solar panels connected to home battery systems networked to central battery storage to maximise the use of renewable energy and provide for energy neutral homes when assessed across a 12-month period.*

With regards to **transport emissions**, place-specific considerations include:

- Sittingbourne - is the Borough’s highest order centre, with a good town centre and retail offer, an extensive employment offer and a very good rail service; however, certain of the available sites to the south of the town are not very well linked by public or active transport, such that it could be difficult to achieve modal shift.
- Faversham – is a second tier settlement, but there is an identified opportunity to enhance the employment offer, and there is good potential to reach Canterbury and other locations in Kent by public transport.

Maintaining a focus on Faversham, strategic growth to the E/SE of Faversham is tentatively supported, given the inherent opportunities associated with strategic growth locations, and because the site is well-related to a higher order settlement with a rail station, and noting the commitment to deliver a good mix of uses onsite and ensure a focus on walking/cycling infrastructure. However, concerns and questions remain (discussed further in Appendix III).

- Sheppey – which would see moderately higher growth under BGS-A, is less well connected / more likely to be associated with entrenched car dependency; however, Queenborough/Rushenden (one of the locations under close consideration for growth) benefits from a rail station, and there is also a good cycle route to Sittingbourne (partly off-road).
- Other strategic site options (Bobbing, Southeast Sittingbourne and North Street) are all less well related to a higher order centre than is the case for East / Southeast of Faversham, with North Street potentially standing-out as performing poorly, as it is relatively poorly related to *Faversham*, i.e. a second tier settlement. Southeast Sittingbourne potentially stands-out as performing well, as residents would be able to walk/cycle to employment at an expanded Kent Science Park; however, on the other hand, there is a concern that an expanded Kent Science Park (in combination with a new motorway junction) could attract long distance commuting by car, given skills levels locally. As for Bobbing, there is a concern regarding connectivity to Sittingbourne town centre (over 3km distant, via the problematic B2006), and whilst the latest Stantec report states that the latest proposal *“refocuses its emphasis on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus”* this is not entirely evident from the latest proposals on the scheme website.

In **conclusion**, it is inherently challenging to differentiate the broad growth scenarios, including because there can be tensions between objectives around minimising built environment emissions on the one hand and, on the other hand, minimising transport emissions. In the absence of modelling or other detailed analysis, there is a need to weigh-up competing objectives on the basis of professional judgement, in order to arrive at an overall conclusion.

On this basis, it is considered appropriate to highlight **BGS-C** as performing best, because there would be a focus of growth at a strategic urban extension that is well-related to a higher order settlement, *albeit* there are issues and uncertainties, as discussed above. It is considered appropriate to highlight **BGS-E** as second best performing, given the opportunities associated with strategic growth; however, there is a very high degree of uncertainty, given that the locations in question are not ideal from a transport connectivity perspective and/or there would be viability challenges.

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 of the broad growth scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor influencing spatial strategy, site selection and development of site-specific proposals.

Communities

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	5	1 	3	2

Discussion

Perhaps the key consideration relates to support for growth via strategic sites well suited to delivering new and upgraded community infrastructure, as opposed to growth via more 'piecemeal' urban extensions, where opportunities can be missed and issues can arise, despite mechanisms for gathering and directing funds for infrastructure.⁸⁶

This serves to suggest inherent concerns with **BGS-A** and **BGS-B**. More specifically:

- **BGS-A** – there is an anecdotal concern that recent and committed growth at Sittingbourne is putting pressure on infrastructure; however, it is difficult to pin-point specific issues. With regards to secondary school capacity, which is often a key strategic consideration, there are four secondary schools to the south of the A2 (two grammar schools and two non-selective schools), which is the part of Sittingbourne that would likely be a focus of growth, and the North West Sittingbourne strategic allocation is set to deliver a new secondary school (although not in the short term).

Another consideration, in respect of **BGS-A**, is that there would be a degree of increased pressure for growth on the Isle of Sheppey; however, it is difficult to suggest that this necessarily gives rise to community infrastructure concerns. There are not known to be any issues or opportunities in respect of secondary school provision (the Oasis Academy Sheppey is split across two sites, at Sheerness and Minster), and there is a good network of primary schools and doctor's surgeries across the Island, including the rural east (Eastchurch and Leysdown). There is an identified need to support growth at Queenborough/Rushenden (as far as possible, given constraints, notably flood risk), in order to support well-established regeneration objectives; however, it is difficult to suggest that this would be more likely under **BGS-A**.

- **BGS-B** – following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough. In turn, there is clear support for **BGS-C**, which would certainly enable a new secondary school to be delivered as part of a strategic urban extension to the east / southeast of Faversham. Latest understanding is that the secondary school will come forward at the site directly to the east of Faversham, which could also form part of the growth strategy under **BGS-A**; however, it is assumed that it would be much more challenging to deliver a secondary school on the site under **BGS-A**.⁸⁷

There is also considered to be a good degree of support for **BGS-D**, as this would also enable delivery of a new secondary school via a strategic urban extension to the east / southeast of Faversham, although under this scenario there would also be additional 'piecemeal' urban extensions to the town, which would deliver relatively little in the way of infrastructure.

Finally, as for **BGS-E**, a focus at strategic sites is broadly supported; however, there is considerable variation between the four strategic site options, in respect of potential to deliver new/upgraded community infrastructure, including due to variations in development viability across the Borough. In particular, viability is a constraint to growth in the Sittingbourne area, and therefore an issue for the Bobbing and Southeast Sittingbourne strategic site options. In practice, the scale of growth envisaged for Southeast Sittingbourne is such that there would be good potential to deliver new and upgraded community infrastructure (despite costs for major transport infrastructure upgrades), including a secondary school, and the possibility of delivering a further education facility for Sittingbourne has been suggested. The proposed scheme is notably smaller, with no secondary school proposed

⁸⁶ All new development is expected to contribute towards the cost of new infrastructure. Infrastructure funding by developers is most often secured through planning obligations (either through a Section 106 agreement or Section 278 Highway agreement with Kent County Council) or the Community Infrastructure Levy (CIL); however, there is no CIL in place for Swale. On-site infrastructure will be secured based on the needs of each proposal and delivered directly by the developer or through financial contributions and/or the provision of land. Off-site infrastructure will be secured through developer contributions.

⁸⁷ Under **BGS-A** the site in question, known as Land at Lady Dane Farm, would deliver an urban extension of c.600 homes, and would likely be planned and delivered in conjunction with a smaller site to the north (Land at Graveney Road), with the combined scheme delivering around 840 homes. However, under **BGS-C** these two sites would also be delivered in combination with Southeast Faversham, with the combined scheme delivering in the region of 3,340 homes. This would generate economies of scale that would, it is assumed, enable delivery of the new secondary school (or, more specifically, make it viable for the land to be made available for a new secondary school).

(although the committed school at NW Sittingbourne would be in close proximity, and presumably would have capacity over-and-above that needed to meet committed housing growth at Sittingbourne and Iwade), and there is a need to factor-in the possibility of the scheme expanding in the future.

Finally, in respect of the four competing strategic site options, the latest Stantec report serves to highlight key issues around: A) impacts to existing communities; and B) engagement, joint working and stewardship. These matters are discussed in detail in Appendix III.

In **conclusion**, a key consideration is the need to deliver a new secondary school at Faversham to meet existing and committed future needs. This serves as a reason to conclude that BGS-C will lead to significant positive effects, and BGS-B would lead to significant negative effects. However, there is a degree of uncertainty regarding the proposed East / Southeast of Faversham strategic urban extension at the current time, in the absence of evidence, including an up-to-date masterplan.

It is also appropriate to flag a degree of opportunity associated with BGS-E, although there is considerable uncertainty, given viability constraints in the Sittingbourne area, competing costs and uncertainty regarding the deliverability of site specific proposals. As for BGS-A, it is appropriate to flag a degree of risk associated with piecemeal expansion at Sittingbourne 'loading pressure' onto existing community infrastructure.

Economy and employment

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	3	2	3	1 

Discussion

There is a need to reflect the targets set out in the Employment Land Review (ELR), although certain of the targets are in the form of a range, with this particularly the case for the matter of delivering significant new land for warehousing / distribution.

The following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – it is difficult to envisage any of the available non-strategic sites at Sittingbourne delivering significant new employment land; however, there would also be modestly increased growth on Sheppey under this scenario, where there is one available site in contention for allocation of a mixed use scheme, namely 18/113 (South of Rushenden), which is well-suited to delivering up to 10ha of new employment land (unconfirmed, given a need for further masterplanning work to reflect constraints) at a location fairly well linked to the A249. At Faversham there would be relatively low growth, under this scenario; however, one or more of the non-strategic allocations could potentially come forward as a mixed use scheme, delivering new offices and/or light industrial uses.
- **BGS-B** (Faversham focus) – broadly as per BGS-A, although there could be greater potential to bring forward employment land at Faversham at mixed-use sites. It is fair to assume that the LPR would be able to provide for new offices and light industrial land in accordance with recommendation (B) of the ELR.
- **BGS-C** (Further Faversham focus) – there is good potential to bring forward new employment land as part of a strategic urban extension to the east / southeast of Faversham. Specifically, there is the potential to deliver c.10ha of new industrial land to the east of Faversham and another c.10ha to the southeast (adjacent to M2 J7), as well as smaller scale 'pockets' of employment throughout the scheme (this aligns with the emerging design ethos). On this basis, ELR recommendations in respect of locally arising demand for offices, light industrial and industrial land would be met; however, opportunities to deliver large-scale new industrial land in well-connected locations in the west of the Borough, with a view to providing for the long term needs of footloose strategic warehousing and distribution operators serving London and the Southeast, could be missed. The new industrial land at East / southeast of Faversham (in particular the 10ha employment area adjacent to M2 J7) could prove attractive to strategic warehousing and distribution uses; however, this is unclear. The ELR explains:

“Although Faversham is an untested market for larger unit demand (which fuels the need for additional land) such a highly accessible area is likely to be in demand. The part of the area (closest to the motorway unction) would be particularly attractive to strategic warehouse operators (min area 10 ha), because of the excellent

access to the M2. But should areas in the west of the Borough come forward these are likely to be preferable given they are closer to the M25 and benefit from better north / south access (A429).”

- **BGS-D** (Further Faversham focus still) – performs broadly as per BGS-C, as it is difficult to assume that any of the additional small scale urban extensions to Faversham under this option would deliver significant new employment land.

N.B. there is also one notable site at the far eastern extent of the Borough (adjacent to Canterbury Borough) that is available for development as an employment only scheme, namely 18/154 (Lamberhurst Farm); however, it is difficult to assume that delivery of this site would be more likely under this broad growth scenario.

- **BGS-E** (Strategic sites) – the key point to note is that strategic growth to the **Southeast of Sittingbourne** represents a very significant opportunity, from an ‘economy and employment’ perspective. This matter is explored in detail within the ELR, as well as within the two *New Garden Communities: Assessment of submissions* reports prepared by Stantec in 2019. There would be benefits three broad respects: 1) there could be significant expansion of Kent Science Park; 2) there would be the potential to deliver new strategic warehousing and distribution uses adjacent to a (new) motorway junction in the west of the Borough, thereby fully reflecting ELR recommendations; and 3) the scheme would deliver the final (eastern) section of the Sittingbourne Northern Relief Road (SNRR) and continue the link road south, beyond the A2 as far as a new junction 5a of the M2, thereby supporting the functioning of Eurolink industrial area and *potentially* unlocking further expansion.⁸⁸ Economic benefits would clearly be felt at a larger than local scale, with the site promoters suggesting that Eurolink and Kent Science Park collectively comprise the biggest business centre in Kent. There are additional considerations to factor-in, when considering the merits of strategic growth to the Southeast of Sittingbourne from an ‘economy and employment’ perspective, in particular around the possibility of growth here detracting from growth elsewhere in the Borough (Sittingbourne, Faversham and Sheppey) and in the neighbouring authorities of Medway and/or Maidstone (e.g. the emerging Maidstone Local Plan proposes a “prestigious business park at Junction 8 of the M20”); however, for the purposes of this appraisal, it is appropriate to flag a significant opportunity.

With regards to the final two strategic site options that would come into contention under this broad growth scenario: the current **Bobbing** proposal includes limited new employment land, and there is also a need to factor in concerns regarding traffic at the A249 junctions with the B2006 and M2, with the concern being that traffic could affect the functioning of existing, committed and potential future employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey; the proposal for **North Street** includes notably more employment land, including a “traditional employment/ business area close to M2 on north of site”, but there would be no potential to deliver strategic warehousing/distribution.

In **conclusion**, the ELR serves to highlight a significant opportunity associated with Southeast Sittingbourne, hence it is appropriate to flag BGS-E as having the potential to result in significant positive effects; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viably) and implications for the wider Borough and elsewhere. BGS-C also performs well, as the employment land strategy could align with ELR recommendations at a good (or, at least acceptable) extent. The other broad growth scenarios do not perform poorly, as the employment land strategy could reflect ELR recommendations in part.

Flood risk

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	3	2	★1	★1

⁸⁸ The ELR identifies an area of search, and explains: “This area would make a logical extension to the Borough’s principle employment area - for industrial / warehousing but also potentially the flexible office/light industrial units that are in demand in the area. Employment use in this location would achieve co-locational benefits from proximity to all the other industrial businesses at Eurolink, and sharing the available infrastructure. However, the road infrastructure is the major constraint, and the suitability of the area is contingent on completion of the new link road, and most probably a new access road south of the town (to the M2). We understand there are already congestion issues at Eurolink, and further expansion without solving the access constraint could hinder the efficient operation of the whole Eurolink area. For this area to be taken further the local access (northern relief road) would need to be committed (with other associated upgrades to the local network) and delivered alongside the new employment.” However, there is very limited land remaining outside of the flood risk zone / area of SPA sensitivity, and there are heritage constraints associated with Tonge Parish, including the setting of the grade 1 listed parish church.

Discussion

Large parts of the Borough are constrained by flood risk, as set out within the Strategic Flood Risk Assessment (SFRA, 2019); however, there would be good potential to select sites outside of flood risk zones under all of the broad growth scenarios.

The main concern relates to the increased emphasis on the Isle of Sheppey under **BGS-A**; however, it is difficult to assume that modestly higher growth would necessitate allocation of one or more sites constrained by flood risk, given available sites on the island that are unconstrained by flood risk. There are strong arguments for focusing growth at locations within the flood risk zone at Queenborough/Rushenden, in order to support regeneration; however, it is difficult to suggest that there would necessarily be an increased emphasis on growth here under BGS-A.

A second consideration relates to the likelihood of one or two small urban extensions to the north of Faversham under **BGS-B and BGS-D**. The sites in question would encroach very close to the flood risk zone that constrains land to the north of Faversham (also an area of SPA, wider biodiversity and landscape sensitivity), and there is a need to consider the risk of flood risk zones extending under climate change scenarios; however, on balance there would appear to be the potential for limited further northward expansion of Faversham, from a flood risk perspective.

Finally, there is a need to consider sites that intersect one of the Surface Water Functional Flood Zones associated with the series of dry valleys that characterise the central and southern parts of the Borough. These flood zones are a notable constraint to strategic growth to the southeast of Sittingbourne; however, the SFRA explains:

“This SFRA introduces the concept of Surface Water Functional Flood Zones within dry valleys where there are significant overland flow paths. For development sites located in Surface Water Functional Flood Zones, all types of development could be compatible, providing the FRA can demonstrate that the proposal will be safe from flooding for its lifetime and does not increase flood risk elsewhere.”

In **conclusion**, it is appropriate to highlight those broad growth scenarios involving less growth directed to the Isle of Sheppey as performing well; however, this is highly uncertain, as there is the potential to deliver growth on the island whilst avoiding growth in a flood risk zone, and growth in the flood risk zone on the island is a very specific matter for consideration (as a potential ‘exceptional circumstance’) given potentially overriding regeneration objectives. Significant negative effects are not predicted, but it is considered appropriate to flag a notable degree of concern associated with BGS-A.

Heritage

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
2	3	1	3	1

Discussion

The following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – whilst there is little certainty, an increased focus of growth at Sittingbourne under this broad growth scenario could necessitate one or more significant allocations to the south of Sittingbourne which, broadly speaking, is a relatively sensitive area from a heritage perspective. This area comprises five parishes (also accounting for Bredgar Parish, to the south of the M2) historically associated with the fertile soils of a transitional landscape between downland to the south and Sittingbourne / the Swale to the north. Each parish has a grade 1 listed church, and there are seven conservation areas across the area as a whole, as well as several small clusters of listed buildings and historic farmsteads. It is also important to note that the nationally available dataset of priority habitat shows a high density of traditional orchard habitat patches (the great majority of which appear to still be present on the ground, as understood from aerial imagery), and the Kent Historic Environment shows numerous areas with a ‘horticulture’ historic character.

Another possibility, under BGS-A, is increased pressure for further expansion to the east of Sittingbourne, potentially expanding the town as far as Bapchild and Tonge, both historic parishes with a grade 1 listed church, although Bapchild’s character is now dominated by 20th Century housing, and only Tonge is associated is a designated conservation area.

Finally, there is a need to consider the implications of modestly increased growth on the Isle of Sheppey under this broad growth scenario. Sheppey is associated with wide ranging heritage constraints and opportunities, as explored in detail within the Swale Heritage Strategy (2020). Most of potential growth locations are thought to be of relatively limited sensitivity, on the basis that they would comprise further extensions to the extensive 20th and 21st century development; however, there is a need to consider open views across marshland landscapes, including distant views to Minster Abbey.

- **BGS-B** (Faversham focus) – under this broad growth scenario there would be decreased pressure to allocate problematic sites at Sittingbourne (and Sheppey), but there would be increased pressure to allocate non-strategic urban extensions to Faversham, which is very highly constrained from a historic environment perspective; indeed, Faversham’s heritage value is of at least regional renown, and maintaining this role is central to the vision for the Borough (as understood from the adopted Local Plan). In light of these sensitivities, there is a need to consider potential directions of growth in turn:
 - North: the possibility of one or two modest urban extensions, to more-or-less complete the expansion of Faversham as far as the flood risk zone / area of SPA constraint, potentially gives rise to *relatively* limited concerns from a historic environment perspective, with sites abutting the extensive Faversham Conservation Area but likely to have relatively limited visual connectivity. However, sensitivities do exist, particularly given extensive views across flat, marshland-edge landscapes that potentially hold historic environment value, including views from public rights of way. The Swale Landscape Sensitivity (2020) states the following in respect of one of the locations in question: *“The wider views and visual relationship with the surrounding marshland and tidal creek (including a boat yard) and the local landmark of St. Mary’s Church, Faversham on the skyline provide a relatively strong sense of place. The disused 19th century sewage pumping station and brick works buildings also have some historic and visual interest, the small surviving chimney of which forms a local landmark and contributes to the sense of past industry around the tidal creek area.”*
 - East: much of the 20th and 21st Century expansion of Faversham has been to the east, hence further expansion potentially gives rise to relatively limited concerns, from a historic environment perspective (N.B. see further discussion below regarding landscape concerns, including in respect of ‘urban sprawl’). However, there is a need to consider the rural setting of Faversham, including as experienced by motorists approaching along the A2 from the east, with the Swale Landscape Sensitivity (2020) explaining: *“The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area.”* A further consideration is encroachment of the eastern edge of the town towards historic farmsteads,⁸⁹ and impacts to views from cycling routes and public footpaths that link Faversham to the Goodnestone Conservation Area and the marshland walking and cycling routes beyond.
 - South: Faversham historically extended between the marshes and creekside industry in the north and the A2 in the south, with Ospringe and Syndale Park – both designated conservation areas – to the south of the A2; however, the built form of the town is evolving, with the adopted Local Plan allocating two sites to the south of the A2 (either side of the A251) that will together deliver nearly 600 homes plus new employment land. Under this broad growth scenario there would be pressure for further non-strategic expansion to the south of the A2, and this pressure would most likely concentrate on the sector of land falling between Ospringe in the west and the Brogdale Road in the east. This area is clearly constrained by the Ospringe Conservation Area to the west and the Faversham Conservation Area to the north, plus there is a need to consider contribution to a historic landscape strongly associated with fruit cultivation, as well as impacts to important links between Faversham and the rural landscape to the south of the M2, including the Whitehill and Painters Forstall Conservation Areas and the national fruit collection at Brogdale Farm.
 - West: there is thought to be limited realistic potential for expansion to the west; however, there could be the possibility of a modest urban extension to the north of the A2, potentially expanding the western edge of the town in this area as far as the B2045 ‘Western Link’. There are no listed buildings in this area; however, this land (in particular the western part) contributes to an attractive rural setting to the western edge of Faversham, in combination with the highly visible landscaped grounds of the Syndale Park Conservation Area to the south of the A2. Furthermore, the Ordnance Survey map indicates the site of a Roman burial ground, and the Kent Historic Environment suggests this as the possible site of the Roman Station (mansio) of Durolevum, noting that the A2 is a Roman road (Watling Street).

⁸⁹ One of the farmsteads is associated with a grade 2* listed building and another associated with two grade 2 listed buildings. The third farmstead is not associated with any listed buildings, but is visible on the pre-1900 OS map.


- **BGS-C** (Further Faversham focus) – as noted by the Swale Heritage Strategy (2020): *“It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough”*. In this context, there is potentially merit to a strategic urban extension to the east / southeast of the town, from a historic environment perspective, in order to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the east and southeast of Faversham is relatively unconstrained in historic environment terms, and also an understanding that there would be good potential to avoid and mitigate historic environment impacts by taking a strategic approach to masterplanning, landscaping and design. There could also be good potential to deliver a new community - with associated employment, services, facilities, retail and infrastructure upgrades - that supports Faversham as a thriving market town and visitor/tourist destination. However, there are wide ranging risks and uncertainties, including around traffic (including through the Ospringe Conservation Area), a new retail offer competing with Faversham town centre, impacts to the historic agricultural and horticultural landscape setting of the town and impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. A key consideration is the integrity of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone.⁸⁹
- **BGS-D** (Further Faversham focus still) – it is fair to conclude that BGS-D performs worse than BGS-C; however, in practice it could be possible to deliver one or two modest urban extensions with limited historic environment impact.
- **BGS-E** (Strategic sites) – of the other three strategic site options (in addition to east / southeast of Faversham, which is discussed above), it is **Southeast Sittingbourne** that stands-out as most constrained. Unlike the other new settlement options, there is the potential to draw upon a valley topography to framework growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and containment); however, the corollary is growth would be in proximity to existing historic environment assets. The current proposed masterplan seeks to take a ‘landscape led approach’ and avoid impacts as far as possible, including by avoiding development in proximity to the only conservation area in the vicinity (Rodmersham Green); however, tensions remain nonetheless, most notably at the northern extent of area, where a new link road would cut through the Tonge Conservation Area, and in the central area, where development would abut the hamlet of Rodmersham, where there is a cluster of four listed buildings including a grade 1 listed church, which the Swale Landscape Sensitivity Assessment (2020) describes as “an important local landmark and skyline feature”. The further statement made by the Assessment, as part of a discussion of ‘time depth’, is also of note: *“It is evident that there have been changes in land cover in recent years, with the conversion of areas of commercial orchards to arable, and vice versa, for example along Church Street and Pitstock Road. However, this does not change the fundamental character of the landscape. The loss of some areas of traditionally managed orchards has adversely affected the historic and scenic character of the landscape, although more intensive commercial orchards remain an important feature which contributes to a distinctive sense of place”*. Finally, with regards to the other two strategic site options:
 - **North Street**: the new settlement would envelop grade 1 listed Copton Manor, as well as the cluster of six grade 2 listed buildings, and also encroach upon the historic hamlet of Newhouse Farm / Gosmere (eleven listed buildings) and the Sheldwich Conservation Area to the south, which is associated with raised ground within the Kent Downs AONB. The Swale Landscape Sensitivity Assessment (2020) explains: *“The time-depth of the landscape relates predominantly to the continuity of agriculture, fruit and hop cultivation within the area, together with the presence of many scattered historic houses, farmsteads and associated barns, oasts, stables and granaries in the Kentish vernacular styles (including timber framed, weather boarded and red brick), some with parkland containing notable mature trees, pasture and traditional orchards... Some areas of traditionally managed orchards have been lost in recent years, together with field boundaries, resulting in more open, larger fields.”* It also notes that there is evidence that the very large ‘prairie’ field in the vicinity of Copton has never been enclosed. However, there are also potential benefits from a bypass of North Street.
 - **Bobbing**: is seemingly the least constrained of the strategic site options, in historic environment terms. The new settlement would envelop the string of ten listed buildings that stretches between Bobbing in the south (where there is a grade 1 listed church) and Howt Green in the north; however, there is no designated conservation area; the historic character of this area is presumably somewhat affected by the nearby A429; and development would deliver a bypass of Bobbing. Development would envelop only one historic farmstead (with one grade II listed building), although the possibility of further expansion (in the future) encroaching upon two further farmsteads can be envisaged.

In **conclusion**, the broad growth scenarios involving a focus on further piecemeal urban extensions give rise to a significant degree of concern, and it is appropriate to highlight BGS-B and BGS-D as performing worst, as

Faversham is very sensitive, in historic environment terms. It is suggested that negative effects would be notably less significant under BGS-C and BGS-E; however, this conclusion is subject to the views of Historic England.

Of the strategic site options under consideration, Southeast of Sittingbourne and North Street give rise to the greatest concern; however, under BGS-E it could be possible to focus growth at the two strategic site options subject to more limited constraint.

Housing

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	3	2	1 	5

Discussion

It is assumed that all of the broad growth scenarios would deliver the same number of new homes in the plan period, and it is not possible to suggest that housing need is particularly acute in any one part of the Borough (rural housing needs are a specific topic worthy of consideration, but outside the scope of this current appraisal). BGS-E could well involve allocating one or more sites that continue to deliver homes beyond the plan period (this would certainly be the case for Southeast Sittingbourne and North Street, and potentially Bobbing); however, it is difficult to suggest this is a notable 'positive', from a housing perspective, as housing needs beyond the plan period can be met through a future Local Plan Review.

In turn, it is appropriate to focus attention on differentiating the scenarios in respect of the potential to deliver a good mix of housing types, sizes and (most importantly) tenures. There are inherent uncertainties, and in many ways this is a detailed consideration for the planning application stage; however, in the Swale context it is a strategic consideration because housing mix is a factor of development **viability**, which varies significantly across the Borough.

The headline point to note is that development viability is lower at Sittingbourne and on the Isle of Sheppey (**BGS-A**) than at Faversham (**BGS-B**). However, there is also some finer-grained variation of note (as understood from the house prices 'heat map' presented in Appendix I). In particular, it is notable that the parishes south of Sittingbourne are associated with much higher house prices than Sittingbourne itself, and within Faversham there are areas of notably lower house prices either side of the town centre / conservation area. These variations in development viability are reflected in Policy DM8 (Affordable Housing) of the adopted Local Plan, which requires 0% affordable housing on Sheppey and 10% affordable housing at Sittingbourne, in comparison to 35% affordable housing at Faversham and 40% affordable housing in the rural area. The LPR will adjust the affordable housing policy; however, there will still be a need to account for variations in viability.

As for the four competing **strategic site options**, three are currently proposing to deliver 40% affordable housing, whilst one – Southeast Sittingbourne – is proposing to deliver 20% (having previously proposed 10-20%). The proposed approach at Southeast Sittingbourne reflects an understanding that there will be other funding priorities, in particular major transport upgrades. It is also noted that Southeast Sittingbourne is the only one of the strategic site options to include a clear commitment to delivering specialist housing ("retirement living and self-build opportunities for local people"), which is assumed to represent a development cost (i.e. these uses are thought to be less viable than market housing with affordable), but this is not entirely clear, in any case, this proposal could be subject to change.

None of the strategic site promoters have proposed making land available for Gypsy and Traveller pitches (or Travelling Showpeople plots), which is an approach that is quite common nationally, where there is an established local need.

Finally, in respect of the strategic site proposals, it is important to recognise that additional development costs could emerge leading to a need to reconsider the mix of housing, including affordable housing, that can be delivered. For example, at Bobbing there is uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme, and there is a relatively high degree of uncertainty regarding North Street because this scheme has been less fully worked-up.

A further consideration, related to viability, is **delivery risk**. It is difficult to conclude that this is a 'housing' consideration, as the NPPF puts in place mechanisms to redress unanticipated shortfalls in housing delivery (the presumption in favour of sustainable development). Furthermore, there is the potential for the LPR to proactively

address delivery risk, under all scenarios, by putting in place a land supply that is perhaps 10%, 15% or 20% above the housing requirement, as a contingency for unanticipated delays to delivery ('supply buffer'). However, in the Swale context delivery risk is considered to be an important issue, which should be considered here. As stated within the officer's report to the 28th October 2018 Local Plan Panel: *"Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations."* Viability need not necessarily constrain delivery if development costs are kept low, but this can lead to tensions with wider objectives, for example affordable housing. Having made these introductory remarks, it is appropriate to comment on variation in delivery risk between the four competing strategic site options. This is a focus of the Stantec work, from which an order of preference emerges:

- East and SE Faversham – *"Of the four schemes promoted this is 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 Junction 7..."*
- Bobbing – *"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."*
- North Street – *"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."*
- Southeast Sittingbourne – *"... 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."*

In **conclusion**, it is appropriate to highlight a notable degree of risk associated with BGS-E, given delivery risks associated with a strategy that relies on two strategic sites. Under this scenario there would still be a large supply of homes from sites that are already committed (Swale Borough is in a strong position, with commitments expected to deliver around 11,000 homes in the LPR plan period) and from future windfall sites; however, an element of delivery risk nonetheless. In practice there would be good potential to manage this risk by additionally allocating a package of low risk urban / settlement extensions to deliver early in the plan period; however, for the purposes of this appraisal it is appropriate to 'flag' a notable risk.

BGS-A also performs relatively poorly given viability challenges in the west of the Borough; however, there is considerable uncertainty. It could well be that schemes are able deliver a good mix of housing, to include a good proportion of affordable housing, if housing objectives are prioritised above other policy requirements, for example minimising CO₂ emissions.

BGS-D performs most strongly, as there would be: a focus of growth at Faversham, where development viability is highest; a spread of growth between a strategic site (with inherent associated economy of scale benefits and inherently good potential to deliver a strong housing mix) and additional smaller urban extensions assumed to be associated with low delivery risk and able to deliver early in the plan period, thereby alleviating concerns around delay to delivering the strategic site would lead to a shortfall in housing supply early in the plan period (albeit, as discussed, the NPPF puts in place mechanisms to redress shortfalls against the plan delivery trajectory); and support for a strategic site (East / southeast of Faversham) where the current proposal is to prioritise affordable housing (at 40%, albeit the proposed breakdown of affordable housing tenures is not known) although there is uncertainty at the current time, ahead of further detailed work in respect of masterplanning and viability, taking account of local market conditions (there will be a need to deliver housing at a pace that avoids any concerns around saturation of the local housing market) and including detailed work to understand the costs of required infrastructure.

Land

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
★ 1	2	2	2	★ 1

Discussion

A primary consideration is the need to avoid the loss of best and most versatile (BMV) **agricultural land**, particularly that which is of the highest quality nationally, namely grade 1 land. Swale has a very extensive resource of grade 1 land.

The belt of grade 1 agricultural land in the Borough – known as the fruit belt – is centred on the **A2 corridor**, hence it is very challenging to identify any realistic broad growth scenario that would direct growth away from the area of agricultural land constraint. **Sheppey** is relatively unconstrained, with low-lying land shown by the nationally available dataset as being non-BMV (grade 4) and higher ground shown as grade 3 (which may or may not be BMV); however, BGS-A would involve only a modestly increased focus of growth at Sheppey, recognising that there are wide ranging barriers to growth on the Island.

As for the **strategic site options**, it appears to be East / Southeast Faversham that is most constrained, with the nationally available dataset showing almost all of the land to be of grade 1 quality, and in the knowledge that land in this part of the Borough has always been intensively farmed for agriculture and fruit cultivation. Southeast Sittingbourne is potentially the least constrained, as the nationally available dataset shows the southern part of the site to mostly comprise grade 2 quality land; however, it is important to recall that the dataset is very low resolution (e.g. with Teynham and Newington not recognised as comprising non-agricultural land). Only a small part of the Borough has been surveyed in detail, to establish the grade of agricultural land with certainty, and very little of the land within the strategic site options (Bobbing is a notable exception, where an area of land has been surveyed in detail and found to be of non-BMV (grade 3b) quality).

In **conclusion**, it is appropriate to conclude that any reasonable broad growth scenario 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 appropriate to highlight BGS-A and BGS-E as performing best, given areas of lower quality agricultural land on Sheppey and within the two new settlement options at Sittingbourne; however, this is fairly marginal and uncertain, given a lack of detailed survey work having been completed.

N.B. a further consideration is the extent of **minerals safeguarding** areas across the Borough; however, these are very extensive, and cover the majority of land along the A2 corridor that comes into contention for growth (Southeast Sittingbourne potentially stands-out as being subject to relatively low constraint). As such, it is not considered appropriate to differentiate the broad growth scenarios in respect of impacts to minerals safeguarding areas. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract minerals prior to development.⁹⁰

Landscape

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	4	2	3	★ 1

Discussion

There is a wide range of evidence to take into account, when considering the landscape merits of broad growth scenarios. In addition to avoiding impacts to the Kent Downs AONB and its setting, there is a need to avoid impacts to locally designated landscapes and countryside gaps, as understood from the Landscape Designation Review (2018) and the Important Local Countryside Gaps study (2020). Additionally, the Landscape Sensitivity

⁹⁰ See further discussion at: mineralproducts.org/19-release20.htm

Assessment (2019) examines the sensitivity of all landscape parcels surrounding the main settlements. More broadly, there is a need to consider topography across the Borough, historic landscape character and important views, including from roads and public rights of way. There is also a need to be mindful of wide ranging ecosystem services delivered by landscape units (see stand-alone discussion, below).

Because there is such a wide range of evidence to take into account, the discussion here is high-level, with further detailed discussion presented within Appendices III and V.

Having made these initial points, the following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – whilst there is little certainty, an increased focus of growth at Sittingbourne under this broad growth scenario could necessitate one or more significant allocations to the south of Sittingbourne. This area (parcel SE4) is judged to have overall **moderate-high** sensitivity, with a key conclusion: *“The landscape has a distinctive dry valley in the east, evidenced by its local landscape designation, and a rolling and undulating landform in the centre and west. There is a strong rural character through much of the area, and a resource of valued natural features and semi-natural habitats. There are high levels of enclosure and a well-defined urban edge to Sittingbourne. It is in close proximity and partially visible from the AONB which lies to the south of the M2.”* However, it could be the case that one or more locations for modest urban extensions can be identified that are subject to relatively little landscape constraint.

Another possibility, under this broad growth scenario, is that there could be increased pressure for further expansion to the east of Sittingbourne, likely to the north of the A2, where parcel SE1 is judged to have **moderate** sensitivity. This could involve revisiting the proposals for strategic open space and landscaping set out in the conceptual masterplans for the Stones Farm and NE Sittingbourne allocations within the adopted Local Plan, and there would be wide range constraints and issues to consider (not least Tonge Conservation Area and the grade 1 listed church to the north); however, from a purely landscape perspective, there could be a degree of opportunity around completing the expansion of the town in this direction, and then maintaining a landscape gap to Teynham (which has recently been identified as warranting designation as an important countryside gap, albeit landscape character is somewhat weak). Having said this, the Sensitivity Assessment (2020) notes: *“The area south of the railway line around Tonge has a higher sensitivity due its smaller scale, higher scenic quality and greater prevalence of valued historic and natural features.”*

Also, under this broad growth scenario, there could be moderately increased pressure for growth on the Isle of Sheppey, where all of the landscape parcels that would likely come into contention are judged to have a **moderate-high** sensitivity to housing, bar the two landscape parcels at Leysdown and Warden, which have **low-moderate** sensitivity. There could be the potential for one or more LPR allocations in the Leysdown area; however, any growth would be of a modest scale. A more likely situation is that land in the vicinity of Rushenden comes into contention for growth, given better connectivity and the need for growth to support regeneration objectives. This does give rise to concerns, from a landscape perspective, as land here forms the western extent of the North Swale (Sheppey) Marshes locally designated landscape. Furthermore, there is a likelihood of a mixed use scheme, and the Landscape Sensitivity Assessment identifies this area as having a **high** sensitivity to employment development.

- **BGS-B** (Faversham focus) – there would be decreased pressure to allocate problematic sites at Sittingbourne (and Sheppey), but there would be increased pressure to allocate non-strategic urban extensions to Faversham, which, in short, is associated with a high degree of landscape sensitivity, as evidenced by five of the seven landscape parcels surrounding the town having a **high** sensitivity rating. However, under this scenario there could be the potential to direct growth to modest urban extensions with relatively limited landscape sensitivity, in the context of a wider landscape parcel with high (or moderate-high) sensitivity. Also, the bulk of growth would likely be directed to the east of the town, where the landscape has only **moderate** sensitivity, although there are concerns in respect of built form and ‘urban sprawl’.
- **BGS-C** (Further Faversham focus) – growth would be directed to a strategic urban extension to the E/SE of the town, a strategy that is tentatively supported from a landscape perspective, as the landscape in this area has **moderate** sensitivity (in stark contrast to the high sensitivity parcels that surround most of the town). See further discussion in Appendix III.
- **BGS-D** (Further Faversham focus still) – it is fair to conclude that BGS-D performs worse than BGS-C, due to the need for one or more non-strategic urban extensions in addition to strategic urban extension assumed under BGS-C; however, there could be the potential for one or more modest urban extensions to Faversham that give rise to limited concerns.
- **BGS-E** (Strategic sites) – of the other three strategic site options (in addition to E/SE of Faversham, which is discussed above), it is Bobbing that stands-out as least constrained, on the basis that it would comprise land with **moderate-low** and **moderate** sensitivity. See further discussion in Appendix III.

With regards to the other two strategic site options, a detailed discussion is presented in Appendix III, with the following considered to be key points:

- Southeast Sittingbourne: would likely impact on five landscape parcels to the east and southeast of Sittingbourne, including two that have **moderate-high** sensitivity and one that has **high** sensitivity, namely the Rodmersham and Milstead Dry Valley, which is a locally designated landscape. The current masterplan proposals are described as ‘landscape led’; however, it is challenging to understand what this means in practice, in the absence of detailed work to explore the relative merits of alternatives. See further discussion in Appendix III.

A further discrete consideration is impacts to the AONB. The latest Stantec report states: *“The AONB Unit consider that their concerns can be mitigated and therefore do not have a strong objection.”* However, the latest situation is that that AONB Unit has updated its position, stating: *“... the proposed new motorway junction, located partially within the AONB, represents a major development that would be contrary to planning policy and due to its nature, could not be satisfactorily mitigated in terms of impact on the AONB. Therefore, the Unit continues to object to the proposal.”⁹¹*

- North Street: performs poorly as it entirely comprises landscape parcels identified as having **high** sensitivity. This is a locally designated landscape, with a close association to the AONB, which is adjacent on three sides.

In **conclusion**, it is appropriate to highlight BGS-E as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and East / southeast of Faversham. The potential to comprehensively plan for the very long term future growth of the Borough’s two main settlements can be envisaged; however, in neither case are the current proposals considered to respond to the opportunity in full. As such, it is not possible to predict positive effects. Also, there is a need to apply caution when drawing conclusions in respect of BGS-E, as there are inherent concerns associated with North Street, and also concerns associated with the current proposal for Southeast Sittingbourne, including AONB concerns.

As for the other broad growth scenarios, BGS-C is judged to perform relatively well, given the focus of growth at E/SE of Faversham, whilst those scenarios involving numerous ‘piecemeal’ urban extensions give rise to a cause for concern, albeit there is thought to be some capacity. Notably negative effects are highlighted for the two worst performing scenarios taking a precautionary approach, and given a general view that this would be a continuation of the spatial growth strategy seen over recent decades, which has arguably led to a significant erosion of landscape character.

Box A: Inter-relating issues and impacts at landscape scales

Whilst this current appraisal of broad growth scenarios must necessarily involve considering issues and impacts to a large degree in ‘silos’, there is also a need to recognise the extent to which issues and impacts inter-relate at a variety of scales, perhaps most notably at landscape scales. For example, the Kent Downs AONB Management Plan discusses a complex web of issues and opportunities that require management and planning ‘in the round’; and the Swale estuary and marshlands is another iconic landscape associated with a wide range of ‘natural capital’ stocks and ‘ecosystem service’ flows, leading to benefits in terms of biodiversity, climate change, heritage, health, jobs, food production and more.

The Nature Recovery Priority Areas are a good starting point for holistic consideration of issues and opportunities.

The North Downs

There is limited likelihood of growth directly impacting on the AONB, although: growth to the south of either Sittingbourne or Faversham leads to a need to consider impacts to the setting of the AONB; and there is also a need to consider the possibility of modest growth at Neames Forstal, given that it has a rail station. In turn, perhaps a foremost consideration is the possibility of strategic growth serving to deliver or facilitate strategic enhancements and therefore **benefits**, for example:

- South of Sittingbourne – growth in the vicinity of Kent Science Park could feasibly deliver strategic enhancements to the dry valley(s) between Sittingbourne and Bedminton / Wormhill / Frinsted / Torry Hill in Maidstone Borough. The dry valley, which splits into three dry valleys at Bottom Pond, is associated with a very high density of ancient woodland, and Milstead – adjacent to the east – is associated with two very large woodlands as well as Torry Hill Park (in private ownership); however, it appears that the woodlands in this area have limited accessibility. There could be the potential to: deliver circular walks and cycle routes; work with landowners to increase public accessibility; and deliver land management initiatives aimed at minimising surface water run-off and therefore risks of flash flooding.

⁹¹ See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

- North Street – two dry valleys strongly link the west of Faversham and Ospringe to the AONB, with both valleys associated with a high density of woodlands and heritage assets. Land to the south of Faversham is more distant from high points in the AONB than is the case for land to the south of Sittingbourne; however, this does not detract from the strategic value of these valleys. The possibility of strengthening landscapes to the west and southwest of Faversham as part of a comprehensive approach to planning for the town's expansion might be envisaged. For example, an aim might be to deliver a circular cycle route that follows and then links the two valleys, also taking in historic villages; and possibly linking with Milstead and the dry valleys south of Sittingbourne. There could also be an opportunity to link the series of four country estates (three of which are on the list of registered parks and gardens; all grade II) that are a feature of Kent Down dip slope south of Sittingbourne / Faversham.⁹²

Swale Marshes

A key **opportunity** could be around strategic expansion to the east of Faversham serving to strengthen and enhance the marshlands, and associated historic hamlets and farmsteads on raised land, that lie between Faversham and Seasalter/Whitstable, mindful of issues and opportunities associated with the committed Cleve Hill Solar Farm. A national cycle route already links Faversham to Whitstable; however, there could be opportunities to further enhance accessibility. The concept of 'rewilding' could also feasibly be explored, including with a view to adding to the local tourism offer. The Kent Wildlife Trust is supportive of re-wilding in appropriate parts of the County – see kentwildlifetrust.org.uk/wilderblean.

On Sheppey the option of strategic growth on a par with that under consideration for Sittingbourne and/or Faversham is not considered to be a realistic option for the LPR; however, there could be significant growth nonetheless. Attention focuses on the west of the Island, given that this is the area most suited to growth, and also given that the extensive marshes in the central and eastern parts of the islands are associated with limited growth-related opportunity (given distance and limited accessibility, plus they are already well-managed, with two extensive National Nature Reserves). The Green and Blue Infrastructure Study (2020) identifies some targeted opportunities for enhancement, and also serves to highlight the Isle of Sheppey as experiencing notable health deprivation and having limited access to multifunctional green and blue infrastructure. One identified opportunity area of note is located to the southwest of Rushenden.

The Blean

The Boughton and Dunkirk area is heavily constrained, and hence not likely to be a focus of strategic growth. A new settlement is being promoted, but is not considered to be in realistic contention for allocation.⁹³ As such, the key landscape area for consideration is the Blean Edge Fruit Belt locally designated landscape, which covers land to the north and south of Boughton, to the west of the Blean woodlands. The value of this landscape – both in-and-of-itself and as a strategic gap between Faversham and Boughton - would increase under a scenario involving strategic growth southeast of Faversham, to include strategic employment growth at M2 J7. Also, there is also a need to consider the possibility of growth at Neames Forstal. Alongside any strategic interventions focused on the locally designated landscape there should also be consideration given to land in the vicinity of Boughton Church Conservation Area, which falls outside of the locally designated landscape.

Faversham

The discussion above serves to highlight the possibility of comprehensively planning for the long-term future growth of Faversham alongside strategic planning for the surrounding landscapes of: the Swale marshlands and marshland edge landscapes to the north – to which Faversham relates very closely; dip slope dry valleys to the southwest; and the fruit belt landscape that separates Faversham and Boughton / Neames Forstal to the southeast. This leaves one final sector to the south, where it is more challenging to suggest that this landscape should be a focus of protection / conservation / enhancement in the long-term. This is something of an open 'plateau' type landscape between valleys to the east and west, historically sparsely settled, with very limited priority habitat and high points in the AONB some way distant, plus there is a need to consider that this area is potentially quite well connected to both Faversham and Ashford.

⁹² The Lees Court Estate is notable for also managing extensive land to the north of Faversham – see www.leescourtestate.com.

⁹³ See winterbournefields.com/

Other settlements

Faversham is perhaps the stand-out example of a settlement in Swale Borough where there is the potential to plan strategically for growth alongside strategic planning for surrounding landscapes, with a view to leveraging funding to secure and enhance natural capital and ecosystem services, to the benefit of the growing population (and populations more widely), but any other settlement that is a focus of strategic growth might benefit from this approach.

For example, a scenario might be envisaged where, as a *quid pro quo* for accepting major growth at those locations around Sittingbourne that are less sensitive from an environmental perspective (also recalling that there is a committed high growth strategy for Iwade), government funding might be made available to support both protection and enhancements of sensitive landscapes to the south and southeast of the town as well as delivery of a new motorway junction and southern link road.

As for the Isle of Sheppey, the island is largely characterised by two distinct geographies, namely the marshes and the raised 'clay spine' to the north. This could indicate a strategic planning opportunity, crucially to include major transport upgrades. This could be a matter to explore at the sub-regional scale, as part of work focused on the wider Thames Gateway, with strategy for the Isle of Sheppey considered 'in the round' along with strategy for the Isle of Grain and South Essex.

Conclusion

Large scale 'zoning' of land uses, with a view to securing natural capital and ecosystem service benefits, is potentially in-line with emerging thinking on planning for the natural environment alongside growth. For example, locally prepared Local Nature Recovery Strategies under the Environment Bill will come together to deliver a national Nature Recovery Network, the Wildlife Trusts are calling for a new planning designation of Wild Belts and the concept of targeted 'rewilding' is also gaining traction. However, there are also arguments for allowing settlements and surrounding landscapes to evolve more organically over time and, in this respect, it is notable that the recent Planning White Paper proposes that Local Plans should plan for a time horizon of ten years, rather than the current fifteen years.

Transport

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
4	4	1	3	2

Discussion

The following bullet points consider each of the broad growth scenarios in turn:

- **BGS-A** (Roll forward Bearing Fruits) – a key consideration is junction capacity on the strategic road network, and a primary consideration is capacity at M2 J5 (A249), in respect of which the adopted Local Plan (2017) explains: "*The main strategic risk to the plan overall relates to any significant deferral in the improvement to Junction 5 of the M2*".

Highways England consulted on upgrade options in 2017 (see highwaysengland.citizenspace.com/he/m2-junction-5-improvements) and identified a preferred option, but there have been funding challenges. The September 2019 Stantec report explained that the scheme was still "not fully funded", and discussions have continued through 2020. However, latest understanding is that upgrades will commence in 2021. A planning inquiry closed on 4th December 2020; however, this is specifically in respect of one element of the proposed scheme (a flyover), as opposed to the scheme as a whole.

Additionally, there is a need to consider the three A249 junctions to the west of Sittingbourne. In particular, there are concerns regarding the Bobbing junction, given that the other two junctions have funding for upgrades in place (also, the Grovehurst junction, which serves Iwade, is not likely to serve LPR growth).

In short, there are concerns regarding junction capacity, the timing of upgrades and also the headroom that will exist following upgrades (including headroom at M2 J5, recognising that the M2 may see increase traffic following the Lower Thames Crossing and potentially given an increase in traffic to/from ports).

In light of these points, BGS-A gives rise to notable concerns, as piecemeal growth would 'load pressure' onto the strategic road network. Other points, including taking account of potential growth locations, are discussed above under Air quality, Climate change mitigation and Communities.

- **BGS-B** (Faversham focus) – as discussed above, under Air Quality, BGS-B could necessitate a focus of growth in the Ospringe area, which gives rise to concerns from a transport perspective, given the likelihood of increased traffic on the A2, including through AQMAs. As discussed, it is difficult to envisage a strategic transport solution that would avoid increased traffic impacting on the Ospringe AQMA and, in any case, concerns would remain regarding westbound traffic towards Sittingbourne impacting on AQMAs. Additionally, there is a concern regarding capacity M2 J7, discussed below.
- **BGS-C** (Further Faversham focus) – transport issues associated with strategic growth at Southeast Faversham (as opposed to E/SE of Faversham) are discussed in detail in the latest Stantec report. In short (see further discussion in Appendix III), there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6. It may be that the latest proposal, which involves bringing forward a combined scheme involving growth both to the east and southeast of Faversham, leads to greater potential to deliver timely road infrastructure upgrades, but there is no certainty in this respect.
- **BGS-D** (Further Faversham focus still) – gives rise to significant concerns given that piecemeal growth, in addition to strategic growth to the east / southeast, would give rise to concerns in respect of traffic on the A2 and at M2 J7.
- **BGS-E** (Strategic sites) – a detailed discussion is presented in Appendix III; however, in summary there is least concern with E/SE Faversham. As for the other sites, the Stantec Assessment of Stage 2 submissions (2019) concludes: *“... in general and subject to further modelling it is likely that appropriate mitigation could be achieved. However, there are concerns about [Southeast Sittingbourne] 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 [North Street], on the A251, for which mitigation may not be agreeable or financially viable and also concerns that [Bobbing] will have significant implications on the local highway network which may not be capable of mitigation.”*

N.B. with regards to what might be learned from further modelling, one important consideration is the impact of strategic growth in Swale on junctions outside of the Borough – see discussion in Appendix I, which serves to highlight junctions in Ashford and Maidstone Boroughs (linked to Swale) as important considerations for the LPR.

The following quote from the latest Stantec report is also an important consideration: *“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.... Councils with active proposals for development in emerging plans are able to access funding not available to those who do not.”* There could be an argument to suggest that public sector funding will be more forthcoming where there is strategic growth, including because there will tend to be good potential to effectively channel developer funds to bolster public sector funds.

In **conclusion**, it is difficult to differentiate those broad growth scenarios involving dispersed growth across smaller sites (BGS-A and BGS-B) and those involving a concentration of growth at one or two strategic sites. There is limited evidence in respect of BGS-A and BGS-B; however, the latest Stantec report does explain that: *“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 [Bobbing] would be achievable from a collection of smaller sites in the same broad area.”*

Overall, it is considered appropriate to highlight BGS-C as best performing, primarily on the basis that Stantec find Southeast of Faversham strategic site option to give rise to the fewest concerns, albeit the proposal is now to deliver a “East / southeast Faversham” scheme. Additional evidence, in respect of BGS-C, comes from the April 2020 re-run of the Swale Transport Model (discussed in Appendix I), which examined an approach to growth at Faversham similar to that assumed under BGS-C and serves to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I).

It is considered appropriate to highlight BGS-E as second best performing, given the potential for Southeast Sittingbourne to deliver transformational transport benefits, albeit there is uncertainty regarding delivery. It is fair to highlight BGS-A and BGS-B as jointly worst performing, as there is insufficient evidence to differentiate them.

With regards to effect significance, there are uncertainties and concerns regarding all of the broad growth scenarios, and it is fair to flag the risk of significant negative effects for the two worst performing scenarios.

Water

BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
?	?	?	?	?

Discussion

An important strategic consideration is waste-water treatment capacity. The latest Stantec report includes a section on utilities capacity, which overall highlights very limited concerns, concluding:

“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.”

However, there is a need to apply caution, in the sense that there is a need to minimise any residual risk of capacity breaches (in respect of either treated or untreated effluent), with resultant water quality impacts.⁹⁴ In turn, there are arguments for directing growth to locations where there is existing capacity at the receiving Wastewater Treatment Works (WwTW), as opposed to relying on timely capacity upgrades.

There is some evidence to suggest that capacity at Faversham WwTW is a particular concern. In particular, the Kent Water Sustainable Growth Study (2017) noted that headroom capacity at Faversham WwTW would be exceeded by planned growth to 2031 (as set out in the adopted Local Plan), hence there would be a need for upgrades. However, as part of the assessment of the Southeast Faversham strategic site option, the Stantec *Assessment of Stage 2 Submissions* (2019) explains:

“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... costs, options and works duration [are being discussed].”

Further considerations are as follows:

- Bobbing - it is unclear whether there is a need for a new pumping station, though the promoter has suggested that costs of any network reinforcement that may be required would not be borne by Southern Water.
- In March 2020 Southern Water pleaded guilty to 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events alleged to have taken place between 2010 and 2015, and it is understood that another investigation by the Environment Agency is under way that covers pollution incidents after 2015.⁹⁵

In **conclusion**, it is considered appropriate to highlight uncertain negative effects for all scenarios. Whilst there can be merit to focusing growth at strategic sites, and there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, it is not possible to differentiate the broad growth scenarios with certainty, on the basis of the evidence available. It can also be the case that urban extensions benefit from proximity and existing links to WwTWs.

As for other ‘water’ considerations:

- Pollution to surface water in the vicinity of growth locations – whilst there may be variation in water quality across the Borough’s surface water bodies, it is inherently difficult to differentiate broad growth scenarios, because there is very good potential to deal with water pollution arising from development schemes through

⁹⁴ N.B. as discussed within the Swale LPR Habitats Regulations Assessment (HRA) report, there are relatively limited concerns around sewage effluent impacting the North Kent Estuaries European sites from treated sewage effluent. This is because these estuaries have a high sediment load, low water temperatures and high wave action. As such, smothering macroalgal growth, which has caused issues for European sites on the south coast, is not considered a threat to achievement of conservation objectives for these European sites.

⁹⁵ See <https://www.ft.com/content/3efb3e7b-3388-4f27-85ac-44b00aa1fd37>

Sustainable Drainage Systems (SuDS). Water pollution from breaches of capacity at WwTWs is considered to be a much more important strategic consideration.

- Pollution to groundwater in the vicinity of growth locations – groundwater source protection zones are associated with the parts of the Borough associated with a chalk geology, with Sheppey, Bobbing, and most land at Faversham (bar land directly to the south) falling outside of a source protection zone. However, it is again the case that there is very good potential to suitably avoid/mitigate impacts through the development management process. Groundwater source protection zones can be a particular constraint for polluting developments (e.g. heavy industry, petrol stations).
- Water resources – water scarcity is an issue that applies across the Borough as a whole.

Conclusions

The matrix below draws together the conclusions from the preceding twelve topic-specific appraisal tables.

	BGS-A: Roll forward Bearing Fruits	BGS-B: Faversham focus	BGS-C: Further Faversham focus	BGS-D: Further Faversham focus still	BGS-E: Strategic sites
Rank of preference and categorisation of effects					
Air quality	2	4	3	4	★1
Biodiversity	★1	2	★1	2	★1
Climate change mitigation	4	4	★1	3	2
Communities	4	5	★1	3	2
Economy and employment	4	3	2	3	★1
Flood risk	4	3	2	★1	★1
Heritage	2	3	★1	3	★1
Housing	4	3	2	★1	5
Land	★1	2	2	2	★1
Landscape	4	4	2	3	★1
Transport	4	4	★1	3	2
Water	?	?	?	?	?

Overall appraisal conclusions

It is immediately apparent that scenarios A and B are assigned relatively few stars (indicating highest rank of preference) and green scores, and more red scores than is the case for scenarios C to E. Focusing on scenarios C to E, it is apparent that Scenario D has fewer stars, fewer green scores and more red scores than is the case for scenarios C and E.

However, it does not necessarily follow that it is a straightforward choice between BGS-C and BGS-E, when seeking to decide which is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to Air quality, Biodiversity, Housing and Land objectives, which could mean favouring BGS-A overall.

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 – BGS-B and BGS-D perform poorly, as there is a strong likelihood of increased traffic through Ospringe, which is an air pollution hotspot. The Air Quality Modelling Report suggests that air pollution in Ospringe could roughly halve by the end of the plan period; however, it is nonetheless appropriate to flag a notable degree of risk. It is fair to highlight BGS-E as performing best, on the assumption that there would be a focus of growth at the two best performing strategic sites, namely Southeast Sittingbourne and East / southeast of Faversham.
- Biodiversity – BGS-B and BGS-D perform poorly, as there could be a need to allocate constrained sites to the north of Faversham, and it is appropriate to flag a notable degree of a risk (however small) of SPA/Ramsar impacts. It is difficult to confidently differentiate the other scenarios. BGS-C arguably performs relatively well; however, there is a concern associated with strategic growth to the east of Faversham extending north as far as the railway line.
- Climate change mitigation – it is inherently challenging to differentiate the scenarios, including because there can be tensions between objectives around minimising built environment emissions on the one hand and, on the other hand, minimising transport emissions. However, on balance it is considered appropriate to highlight BGS-C as performing best, because there would be a focus of growth at a strategic urban extension that is well-related to a higher order settlement, albeit there are a range of issues and uncertainties. With regards to the other broad growth scenarios, it is considered appropriate to highlight BGS-E as second best performing, given the opportunities associated with strategic growth; however, there is a very high degree of uncertainty, given that the locations in question are not ideal from a transport connectivity perspective and/or there would be viability challenges. With regards to effect significance, it is difficult to draw conclusions; however, on balance it is considered appropriate to flag a concern with all scenarios, even that which is best performing. This reflects a view that Swale Borough's 2030 net zero target date is so ambitious that decarbonisation must be a primarily driving factor influencing spatial strategy and site selection.
- Communities – a key consideration is the need to deliver a new secondary school at Faversham to meet existing and committed future needs. This serves as a reason to conclude that BGS-C will lead to significant positive effects, and BGS-B would lead to significant negative effects. However, there is a degree of uncertainty ahead of detailed site-specific proposals. It is also appropriate to flag a degree of opportunity associated with BGS-E, although there is considerable uncertainty, given viability constraints in the Sittingbourne area, competing costs and uncertainty regarding the deliverability of site specific proposals. As for BGS-A, it is appropriate to flag a degree of risk associated with piecemeal expansion at Sittingbourne 'loading pressure' onto existing community infrastructure.
- Economy and employment – the Employment Land Review (ELR) serves to highlight a significant opportunity associated with Southeast Sittingbourne, hence it is appropriate to flag BGS-E as having the potential to result in significant positive effects; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viably) and implications for the wider Borough and elsewhere. BGS-C also performs well, as the employment land strategy could align with key recommendations from the ELR.

- Flood risk – it is appropriate to highlight those broad growth scenarios involving less growth directed to the Isle of Sheppey as performing well; however, this is highly uncertain, as there is the potential to deliver growth on the island whilst avoiding growth in a flood risk zone, and growth in the flood risk zone on the island is a very specific matter for consideration (as a potential ‘exceptional circumstance’) given potentially overriding regeneration objectives. Significant negative effects are not predicted, but it is considered appropriate to flag a concern in respect of BGS-A.
- Heritage – the broad growth scenarios involving a focus on further piecemeal urban extensions give rise to a significant degree of concern, and it is appropriate to highlight BGS-B and BGS-D as performing worst, as Faversham is highly constrained. Negative effects could be notably less significant under BGS-C and BGS-E; however, this conclusion is subject to the views of Historic England. Of the strategic site options under consideration, Southeast of Sittingbourne and North Street give rise to the greatest concern.
- Housing – it is appropriate to highlight a concern with BGS-E, given reliance on strategic sites leading to delivery risks. BGS-A also performs relatively poorly given viability challenges; however, there is considerable uncertainty. BGS-D performs most strongly, as there would be: a focus of growth at Faversham, where development viability is highest; a spread of growth between a strategic site and smaller urban extensions assumed able to deliver early in the plan period; and support for a strategic site where the current proposal (to be confirmed) is to prioritise affordable housing.
- Land – it is appropriate to conclude that any reasonable broad growth scenario 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 appropriate to highlight BGS-A and BGS-E as performing best; however, this is marginal and uncertain.
- Landscape – it is appropriate to highlight BGS-E as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and East / southeast of Faversham. The potential to comprehensively plan for the very long term future growth of the Borough’s two main settlements can be envisaged; however, in neither case are the current proposals considered to respond to the opportunity in full. As such, it is not possible to predict positive effects (plus there is a need to *apply caution* when drawing conclusions in respect of BGS-E, as there are concerns associated with North Street and SE Sittingbourne). As for the other scenarios, BGS-C is judged to perform relatively well, given the focus of growth at East / southeast of Faversham, whilst those scenarios involving numerous ‘piecemeal’ urban extensions give rise to a cause for concern.
- Transport – it is difficult to differentiate those broad growth scenarios involving dispersed growth across smaller sites (BGS-A and BGS-B) and those involving a concentration of growth at one or two strategic sites. However, an overriding consideration is that piecemeal urban extensions can lead to opportunities missed in respect of delivering strategic transport infrastructure upgrades, and in respect of supporting ‘trip internalisation’. In respect of the strategic site options, all are associated with challenges, but East / Southeast of Faversham may give rise to fewest concerns. This leads to a conclusion that BGS-C performs best. It is considered appropriate to highlight BGS-E as second best performing, given the potential for Southeast Sittingbourne to deliver transformational transport benefits, albeit there is uncertainty regarding deliverability. With regards to effect significance, there are uncertainties and concerns regarding all of the broad growth scenarios, and it is fair to flag the risk of significant negative effects for the two worst performing.
- Water – focusing on the matter of capacity at Wastewater Treatment Works (WwTWs), it is considered appropriate to highlight uncertain negative effects for all scenarios. Whilst there can be merit to focusing growth at strategic sites, and there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, it is not possible to differentiate the broad growth scenarios with certainty, on the basis of the evidence available.

Appendix IV: Strategic site options

Introduction

The aim of this appendix is to present an appraisal of the four competing strategic site options discussed in Section 6.2.

Appraisal methodology



Appraisal findings are presented below within 12 separate tables, with each table dealing with a specific sustainability topic (see Section 3). Within each table the performance of each of the strategic site options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁹⁶ and the strategic site options are also ranked in order of preference.

Other points on methodology discussed in above, in respect of the appraisal of broad growth scenarios (Appendix II) also apply to the appraisal of strategic site options.

Appraisal findings

The tables below presents appraisal findings in relation to the strategic site options.

Air quality

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
	3		2

Discussion

Despite all options being in proximity to problematic A2 corridor, they are likely to have different degrees of dependency upon it. The northern extent of **Option 1** (Southeast Sittingbourne) is adjacent to the A2 and would likely facilitate direct access to it. However, Option 1 would also have potential to deliver a new junction to the M2 which runs adjacent to the site's southern extent, which would likely provide primary east-west connectivity for non-local traffic generated from new development at the site. This could have the effect of minimising the overall level of traffic using the A2 for journeys other than to local destinations, which would help limit adverse effects on AQMAs at Sittingbourne, Teynham and Ospringe. There could be potential to provide or enhance sustainable transport connections to services at central Sittingbourne, and the scale of the site suggests that local services would likely be provided within the site, helping minimise the need to travel to meet day-to-day needs.

Similarly, the eastern extent of **Option 3** (East and SE Faversham) is adjacent to junction 7 of the M2, which could also provide the primary east-west axis for traffic generated by development on site, minimising the level of traffic funnelled along the A2 corridor through the Ospringe, Tenyham and Sittingbourne AQMAs. Additionally, the option's close proximity to services at central Faversham could present opportunities to ensure residents can access these services by modes other than the car, helping minimise additional emissions from local travel within Faversham.

Option 4 (North Street) would be served by junction 6 of the M2, again suggesting that the majority of east-west traffic would be unlikely to flow to the A2 and impact the AQMAs. However, the option's greater distance from existing services and facilities at central Faversham serves to suggest that many needs would continue to be met by private car, potentially loading new vehicle movements onto the local road network in central Faversham. In particular, there could be potential for heightened pollution from queuing traffic at the junction of the A251 and the A2, as traffic from Option 4 would pass through this junction to access the town centre. Whilst this is not an AQMA, it is a not air pollution problem area, given the nearby school.

⁹⁶ **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.

Option 2 (Bobbing) appears to have greatest potential to directly increase traffic flows through one or more AQMAs. Specifically, traffic travelling eastwards into central Sittingbourne or westwards towards Newington and Rainham would flow towards the AQMAs at St Paul's Street, Newington High Street and Rainham respectively. Whilst this would be mitigated to an extent by provision of public transport, it is unlikely that the B2006 would provide an attractive option for walking or cycling to town centre services at Sittingbourne and so a degree of car dependency is likely to remain for access to some.

It is recognised that the promoter of Option 1 suggests development at the option will “impact positively” on air quality at the Borough’s AQMAs. The rationale behind this centres on the same argument as has been discussed above, namely facilitating travel via the M2, rather than the A2, and by delivering a good degree of self-containment / trip internalisation. The promoter of Option 2 says that air quality issues arising from new development could be mitigated via provision of enhanced public transport facilities in relation to travel to both Sittingbourne and Rainham. No specific discussion of air quality is presented by the promoters of Options 3 or 4.

In **conclusion**, it is considered that by virtue of their potential to support walking and cycling to local services and to direct longer distance car journeys away from the Borough’s AQMAs, Options 1 and 3 perform most strongly in relation to air quality. Option 4 performs less strongly, as although it is unlikely to directly generate traffic which flows through one or more AQMAs, its location is considered likely to embed a degree of dependency on emissions-generating transport modes.

Option 2 is found to perform least strongly, as it is considered unlikely to support walking and cycling to higher tier services and whilst there could be potential to expand existing bus services to serve the option, it is likely that accessing many services would be most conveniently achieved via car, generating traffic which would flow through AQMAs to both the east and the west. However, significant negative effects are not predicted, given good potential for mitigation, and also noting that air quality is improving over time and set to improve significantly over the plan period, due to the switchover to electric vehicles.

Biodiversity

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
3	2	★ 1	★ 1

Discussion

With regards to internationally designated sites:

- Option 1 (Southeast Sittingbourne) – the current proposal is to deliver significant growth to the north of the A2, where the SPA would be in relative proximity, although it is not clear that there would be good connectivity by road or PROW.
- Option 2 (Bobbing) – the northern extent of the site would be around 2km from the SPA, and whilst it is not clear that this is a particularly accessible or sensitive part of the SPA, there is a need to consider in-combination impacts given committed growth at Iwade and Northwest Sittingbourne (also the potential for the Bobbing scheme to expand in the future).
- Option 3 (E/SE Faversham) - the walking route to the SPA would be c2.25km; and the driving route to the SPA would be via Goodnestone. A further consideration is the likelihood of growth leading to a degree of increased recreational pressure on the Blean Woodlands SAC to the east, potentially in combination with growth in Canterbury District; however, the part of the SAC in closest proximity is managed as a National Nature Reserve, and the car park is on the eastern edge, well over 10 km distant.
- Option 4 (North Street) – is also within driving distance of the Blean Woodlands. The site promoters of Option 4 highlight the potential to “provide a mitigation package” for the Blean Complex SAC, though details are not provided.

The Borough has several nationally important Sites of Special Scientific Interest (**SSSIs**), though the four options are mostly fairly distant. This is again on the basis that the majority of the Borough’s SSSIs, and those in neighbouring areas, are clustered along the coastline. The Church Woods, Blean SSSI – and the National Nature Reserve at the same location – are the principal exceptions to this, though it is considered that recreational pressure is less significant in relation to these designations than in relation to the Blean Complex SAC.

In terms of effects on lower-tier designations, **Option 1** (Southeast Sittingbourne) stands out as having potential for adverse effects as the expansive scale of the site means it envelops a number of local sites. First, development under Option 1 would likely include a focus of growth at the Highstead / Rodmersham Green area, where there is a high density of woodland, including the ancient woodlands of Highstead Wood, Box Wood and Cromer's Wood. This could lead to degradation of the ancient woodland itself, as well as its role in sustaining the wider habitat network.

Option 1 also includes the Highstead Quarries Local Wildlife Site (LWS) - which is adjacent to the existing built area of Sittingbourne - and the option also nearly encircles the Cromer's Wood LWS at Woodstock to the south. The uneven (and potentially unstable) nature of the land around the former quarry suggests that development is unlikely to come forward in the immediate vicinity of this LWS, though the Cromer's Wood LWS has a largely open and undeveloped periphery, and it may be important to retain this as far as possible through the development process to maintain habitat connectivity.

The Biodiversity Baseline Study (2020) identifies that broad areas of traditional orchard priority habitat within Option 1 are a strategic priority at the borough-scale, and there is understood to have been significant loss of this habitat over recent decades. Therefore, whilst there could be potential adverse effects to habitat connectivity at a landscape scale from strategic growth at Option 1, there could equally be an opportunity to seek to deliver habitat enhancement. The Biodiversity Baseline Study notes that these opportunities could include providing habitat linkages between Highstead Wood and Cromer's Wood.

Areas of ancient woodland are also evident within and adjacent to **Option 2** (Bobbing) and adjacent to Option 4 (North Street). At Option 2, it could be feasible to incorporate an appropriate development buffer around the Rooks Wood ancient woodland at its centre, though it is appropriate to highlight the potential for harm to the woodland itself from activities such as trampling underfoot, and of harm to its wider habitat connectivity which could be severed by encircling development.

At **Option 4** (North Street), a small area of the Badgin Wood ancient woodland is adjacent to the site's south west boundary, though in practice it is considered that the southern extent of the site would likely incorporate a landscape or natural buffer as proposed by the site promoter, which would provide appropriate mitigation. The Biodiversity Baseline Study notes in relation to land at Option 4 that "onsite Biodiversity Net Gain provision should seek to increase the extent of deciduous woodland and other key habitats" suggesting that although the site has a range of sensitivities, there could be opportunities to deliver positive effects through the development process via habitat enhancement.

Option 3 (East and SE Faversham) appears to have very limited sensitivity in relation to lower tier designations, as there are no designated sites within or adjacent to it. Very small, localised areas of priority habitat are evident at two separate areas of deciduous woodland near the A2. In this context there could be good opportunities to seek a biodiversity net gain through Option 3, and it is noted that the site promoter has proposed "ecological enhancements" on site to establish new habitats.

In **conclusion**, Option 1 stands out as having potential for adverse effects on habitats of at least local significance, including several areas of ancient woodland. The theoretical potential for seeking a net gain in biodiversity through the development process must be balanced against the potential for adverse effects of significant urbanisation on the area's habitat networks and individual biodiversity assets, and it is considered that on balance Option 1 could give rise to adverse effects overall.

Option 3 and 4 both have limited sensitivity in relation to biodiversity designations, and could offer opportunities to deliver a net gain in biodiversity through the development process through on and off site habitat creation. Option 2 includes the Rooks Wood area of ancient woodland near its centre, and whilst this could be protected through buffering, its role in the wider habitat network may be at risk of harm through the urbanisation of its surrounding area.

On balance therefore, it is considered the Option 1 performs poorly in relation to biodiversity, whilst Options 3 and 4 perform most strongly and broadly on a par with one another. Option 2 is found to perform less strongly than Options 3 and 4.

Significant negative effects are not predicted, recognising that strategic sites can and should be masterplanned so as to deliver extensive and high-quality on-site green infrastructure, and can also potentially direct funds to targeted offsite habitat enhancement or creation initiatives, in support of strategic / landscape scale objectives.

All of the schemes in question have made high-level commitments, including around ensuring that at least 50% of the total site area is brought forward as open-space; however, at the current time it is not clear that any stand-out opportunities or proposals exist, hence significant positive effects are not predicted.

Climate change mitigation

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
★ 1	2	★ 1	2

Discussion

As discussed in Appendix II, whilst strategic growth can give rise to a range of opportunities in respect of delivering measures in support of **built environment** decarbonisation, there is limited evidence to suggest that any of the sites in question are associated with particular locational opportunity, and limited evidence of scheme proposals being developed with decarbonisation as a priority objective (Southeast Sittingbourne stands-out as performing relatively well in this respect, as discussed in Appendix II).

With regards to **transport emissions**:

- Option 3 (East and SE Faversham) - strategic growth to the E/SE of Faversham is tentatively supported, given the inherent opportunities associated with strategic growth locations, and because the site is well-related to a higher order settlement with a rail station, and noting the commitment to deliver a good mix of uses onsite and ensure a focus on walking/cycling infrastructure. However, concerns and questions remain.
- Other options (Bobbing, Southeast Sittingbourne and North Street) are all less well related to a higher order centre than is the case for E/SE of Faversham, with North Street potentially standing-out as performing poorly, as it is relatively poorly related to *Faversham*, i.e. a second tier settlement. Southeast Sittingbourne potentially stands-out as performing well, as residents would be able to walk/cycle to employment at an expanded Kent Science Park; however, on the other hand, there is a concern that an expanded Kent Science Park (in combination with a new motorway junction) could attract long distance commuting by car, given skills levels locally. As for Bobbing, there is a concern regarding connectivity to Sittingbourne town centre (over 3km distant, via the problematic B2006), and whilst the latest Stantec report states that the latest proposal “*refocuses its emphasis on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus*” this is not entirely evident from the latest proposals on the scheme website.

In **conclusion**, it is inherently challenging to differentiate the strategic site options, including because there can be tensions between objectives around minimising built environment emissions on the one hand and, on the other hand, minimising transport emissions. In the absence of modelling or other detailed analysis, there is a need to weigh-up competing objectives on the basis of professional judgement, in order to arrive at an overall conclusion.

On this basis, it is considered appropriate to highlight two options as joint best performing:

- Option 1 (Southeast Sittingbourne) – the scheme proposals are encouraging, but are nonetheless high-level and potentially subject to change, recalling that scheme viability is challenging, as understood from the proposal to deliver only 20% affordable housing; also, there are certain question-marks regarding potential to minimise per capita transport emissions.
- Option 3 (East and SE of Faversham) would involve a strategic urban extension to a higher order settlement. However, concerns and questions remain: Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (albeit potentially supportive of rapid bus services to Canterbury, Whitstable/Herne Bay and other locations to the east); there is uncertainty regarding potential to deliver growth to the south of the A2 in combination with growth to north of the A2, as a combined strategic scheme that leads to additional economies of scale and potential to deliver sustainable transport and LZC infrastructure, and other climate change focused measures; and There is a degree of uncertainty regarding the extent to which the masterplanning and design ethos of the scheme is supportive of minimising emissions (see discussion below, under ‘Communities’).

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 strategic site options, even that which is best performing. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a primary driving factor influencing site selection and development of site-specific proposals.

Communities

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
2	3	1	4

Discussion

As discussed in Appendix II, a key consideration is in respect of delivering, or supporting delivery of targeted upgrades to community infrastructure, particularly **strategic community infrastructure**, with secondary school capacity discussed as a key matter.⁹⁷ As discussed in Appendix II, there is considerable variation between the competing strategic site options:

- Option 1 (Southeast Sittingbourne) - viability is a constraint to growth in the Sittingbourne area; however, the scale of growth envisaged for Southeast Sittingbourne is such that there would be good potential to deliver new and upgraded community infrastructure (despite costs for major transport infrastructure upgrades), including a secondary school, and the possibility of delivering a further education facility for Sittingbourne has been suggested.
- Option 2 (Bobbing) - is significantly smaller, with no secondary school proposed (although the committed new school at Northwest Sittingbourne would be in close proximity, and presumably would have headroom capacity, i.e. capacity over-and-above that needed to meet committed housing growth at Sittingbourne and Iwade).
- Option 3 (East and SE Faversham) - would certainly enable delivery of a new secondary school. Following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, as discussed in Appendix II.
- Options 4 (North Street) – proposes delivery of a secondary school; however, latest understanding is that any scheme would need to be smaller than that proposed by the site promoters, in order to reflect constraints, which could have a bearing on viability and, in turn, potential to deliver (make land available for) a secondary school.

Beyond the matter of strategic community infrastructure delivery, the latest Stantec report serves to highlight the following:

- **Impacts to existing communities** – there is greatest concern in respect of the envelopment of Bobbing, which is a historic village (six listed buildings, including a grade 1 listed church) with a primary school, although development would deliver a bypass of the village, serving to greatly reduce traffic through the village, along Sheppey Way). There are also similar concerns in respect of North Street, which is a settlement not much smaller than Bobbing (if at all), but which has no church or any other community facilities (there are, however, six listed buildings). Development would deliver a bypass of the village; however, there are concerns regarding traffic through Sheldwich, to the south. With regards to Southeast Sittingbourne, the current proposal is to avoid growth in proximity to the main rural community at Highstead / Rodmersham Green (notably larger than Bobbing), and the secondary school plus sports facilities would be located nearby; however, development would encroach on the small historic hamlet of Rodmersham (with a grade 1 listed church), plus there is a need to consider Bapchild and Tonge (both historic parishes) at the northern extent of the scheme; furthermore, there are concerns regarding 'rat running' to Sittingbourne town centre through villages and residential areas. Finally, East and SE Faversham gives rise to relatively limited concerns, regarding impacts to existing communities.
- **Engagement, joint working and stewardship** – this is another matter that is a focus of the Stantec work, with the summary risk matrix at paragraph 9.19 of the most recent report serving to highlight that East and SE Faversham stands-out as performing well. There is a need to exercise a degree of caution, as the points made by Stantec relate specifically to Southeast Faversham (i.e. the scheme promoted by the Duchy of Cornwall); however, as explained by Stantec:

“The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail... As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards... Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust,

⁹⁷ A typical approach is to make services land available or the school, as opposed to building the school.


which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues.”

This is in many ways encouraging, from a ‘communities’ perspective. However, there is a concern regarding an early ‘inward’ focus on detailed design to the detriment of effective planning to realise strategic infrastructure, environmental and socio-economic objectives, including at the Faversham scale and wider scales (e.g. landscape scales), and with a long-term perspective. It is also noted that no updated proposals or evidence has been made publicly available to update the August 2018 submission (see swale.gov.uk/planning-and-regeneration/local-plans/sd-options), although the Duchy of Cornwall did engage well with Stantec through 2019 ‘assessment of submissions’ process. There is no website for this scheme, unlike Southeast Sittingbourne and Bobbing.

In **conclusion**, a key consideration is the need to deliver a new secondary school at Faversham to meet existing and committed future needs. This serves as a reason to support Option 3 (East and SE Faversham). However, there is a degree of uncertainty regarding the scheme at the current time, in the absence of evidence, including an up-to-date masterplan.

It is also appropriate to flag a degree of opportunity associated with the other options, in particular Southeast Sittingbourne.

Economy and employment

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
	4	2	3

Discussion

There is a need to reflect the targets set out in the Employment Land Review (ELR), although certain of the targets are in the form of a range, with this particularly the case for the matter of delivering significant new land for warehousing / distribution.

In light of the ELR, **Option 1** (Southeast Sittingbourne) represents a very significant opportunity, from an ‘economy and employment’ perspective. This matter is explored in detail within the ELR, as well as within the two New Garden Communities: Assessment of submissions reports prepared by Stantec in 2019. There would be benefits three broad respects: 1) there could be significant expansion of Kent Science Park; 2) there would be the potential to deliver new strategic warehousing and distribution uses adjacent to a (new) motorway junction in the west of the Borough, thereby fully reflecting ELR recommendations; and 3) the scheme would deliver the final (eastern) section of the Sittingbourne Northern Relief Road (SNRR) *and* continue the link road south, beyond the A2 as far as a new junction 5a of the M2, thereby supporting the functioning of Eurolink industrial area and potentially unlocking further expansion.⁸⁸ Economic benefits would clearly be felt at a larger than local scale, with the site promoters suggesting that Eurolink and Kent Science Park collectively comprise the biggest business centre in Kent.

However, there are additional considerations to factor-in, when considering the merits of strategic growth to the Southeast of Sittingbourne from an ‘economy and employment’ perspective, in particular around the possibility of growth here detracting from growth elsewhere in the Borough (Sittingbourne, Faversham and Sheppey) and in the neighbouring authorities of Medway and/or Maidstone (e.g. the emerging Maidstone Local Plan proposes a “prestigious business park at Junction 8 of the M20”); however, for the purposes of this appraisal, it is appropriate to flag a significant opportunity.

There are also highly significant employment land proposals as part of **Option 3** (East and SE Faversham). There is the potential to deliver c.10ha of new industrial land to the east of Faversham and another c.10ha to the southeast (adjacent to M2 J7), as well as smaller scale ‘pockets’ of employment throughout the scheme (this aligns with the emerging design ethos). On this basis, ELR recommendations in respect of locally arising demand for offices, light industrial and industrial land would be met; however, opportunities to deliver large-scale new industrial land in well-connected locations in the west of the Borough, with a view to providing for the long term needs of footloose strategic warehousing and distribution operators serving London and the Southeast, could be missed. The new

industrial land at East / southeast of Faversham (in particular the 10ha employment area adjacent to M2 J7) could prove attractive to strategic warehousing and distribution uses; however, there is unclear. The ELR explains: *“Although Faversham is an untested market for larger unit demand (which fuels the need for additional land) such a highly accessible area is likely to be in demand. The part of the area (closest to the motorway uncton) would be particularly attractive to strategic warehouse operators (min area 10 ha), because of the excellent access to the M2. But should areas in the west of the Borough come forward these are likely to be preferable given they are closer to the M25 and benefit from better north / south access (A429).”*

Option 4 (North Street) includes proposals for “medium/high density office” space, along with a “traditional employment/ business area close to M2 on north of site”, as well as a range of E-class employment uses in the form of mixed-use development at local centres within the site. Another consideration is the potential to support the economic role of Faversham town centre and other existing employment locations in the town, with Option 3 potentially preferable to Option 4 in this respect, given greater potential to walk and cycle to destinations within Faversham.

Development proposed under **Option 2** (Bobbing) includes more limited new employment land proposals, with seemingly limited or no potential to address the ELR’s recommendation in respect of delivering new warehousing space in the west of the Borough. There is also a need to factor-in concerns regarding traffic at the A249 junctions with the B2006 and M2, with the concern being that traffic generated at Option 2 could affect the functioning of existing, committed and potential future employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey.

In **conclusion**, it is considered that Option 1 (Southeast Sittingbourne) stands out as strongest performing, with significant positive effects predicted; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viably) and implications for the wider Borough and elsewhere. East and SE Faversham also performs well, given the potential to deliver major new employment land well linked to both Faversham and the M2. Option 2 (Bobbing) is found to perform most weakly as it proposes the smallest overall quantum of employment land; however, none of the options perform poorly, as there would be the potential to support a borough-wide strategy in line with ELR targets and recommendations.

Flood risk

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
2	2	2	1

Discussion

Although large parts of the Borough as a whole are constrained by flood risk, it is apparent that none of the strategic site options are substantially affected by **fluvial flood risk**. Fluvial flood risk affects Option 1 (Southeast Sittingbourne) and Option 2 (Bobbing; to a small extent); however, this is in the form of one or more narrow channels, with good potential to incorporate flood zones into areas of open space. For example, the Southeast Sittingbourne site promoter proposes that *“flood areas will be incorporated within the masterplan such that they will not impact the existing flood risk regime”*.

In terms of **surface water flood risk**, all options are affected by corridors of risk, some of which is ‘high’, i.e. an annual chance of flooding of greater than 3.3%. However, none of the options appear affected by widespread areas of risk, rather the areas of risk are either narrow channels or isolated pockets. This suggests that the affected areas could either be incorporated into open space or mitigated through measures such as SuDS (where possible).

In terms of the proportion of total site area affected by surface water flood risk, Option 3 (East and SE Faversham) is considered to perform most strongly on the basis that it appears to have the smallest proportion affected overall. The affected areas under Option 3 are discrete and could be comfortably accommodated within the final site layout. Option 4 (North Street) is considered to have the next strongest performance, as the main area affected comprises a narrow corridor through the centre of the site in a north-south alignment. Although this is a prominent alignment within the site, the size and shape of the affected area would be unlikely to present a technical or design obstacle and could be feasibly incorporated into the future site layout. Option 2 (Bobbing) is considered to perform least strongly in relation to surface water flood risk, as widespread areas of risk, not just narrow channels, are evident within the site itself and at its periphery. Most notably, a large expanse of the site’s west is within an area of high surface water flood risk, with further areas of medium and lower risk extending beyond. A channel of high risk runs

throughout the site in a north east-south west alignment, whilst a substantial ‘pool’ of high risk is evident north of Parsonage Lane in the site’s east. Other isolated areas of high risk are pepper-potted throughout the site, contributing to its weaker relative performance.

A further consideration is the matter of avoiding increased flows of water leading to increased risk of **down-stream flood risk**:

- Option 1 (Southeast Sittingbourne) - there are parts of east Sittingbourne downstream fall within the fluvial flood risk zone, but there is good potential to buffer the flood risk zone within the site, given that the flood risk zone is associated with the valley which, in turn, is associated with landscape constraint.
- Option 2 (Bobbing) - a shallow valley is associated with surface water flood risk channel, which then becomes a fluvial flood risk channel at the northern extent of the site, and then affects a significant number of existing homes downstream in Iwade. The emerging masterplan shows areas of greenspace and SuDS at the northern extent of the site, in response to the flood risk issue; however, there is also a proposed housing area, which possibly gives rise for a cause for concern around growth leading to increased surface water runoff and, in turn, increased flood risk downstream. The Swale Level 1 SFRA (2019) explains:

“The Iwade catchment is an area identified by Kent County Council where the effective implementation of SuDS features is likely to be key to enabling future development. There is a history of flooding in Iwade that is exacerbated by large areas of flow paths being culverted, with future development likely to have a reasonably significant impact on flood risk. As such, it is important that SuDS features and landscaping in potential developments are designed to attenuate surface water before it enters the Iwade Stream. Potential development in the Iwade catchment will only be permitted if it is demonstrable that betterment of runoff rates will be achieved.”

- Option 3 (East and SE Faversham) - perhaps the key point to note is that intensification of development (specifically, an additional 70 homes and potentially also a new link road) within the existing Preston Fields allocation (located at the southwest extent of the proposed East and SE Faversham scheme, between Salters Lane and the A251) is associated with a shallow valley within which there is a band of surface water flood risk which is associated with ‘pools’ to the north of the site (due to linear infrastructure in the form of the A2 and railway) and becomes an area of fluvial flood risk further downstream, affecting the Cyprus Road area of Faversham.

A final consideration relates to the potential to deliver strategic flood risk attenuation measures, potentially in the form of strategic **Flood Storage Areas** (FSAs), such that the effect of development is to reduce existing flood risk. However, it is not clear that any strategic opportunities present themselves (opportunities might typically exist where there is the potential to deliver new open space of the scale of a country park, leading to wide-ranging benefits / value creation beyond flood risk). As discussed, the masterplan proposals for Bobbing include significant areas of new accessible open space in that part of the site that is sensitive from a flood risk perspective, but there is little reason to suggest that the effect will be to significantly reduce downstream flood risk affecting Iwade.

In **conclusion**, Option 4 (North Street) stands out as notably unconstrained, whilst it is difficult to differentiate the other strategic site options with any confidence. Significant effects are not anticipated under any of the options, given the likely levels of risk involved, and good potential to address flood risk through masterplanning/design and SuDS.

Heritage

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
3	1	2	3

Discussion

Appendix II presents a detailed discussion of heritage issues and impacts, highlighting the following:

- **Option 1** (Southeast Sittingbourne) - unlike the other new settlement options, there is the potential to draw upon a valley topography to framework growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and containment); however, the corollary is growth would be in proximity to existing historic environment assets. The current proposed masterplan seeks to take a ‘landscape led approach’ and avoid impacts as far as possible, including by avoiding development in proximity to the only conservation area

in the vicinity (Rodmersham Green); however, tensions remain nonetheless, most notably at the northern extent of area, where a new link road would cut through the Tonge Conservation Area, and in the central area, where development would abut the hamlet of Rodmersham, where there is a cluster of four listed buildings including a grade 1 listed church, which the Swale Landscape Sensitivity Assessment (2020) describes as “an important local landmark and skyline feature”. The further statement made by the Assessment, as part of a discussion of ‘time depth’, is also of note: *“It is evident that there have been changes in land cover in recent years, with the conversion of areas of commercial orchards to arable, and vice versa, for example along Church Street and Pitstock Road. However, this does not change the fundamental character of the landscape. The loss of some areas of traditionally managed orchards has adversely affected the historic and scenic character of the landscape, although more intensive commercial orchards remain an important feature which contributes to a distinctive sense of place”*.

- **Option 2** (Bobbing) - is seemingly the least constrained of the strategic site options, in historic environment terms. The new settlement would envelop the string of ten listed buildings that stretches between Bobbing in the south (where there is a grade 1 listed church) and Howt Green in the north; however, there is no designated conservation area; the historic character of this area is presumably somewhat affected by the nearby A429; and development would deliver a bypass of Bobbing. Development would envelop only one historic farmstead (with one grade II listed building), although the possibility of further expansion (in the future) encroaching upon two further farmsteads can be envisaged.
- **Option 3** (East and SE Faversham) - as noted by the Swale Heritage Strategy (2020): *“It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough”*. In this context, there is potentially merit to a strategic urban extension to the east / southeast of the town, from a historic environment perspective, in order to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the east and southeast of Faversham is relatively unconstrained in historic environment terms, and also an understanding that there would be good potential to avoid and mitigate historic environment impacts by taking a strategic approach to masterplanning, landscaping and design. There could also be good potential to deliver a new community - with associated employment, services, facilities, retail and infrastructure upgrades - that supports Faversham as a thriving market town and visitor/tourist destination. However, there are wide ranging risks and uncertainties, including around traffic (including through the Ospringe Conservation Area), a new retail offer competing with Faversham town centre, impacts to the historic agricultural and horticultural landscape setting of the town and impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. A key consideration is the integrity of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone.⁸⁹
- **Option 4** (North Street) - the new settlement would envelop grade 1 listed Copton Manor, as well as the cluster of six grade 2 listed buildings, and also encroach upon the historic hamlet of Newhouse Farm / Gosmere (eleven listed buildings) and the Sheldwich Conservation Area to the south, which is associated with raised ground within the Kent Downs AONB, as well as the Grade II listed Lees Court Registered Park and Garden. The Swale Landscape Sensitivity Assessment (2020) explains: *“The time-depth of the landscape relates predominantly to the continuity of agriculture, fruit and hop cultivation within the area, together with the presence of many scattered historic houses, farmsteads and associated barns, oasts, stables and granaries in the Kentish vernacular styles (including timber framed, weather boarded and red brick), some with parkland containing notable mature trees, pasture and traditional orchards... Some areas of traditionally managed orchards have been lost in recent years, together with field boundaries, resulting in more open, larger fields.”* It also notes that there is evidence that the very large ‘prairie’ field in the vicinity of Copton has never been enclosed. However, there are also potential benefits from a bypass of North Street.

In **conclusion**, Option 1 (Southeast of Sittingbourne) and Option 4 (North Street) give rise to the greatest concern, whilst Option 2 (Bobbing) gives rise to the least concerns (potentially of a very similar magnitude to Option 3). Significant negative effects are not predicted at this stage; given good potential to respond to the historic environment constraints through sensitive masterplanning and design; however, there is considerable uncertainty ahead of receiving the views of Historic England.

Housing

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
4	2	1	3

Discussion

As discussed in Appendix II, a key consideration is variation in respect of proposals around **affordable housing** delivery. At the current time, three of the strategic site options are proposing to deliver 40% affordable housing, whilst one – Southeast Sittingbourne – is proposing to deliver 20% (having previously proposed 10-20%).

The proposed approach at Southeast Sittingbourne reflects viability constraints and an understanding that there will be other funding priorities, in particular major transport upgrades. It is also noted that Southeast Sittingbourne is the only one of the strategic site options to include a clear commitment to delivering specialist housing (“retirement living and self-build opportunities for local people”), which is assumed to represent a development cost (i.e. these uses are thought to be less viable than market housing with affordable), but this is not entirely clear, in any case, this proposal could be subject to change.

None of the strategic site promoters have proposed making land available for Gypsy and Traveller pitches (or Travelling Showpeople plots), which is an approach that is quite common nationally, where there is an established local need.

Appendix II also goes on to discuss variation in **delivery risk**, drawing on work completed by Stantec in 2019, on the basis of which an order of preference emerges:

- East and SE Faversham – *“Of the four schemes promoted this is 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 Junction 7...”*
- Bobbing – *“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.”*
- North Street – *“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.”*
- Southeast Sittingbourne – *“... 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.”*

In **conclusion**, it is appropriate to place the strategic site options in an overall order of preference as per the bullet points above. Option 3 (East and SE Faversham) performs well, both in the sense that the proposal is to deliver 40% affordable housing (although the breakdown of affordable housing tenures is not known) and in the sense that there is low delivery risk; however, there remains uncertainty ahead of further detailed work in respect of masterplanning and viability, taking account of local market conditions (there will be a need to deliver housing at a pace that avoids any concerns around saturation of the local housing market) and including detailed work to understand the costs of required infrastructure.

N.B. it is important to recognise that any of the strategic site options could be subject to unforeseen costs that affect viability. For example, at Bobbing there is uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme, and there is a high degree of uncertainty regarding North Street because this scheme is less fully worked-up.

Land

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
1	2	3	2

Discussion

A key consideration in the context of Swale is to minimise and avoid where possible the loss of **'best and most versatile' (BMV) agricultural land**. In light of this, it is important to recognise that only a fraction of the Borough's agricultural land quality has been surveyed in detail, to establish the grade of agricultural land with certainty, and very little of the land within the strategic site options (Bobbing is a notable exception, where an area of land has been surveyed in detail and found to be of non-BMV (grade 3b) quality).

Nevertheless, Swale is within Kent's 'fruit belt' and the quality and productiveness of its soils is reflected at a lower resolution in the nationally available dataset. This dataset shows a band of grade 1 and grade 2 land, i.e. the very highest quality BMV land, which runs laterally east-west through the centre of the Borough, underlying many of the Borough's key settlements.

Therefore, it is notable that all four of the strategic site options are located near settlements in this central corridor, as all are substantially underlain by grade 1 land and all are predominantly in productive agricultural use. This gives rise to significant potential for the loss of BMV land through the development process at all four of the options. There is no meaningful opportunity to mitigate against the effects of losing high quality soils.

Differences between the strategic site options are fairly marginal, but it appears to be East / SE Faversham that is potentially most constrained, with the nationally available dataset showing almost all of the land to be of grade 1 quality. Southeast Sittingbourne is potentially the least constrained, as the nationally available dataset shows the southern part of the site to mostly comprise grade 2 quality land; however, it is important to recall that the dataset is very low resolution (e.g. with Teynham and Newington not recognised as comprising non-agricultural land).

In **conclusion**, all four options are considered likely to give rise to significant adverse effects in relation to the loss of 'best and most versatile' agricultural land, including significant areas of grade 1 land which is a scarce resource nationally. East / SE Faversham is potentially most constrained, and Southeast Sittingbourne potentially the least constrained; however, differences are quite marginal.

N.B. a further consideration is the extent of **minerals safeguarding** areas across the Borough; however, these are very extensive, and cover the majority of land along the A2 corridor (Southeast Sittingbourne potentially stands-out as being subject to relatively low constraint). As such, it is not considered appropriate to differentiate the broad growth scenarios in respect of impacts to minerals safeguarding areas. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract minerals prior to development.⁹⁰

Landscape

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
2	★ 1	★ 1	3

Discussion

Beginning with **Option 1** (Southeast Sittingbourne) there are wide-ranging considerations:

- A primary consideration is impacts to the AONB. The latest Stantec report states: “*The AONB Unit consider that their concerns can be mitigated and therefore do not have a strong objection.*” However, the latest situation is that that AONB Unit has updated its position, stating: “*... the proposed new motorway junction, located partially within the AONB, represents a major development that would be contrary to planning policy and due to its nature, could not be satisfactorily mitigated in terms of impact on the AONB. Therefore, the Unit continues to object to the proposal.*”⁹⁸
- It is the largest of the strategic site options, and its location at fringe of Sittingbourne ensures that it makes a considerable contribution to the landscape setting of Sittingbourne and several distinct smaller settlements at the Sittingbourne fringe. The site falls within a designated Important Local Countryside Gap (ILCG), the purposes of which is “to retain the individual character and setting of settlements”. Although it is noted that the site promoter has proposed retain some degree of landscape buffering between the areas of new development and the existing settlements to help preserve their identity, it is considered likely that urbanisation of the area would erode the perceived and actual gap between settlements.
- Similarly, the site partially intersects the recently proposed ILCG between Teynham and Bapchild, as per the Swale Important Local Countryside Gaps report (2020). The report proposes a new ILCG designation “to avoid the coalescence of Teynham and Bapchild” and safeguard “the essential gap south of the A2”.
- The Rodmersham, Milstead and Highstead Dry Valley locally designated landscape constrains the southern half of the site. The ‘statement of significance’ (2020) notes that the area is “a topographically distinct landscape with a strong sense of place and rural character”, but that “the quality has deteriorated notable on the edge of Sittingbourne”. There could be opportunities to restore this landscape quality where it has deteriorated in order to strengthen the integrity of the landscape as a whole; though in practice it is considered that strategic scale of development under Option 1, even where it results in piecemeal enhancements, would be unlikely to lead to a higher quality cohesive natural landscape overall.
- The Swale Landscape Sensitivity Assessment (2019) finds that the landscape parcels within Option 1 (parcels SE2 and SE3 of the study) have ‘moderate high’ and ‘high’ sensitivity in the landscape respectively. This finding is on the basis that “much of the landscape” has “a high degree of visual prominence, and provides a rural landscape providing separation between Sittingbourne and Bapchild”. This adds further weight to the notion that development under Option 1 would have significant potential to alter the established pattern of development at the south eastern periphery of Sittingbourne, with adverse effects on the landscape setting – and individual identity of – a range of smaller settlements.
- The current masterplan proposals are described as ‘landscape led’, and it is recognised that the scheme has evolved considerably and repeatedly over recent years, with the latest Stantec report explaining that efforts have been made to avoid the valley and valley slopes, and that proposals have “*move[d] way from a necklace approach*”. However, there is a need to understand the pros and cons of achieving the required scale of growth whilst containing growth west of a line that runs between Bapchild, Rodmersham, Rodmersham Green and Kent Science Park, thereby achieving a scheme that is more contained in landscape terms, in that it remains ‘facing’ Sittingbourne and avoids ‘breaking over’ into the valley to the east. Under the current proposal there could be a concern regarding long term sprawl at the edge of Sittingbourne and also in the Teynham/Lynstead area, which might be argued for as involving ‘infilling’ or ‘rounding off’.

It is apparent that **Option 4** (North Street) also has significant sensitivity within the landscape, with the site occupying a ‘notch’ into the Kent Downs Area of Outstanding Beauty (AONB). This is a relatively low-lying part of the AONB, with high points in the AONB some way distant to the south (this contrasts with the situation south of the M2 at Sittingbourne); however, there is little doubt that the site contributes to the setting of the AONB. For example, the south western boundary of the site is marked by Plumford Road, a rural lane associated with quite

⁹⁸ See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

expansive countryside views, and it seems quite clear that the landscape north of the road (within the site) is contiguous with the landscape to the south (within the AONB). Similar landscape contiguity is evident either side of Newhouse Lane which marks the south eastern boundary of the site. It is noted that the site promoter's prospectus response proposes softening the southern boundary via planted screening and by incorporating sports pitches rather than built development at the southern extent. However, this would still represent a substantial departure from the prevailing rural character inherent in the landscape at present.

This is underscored by the Swale Landscape Sensitivity Assessment (2019) which finds that Option 4 falls within two separate parcels (i.e. FM2 and FM3), both of which are concluded to be of 'High' sensitivity to development, the highest rating of the five tier sensitivity scale. The study highlights sensitivity in relation to the AONB, concluding that there are "many open and visually exposed areas that have a visual relationship with the AONB" and reinforces the notion that sensitivity is widespread within the parcels, noting that "there are no notable variations in overall sensitivity" within the area.

Option 4 is also notable for being located entirely within the proposed Local Landscape Area (LLA) of Kent Downs – North Street Dip Slope. The LLA 'statement of significance' (2020) again reiterates that the area of Option 4 has inherent landscape value and sensitivity, finding that the area provides part of the "visual setting and the rural context for the AONB" and noting that the landscape "is relatively open", which "allows long views". The LLA suggest that the key requirement is "to conserve and enhance landscape quality and condition". This again suggests that development on a strategic scale would run counter to such a requirement and would give rise to significant negative effects in relation to landscape.

By contrast, **Option 2** (Bobbing) is distant from the AONB and associated with broad landscape units assigned 'moderate' and 'low-moderate' sensitivity scores by the Landscape Sensitivity Assessment. The southern part of the site is more sensitive, given existing narrow settlement gaps; however, the current proposal is for development to extend only as far south as the railway line, meaning that, whilst the Bobbing settlement gap would be eroded or lost, the gap(s) between Sittingbourne and Newington would not be affected. In this respect, it is important to note that an earlier masterplan proposed a large area of parkland to the south of the railway. Finally, it is important to note that the Stantec *Assessment of Stage 2 Submissions* (2019) identifies the potential for the scheme to expand beyond its current 'red line boundary' (see page 15 of the report). There is an argument for comprehensive long-term planning for this part of the Borough, rather than piecemeal growth. The possibility of comprehensively planning for the entire area of land between the A249 in the east, the A2 in the south, the Lower Halstow – Iwade Ridge in the west and Iwade in the north might be envisaged, with a view to securing infrastructure, environmental protection/enhancement and employment land.

With regards to **Option 3** (East and SE Faversham), the Landscape Sensitivity Assessment (2019), which finds the entire site to fall within a parcel of moderate sensitivity (parcel FM1), which equates to relatively limited sensitivity in the context of the Borough and, in particular, Faversham. The assessment notes that the "presence of major road infrastructure and heavy traffic" has a significant impact on "the sense of rurality and tranquillity". Despite this, however, the assessment also finds that the area "retains a strongly agricultural character" and that this character together with the "visual exposure of the area" results in a degree of sensitivity. It is important to recognise that development would breach a longstanding settlement boundary feature to the southeast of the town, namely the A2 which has historically marked the limit of the southern extent of the town (with the town centre focused on the creek, more so than the road and railway); however, existing Local Plan allocations have already breached the boundary of the A2 to the south of the town. Furthermore, expansion to the southeast has the benefit of being able to draw upon the M2 (with the AONB beyond) as a new strong/defensible long-term boundary. Having said this, the current proposal falls short of comprehensively planning for land as far as similarly defensible boundaries to the east (either the A299 or, should employment be a suitable use surrounding the motorway junction, the need to maintain a landscape buffer to Boughton) and the northeast (flood risk and heritage including farmsteads and the Goodnestone Conservation Area).

In **conclusion**, it is appropriate to flag a risk of significant negative effects under Option 1 and Option 4. By contrast, Options 2 and 3 are found to have relatively limited potential for adverse effects in relation to landscape. However, both Option 2 and Option 3 would bring forward development which breaches an existing natural settlement boundary (i.e. the A249 at Bobbing and the A2 at Faversham), and there could be a need for further work to ensure that opportunities for long-term strategic planning for landscape units are realised.

Transport

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
★ 1	3	★ 1	2

Discussion

There is good potential to differentiate the strategic site options on the basis of the analysis set out in *New Garden Communities: Assessment of Stage 2 submissions* (Stantec, 2019).

- **Option 1** (Southeast Sittingbourne) – as has been discussed, there is a major opportunity, with Stantec concluding that: “*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, Stantec strike a major note of caution, with the primary issue being delivery of Junction 5a. Whilst the proposal to fund the junction without reliance on public funds is strongly supported, and the scheme promoters are to be commended for having provided details of the private funding arrangements, it is nonetheless the case that there is “*uncertainty around the junction timing, funding and delivery. Should the J5a costs increase, there is limited viability in the proposals to absorb these.*” Stantec also discuss several other matters:

“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.”

“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.”

“... we are aware that here 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.”

- **Option 2** (Bobbing) - Stantec conclude that: “*There is a risk of a ‘showstopping’ highways issue here – associated with the local network, A249 and the not fully funded J5 improvements.*” The latest situation is that M2 J5 improvements are expected to commence in 2021; however, the question of headroom is uncertain, and other concerns remain. Stantec suggest that: “*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.*” However, there is no discussion of links to Newington Station on the scheme website.
- **Option 3** (East and SE Faversham) – key statements made within the Stantec report include:
 - “*The primary issue is the M2 J7 [Brenley Corner] which currently operates above capacity. Greater detail is required to understand the impact and mitigation... 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.*”
 - “*The proposal appears to rely on the upgrades to Brenley Corner, however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated...*”
 - “*While there is mention of the Preston Fields link [to M2 J6], 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.*”
 - “*The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any ‘calming’ may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved and secured as part of this scheme.*”

In short, there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6. It

may be that the latest proposal, which involves bringing forward a combined scheme involving growth both to the east and southeast of Faversham, leads to greater potential to deliver timely road infrastructure upgrades, but there is no certainty in this respect.

- **Option 4 (North Street)** - there are a range of issues, including:
 - *“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.”*
 - *“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 potential significant impacts on the local road network, and specifically the relationship between the rural roads and AONB.”* In this respect, the possibility of rural ‘rat running’ towards Canterbury can be envisaged.
 - The M2 is a significant barrier to walking, with none of the north/south routes (Salters Lane, Selling Road and Brogdale Road) having pavements or being suitable for cycling.
 - There are also concerns about the northern section of the A251, including the M2 J6 interchange and the A2 junction.
 - On the plus side, there would be good potential for the development to be served by high frequency bus services operating between Faversham and Ashford (indeed, the site is potentially best performing in this respect).

The Stantec report (2019) also makes the following overarching statement:

“... in general and subject to further modelling it is likely that appropriate mitigation could be achieved. However, there are concerns about [Southeast Sittingbourne] 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 [North Street], on the A251, for which mitigation may not be agreeable or financially viable and also concerns that [Bobbing] will have significant implications on the local highway network which may not be capable of mitigation.”

In short, Stantec find Southeast of Sittingbourne strategic site option to give rise to the fewest concerns, albeit the proposal is now to deliver an “East and SE Faversham” scheme. Additional evidence, in respect of East and SE Faversham, comes from the April 2020 re-run of the Swale Transport Model (discussed in Appendix I), which serves to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I).

In **conclusion**, it is considered appropriate to highlight Southeast of Sittingbourne as performing as well as East and SE Faversham, given the potential to deliver transformational transport benefits, albeit there is considerable uncertainty regarding deliverability. Mindful of the alternative to strategic growth, which is a strategy involving piecemeal urban extensions, it is considered appropriate to conclude a degree of opportunity associated with the two best performing options. It is also appropriate to flag a degree of risk associated with the worst performing option.

Water

Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
?	?	?	?

Discussion

An important strategic consideration is waste-water treatment capacity. The latest Stantec report includes a section on utilities capacity, which overall highlights very limited concerns, concluding:

“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.”

However, there is a need to apply caution, in the sense that there is a need to minimise any residual risk of capacity breaches (in respect of either treated or untreated effluent), with resultant water quality impacts.⁹⁹ In turn, there are arguments for directing growth to locations where there is existing capacity at the receiving Wastewater Treatment Works (WwTW), as opposed to relying on timely capacity upgrades.

There is some evidence to suggest that capacity at Faversham WwTW is a particular concern. In particular, the Kent Water Sustainable Growth Study (2017) noted that headroom capacity at Faversham WwTW would be exceeded by planned growth to 2031 (as set out in the adopted Local Plan), hence there would be a need for upgrades. However, as part of the assessment of the Southeast Faversham strategic site option, the Stantec *Assessment of Stage 2 Submissions* (2019) explains:

“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... costs, options and works duration [are being discussed].”

Further considerations are as follows:

- Southeast Sittingbourne – there have been “extensive discussions” with Southern Water about the provision of a new pumping station to connect with the existing network and carry flows to Sittingbourne WwTW.
- Bobbing - it is unclear whether there is a need for a new pumping station, though the promoter has suggested that costs of any network reinforcement that may be required would not be borne by Southern Water.
- East and Southeast Faversham - the site promoters recognise that “development is likely to require the upgrading of the Faversham WwTW”.
- North Street - the need for WwTW upgrades at Faversham is again acknowledged, and a “collaborative approach with Southern Water” is proposed in order to model likely demand and devise a “programme of investment” to be carried out.
- In March 2020 Southern Water pleaded guilty to 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events alleged to have taken place between 2010 and 2015, and it is understood that another investigation by the Environment Agency is under way that covers pollution incidents after 2015.¹⁰⁰

In **conclusion**, it is considered appropriate to highlight uncertain negative effects for options. Whilst there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, and it is noted that Option 4 (North Street) is some distance from Faversham WwTW, which could present challenges, it is not possible to differentiate the strategic site options with certainty, on the basis of the evidence available.

As for other ‘water’ considerations:

- Pollution to surface water in the vicinity of growth locations – whilst there may be variation in water quality across the Borough’s surface water bodies, it is inherently difficult to differentiate the strategic site options, because there is very good potential to deal with water pollution arising from development schemes through Sustainable Drainage Systems (SuDS). Water pollution from breaches of capacity at WwTWs is considered to be a much more important strategic consideration.
- Pollution to groundwater in the vicinity of growth locations – groundwater source protection zones are associated with the parts of the Borough associated with a chalk geology, which serves to constrain Southeast Sittingbourne and North Street. However, it is again the case that there is very good potential to suitably avoid/mitigate impacts through the development management process. Groundwater source protection zones can be a particular constraint for polluting developments (e.g. heavy industry, petrol stations).
- Water resources – water scarcity is an issue that applies across the Borough as a whole.

⁹⁹ N.B. as discussed within the Swale LPR Habitats Regulations Assessment (HRA) report, there are relatively limited concerns around sewage effluent impacting the North Kent Estuaries European sites from treated sewage effluent. This is because these estuaries have a high sediment load, low water temperatures and high wave action. As such, smothering macroalgal growth, which has caused issues for European sites on the south coast, is not considered a threat to achievement of conservation objectives for these European sites.

¹⁰⁰ See <https://www.ft.com/content/3efb3e7b-3388-4f27-85ac-44b00aa1fd37>

Conclusions

The matrix below draws together the conclusions from the preceding twelve topic-specific appraisal tables.

	Option 1 Southeast Sittingbourne	Option 2 Bobbing	Option 3 East and SE Faversham	Option 4 North Street
	Rank of preference and categorisation of effects			
Air quality	★1	3	★1	2
Biodiversity	3	2	★1	★1
Climate change mitigation	★1	2	★1	2
Communities	2	3	★1	4
Economy and employment	★1	4	2	3
Flood risk	2	2	2	★1
Heritage	3	★1	2	3
Housing	4	2	★1	3
Land	★1	2	3	2
Landscape	2	★1	★1	3
Transport	★1	3	★1	2
Water	?	?	?	?

Overall appraisal conclusions

It is immediately apparent that Option 3 (East and SE Faversham) is assigned the most stars (indicating highest rank of preference) and has joint fewest red scores (significant negative effects). However, it does not necessarily follow that Option 3 is best performing overall. This is because the appraisal does not make any assumptions regarding the weight that is attributed to each topic in the decision-making process. For example, the decision-maker might decide to give particular weight to 'economy and employment' objectives, then Option 1 might be considered to be best performing overall.

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 – Option 2 (Bobbing) performs poorly given relatively limited potential to support good links to a higher order centre by walking, cycling and public transport, and the likelihood of generating increased traffic flows through AQMAs. However, significant negative effects are not predicted, given good potential for mitigation, and because air quality is improving over time and set to improve significantly over the plan period, due to the switchover to electric vehicles.
- Biodiversity – Option 1 (Southeast Sittingbourne) stands out as having potential for adverse effects on habitats of at least local significance, including several areas of ancient woodland. Option 2 (Bobbing) is also notably constrained by Rooks Wood, which is an ancient woodland. Significant negative effects are not predicted, recognising that strategic sites can and should deliver strategic enhancements. All four schemes have made high-level commitments, including around ensuring that at least 50% of the total site area is brought forward as open-space; however, at the current time it is not clear that any stand-out opportunities or proposals exist, hence significant positive effects are not predicted.
- Climate change mitigation – two options are judged to perform relatively well:
 - Option 1 (Southeast Sittingbourne) – the proposals for minimising built environment emissions are encouraging, but are nonetheless high-level and potentially subject to change, recalling that scheme viability is challenging; also, there are certain question-marks regarding potential to minimise per capita transport emissions.
 - Option 3 (East and SE of Faversham) – performs well from a perspective of minimising transport emissions, as it would involve a strategic urban extension to a higher order settlement. However, Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (although this could support good bus connectivity with Canterbury and beyond). Also, there is uncertainty regarding potential to deliver growth to the south of the A2 in combination with growth to north of the A2, as a combined strategic scheme that leads to additional economies of scale and potential to deliver LZC infrastructure and other climate change focused measures; and there is a degree of uncertainty regarding the extent to which the masterplanning and design ethos of the scheme is supportive of minimising emissions.

It is challenging to reach a conclusion on effect significance; however, on balance, it is considered appropriate to flag a concern with all strategic site options. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a primary driving factor influencing site selection and site-specific proposals.

- Communities – a key consideration is the need to deliver a secondary school at Faversham to meet existing and committed future needs. This serves as a reason to support Option 3 (East and SE Faversham); however, there is some uncertainty, given the evidence available. It is also appropriate to flag a degree of opportunity associated with the other options, in particular Southeast Sittingbourne.
- Economy and employment – Option 1 (Southeast Sittingbourne) could realise a significant opportunity; however, there is uncertainty in the absence of detailed work to explore what could be achieved (viably) and implications for the wider Borough and elsewhere. Option 3 (East and SE Faversham) also performs well, given the potential to deliver major new employment land well linked to both Faversham and the M2. Option 2 (Bobbing) is found to perform most weakly as it proposes the smallest overall quantum of employment land; however, none of the options perform poorly, as there would be the potential to support a borough-wide strategy in line with the Employment Land Review recommendations.

- Flood risk – Option 4 (North Street) stands out as notably unconstrained, whilst it is difficult to differentiate the other strategic site options with any confidence. Significant effects are not anticipated under any of the options, given the likely levels of risk involved, and good potential to address flood risk through masterplanning/design and SuDS.
- Heritage – Option 1 (Southeast of Sittingbourne) and Option 4 (North Street) give rise to the greatest concern, whilst Option 2 (Bobbing) gives rise to least concerns. Significant negative effects are not predicted at this stage; given good potential to respond to the historic environment constraints through sensitive masterplanning and design.
- Housing – Option 3 (East and SE Faversham) performs well, both in the sense that the proposal is to deliver 40% affordable housing and in the sense that there is low delivery risk; however, there remains uncertainty ahead of further detailed work in respect of masterplanning and viability, including detailed work to understand infrastructure costs.
- Land – all four options would result in significant loss of ‘best and most versatile’ agricultural land, including significant areas of grade 1 land which is a scarce resource nationally. East / SE Faversham is potentially most constrained, and Southeast Sittingbourne potentially the least constrained; however, differences are quite marginal.
- Landscape – both Option 1 (Southeast Sittingbourne) and Option 4 (North Street) give rise to wide-ranging landscape concerns, including around the potential for AONB impacts. By contrast, Options 2 and 3 are found to have relatively limited potential for adverse effects in relation to landscape, although both schemes are associated with sensitivities..
- Transport – Option 3 (East and Southeast Faversham) is associated with a relatively high degree of certainty regarding the potential to deliver growth without leading to capacity issues on the strategic road network, although there remains a degree of uncertainty, both in respect of capacity at junction 7 of the M2, and around the potential to achieve a road link to the A251 and junction 6 of the M2. It is also appropriate to highlight Option 1 (Southeast Sittingbourne) as performing well, as growth could deliver transformational transport benefits; however, deliverability is uncertain.
- Water - whilst there is some evidence to suggest that wastewater treatment is a particular constraint in the Faversham area, it is not possible to differentiate the strategic site options with certainty, on the basis of the evidence available.

Appendix V: Site options

Introduction

The aim of this appendix is to present GIS analysis of all site options. As discussed in Section 6.3, this was one element of work that fed into the establishment of reasonable alternatives ('growth scenarios') for appraisal. **This appendix is a work in progress, and will be finalised in time for the SA Report.**

Appraisal methodology

The table below 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.

Under each heading, sites are scored on a **red / amber / green** scale, where red indicates a greater degree of constraint and green indicates a lower degree of constraint. The score assigned primarily reflects how the site in question performs relative to other site options. Further explanation will be provided in the SA Report.

Appraisal findings

The table below presents an analysis of all SHLAA sites, grouped by location. Further analysis will be presented within the SA Report.

Table A: GIS analysis of SHLAA sites

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/138	Land at Fox Hill/School Lane	Bapchild	6	Red	Amber	Amber	Green	Amber	Green	Green	Green	Amber	Green	Amber	Red	Amber	Amber	Green	Green	Amber
SLA18/097	Tonge Country Park, Hempstead Lane	Bapchild	6	Red	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green	Amber	Red	Amber	Amber	Green	Green	Amber
SLA18/005	Land Rear of The Street and Hempstead Lane	Bapchild	4	Red	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green	Amber	Red	Amber	Amber	Green	Green	Amber
SLA18/026	Land off Hempstead Lane	Bapchild	2	Red	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green	Amber	Red	Amber	Amber	Green	Green	Amber
SLA18/159	Land West of Mustards Road	Bay View	3	Amber	Green	Amber	Green	Amber	Amber	Amber	Red	Red	Red	Green	Amber	Amber	Amber	Green	Green	Amber
SLA18/146	Lime Kiln Shaw, Lime Kiln Road	Bexon/Milstead	0	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Green	Red
SLA18/224	Land at Bobbing	Bobbing	418	Red	Red	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Red	Amber	Amber	Green	Green	Amber

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/224a	Land at Bobbing	Bobbing	203																	
SLA18/101	Land at Hill Farm	Bobbing	18																	
SLA18/001	Land West of Sheppey Way	Bobbing	4																	
SLA18/009	Church Farm, Sheppey Way	Bobbing	1																	
SLA18/007	Land East of Sheppey Way	Bobbing	1																	
SLA18/069	Land Adjacent 8 Bobbing Hill, Key Street	Bobbing	0																	
SLA18/144	Land at Starveacre Lane and Hearts Delight	Borden	26																	
SLA18/143	Land at Home Farm	Borden	12																	
SLA18/053	Blue House Field, Rear of Mountview	Borden	5																	
SLA18/118	Land North of/Adjacent to 124 Borden Lane	Borden	1																	
SLA18/047	Land at Street Farm, Pond Farm Road	Borden	1																	
SLA18/142	Land at The Nurseries, Pond Farm Road	Borden/Oad Street	3																	
SLA18/158	Wellbrook Farm (site B)	Boughton	17																	
SLA18/082	Land North of The Street/Canterbury Road	Boughton	5																	
SLA18/157	Wellbrook Farm (Site A)	Boughton	3																	
SLA18/085	Land Rear of 142-146 The Street	Boughton	2																	
SLA18/150	The Former Garden Hotel (no 169), The Street	Boughton	1																	
SLA18/002	Land West of Kaine Farm House, Breach Lane	Breach	1																	
SLA18/073	Land West of The Street	Bredgar	11																	
SLA18/110	Land West of Bredgar, Wrens Road	Bredgar	10																	
SLA18/084	Land at Gibbens Farm, The Street	Bredgar	7																	
SLA18/048	Land Opposite Rookery Close, Primrose Lane	Bredgar	2																	
SLA18/117	Land Adjacent Westfield, Swanton Street	Bredgar	2																	
SLA18/074	Land North of Bexon Lane	Bredgar	1																	
SLA18/049	Firs Farm, Deans Hill Road	Bredgar	0																	
SLA18/066	Land at Parsonage Farm, The Street	Bredgar	0																	
SLA18/050	Land at Danaway, Maidstone Road	Danaway	1																	
SLA18/083	Land off Dargate Road	Dargate	2																	
SLA18/104	Land at The Street	Doddington	2																	
SLA18/072	Former Doddington Primary School, The Street	Doddington	1																	
SLA18/012	Land at Hopes Hill	Doddington	1																	

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/089	Land at Home Farm,, The Street	Doddington	0																	
SLA18/090	Land at Former Gas Yard, The Street	Doddington	0																	
SLA18/156	Foresters Lodge Farm	Dunkirk	69																	
SLA18/155	Land off of Canterbury Road	Dunkirk	5																	
SLA18/136	Land North of Canterbury Road	Dunkirk	1																	
SLA18/162	Bossenden Farm Frontage Land	Dunkirk	1																	
SLA18/163	Oakside Park, London Road	Dunkirk	0																	
SLA18/063	Land North of Eastchurch	Eastchurch	35																	
SLA18/189	Land nth of High Street, Eastchurch	Eastchurch	1																	
SLA18/223	Land at Ashford Road, North Street, Sheldwich	Faversham	310																	
SLA18/226	South East Faversham	Faversham	131																	
SLA18/065	Land East of Abbey Farm	Faversham	53																	
SLA18/028	Land at Queen Court Farm, Faversham	Faversham	44																	
SLA18/091	Land at Lady Dane Farm	Faversham	43																	
SLA18/167	Land West of Western Link	Faversham	36																	
SLA18/178	Preston Fields, Canterbury Road, Faversham	Faversham	14																	
SLA18/221	Land at Lady Dane Farm, Love Lane	Faversham	11																	
SLA18/135	Land at Graveney Road, East of Faversham	Faversham	8																	
SLA18/152	Land south of A2 London Road/West of Water Lane	Faversham	8																	
SLA18/062	39 Abbey Fields	Faversham	8																	
SLA18/077	Land at Ham Road	Faversham	6																	
SLA18/149	Land at Oare Gravel Works, Ham Road	Faversham	5																	
SLA18/019	Syndale Park, London Road	Faversham	4																	
SLA18/081	Land at London Road and Western Link	Faversham	3																	
SLA18/114	Land at Brent Road	Faversham	3																	
SLA18/108	Land at Brett House, Bysing Wood Road	Faversham	3																	
SLA18/068	Land at Perry Court Farmhouse, Brogdale Road	Faversham	3																	
SLA18/107	Land East of Faversham Industrial Estate, Graveney Road	Faversham	2																	
SLA18/235	Land at Perry Court Farm, London Road, Faversham	Faversham	2																	
SLA18/079	Queens Court Farm Yard, Water Lane	Faversham	2																	
SLA18/030	Land at Lion Field, London Road	Faversham	1																	

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/174	Land at Ham Farm, Ham Road	Faversham	1																	
SLA18/194	Bysingwood Primary School, Hazebrouck Road	Faversham	1																	
SLA18/078	Lady Dane Farm Buildings, Love Lane	Faversham	1																	
SLA18/169	97-103 Ashford Road	Faversham	1																	
SLA18/029	Swan Quay, Belvedere Road	Faversham	0																	
SLA18/060	Land at Wallend, Lower Road	Halfway	36																	
SLA18/165	Land East of Queenborough	Halfway	27																	
SLA18/080	Land at Halfway Road, Halfway Houses	Halfway	6																	
SLA18/176	Land at Belgrave Road	Halfway	5																	
SLA18/088	Land South West of Belgrave Road	Halfway	2																	
SLA18/064	Land at Highfield Road	Halfway	2																	
SLA18/186	Halfway Houses Primary School, Southdown Rd	Halfway	2																	
SLA18/209	Land at Minster Academy, Admiral Walkm Minster	Halfway	1																	
SLA18/133	Land at Bartletts Close, Halfway	Halfway	1																	
SLA18/111	Hartlip Industrial Estate	Hartlip	6																	
SLA18/003	Gardening World, Lower Hartlip Road	Hartlip Hill	2																	
SLA18/057	Church Farm, Kays Lane	Hernhill	1																	
SLA18/154	Land at Lamberhurst Farm	Highstreet	23																	
SLA18/232	Land at Stickfast Lane	Howt Green	115																	
SLA18/004	Land at Pheasant Farm (West), Sheppey Way	Howt Green	2																	
SLA18/219	Land East of Iwade	Iwade	67																	
SLA18/054	Land South and South-West of Iwade	Iwade	25																	
SLA18/105	Halfway Egg Farm, Featherbed Lane	Iwade	3																	
SLA18/037	Land South of Dunlin Walk	Iwade	1																	
SLA18/187	Iwade fruit & produce	Iwade	0																	
SLA18/188	IwadeVillage Centre II	Iwade	0																	
SLA18/129	Keycol Farm, Keycol Hill	Keycol	7																	
SLA18/166	Land rear of Solna, Keycol Hill	Keycol	3																	
SLA18/109	Land Adjacent St Clements School, Leysdown Road	Leysdown	4																	
SLA18/181	Shellness Rd & Park Avenue	Leysdown	0																	
SLA18/121	Seaview Park, Warden Bay Road	Leysdown/Warden	5																	

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/173	Former Funton Brickworks	Lower Halstow	7																	
SLA18/140	Callum Park, Basser Hill	Lower Halstow	2																	
SLA18/008	Land South of School Lane	Lower Halstow	1																	
SLA18/036	Southfield, Wardwell Lane	Lower Halstow	0																	
SLA18/126	Southern Plot opp Westfield Cottages, Breach Lane	Lower Halstow	0																	
SLA18/145	Church House, Church Path	Lower Halstow	0																	
SLA18/130	Land North of The Valance	Lynsted	4																	
SLA18/034	Land West of The Street	Lynsted	3																	
SLA18/132	Medlar House, Lynsted Lane	Lynsted	1																	
SLA18/102	Milstead Manor Farm, Manor Road	Milstead	1																	
SLA18/177	Land at Cowstead Farm, Lower Road (was also SW/184)	Minster	30																	
SLA18/038	Land East of Scocles Road	Minster	27																	
SLA18/059	Land Adjacent to Kingsborough Farm, Eastchurch Road	Minster	17																	
SLA18/033	Windy Gap, Chequers Road	Minster	13																	
SLA18/018	Land off Lower Road	Minster	5																	
SLA18/198	Plover Road (Thistle Hill), Minster	Minster	4																	
SLA18/171	Between 11 & Sunset, Southsea Avenue	Minster	3																	
SLA18/131	Land adj. Allocation A12	Minster	3																	
SLA18/011	Land Rear of 66 Scrapsgate Road	Minster	2																	
SLA18/234	Land at Plough Road, Minster, ME12 4JF	Minster	2																	
SLA18/031	Land at Plough Road	Minster	1																	
SLA18/067	Land off Elm Lane	Minster	1																	
SLA18/141	Land West of Martindale, Elm Lane	Minster	1																	
SLA18/193	Land at Minster County Primary School	Minster	0																	
SLA18/161	Plough Leisure Caravan Park	Minster/Eastchurch	1																	
SLA18/093	Land Adjacent Monica Close	Neames Forstall	1																	
SLA18/096	Land East of Selling Road (2)	Neames Forstall	1																	
SLA18/094	Land East of Selling Road	Neames Forstall	1																	
SLA18/229	Land at Pond Farm, Newington	Newington	13																	
SLA18/076	Land at Ellen's Place, High Street	Newington	2																	
SLA18/075	Land at St Mary's View	Newington	1																	

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/103	Land South of Oak Hill	Newington	1																	
SLA18/015	High Oak Hill Farm, High Oak Hill, Iwade Road	Newington	1																	
SLA18/100	148 High Street	Newington	1																	
SLA18/228	Land adj Newington Manor, Bull Lane	Newington	0																	
SLA18/124	Land at The Tracies	Newington	0																	
SLA18/127	Land SW of Boyse's Hill Farm	Newington/Keycol	12																	
SLA18/115	Land at 18 The Courtyard, Seed Road	Newnham	0																	
SLA18/160	Land at Norton Ash Garden Centre	Norton Ash	9																	
SLA18/023	Bowl Reed, Oad Street	Oad Street	2																	
SLA18/024	Land Adjacent to Bowl Reed, Oad Street	Oad Street	2																	
SLA18/035	Land East of Painters Farm, Painters Forstal Road	Painter's Forstall	1																	
SLA18/086	Churchmans Farm, Stalisfield Road	Painter's Forstall	0																	
SLA18/220	West of Rushenden Road	Q'borough/Rush	11																	
SLA18/207	South of Queenborough Creek	Q'borough/Rush	7																	
SLA18/214	Former Istil site Rushenden Road/Thomsett Way	Q'borough/Rush	4																	
SLA18/199	West Street, Queenborough	Q'borough/Rush	1																	
SLA18/180	Nil Desperandum Rushenden Hill	Q'borough/Rush	1																	
SLA18/061	Land at Queenborough Road	Q'borough/Rush	1																	
SLA18/032	Neats Court, Queenborough Road	Q'borough/Rush	0																	
SLA18/179	The Foundary, Rushenden Road	Q'borough/Rush	0																	
SLA18/113a	Land at The Port of Sheerness, Rushdenden Road	Q'borough/Rush	Not yet subject to analysis due to altered site boundary (see detailed appraisal in Section 10)																	
SLA18/027	Land at Radfield Farm, London Road	Radfield	3																	
SLA18/172	Otterham Quay, Otterham Quay Lane	Rainham	4																	
SLA18/098	Land at Otterham Quay Lane	Rainham	2																	
SLA18/052	Rushett Farm Buldings, Rushett Lane	Rushett	0																	
SLA18/147	Land at Forstal Farm (West), Selling Road	Selling	11																	
SLA18/095	Norham Farm, Selling Road	Selling	2																	
SLA18/092	Land West of Norham Farm, Selling Road	Selling	1																	
SLA18/148	Land at Forstal Farm (East), Selling Road	Selling	7																	
SLA18/014	Danley Farm, Drove Road	Sheerness	51																	
SLA18/134	Stocks Paddock	Sheldwich	0																	

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/225	South East Sittingbourne	Sittingbourne	804																	
SLA18/137	Land between A2 Bapchild and Northern Relief Road	Sittingbourne	92																	
SLA18/182	Land North of Quinton Road (See SW/022)	Sittingbourne	61																	
SLA18/218	North East Sittingbourne	Sittingbourne	51																	
SLA18/217	Land West of Wises Lane (see also SW/437)	Sittingbourne	34																	
SLA18/017	Land at Ufton Court Farm, Starveacre Lane	Sittingbourne	27																	
SLA18/139	Land at South-West Sittingbourne	Sittingbourne	12																	
SLA18/184	Land at Pheasant Farm, east of Sheppey Way, Bobbing	Sittingbourne	10																	
SLA18/215	Crown Quay Lane	Sittingbourne	8																	
SLA18/021	Chilton Manor Farm, Highsted Road	Sittingbourne	7																	
SLA18/112	Land at Sittingbourne Golf Centre, Church Road	Sittingbourne	6																	
SLA18/185	Land at Great Grovehurst Farm	Sittingbourne	5																	
SLA18/233	Land adjacent to Cryalls Lane, Sittingbourne	Sittingbourne	4																	
SLA18/222	Land at Manor Farm, Key Street	Sittingbourne	2																	
SLA18/195	152 Staplehurst Road	Sittingbourne	2																	
SLA18/175	Land north of Key Street, Sittingbourne	Sittingbourne	2																	
SLA18/208	Former McDonald's Mailing Centre, Staplehurst Road	Sittingbourne	2																	
SLA18/016	Land Rear of Bramblefield Lane and Grovehurst Road	Sittingbourne	1																	
SLA18/230	Sittingbourne Adult education , College Rd	Sittingbourne	1																	
SLA18/227	45 Key Street	Sittingbourne	0																	
SLA18/196	35, High Street, Milton Regis	Sittingbourne	0																	
SLA18/201	Central Avenue	Sittingbourne TC	1																	
SLA18/216	Bell House, Bell Road	Sittingbourne TC	1																	
SLA18/200	Swale House and environs	Sittingbourne TC	1																	
SLA18/170	Former Bus Depot, East Street	Sittingbourne TC	0																	
SLA18/056	Land West of Mount Farm Cottages, Staplestreet	Staplestreet	0																	
SLA18/183	Land at Frogna Lane	Teynham	31																	
SLA18/025	Land West of Frogna Lane	Teynham	24																	
SLA18/106	Land at Barrow Green Farm, London Raod	Teynham	13																	
SLA18/116	Land South of London Road/West of Lynsted Lane	Teynham	6																	
SLA18/122	Land at Claxfield Road (Site 1)	Teynham	6																	

SHLAA ref.	Name / address	Location	Hectares	Agricultural land	Air quality management area	Special Protection Area	Special Area of Conservation	SSSI	GP Surgery	Primary school	Secondary school	Train station	Flood zone 2	Conservation area	Grade 1 listed building	Grade 2* listed building	Grade 2 listed building	Registered park or garden	Scheduled monument	Kent Downs AONB
SLA18/190	Land East of Station Road	Teynham	4																	
SLA18/236	Land to the north of Vigo Cottage, Lynsted Lane, Teynham	Teynham	3																	
SLA18/055	Land at Lynsted Lane	Teynham	2																	
SLA18/153	Land south of Dover Castle Inn, A2 London Road/Cellarhill	Teynham	1																	
SLA18/213	BarrowGreen Farm, Barrow Green, Teynham	Teynham	1																	
SLA18/010	Land at Cellar Hill	Teynham	1																	
SLA18/123	Land at Claxfield Road (Site 2)	Teynham	1																	
SLA18/237	Land to the north of Vigo Cottage, Lynsted Lane, Teynham	Teynham	0																	
SLA18/022	Land at Hearts Delight Road	Tunstall	7																	
SLA18/044	Land adj. Filmer House, Wren's Road and Hearts Delight Road	Tunstall/Borden	8																	
SLA18/164	Land South of Hearts Delight, Hearts Delight Road	Tunstall/Borden	5																	
SLA18/046	Land South of Hearts Delight, Hearts Delight Road	Tunstall/Borden	2																	
SLA18/045	Land Opposite Uplands, Hearts Delight Road	Tunstall/Borden	1																	
SLA18/043	Land Adjacent Sunnyside, Wren's Road	Tunstall/Borden	1																	
SLA18/042	Land Adjacent Wren's Oast, Sutton Baron Road	Tunstall/Borden	1																	
SLA18/013	Land East of Chaffes Lane	Upchurch	6																	
SLA18/119	Land at Long Field	Upchurch	2																	
SLA18/087	Land Adjoining/Rear of Jubilee Fields	Upchurch	2																	
SLA18/099	Land South of 93 Chaffes Lane	Upchurch	1																	
SLA18/051	Land at Wetham Green	Upchurch	1																	
SLA18/151	Land at Warden, South of Knoll Way	Warden	7																	

Appendix VI: Sub area scenarios

Introduction

The aim of this appendix is to present a discussion of growth scenarios for the following sub-areas:

- Sittingbourne
- Faversham
- West Sheppey
- Teynham
- Newington
- Eastchurch
- Leysdown
- Boughton
- Iwade
- Tier 5 settlements and the rural area

The conclusions from each sub-area discussion are presented in Section 7 of the main body of the report which, in turn, feeds into the establishment of borough-wide reasonable growth scenarios (Section 8).

Methodology

For each sub-area the aim is to discuss sites in contention for allocation, consider how sites might potentially be brought forward in combination ('growth scenarios'), and then arrive at a conclusion on reasonable growth scenarios to take forward.

Key sources of evidence include:

- the Council's Strategic Housing Land Availability Assessment (SHLAA)¹⁰¹
- the GIS analysis presented in Appendix IV;
- the discussion of sites presented in the Officers Report to the 8th October Local Plan Panel;¹⁰² and
- discussion with officers.

Sittingbourne

Sittingbourne is the Borough's main settlement, and a significant settlement in the wider sub-region, including because of major employment centres at Eurolink and Kent Science Park (to the south of Sittingbourne). For these reasons, and because land has been available subject to limited constraint, Sittingbourne has seen significant growth over recent years and decades, and there is significant committed growth. Perhaps most notable is committed strategic growth to the north of the town, where over 1,500 homes will come forward at Northwest Sittingbourne and over 550 homes at the closely linked settlement of Iwade.

It is also important to note that Sittingbourne town centre is in the process of significant transformation and regeneration. In 2019, the Council's multi-storey car park opened, freeing up small and under-used surface car parks for re-development. In addition, the multi-million pound entertainment complex, hotel and public realm improvements have sparked further investment with small scale residential, retail and leisure development completed or in the pipeline.

As a final introductory point, it is important to note that Sittingbourne's expansion has encroached on the surrounding parishes of Bobbing, Borden, Tunstall, Rodmersham, Bapchild and Tonge. Within these parishes the main rural settlements are Bobbing, Borden, Tunstall, Rodmersham Green and Bapchild (all of which have a primary school). These are rural settlements, but are appropriately considered here, because they all relate closely to Sittingbourne.

¹⁰¹ See <https://services.swale.gov.uk/meetings/mgAi.aspx?ID=8571>

¹⁰² See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2323>

A shortlist of potential growth locations and site options are discussed in Table A, with Figure A presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table A: Potential growth locations and site options at Sittingbourne

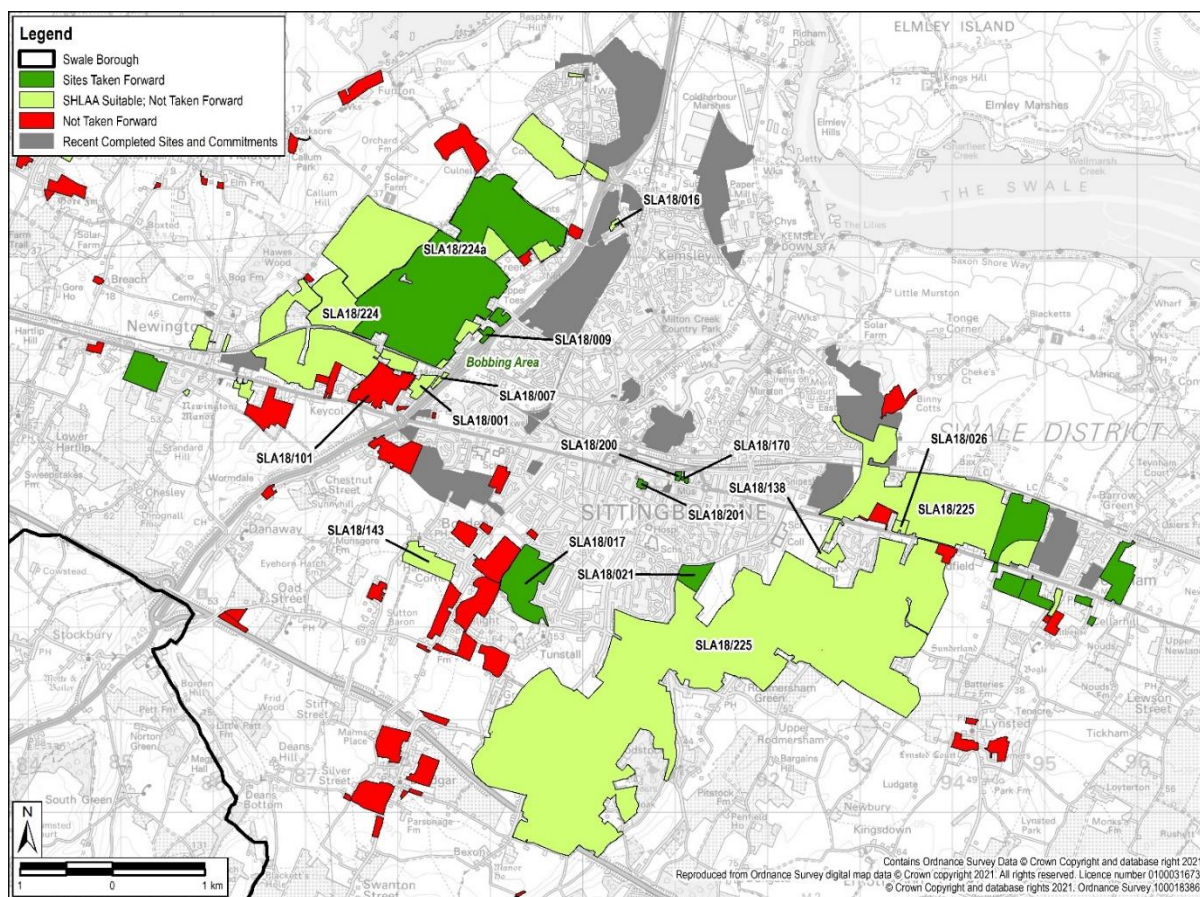
Potential growth location		Supported by SHLAA?	Discussion
Town centre	SLA18/170 SLA18/200 SLA18/201	Yes, but not deliverable"	<p>The emerging preferred growth scenario, following the Cabinet decision of 28th October, is to allocate Sittingbourne town centre as a broad area for the delivery of around 850 homes.</p> <p>This quantum of homes reflects the sites identified in the SHLAA, mindful that site deliverability can be addressed through the committed Sittingbourne Town Centre Planning and Urban Design Supplementary Planning Document (SPD). A considerable amount of work has already been completed to explore masterplanning principles for the town centre, identifying areas suitable for housing, including the eastern and western gateways to the high street, 'backland' areas well connected to the high street by alleyways, St Michael's Avenue and Eurolink Way, and there is confidence that growth locations will be identified through the SPD. The vision for the town centre is to consolidate the retail offer, whilst supporting residential, cultural and leisure uses, which aligns with the recent national changes to the town centre planning use class orders (i.e. introduction of the new class E use class, which includes retail alongside other uses, to support evolution of high streets).</p> <p>In short, the 850 homes figure is considered to be suitably conservative figure. Whilst there are viability challenges, there is considered to be good potential to deliver at least this number of homes, hence there are limited arguments for exploring a lower growth approach. Equally, there are limited arguments for exploring higher growth. The merits of potential higher growth options can be suggested in theory (e.g. delivering low carbon infrastructure); however, in practice, there is a need for town centre planning to be driven by detailed work on masterplanning, design, site availability/assembly etc.</p>
Strategic site	SLA18/225 SE Sittingbourne	Caveated support	Ruled out for the reasons given in Section 6.2.
	SLA18/224 / 224a Land at Bobbing ¹⁰³		<p>Taken forward for the reasons given in Section 6.2.</p> <p>N.B. the proposal is to assume a scheme broadly in line with that proposed by the site promoter; however, see discussion in Appendix III.</p>
South	SLA18/017 Land at Ufton Court	Yes	Were presented as options to the 8 th October Local Plan Panel, who recommended allocation of SLA18/021; however, the decision was subsequently made at 28 th October Cabinet to <i>not</i> allocate the site.
	SLA18/021 Chilton Manor Fm	Yes	

¹⁰³ The larger site was submitted through the SHLAA and the smaller site as part of subsequent work to explore strategic site options.

East	SLA18/137 Land between A2 Bapchild and existing NRR	Yes	<p>Also, presented as options to the 8th October Local Plan Panel; however, considered to be less suitable than the two 'South' sites, above.</p> <p>Reasons are given in the Officers report to the LPP meeting. More broadly, any further expansion to the east of Sittingbourne (beyond the two allocations in the adopted Local Plan) would need to be very carefully considered, with a view to: avoiding coalescence with Bapchild and Tonge (both historic parishes with grade 1 listed churches); respecting landscape sensitivity (most notably to the south of the A2); avoiding 'sprawl' towards Teynham; and ensuring delivery of the final segment of the Sittingbourne Northern Relief Road. At the current time there is no certainty regarding what a scheme might involve, and whilst the potential transport benefits of delivering the new road link are recognised, it is far from clear that benefits would outweigh the disbenefits.</p>
	SLA18/138 Land at Fox Hill/ School Lane	Yes	
Bobbing	18/001 West of Sheppey Way	Yes	<p>Presented to the LPP Panel with a recommendation for non-allocation; however, for the purposes of establishing growth scenarios, there is considered to be potential for modest growth at Bobbing, given: village services and facilities, good links to higher order centres and a dispersed built form potentially suited to consolidation. One or both of the sites supported by the SHLAA could be suitable for allocation, and potentially that part of 18/101 east of the electricity pylons and rising land to Rook Lane / Keycol. Sites other than those in the SHLAA might also feasibly be explored, potentially through a Neighbourhood Plan.</p>
	18/009 Church Farm	Yes	
	18/101 Land at Hill Farm	No	
Borden	SLA18/143 Land at Home Farm	Yes	<p>Borden is one tier higher than Bobbing in the settlement hierarchy (albeit the local offer is very similar, as understood from Settlement Hierarchy Study, 2020), but this broad area, to the south of Sittingbourne, is considered to be subject to higher landscape, heritage and biodiversity constraint. There is a high density of promoted sites, and one or more might be found to be suitable (in whole or in part) upon further investigation (potentially through a Neighbourhood Plan). However, for the purposes of the LPR, it is not considered necessary to take forward a scenario that sees any allocation(s) at Borden. This decision is made mindful of the constraints to growth, the nearby committed site at South West Sittingbourne and also nearby site 18/017 (discussed above).</p>
	Other sites	No	
Bapchild	SLA18/138 Land at Fox Hill/ School Lane	Yes	<p>Bapchild is a tier 5 settlement, as per Borden, and overall has a better local offer than Borden, as understood from Settlement Hierarchy Study.</p> <p>SLA18/138 has been discussed above, as a possible (albeit unlikely) component of strategic expansion to the east of Sittingbourne, but might alternatively be considered as an extension to Bapchild. It is, however, subject to constraints, including in terms of landscape (moderate-high sensitivity),</p>

	<p>SLA18/026 Land off Hempstead Lane</p>	<p>Yes</p>	<p>coalescence / gap to Sittingbourne (the site would split the field that forms the bulk of the gap) and heritage (grade 1 listed church). SLA18/026 is potentially less constrained overall, but relates less well to the village, is further from Sittingbourne, would be more visible from the A2 and comprises grade 1 agricultural land (adjacent land parcels have been surveyed in detail) currently used for orchards (not priority habitat). In conclusion, it is not considered necessary to take forward a scenario that sees any allocation(s) at Bapchild, in light of site specific constraints and strategic considerations, including a general view that further growth in this part of the A2 corridor – over-and-above the adopted Local Plan allocations - must be carefully considered, rather than piecemeal.</p>
<p>Other sites supported by the SHLAA but not discussed in the rows above are: SLA18/016 (small site with access constraints); SLA18/007 (suitable for employment only, discussed in Box 8.1); and sites that are committed (SLA18/175, SLA18/182, SLA18/184, SLA18/195, SLA18/208, SLA18/217, SLA18/218, SLA18/222).</p>			

Figure A: Potential growth locations taken forward at Sittingbourne



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate Sittingbourne town centre as a broad area for the delivery of around 850 homes. There is a need to explore **higher growth scenarios**, in light of the discussion presented in Sections 5 and 6 of this report.

A first port of call is the two urban extension options to the south of Sittingbourne (18/017 and 18/021), which together would deliver c.380 homes. Furthermore, as discussed in Table A, there is considered to be the potential for growth at Bobbing. The precise number of homes and sites to allocate can reasonably be left undefined (there would be merit to taking forward allocation(s) through a Neighbourhood Plan); however, on balance, it is considered appropriate to assume delivery of circa 120 homes. This brings the total number of additional homes under this scenario to 500. This is **higher growth scenario 1**.

Secondly, there is the option of strategic growth at Bobbing. This would deliver an additional circa 2,500 homes (possibly with additional growth beyond the plan period). This is **higher growth scenario 2**.

In conclusion, **three growth scenarios** should be taken forward to Section 8 of the main report.

Faversham

Faversham is a tier 2 settlement in the adopted settlement hierarchy, alongside Sheerness. Environmental constraints to growth are well understood, perhaps most notably heritage constraints; however, the adopted Local Plan allocates several significant sites, most notably mixed use urban extensions to the north (c.370 homes), east (c.350 homes) and south (c.650 homes). Committed growth to the south is of particular note, as growth here will lead to a significant change to the urban form of the town. Faversham historically extended between the marshes and creek-side industry in the north and the A2 in the south, but committed sites mean that there is now more potential to consider expansion of the town as far south as the M2.

A shortlist of potential growth locations and site options are discussed in Table B, with Figure B presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

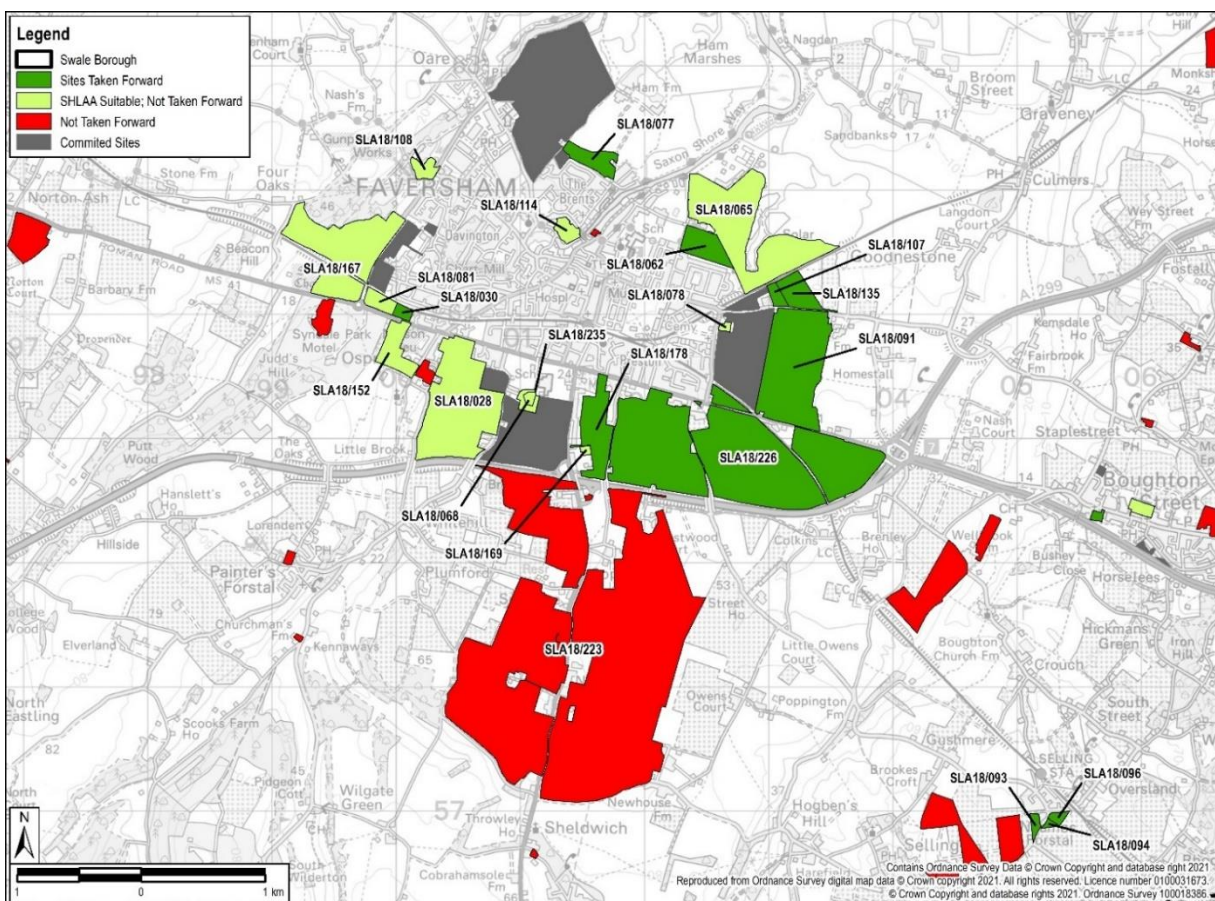
Table B: Potential growth locations and site options at Faversham

Potential growth location		Supported by SHLAA?	Discussion
Urban and small sites	SLA18/078	Yes	A Faversham Neighbourhood Plan is in preparation, and would be well placed to allocate one or more of these urban or small sites, and/or identify further sites, including with a view to supporting town centre vitality (see discussion of Sittingbourne town centre, above); however, the safe option (at the current time) is not to assume any supply.
	SLA18/114		
	SLA18/169		
	SLA18/235		
East and southeast	SLA18/226 South East Faversham	Caveated support	The emerging preferred growth scenario, following the Cabinet decision of 28 th October, is to support strategic growth to the east / southeast, delivering around 3,400 homes across these four sites. SLA18/226 is the central component, having been examined as a stand-alone garden community option since 2018. SLA18/091 would comprise a 600 home extension to the committed Lady Dane Farm scheme, and there is understood to be good potential to masterplan and deliver the scheme in combination with SLA18/226. SLA18/135 is a smaller site at the northern extent of the combined scheme, and would extend an existing allocation by 240 homes (it is also important to note that the western extent of the site is an existing employment allocation - SLA18/107 - but is now proposed for residential). SLA18/178 is an existing allocation, where the proposal is now to deliver an additional 70 homes on the southern part of the site (instead of leaving this land undeveloped), potentially enabling a link road between the A251 and SLA18/226.
	SLA18/091 Land at Lady Dane Fm	Yes	
	SLA18/135 Land at Graveney Road	Yes	

	SLA18/178 Preston Fields	Yes	Finally, it is considered important to note the possibility of a higher growth scenario involving comprehensive planning for the entire land parcel bounded by: Faversham Creek to the northwest (to include site SLA18/062); the flood zone / local wildlife sites / Goodnestone Conservation Area in the north; the A299 in the east; the M2 to the south; and the A251 to the southwest. Additional homes could lead to economies of scale in support of additional infrastructure, to include strategic green infrastructure to protect and buffer heritage and biodiversity assets; and the potential to 'unlock' strategic employment land in the vicinity of M2 Junction 7 might also be envisaged. See further discussion of strategic planning at landscape scales in Appendix II.
North Street	SLA18/223 Land at Ashford Road, North Street, Sheldwich	No	New settlement option ruled out for the reasons given in Section 6.2.
North	SLA18/065 East of Abbey Farm	Yes	Land to the north is considered the next port of call, as there are two sites considered to be <i>relatively</i> unconstrained, in the Faversham context, namely SLA18/062 and SLA18/077. Modest extensions here could more-or-less complete the expansion of Faversham north as far as the flood risk zone / zone of SPA and wider biodiversity sensitivity. SLA18/065 is considered the least suitable of the three sites. It would extend SLA18/062 to include an area of land that is heavily constrained in flood risk and biodiversity terms.
	SLA18/062 39 Abbey Fields	Yes	
	SLA18/077 Land at Ham Road	Yes	
South (north of the A2)	SLA18/081 Land at London Road and Western Link	Yes	Both sites are quite well contained in built form terms, but the western site contributes to an attractive rural setting to the western edge of Faversham, in combination with the highly visible landscaped grounds of the Syndale Park Conservation Area to the south of the A2. Furthermore, the Ordnance Survey map indicates the site of a Roman burial ground, and the Kent Historic Environment suggests this as the possible site of the Roman Station (mansio) of Durolevum, noting that the A2 is a Roman road (Watling Street).
	SLA18/030 Land at Lion Field	Yes	
South (south of the A2)	SLA18/028 Land at Queen Court Farm, Faversham	Yes	As discussed, the existing Local Plan includes three allocations to the south of the A2, which essentially comprise those sites considered to be least constrained at the time of preparing that Local Plan. Uncommitted land to the south of the A2 is constrained in historic environment and landscape terms, particularly given: the Ospringe Conservation Area to the west; the Faversham Conservation Area to the north; a wider historic landscape associated with fruit cultivation; and impacts to important links between Faversham and the rural landscape to the south of the M2, including the Whitehill and Painters Forstall Conservation Areas and the national fruit collection at Brogdale Farm. There are also road access and air quality constraints, particularly given the Ospringe AQMA.
	SLA18/152 Land south of A2/ West of Water Lane	Yes	

	SLA18/068/235 Land at Perry Court Farm	Yes	Also, the officers' report to the 8 th November Local Plan Panel makes the following important statement in respect of the largest of these sites (SLA18/028): "Site promoters have been unable to demonstrate collaboration with the land available to the west and north west that might provide an opportunity for a link road from the A2 at Ospringe to the A251 Ashford, meaning that the site would most likely be developed in isolation rather than as a more cohesive approach that could potentially yield the benefit of a bypass that could relieve traffic on the A2 and better walking and cycling links with the town centre."
West	SLA18/167 West of Western Link	Yes	Both sites are constrained in landscape terms, with the western edge of Faversham defined by the Syndale Valley local landscape designation. Additionally, the larger site would impact on the setting of Syndale Conservation Area, and the smaller site mostly falls in flood risk zone 2.
	SLA18/108 Land at Brett House	Yes	
Other sites supported by the SHLAA but not discussed above are committed (SLA18/149, SLA18/174, SLA18/194).			

Figure B: Potential growth locations taken forward at Faversham



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support strategic growth to the east / southeast, delivering around 3,400 homes. There is a need to explore scenarios involving smaller scale urban extensions, in place of strategic growth to the east / southeast, which in practice means exploring lower growth scenarios. Higher growth could feasibly be achieved by more comprehensive expansion to the east; however, the land in question was not considered through the SHLAA and is not known to be available, so this option is ruled out on delivery grounds.

Focusing on lower growth scenarios, five urban extension options have been identified that are judged to perform relatively well, for the purposes of arriving at growth scenarios, namely sites 18/030, 18/062, 18/077, 18/091 and 18/135. The combined yield of these sites, according to the figures presented in the report to the 8th October Local Plan Panel meeting, is 1,065 homes; however, it is considered appropriate to round this figure down to 1,000 homes. This is **lower growth scenario 1**.

Other lower growth scenarios can obviously be envisaged that would involve a selection of the five urban extension options that feature in lower growth scenario 1. One possible scenario, of note, would involve allocating only the three smaller urban extensions to the north and south, with further expansion to the east resisted, including due to concerns around 'urban sprawl'. However, expansion to the east would comprise a mixed use scheme, to include at least 10 ha of new employment land, which is an important consideration in light of the employment land targets set by the ELR (2018). Furthermore, there is a need to recall the 2020 decision by Cabinet, in respect of focusing growth at Faversham through the LPR.

In conclusion, **two growth scenarios** should be taken forward to Section 8 of the main report.

West Sheppey

Sheerness is a tier 2 settlement in the settlement hierarchy, whilst Minster/Halfway and Queenborough/Rushenden together comprise tier 3 of the settlement hierarchy. Together, these linked settlements comprise the 'West Sheppey Triangle'.

The adopted Local Plan makes a series of housing allocations at Minster/Halfway, with Barton Hill Drive by far the largest scheme (now with permission for 700 homes). There are also three very small allocations at Queenborough/Rushenden, and much of area is designated as an area of regeneration, as part of which there is support for significant housing growth. There are no allocations at Sheerness, but the Port of Sheerness area is designated as an area of regeneration. The focus is on safeguarding the port function and encouraging investment in infrastructure that supports water and rail freight connections.

A shortlist of potential growth locations and site options are discussed in Table C, with Figure C presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table C: Potential growth locations and site options in the West Sheppey Triangle

Potential growth location		Supported by SHLAA?	Discussion
Sheerness		N/a	There is support for housing growth in Sheerness, and this could form part of plans for regeneration of the Port and Blue Town area; however, the safe option (at the current time) is not to assume any supply.
Queenborough / Rush'den	SLA18/113 Land at Port of S'ness, Rushdenden	No	Since the SHLAA conclusion the Council has worked closely with the site promoters to explore options for this site, and it now forms part of the emerging preferred growth scenario, following the Cabinet decision of 28th October. The proposal is to deliver 850 homes and around 10 ha of additional employment, and take additional steps aimed at supporting regeneration; however, there are a range of delivery and environmental challenges to overcome, including flood risk.
	SLA18/199 SLA18/207 SLA18/214 SLA18/220	Yes	Fall within the regeneration area and are listed within the supporting text to Policy Regen 2 of the adopted Local Plan as having the potential to deliver up to 1,180 homes. They are shown in Figure C (below) as commitments; however, given delivery and environmental challenges (including almost complete coverage of flood risk zone 3), the safe option (at the current time) is not to assume any supply.
East and Southeast of Minster	SLA18/038 East of Scocles Road	Yes	Over the past 30 years a major new community has come forward in the Thistle Hill area, to south of Minster / north of the A2500 Lower Road / east of Barton Hill Drive / west of Scocles Road.

	SLA18/067 Land off Elm Lane	Yes	<p>Housing development has supported investment in infrastructure, including community and green infrastructure, and final elements of the long-committed scheme are still building-out. Additionally, the most recent Local Plan allocated perhaps a final parcel of land in the Thistle Hill area, for 97 homes, and a site adjacent to the east (north of Elm Lane), for 50 homes.</p> <p>SLA18/038 was given close consideration through the plan-making / SA process, when preparing the adopted Local Plan, but was ultimately ruled-out as 'unreasonable', including as nearby Barton Hill Drive was judged to be preferable, and the view was that both sites could not come forward in combination. For the purposes of the LPR, which looks to 2038 rather than 2031, it is considered reasonable to explore the option of allocating SLA18/038, including as it is a larger site potentially suited to delivering planning gain. However, allocation of this site alone might still represent something of a piecemeal approach to growth in this area. A more strategic and comprehensive approach could be preferable, including with a view to respecting landscapes of 'moderate-high' sensitivity and delivering increased capacity along the Lower Road.¹⁰⁴</p> <p>On the basis of this discussion, SLA18/067 performs less well, as a much smaller site that would involve piecemeal expansion.</p>
West of Minster / south of Halfway	SLA18/165 Land East of Queenborough	Yes	<p>There is merit to growth in this area – west of Minster / south of Halfway / west of Queenborough / north of the Lower Road (or the flood risk zone) – including as it is relatively well-connected in the Sheppey context. This is reflected in four adopted Local Plan allocations, including Barton Hill Drive, which now has planning permission for 700 homes.</p> <p>There could be merit to taking a strategic / comprehensive approach to further growth in this area, including with a view to addressing landscape and other environmental constraints and opportunities, and maximising infrastructure delivery benefits. This could mean avoiding development of raised land (Barrows Hill and Furze Hill; see footnote discussion, below), which could offer an opportunity to deliver new strategic green infrastructure, and also land to the south of the Lower Road (site SLA18/060), across which there are long ranging views to Sittingbourne.</p> <p>However, all of the sites supported by the SHLAA would involve piecemeal growth. SLA18/165 is notable as a large site, but would involve development of land rising towards Barrows Hill.</p> <p>N.B. it is noted that a more comprehensive scheme for Barton Hill Drive (1,400 homes, rather than the committed 700 home scheme) is now being promoted, to include additional infrastructure delivery and low carbon measures (a net zero scheme is proposed); however, this was not submitted in time to be considered through the SHLAA.</p>
	SLA18/088 Land South West of Belgrave Road	Yes	
	SLA18/064 Land at Highfield Road	Yes	
	SLA18/133 Land at Bartletts Close, Halfway	Yes	
	SLA18/060 Land at Wallend, Lower Road	No	

¹⁰⁴ The Swale Landscape Sensitivity Assessment (2020) identifies all land surrounding Minster as having moderate-high sensitivity to housing growth, with inherent sensitivities associated with the raised rolling landscape of Sheppey's clay "backbone". However, the study also discusses important spatial variation. Firstly, it is important to note that the landscape parcel directly to the southeast of Minster Abbey is judged to have 'high' sensitivity to employment development (i.e. taller/bulkier buildings); and, secondly, the following is an important quote describing spatial variation in landscape sensitivity within the broad landscape parcel (MR2) that falls between the southern edge of Minster/Halfway and the A2500 Lower Road: "Key spatial variations are the distinctive landforms of Barrows Hill and Furze Hill to the west which have higher sensitivity, the retention of an open rural setting along the A2500 and the relationship to the adjacent marshes, plus the role of the slopes as a rural setting to Minster Abbey, notably in the area south of Woottons Farm rising from the A2500, which are especially sensitive. There may be areas of lower sensitivity on lower lying land to the west associated with existing development."

Park homes (also relevant to the Leysdown area)

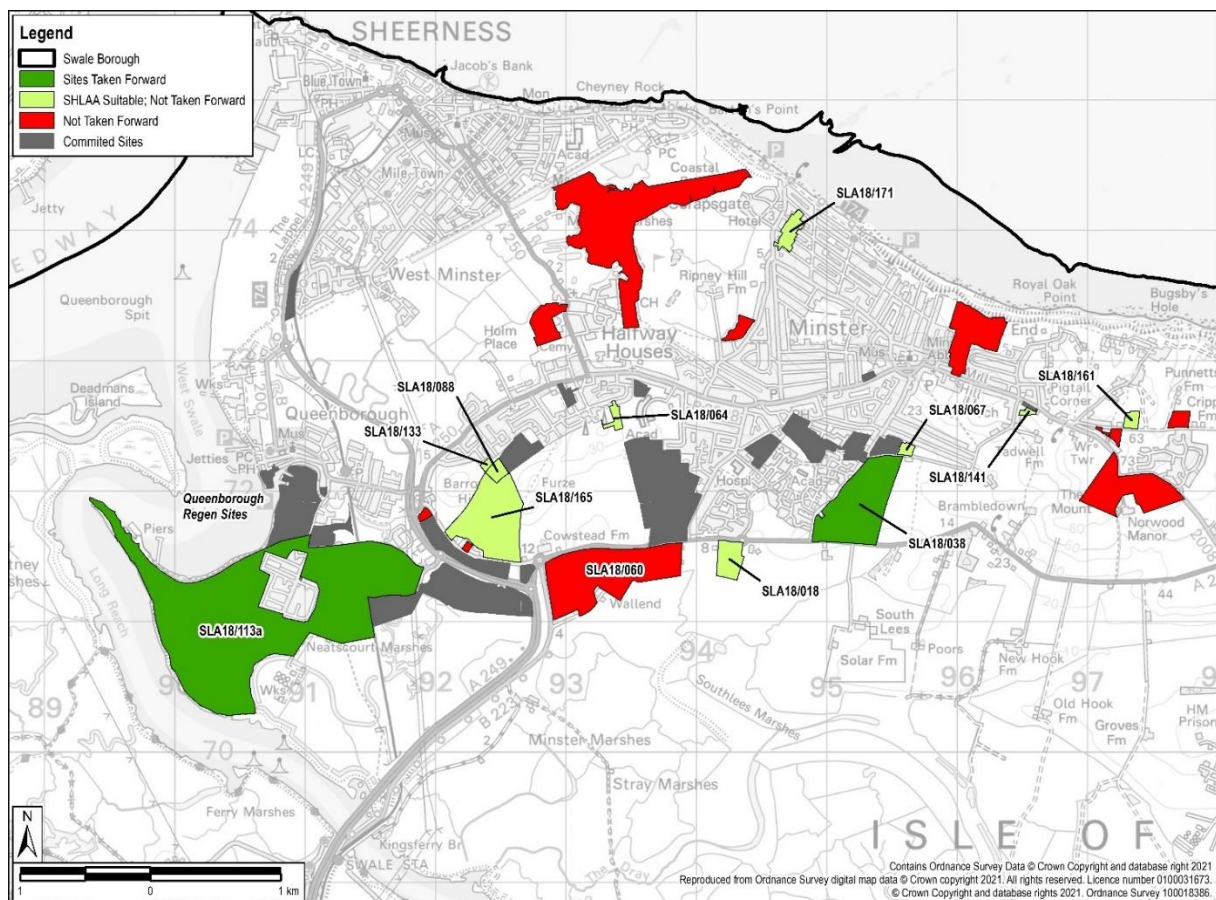
An “Interim Policy Statement on “Use of caravans/chalets as permanent residences” was presented to the Local Plans Panel on 7th May 2020. This proposed a shift in approach, specifically support for: “Proposals for the conversion/redevelopment of holiday accommodation on holiday parks in the Borough to permanent residence (12 months of the year) will be granted provided that all of the following criteria are met...”

There is the option of taking forward this interim policy through the LPR, which could lead to a significant supply of new homes on the Isle of Sheppey. There are good reasons for seeking to enable conversion/redevelopment to permanent residence, including because such sites can often be suited to the over 55s looking to downsize from family-sized housing. However, there is a need to apply caution, as given the location of some existing park homes sites (e.g. risk of flooding; accessibility to services and facilities) and constraints to ensuring good living standards onsite.

On balance, there is not considered to be a need to build this into growth scenarios.

Other sites supported by the SHLAA but not discussed in the rows above are: SLA18/171 (a constrained greenfield site within the settlement confines of Minster, potentially suited to Local Greenspace designation); SLA18/141 (a small site on the eastern edge of Minster); SLA18/018 (proposed for non-residential uses, discussed in detail in the officers’ report to the 8th October Local Plan Panel); and sites that are committed (SLA18/131, SLA18/176, SLA18/177, SLA18/179, SLA18/180, SLA18/186, SLA18/193, SLA18/198, SLA18/209).

Figure C: Potential growth locations taken forward in the West Sheppey triangle



Conclusion

The emerging preferred growth scenario, following the Cabinet decision of 28th October, is to allocate site 18/113 for 850 homes. This site has the potential to support regeneration objectives for Queenborough/Rushenden, but

is subject to a range of constraints and delivery challenges. As such, there is a need to explore scenarios involving non-allocation of this site.¹⁰⁵

One other site has been identified as performing relatively well, for the purposes of arriving at growth scenarios, namely site 18/038, to the southeast of Minster. The capacity of this site is c.650 homes, hence allocation of this site in place of site 18/113 would involve modestly lower growth directed to West Sheppey (but there are also options for allocations in the eastern part of the Island, as discussed below). This is **lower growth scenario 1**.

Additionally, there is the option of nil allocations, particularly given concerns regarding capacity on the A249 and at junction 5 of the M2 under scenarios where there is also higher growth in the Sittingbourne area. This is **lower growth scenario 2**.

In conclusion, **three growth scenarios** should be taken forward to Section 8 of the main report.

Teynham

Teynham is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities and good connectivity to Sittingbourne and Faversham by road and rail, although AQMAs are a significant constraint.

The adopted Local Plan allocates four sites to deliver a total of around 410 homes, with 260 proposed at a mixed use extension of the village to the west. This is notably more than the 115 homes directed to Newington, which is a similar settlement.

As a final introductory point, it is important to note that all agricultural land surrounding the village is shown by the nationally available (low resolution) dataset to be of grade 1 quality (although much of the land has been surveyed in detail, which shows there to be some grade 2 quality land).

A shortlist of potential growth locations and site options are discussed in Table D, with Figure D presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table D: Potential growth locations and site options at Teynham

Potential growth location		Supported by SHLAA?	Discussion
Northwest	SLA18/025 Land West of Frognal Lane	Yes	This site would extend the 260 home mixed use scheme that is an allocation in the adopted Local Plan. There would be good accessibility to the rail station (there is a footpath along Lower Road, west of Frognal Lane); however, there is heritage constraint, in the form of two listed buildings (one grade 2*), and new homes would, to some extent, be separated from the rest of the village by the committed employment area, sports pitches and open space. There is also a need to consider the landscape gap to Bapchild and Sittingbourne.
	SLA18/225 SE Sittingbourne	Yes	It is important to note the extensive SE Sittingbourne site extends to include site SLA18/025 and the committed area of open space to the west of Frognal Lane (south of SLA18/025). However, the latest proposals for SLA18/225 appear to leave the open space undeveloped.

¹⁰⁵ This conclusion *could* be questioned, as the two main constraints – flood risk and proximity to / links with the SPA – are relatively ‘black and white’, meaning that they either will be addressed through the planning application process, such that the site can be judged sustainable and suitable for development, or will not be addressed, such that the site is not developed. This site could lend itself to further work to explore site-specific alternatives.

Northeast	SLA18/106 Land at Barrow Green Farm, London Rd	Yes	This site would extend and link the two existing modest allocations to the east of the village, and would benefit from very good accessibility to the rail station. The assumption is that only the western part of the site would be developed, delivering around 100 homes. This is an important consideration given a ridgeline running north/south through the centre of the site, associated with public footpaths.
Southeast (Lynsted Lane)	SLA18/055 Land at Lynsted Lane	Yes	Lynsted Lane is understood to be constrained by its problematic junction with the A2, which is located in the centre of the village, with the AQMA covering that part of the A2 immediately to the east. This is understood to be a key issue, with the officers' report presented to the October 8 th Local Plan Panel making clear that this is the least suitable of the sites judged to be suitable through the SHLAA.
Southeast (Cellar Hill)	SLA18/010 Land at Cellar Hill	Yes	Cellar Hill is covered by the conservation area, although the officers' report presented to the October 8 th Local Plan Panel highlights that there could be potential for sensitive development nonetheless.
	SLA18/153 Land south of Dover Castle Inn, A2/Cellarhill	Yes	
Southwest	SLA18/116 Land South of London Road/West of Lynsted Lane	Yes	Land between Claxfield Road and Lynstead Lane is judged to have relatively low landscape sensitivity in the borough-wide context, according to the Landscape Sensitivity Assessment (2020); however, there is a degree of sensitivity, given views across this land from footpaths and Claxfield Road, which is designated as a rural lane. There is also heritage constraint, with a grade 2* listed farmhouse adjacent to the west of SLA18/122, and further listed buildings to the south. Focusing on adjacent sites 116 and 122, the proposal is to deliver modest housing growth abutting the village, with both sites gaining access onto Claxfield Road (as opposed to Lynsted Lane). However, there is limited potential to make use of existing field boundaries, hence the possibility of further expansion south over time can be foreseen.
	SLA18/122 Land at Claxfield Road (Site 1)	Yes	
	SLA18/123 Land at Claxfield Road (Site 2)	Yes	
Other sites supported by the SHLAA but not discussed in the rows above are committed (SLA18/183, SLA18/190, SLA18/213).			

Figure D: Potential growth locations taken forward at Teynham



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to support an ‘area of opportunity’ at Teynham, expected to deliver around 1,100 homes. As explained in the officers report to the 8th November Local Plan Panel: *“To maximise opportunities for more comprehensive placemaking, the sites have... been considered as a whole with a view to identifying and considering their potential cumulative effect and what infrastructure provision should form part of any allocations to support existing and new communities in this location.”*

There is also a need to explore scenarios involving one or more discrete allocations, in place of an area of opportunity, which in practice means exploring lower growth scenarios. On balance, it is suggested that growth to the northeast and southwest should be the first port of call; however, this is marginal, as the site to the northwest (Site 18/025) and the two sites to the southeast (SLA18/153 and SLA18/010) may also be suitable. The combined yield of the sites to the northeast and southwest is c.350 homes. This is **lower growth scenario 1**.

Additionally, there is the option of nil allocations, given: committed growth; A2 traffic and air quality issues; and few clear growth related opportunities short of delivering a bypass. This is **lower growth scenario 2**.

In conclusion, **three growth scenarios** should be taken forward to Section 8 of the main report.

Newington

Newington is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities and good connectivity to Sittingbourne and the Medway towns by road and rail, although AQMAs are a significant constraint.

The adopted Local Plan allocates one site to deliver 115 homes. This is notably fewer than the 410 homes (plus employment land) directed to Teynham, which is a similar settlement.

As a final introductory point, it is important to note that all agricultural land surrounding the village is shown by the nationally available (low resolution) dataset to be of grade 1 quality.

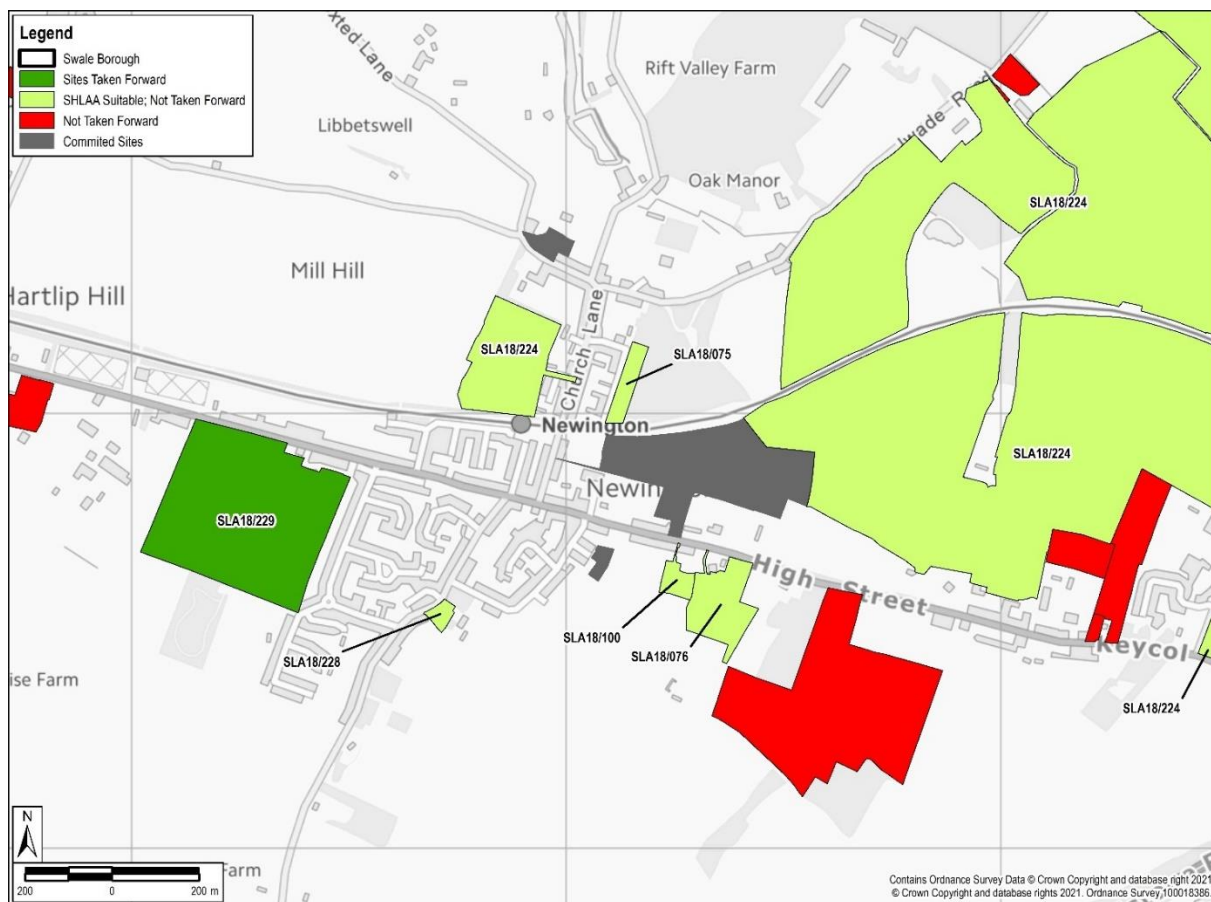
A shortlist of potential growth locations and site options are discussed in Table E, with Figure E presenting a summary in respect of those taken forward to the next stage (borough-wide growth scenarios) versus those ruled out at this stage.

Table E: Potential growth locations and site options at Newington

Potential growth location		Supported by SHLAA?	Discussion
North	SLA18/075 Land at St Mary's View	Yes	Land to the north of the railway line is constrained in landscape and heritage terms, with the land rising to the north, towards the conservation area and grade 1 listed church. Road accessibility is a constraint, with Church Lane a narrow road meeting the A2 within an AQMA.
	SLA18/224 / 224a Land at Bobbing ¹⁰⁶	Caveated support	SLA18/224 is a western outpost of the very large site originally submitted by the promoters of a new garden community at Bobbing; however, there has subsequently been no discussion of bringing forward this land. It benefits from being well contained, potentially with limited landscape sensitivity, but the Church Lane constraint applies, and there is currently no access to the rail station from the north.
Southwest	SLA18/229 Land at Pond Farm	Yes	An application for 140 homes (plus a care facility) on this site was dismissed at appeal in 2017, primarily on air quality and landscape grounds. However, it is considered appropriate to explore the option of allocation through the LPR, given that: air quality is improving (or, at least, set to improve); and the Swale Landscape Sensitivity Assessment (2020) identifies land to the south of Newington as relatively unconstrained, in the borough-wide context. There could also be the possibility of delivering an element of planning gain, with the scheme dismissed at appeal in 2017 having proposed to make land available for a healthcare facility, and noting the village recreation ground adjacent to the south. Latest understanding is that a scheme for around 200 homes is being proposed. This amounts to 15 dwellings per hectare on average, suggesting good potential to deliver onsite green infrastructure, including in order to buffer the listed building to the northeast of the site.
Southeast	SLA18/076 Land at Ellen's Place	Yes	There could be potential for expansion of the village in this direction, noting that the Landscape Sensitivity Assessment (2020) identifies land south of the A2 as relatively unconstrained, in the borough-wide context. Options for strategic expansion can be envisaged, utilising existing landscape features and avoiding encroachment on rising ground towards Keycol. However, the two sites in question would represent piecemeal growth, and would not relate well to the existing built form. It is not clear that they could be delivered effectively in combination (they appear to be separated by a mature hedgerow), hence the western site would seemingly require access onto the A2 within the AQMA. Also, this site (SLA18/100) was dismissed on appeal in 2018 on grounds of harm to the open, rural character and appearance of the countryside.
	SLA18/100 148 High Street	Yes	
Other sites supported by the SHLAA but not discussed in the rows above are committed SLA18/228 (as small site in the conservation area) and SLA18/124 (which is committed).			

¹⁰⁶ The larger site was submitted through the SHLAA and the smaller site as part of subsequent work to explore strategic site options.

Figure E: Potential growth locations taken forward at Newington



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There is a need to explore higher growth scenarios, recognising that Newington is a tier 4 settlement that is well connected by road and has a rail station.

One site option has been identified that is judged to perform relatively well, for the purposes of arriving at growth scenarios, namely site18/229, which would deliver around 200 homes. This is **higher growth scenario 1**. The next port of call would be land to the southeast, and at least one of the sites in question appears to be subject to limited constraint, but allocation would represent piecemeal growth and the site does not relate well to the existing built form of the village.

In conclusion, **two growth scenarios** should be taken forward to Section 8 of the main report.

Eastchurch

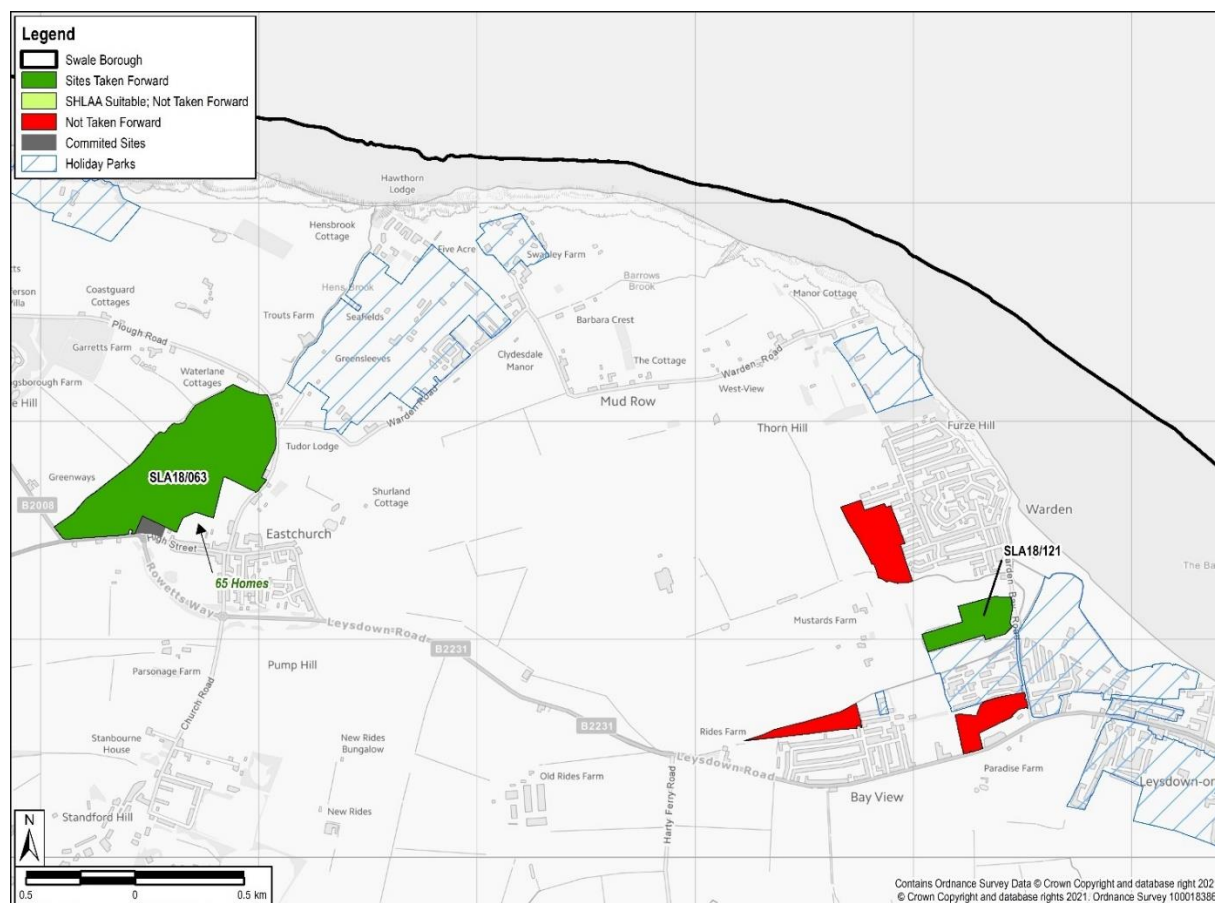
Eastchurch is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, but is not very well connected to higher order centres, given its location towards the east of the Isle of Sheppey, a limited bus service and traffic issues on the island, particularly in the summer tourism season. The adopted Local Plan allocates one site to deliver 15 homes.

There is only one SHLAA site at Eastchurch, namely SLA18/063 (Land North of Eastchurch). This is a large site that could feasibly more than double the size of the village; however, a smaller scheme is now being promoted, for 65 homes. Any scheme here would not relate very well to the existing village, and would give rise to landscape concerns given topography, limited potential landscape features to bound expansion and ‘moderate-high’ landscape sensitivity. There is also a need to consider the setting of the small historic village core, which includes a grade 1 listed church.

Other than land to the north, the only other potential direction of growth would appear to be land to the east, given designated local greenspace to the west and the visual prominence of Pump Hill to the south. However, the large field to the east of the village is not available, and also has moderate-high landscape sensitivity, with the Landscape Sensitivity Assessment explaining: “The area east of Eastchurch is particularly sensitive in relation to the setting of the historic area at Shurland.”

Figure F presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Figure F: Potential growth locations taken forward at Eastchurch and Leysdown



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Eastchurch, recognising its relatively isolated location on the Isle of Sheppey; however, as a tier 4 settlement there is a need to remain open to the option of allocation, should sites be available and suitable.

One site option has been identified that is potentially suitable for allocation (for the purposes of arriving at growth scenarios), namely site 18/063, which would yield c.65 homes. This is **higher growth scenario 1**.

In conclusion, **two growth scenarios** should be taken forward to Section 8 of the main report.

Leysdown

Leysdown is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, but is not very well connected to higher order centres, given its location towards the east of the Isle of Sheppey, a limited bus service and traffic issues on the island, particularly in the summer tourism season. Leysdown is heavily associated with tourism, as is evident from the extent of holiday parks (shown on the adopted Local Plan policies map). The adopted Local Plan allocates one site to deliver 10 homes.

Leysdown is of note as its current position in the hierarchy is somewhat marginal; specifically, there is an argument for moving Leysdown to tier 5. On one hand this could indicate a need to restrain growth to a level below that which might otherwise be considered appropriate for a tier 4 settlement; however, on the other hand, there is an argument for seeking to support investment in the town via housing growth, such that its tier 4 status is reinforced. The Settlement Hierarchy Study (2020) explains: “Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services.”

There is only one site at Leysdown supported by the SHLAA, namely SLA18/121 (Seaview Park, Warden Bay Road). One other site is also available, but comprises designated Local Greenspace.

Focusing on SLA18/121, the site currently comprises a holiday park, such that it includes a strong element of brownfield land. A housing scheme would not adjoin an existing settlement boundary, but would occupy a potentially suitable location between the existing settlement confines of Leysdown, Warden and Bay View.

Finally, there is a need to consider the possibility of further housing growth through conversion of park homes (see discussion in Table C, above); however, on balance this is not considered to be a reasonable option to take forward.

Figure F, above, presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. There are limited strategic arguments for allocation at Leysdown, as per Eastchurch; however, there is an argument for housing growth in support of village vitality objectives, e.g. with a view to supporting shops and services outside of the tourism season.

One site option has been identified that is potentially suitable for allocation (for the purposes of arriving at growth scenarios), namely site 18/121. The SHLAA records the yield of this site as 135 homes; however, parts of the site are constrained by flood risk, hence it is considered appropriate to assume a lower yield of c.100 homes. This is **higher growth scenario 1**.

In conclusion, **two growth scenarios** should be taken forward to Section 8.

Boughton

Boughton is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, and is quite well connected by road and bus to Faversham and Canterbury. It also relates closely to Dunkirk, which is a tier 5 settlement a short distance to the east. However, it is subject to heritage, biodiversity and landscape constraint, with the Landscape Sensitivity Assessment (2020) notably finding all four landscape parcels surrounding the village to have ‘high’ sensitivity. The adopted Local Plan allocates three sites to deliver 37 homes.

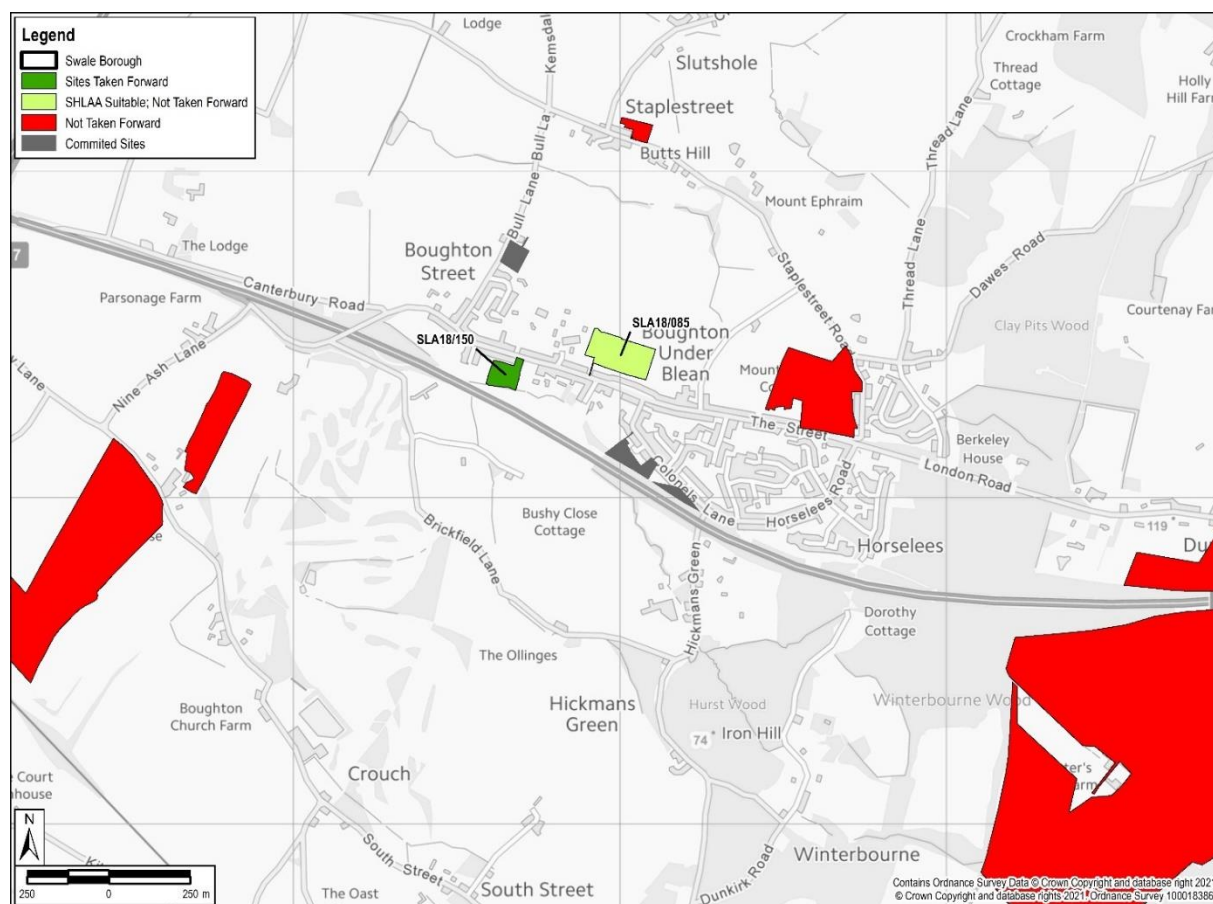
The SHLAA supports two sites, one of which (SLA18/150, the Former Garden Hotel) is now proposed for allocation (20 homes). The site falls within the conservation area and includes a grade 2 listed building, with several others in close proximity; however, the site includes an element of brownfield land, and there is understood to be good potential to bring forward a scheme that is sympathetic to the clear heritage sensitivities. Also, as noted by the SHLAA, there is a history of unimplemented planning permissions.

The other site supported by the SHLAA - 18/085 (Land Rear of 142-146 The Street) – also includes an element of brownfield land, but is considered to be notably less suitable, given the landscape and heritage sensitivities (noting the location of public rights of way), and question-marks regarding safe vehicular access. It is also important to note that a Neighbourhood Plan is in preparation, which could consider allocation of this site.

Of the sites not supported by the SHLAA, SLA18/082 (Land North of The Street/Canterbury Road) is of note as a larger site, where development could serve to round-off the built form. However, the site is sensitive in landscape terms noting reference in the Landscape Sensitivity Assessment (2020) to “a strongly rural and scenic backdrop and immediate setting to Boughton, which is apparent in views from... Boughton Street, with rolling orchards adjoining these routes”. The site is also visible from Staple Street, which is a route leading to Staplestreet Conservation Area and Mount Ephraim (house and gardens), which is grade 2 listed on the national register of parks and gardens, and a visitor destination. It is also noted that the conservation area extends south to include an oast house located a short distance from the northern edge of the site, and seemingly visible across the site.

Figure G presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Figure G: Potential growth locations taken forward at Boughton



Conclusion

The **emerging preferred growth scenario** is to allocate one site for 20 homes. This site that is quite firmly supported, hence there is no reasonable need to explore scenarios involving non-allocation of this site.

As for possible higher growth scenarios, there is only one site highlighted by the SHLAA as potentially in contention; however, on balance it is not considered appropriate to explore a higher growth option involving additional allocation of this site given that: there are limited strategic arguments for growth at Boughton; a Neighbourhood Plan is in preparation (which could consider allocation of this site); and there are question-marks regarding the site in landscape, heritage and access terms.

In conclusion, **one growth scenario** should be taken forward to Section 8 of the main report.

Iwade

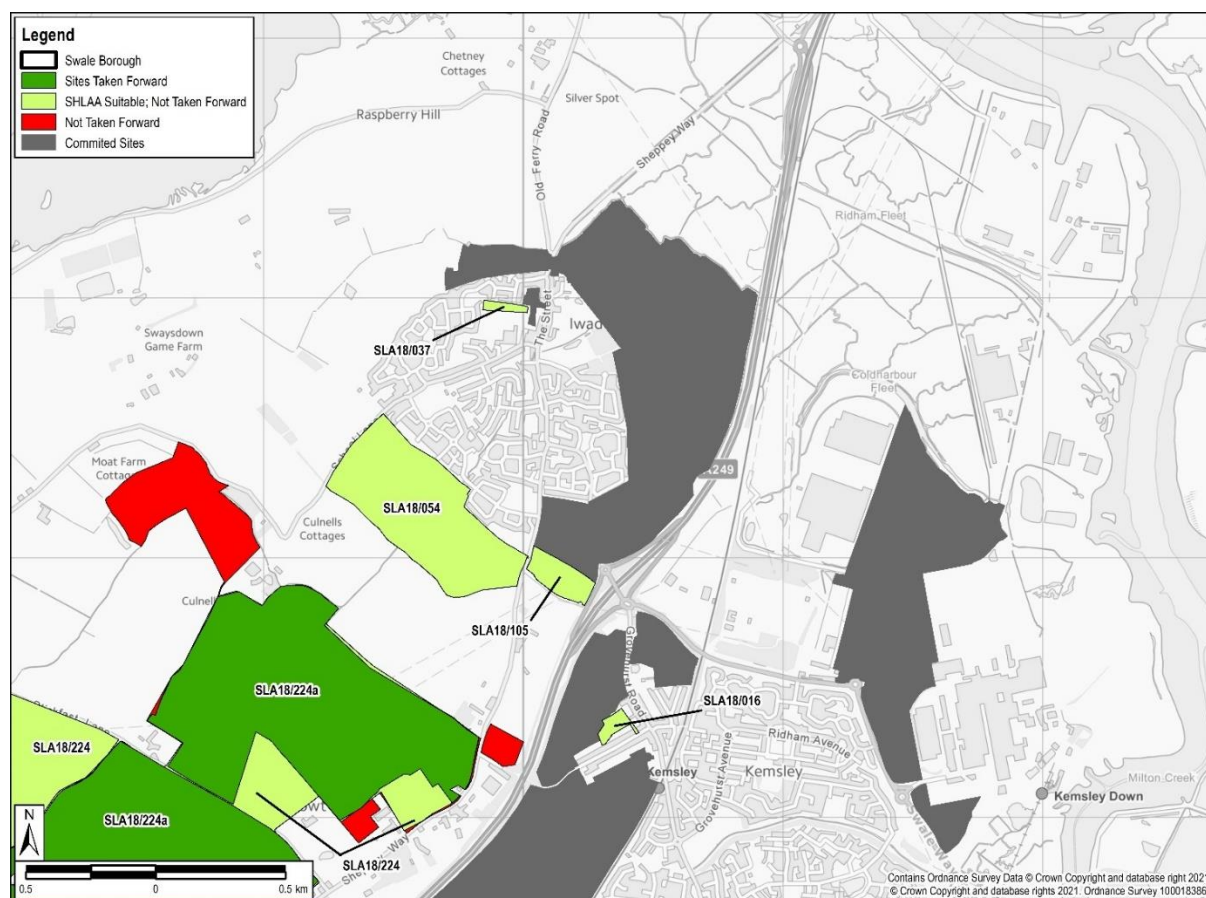
Iwade is one of six tier four settlements in the Borough. It benefits from a range of local services and facilities, and is quite well connected by road, bus and cycle routes to Sittingbourne.

Iwade has undergone major expansion over the past 20 years with significant further development planned through existing unimplemented allocations. Another important consideration is the Grovehurst junction to the A249, where committed improvements are only likely to support the level of development that is currently planned.

The SHLAA supports three sites, including a large site to the southwest of the village. However, there are strong strategic arguments for not directing further growth to Iwade at the current time, given the scale of committed growth. Also, there is a need to consider the possibility of strategic planning for growth to the south of Iwade in combination with growth at Bobbing.

Figure G presents a summary of those taken forward to the next stage versus those ruled out at this stage.

Figure H: Potential growth locations taken forward at Iwade



Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate nil sites. Three sites at Iwade are identified as potentially suitable for allocation by the SHLAA; however, there is considered to be a strong case for non-allocation at Iwade through the LPR, on the basis that Iwade is set to see significant growth through committed sites.

In conclusion, **one growth scenario** should be taken forward to Section 8 of the main report.

Tier 5 settlements and the rural area

There are arguments for supporting growth at villages, with a view to meeting locally arising housing needs and supporting village vitality; however, tier 5 and smaller villages are suited to only modest growth, such that Neighbourhood Plans are well placed to allocate sites. Whilst interest in Neighbourhood Planning amongst parish councils in the Borough is currently limited, there is a good chance that Neighbourhood Plans will come forward in the plan period to deliver housing in rural areas.

A number of tier 5 settlements have already been discussed above, including Borden and Bapchild, which are associated with Sittingbourne. Of the remaining tier 5 settlements, the Settlement Hierarchy Study (2020) serves to highlight the range of services and facilities available locally varies considerably, with a relatively good offer at:

- Bredgar – notable for being associated with three large available sites (3 to 7 ha); however, all sites at Bredgar are judged to be unsuitable by the SHLAA, including because Bredgar is located within the AONB.
- Selling – there are two adjacent small sites, which seemingly could be delivered in combination; however, both are judged to be unsuitable by the SHLAA, including because Selling is located within the AONB.
- Upchurch – has comfortably the best offer of local services and facilities of the tier 5 settlements, plus there is a (limited) bus service, including to nearby (c.4km) Rainham Station. The SHLAA supports one site - SLA18/119 (Land at Long Field) – however, the site does not relate very well to the built form of the village, and a footpath crosses the site.

The next port of call is SLA18/154 (Lamberhurst Farm), as this is a large site judged to be suitable by the SHLAA. Located on the border with Canterbury, it is now proposed as an employment allocation, following the Cabinet decision of 28th October; however, it is being promoted as a mixed use scheme involving 300 homes. It is noted that there was some support for a mixed use scheme at the 8th October Local Plan Panel meeting; however, on balance this option is not taken forward. The site sits in a gap between locally important landscapes, and there is potentially an opportunity to deliver community infrastructure to the benefit of Dargatem, Highstreet and Yorkletts (there is notably no primary school in this area); however, a 300 home scheme would not be likely to deliver new community infrastructure of any significance. Also, the site is adjacent to common land (Victory Wood, a Woodland Trust nature reserve) and in close proximity to the Blean Woodlands SAC.

There is only one other site in the rural area judged to be suitable through the SHLAA, namely SLA18/161 (Plough Leisure Caravan Park), which is located adjacent to the recent Kingsborough Manor development, between Minster and Eastchurch (see Figure C, above); however, this site is being promoted for park homes, i.e. a specific consideration not suited to being explored through the appraisal of growth scenarios.

Having considered all of the better served tier 5 settlements, and all of the sites supported by the SHLAA, the next port of call is Neames Forstal (see Figure B, above). This is because the village benefits from a rail station; however, the offer of local services and facilities is very limited, and the western edge of the village falls within the AONB. Three adjacent sites are being promoted for a combined scheme, which would also deliver a new footpath link to Selling (c. 1.5km to the west), where there is a primary school and other facilities. The SHLAA judges these sites to be unsuitable, including due to the AONB constraint; however, the emerging proposal, following the Cabinet decision of 28th October, is to deliver a combined scheme of 90 homes that responds to the AONB constraint. As explained within the officers report to the 8th November Local Plan Panel, the two sites adjacent to the AONB are not considered likely to contribute significantly to the setting of the AONB, whilst the site within the AONB would only be developed in part, so as to round-off the village edge.

Finally, there is a need to note SLA18/156 (Foresters Lodge Farm). A new settlement is being promoted (see www.winterbournefields.com), however, the site is constrained in a number of respects, perhaps most notably in terms of landscape and biodiversity, as discussed within the officers' report to the 8th October Local Plan Panel.

Conclusion

The **emerging preferred growth scenario**, following the Cabinet decision of 28th October, is to allocate three adjacent sites at Neames Forstal to deliver 90 homes in total. These sites were not supported by the SHLAA, and there remain question-marks regarding suitability for allocation; however, there would be relatively little to be gained through exploring non-allocation further through the appraisal of borough-wide growth scenarios. As such, and on balance, there is not considered to be a reasonable need to take forward scenarios involving non-allocation of any of these sites.

With regards to higher growth scenarios, attention focuses on the possibility of additionally allocating one of the sites identified as potentially suitable for allocation by the SHLAA.¹⁰⁷ However, on balance, it is not considered appropriate to explore a higher growth scenario involving additional allocation of one or more of these sites, given that: there are limited strategic arguments for growth at any of the lower order settlements in question; there are question-marks regarding the suitability of certain of these sites; and there is the potential to allocate sites at lower order settlements through Neighbourhood Plans.

Finally, there is a need to give special mention to site 18/154 (Lamberhurst Farm), which is proposed as an employment allocation, following the Cabinet decision of 28th October, but which is being promoted as a mixed use scheme involving 300 homes. It is noted that there was some support for a mixed use scheme at the 8th October meeting; however, on balance it is not considered necessary or appropriate to take forward the option of a mixed-use scheme to Section 8.

In conclusion, **one growth scenario** should be taken forward to Section 8 of the main report.

Conclusion on sub-area scenarios

Figure I presents a summary of those sites that feature in the sub-area scenarios and are therefore 'taken forward' to borough-wide reasonable growth scenarios. Table F presents a summary of the sub-area scenarios.

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

¹⁰⁷ In summary, SHLAA suitable sites in the rural area are found at: Bobbing (discussed under Sittingbourne), Bapchild (discussed under Sittingbourne), Borden (discussed under Sittingbourne), Kingsborough Manor (Sheppey), Lamberhurst Farm and Upchurch.

- 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.

Figure I: Summary of sites taken forward to borough-wide reasonable growth scenarios

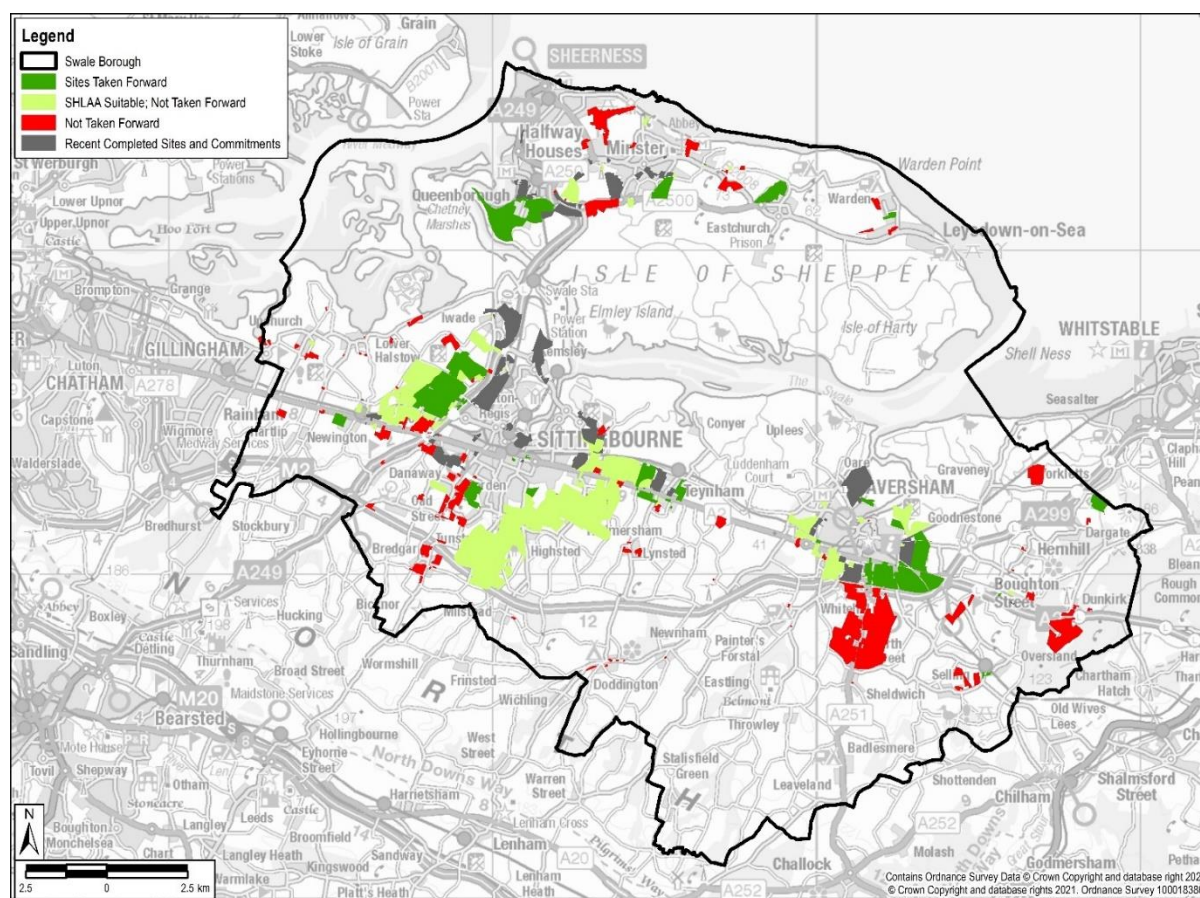


Table F: Summary of sub-area scenarios (number of homes; emerging preferred scenario in bold)

Sub-area	Scenario 1	Scenario 2	Scenario 3
Sittingbourne	850	1,350	3,350
Faversham	1,000	3,400	-
West Sheppey	0	650	850
Teynham	0	350	1,100
Newington	0	200	-
Eastchurch	0	65	-
Leysdown	0	100	-
Boughton	20	-	-
Iwade	0	-	-
Tier 5 settlements	90	-	-

Appendix VII: Growth scenarios

Introduction

The aim of this section is to present a summary appraisal of the reasonable growth scenarios. Detailed appraisal findings are presented in **Appendix VII**.

Appraisal methodology

Appraisal findings are set out under 12 separate headings, with each heading dealing with a specific sustainability topic (see Section 3). A final section then presents summary findings and conclusions.

Each of the topic-specific discussions begins with a table that seeks to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)¹⁰⁸ and rank the reasonable growth scenarios in order of preference.

Further points on methodology are as follows:

- Significant effects – the aim is to identify, describe and evaluate significant effects in respect of each element of the established appraisal framework in turn.¹⁰⁹ A final concluding section considers significant effects ‘in the round’, but does not aim to reach an overall conclusion on the sustainability of each of the growth scenarios, or place them in an overall order of preference. Any attempt to do so necessitates assigning weight to each element of the appraisal framework, which is outside of the scope of SA (it is a task for the decision-maker, informed by SA findings).
- Methodology – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance. This is not an exact science, given the nature of the scenarios under consideration, but rather involves making assumptions and applying professional judgement. Appraisal ‘workings out’ are presented only to a limited extent, with a view to ensuring an appraisal narrative that is relatively concise and accessible.
- Evidence – it is not possible to list all of the evidence sources that are drawn-upon as part of the appraisal; however, it is appropriate to highlight that extensive use has been made of: the evidence-base studies commissioned by the Council since 2018; materials submitted and made available (on websites) by strategic site promoters; and two reports prepared by Stantec in 2019, namely *Assessment of Submissions* (Feb 2019)³⁴ and *Assessment of Stage 2 Submissions* (Oct 2019).³⁵

A key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and ‘planning gain’ (e.g. affordable housing). The Stantec work is notable for exploring site specific proposals in detail, and there is certainly a need to take site specific proposals into consideration here; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

A note on constants

As can be seen from Table 8.3, certain allocations are a constant across the reasonable growth scenarios, namely: Sittingbourne town centre (850 homes), Sheerness (0 homes), Boughton (20 homes), Iwade (0 homes), Neames Forstal (90 homes) and other tier 5 and smaller settlements (0 homes). Allocation of Lamberhurst Farm for employment is also a constant across the growth scenarios.

Allocations that are a constant across the growth scenarios are not a focus of the appraisal, given the need to focus on differentiating the growth scenarios. However, account is taken of the ‘constants’ when reaching a conclusion on significant effects for each growth scenario, and all proposed allocations will be a focus of the forthcoming appraisal of the LPR as a whole.

¹⁰⁸ **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.

¹⁰⁹ The appraisal framework was established mindful of the list of topics suggested as potentially appropriate to include within the scope of SA at paragraph 6 of Schedule 2 within the SEA Regulations. In this way paragraph 6 of Schedule 2 has ‘fed in’.

Appraisal findings

The appraisal of reasonable growth scenarios is presented below under 12 headings.

Air quality

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
★ 1	3	2	2	4

Discussion

Air quality is currently a widespread issue along the A2, given the number of homes and other ‘sensitive receptors’ located in proximity to this busy road, with AQMAs designated at Rainham (to the west of Swale), Newington, Keycol (declared in December 2020), Sittingbourne, Teynham and Ospringe, and other sensitive locations (typically junctions) highlighted by the Swale Air Quality Modelling Report (2020). Another AQMA is located along the B2006 in Sittingbourne, where HGV traffic is a particular issue, and the Air Quality Modelling Report also highlights the A251 (which links Faversham to Ashford) as problematic.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, from an air quality perspective, including because there would be: two motorway junctions in close proximity; delivery of services, facilities and employment onsite that supports trip internalisation; good potential to walk or cycle to Faversham railway station, including via new walking/cycling infrastructure; and some potential to walk/cycle to the town centre (beyond the rail station), albeit it would be somewhat distant, at greater than 2km from certain points of the site (noting barriers, including the railway line).

However, a higher growth strategy for Teynham gives rise to a cause for concern, given Teynham’s distance from a motorway junction and, in turn, its reliance on the A2 for journeys to higher order settlements that will inevitably involve passing through at least one AQMA. The aspiration is for higher growth to support delivery of a village bypass, which is much needed from a perspective of wishing to address traffic and air pollution within the village centre, including within the designated AQMA; however, the potential for growth to ‘unlock’ land to deliver a bypass is far from clear, given the constraints that exist, including the conservation area.

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from an air quality perspective. This is particularly the case because Bobbing gives rise to concerns regarding increased traffic along the problematic B2006, which would be a primary route for accessing Sittingbourne town centre. The AQMA here was recently (December 2020) amended to include particulate matter (PM10) after the monitoring stations registered an increase in pollution levels. Also, there is a need to consider the AQMA at Newington and the recently (December 2020) designated AQMA at Keycol Hill, on the A2. Some traffic from Sittingbourne and Bobbing seeking to access the Medway Towns will take the A2 route, rather than the longer route via the M2.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver c.1,000 homes under this scenario, these give rise to limited cause for concern, although: the modest urban extension to the south would presumably involve a new junction onto the A2 very close (near adjacent) to the Ospringe AQMA; and the new community at the circa 840 home expansion to the east would be at least 1.5km distant from the town centre, with the railway a barrier to movement. The cycling route would likely be via the B2040, which is distant from the southern part of the site, and along which there is no cycle path/lane.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne (also Bobbing), Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – the two urban extensions are fairly well-located, in terms of supporting access to the town centre and other key destinations by walking, cycling and public transport, and avoiding increased traffic through the AQMAs and other known air pollution hotspots. Bobbing is constrained, as discussed above; however, the quantum of homes assumed under this scenario is modest.

- Newington – the site in question, known as Pond Farm, has been closely scrutinised in the past in respect of the potential for development to lead to unacceptable air quality impacts. The access point onto the A2 would presumably avoid the Newington AQMA, and the rail station would be within walking distance (under 800m); however, traffic bound for higher order centres would pass through at least one AQMA. It is recognised that air quality in some locations may have improved since the appealed planning application was dismissed in 2016/17, and the site promoters have presumably explored ways to mitigate concerns; however, equally, the Keycol Hill AQMA was designated only in December 2020.
- Teynham – the assumption here is that urban extensions to the village would deliver 350 homes (over and above existing committed sites) and that it would not be possible to deliver a village bypass. Development along Lynsted Lane would be avoided, recognising that the junction of Lynsted Lane and the A2 is highly problematic; however, concerns regarding increased traffic within and through AQMAs would remain.
- Scenario 4 (E/SE Faversham + Bobbing) – there is little reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in-combination impact on any air pollution hotspot.

The assumption, under this scenario, is that support for two strategic growth locations would be accompanied by a lower growth strategy at other locations, including at Teynham (where the assumption is that there would be nil LPR allocations). This approach is supported, on balance, from an air quality perspective.

- Scenario 5 (Preferred scenario + low risk UEs) – assuming that the effect of this scenario is to provide for genuine higher growth (as opposed to seeking to provide for LHN with a large supply buffer, and thereby minimise the risk of problematic windfall schemes), then this scenario gives rise to an inherent concern, on the basis that Swale is a constrained Borough. Equally, the specifics of this high growth strategy give rise to cause for concern. In particular, a higher growth strategy for the Isle of Sheppey (allocations totalling 1,665 homes) in combination with allocations for 500 homes at Sittingbourne (plus town centre regeneration) and higher growth strategies for Newington and Teynham could well give rise to in-combination impacts on one or more air pollution hotspots in the west of the Borough.

In **conclusion**, Scenario 1 (the emerging preferred scenario), is judged to perform best on balance, although it is a challenge to differentiate this scenario from Scenarios 3 and 4, which also have merit in certain respects.

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; however, air pollution is currently a priority issue for the Council.¹¹⁰

Biodiversity

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	3	★1	★1	2

Discussion

A key issue for the Borough as a whole is avoiding impacts to the Swale and Medway SPA/Ramsar sites (“North Kent Estuaries European sites”), including via increased recreational pressure and/or development of land that is functionally linked to the European sites (e.g. fields used for foraging or roosting by significant wildfowl or wading bird populations); however, growth opportunities in problematic locations are quite limited (more so than was the case for the adopted Local Plan). Aside from the internationally designated sites, nationally designated SSSIs are a limited constraint to growth at locations potentially in contention for allocation; however, locally important habitats are a widespread constraint, and there is also a need to recognise landscape-scale constraints and opportunities.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is supported, from biodiversity perspective. This land is notably unconstrained in biodiversity terms, with very limited onsite priority habitat and limited designated land in close proximity. However, the northern extent of the scheme (beyond the Graveney Road) gives rise to a degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields Local Wildlife Site

¹¹⁰ See <https://swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/keycol-hill-aqma-approved>

(LWS); the walking route to the SPA would be c.2.25km and the driving route to the SPA could be attractive to dog walkers, via Goodnestone. A further consideration is the likelihood of growth leading to a degree of increased recreational pressure on the Blean Woodlands SAC to the east, potentially in combination with growth in Canterbury District; however, the part of the SAC in closest proximity is managed as a National Nature Reserve, and the car park is on the eastern edge, well over 10 km distant.

N.B. other sites that form part of Scenario 1 are discussed below.

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a biodiversity perspective. This is for two reasons. Firstly, the site is slightly closer to the SPA, and whilst it is not clear that this is a particularly accessible or sensitive part of the SPA, there is a need to consider in-combination impacts given committed growth at Iwade and Northwest Sittingbourne (also the potential for the Bobbing scheme to expand in the future). Secondly, the proposal is for development to largely envelop a small ancient woodland (Rook Wood). Whilst the proposal includes large areas of greenspace, within which it will be possible to deliver targeted habitat creation, there is a need to consider the possibility that having to compensate for impacts to Rook Wood could lead to a challenge in respect of achieving an overall (and sufficient) biodiversity net gain at an appropriate landscape scale.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, there is a degree of concern associated with: expansion to the east (particularly land north of Graveney Road, see discussion above); and the two assumed modest urban extensions to the north of the town, which would more-or-less complete the northern expansion of the town as far as the flood risk zone and/or land locally designated for its biodiversity value. This land is well connected to the SPA/Ramsar by public right of way, and the fact that adjacent land is either known to be of local importance for biodiversity (Abbey Fields LWS), or managed for biodiversity (Oare Gravel Works), could potentially suggest a likelihood of the land being functionally linked to the SPA/Ramsar.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – land to the south of Sittingbourne, broadly speaking, is associated with a high density of small dispersed habitat patches (including traditional orchard habitat, which is a priority) that may function as one or more ecological networks. However, the two urban extensions assumed here are thought to give rise to limited concerns. Both are in fairly close proximity to existing woodland or traditional orchard habitat patches, and both are thought to be currently used for fruit growing; however, it is not possible to suggest that land used for intensive fruit growing is likely to contribute to landscape scale ecological connectivity.

Finally, with regards to Bobbing, the areas that would come into contention for modest growth are unconstrained in strategic biodiversity terms, with very limited priority habitat in this area.

- Isle of Sheppey – replacing site SLA18/113 at Rushenden (850 homes plus employment land) with site 18/038 to the southeast of Minster (650 homes) is quite strongly supported, from a biodiversity perspective. Site SLA18/113 is shown by the nationally available dataset to include significant priority wetland habitat and is adjacent to the SPA (indeed, the SPA intersects the site, to a small extent), which gives rise to a significant concern.¹¹¹ Detailed work has been undertaken by the site promoters, and through the LPR Habitats Regulations Assessment (HRA) process, to understand the potential to bring the site forward without impacting the SPA or functionally linked areas, and the HRA is able to conclude the likelihood of being able to avoid significant adverse effects to the SPA, on the assumption that prescribed steps are taken through the planning application process. However, concerns do naturally remain, in light of the need to follow the mitigation hierarchy, i.e. seek to avoid effects ahead of relying on mitigation, where possible. A key concern to emerge, through the HRA process, is the potential for development to result in coastal squeeze, noting that the medium to long term strategy for this land set out in the Medway and Swale Shoreline Management Plan (SMP)¹¹² is managed realignment, and thus enabling habitats to shift in accordance with sea level rise and climate change. In addition, the Medway Estuary and Swale Flood and Coast Management Strategy¹¹³ identifies that the current through to 2118 management policy for BA8.5:

¹¹¹ The Biodiversity Baseline Study (2020) states: “This entire site falls within the Swale Nature Recovery Priority Area. A large portion of the site is classified as Open Mosaic Habitat on Previously Developed Land, Floodplain Wetland Mosaic and coastal saltmarsh priority habitats. The portion of the site not classified as priority habitat is of high strategic significance for connecting areas of priority habitat and should be prioritised for habitat restoration through [biodiversity net gain] projects. Due to the large proportion of high distinctiveness habitats on site it will be technically and financially challenging to deliver [biodiversity net gain].”

¹¹² See <https://se-coastalgroup.org.uk/shoreline-management-plans/medway-estuary-to-swale/>

¹¹³ See <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy>

Rushenden Marshes is “No Active Intervention”, i.e. current sea defences will not be maintained. However, the situation is not clear, as the majority of the frontage is not currently defended, and is artificially raised as the land has been historically used to deposit dredged material. The HRA recommends that managed realignment options should be explored within the site boundary alongside development, and so there is a possibility that development could support maintenance and creation of habitat, i.e. a long term net gain.

- Teynham and Newington – both villages are historically very strongly associated with fruit growing, and there remain remnant patches of traditional orchard priority habitat, most notably at Teynham. However, a strategic approach to growth at Teynham could support a strategic approach to achieving biodiversity net gain at an appropriate landscape scale, whilst site 18/229 at Newington appears to be quite unconstrained (it is currently used for intensive fruit growing), and would likely deliver significant onsite green infrastructure (the assumed yield amounts to 15 dwellings per hectare). The possibility of delivering new onsite habitat to buffer the adjacent woodland (which is about 20 years old) and recreation ground might be envisaged.
- Eastchurch and Leysdown – both settlements are thought to be relatively unconstrained. The Sheppey Cliffs and Foreshore SSSI is nearby, but is assumed to have limited sensitivity to modest housing growth.
- Scenario 4 (E/SE Faversham + Bobbing) – there is little reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in combination biodiversity impact.

The assumption is that support for two strategic growth locations would be accompanied by a lower growth strategy at other locations, including at Rushenden (i.e. site SLA18/113 would not be allocated).

- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy does not necessarily give rise to a cause for concern, as additional growth might not lead to increased risk of in-combination impacts (there would be a need to investigate SPA concerns associated with a higher growth strategy for Sheppey) and as there would be flexibility to assist with meeting any unmet needs arising from elsewhere in a constrained sub-region.

In **conclusion**, 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 has been completed, and further work remains underway, to understand the potential to avoid and mitigate biodiversity concerns associated with the site, and there could be options that would achieve an overall biodiversity net gain). 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 (Scenarios 1, 2 and 5). 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

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
★ 1	2	2	★ 1	2

Discussion

There is a need to consider greenhouse emissions from both transport and the built environment.

In respect of **transport emissions**, issues and opportunities are quite well understood, and the recent Energy White Paper (2020) presents a helpful overview of strategic priorities, namely: modal shift to public and active transport; place based solutions (“*why emissions occur in certain locations*”); decarbonising how we get goods (including transforming “last mile deliveries”); and decarbonisation of vehicles, including charging infrastructure and energy system readiness. A national Transport Decarbonisation Plan is due in spring 2021 and, ahead of that, a recent study has explored national priorities, with a focus on the links between planning and transport, and ensuring effective collaboration between local planning authorities and transport authorities at the county and sub-regional level.¹¹⁴ Also, the TCPA has recently prepared a guide setting out the particular opportunities associated with ‘garden communities’.¹¹⁵ There are certainly opportunities associated with strategic growth locations in more viable

¹¹⁴ See [tps.org.uk/news/tps-launches-its-state-of-the-nation-report](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464812/energy-white-paper-2020.pdf)

¹¹⁵ See [tcpa.org.uk/guidance-for-delivering-new-garden-cities](https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities)

locations over-and-above piecemeal growth in less viable locations; however, it is also crucial to consider proximity and existing 'sustainable transport' links between new homes and key destinations.

With regards to **built environment emissions**, there are strong arguments for supporting a focus of growth at one or more strategic sites and focusing growth where viability is highest, with a view to facilitating: low and zero carbon (LZC) infrastructure, including heat networks (which require strategic planning and typically necessitate higher densities and a fine grained mix of uses); buildings designed to achieve net zero regulated emissions (or otherwise ambitious levels of regulated emissions);¹¹⁶ an ambitious approach to unregulated emissions, including embodied and other non-operational emissions, including by supporting modern methods of construction (e.g. offsite construction of modular homes); and 'smart energy systems' – seen as a priority within the Energy South 2 East Local Energy Strategy (2020) and the recent Energy White Paper (2020), which includes a major focus on delivering a 'Smart Electricity System'. Another consideration, in respect of built environment emissions, is the need to consider the possibility of locating growth in proximity to strategic heat sources (also locations with strategic heat demand, e.g. leisure centres), with a view to facilitating delivery of heat networks; however, no particular opportunities are known to exist in the Swale context (see discussion of Sittingbourne town centre in Appendix I). A further consideration, in respect of built environment emissions, is the possibility of strategic growth locations supporting the use of hydrogen, including potentially for heating. Hydrogen is a major focus of the recent Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and a Hydrogen Strategy is due in 2021; however, opportunities remain uncertain at the current time, and are likely to be longer term.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, given the inherent opportunities associated with strategic growth locations, and because the site is well-related to a higher order settlement with a rail station, and noting the commitment to deliver a good mix of uses onsite and ensure a focus on walking/cycling infrastructure. However, concerns and questions remain:
 - Faversham is a second tier settlement, proximity to Faversham town centre is not ideal and two motorway junctions will be in close proximity (albeit potentially supportive of rapid bus services to Canterbury, Whitstable/Herne Bay and other locations to the east);
 - There is uncertainty regarding potential to deliver growth to the south of the A2 in combination with growth to north of the A2, as a combined strategic scheme that leads to additional economies of scale and potential to deliver sustainable transport and LZC infrastructure, and other climate change focused measures; and
 - There is a degree of uncertainty regarding the extent to which the masterplanning and design ethos of the scheme is supportive of minimising emissions (see discussion below, under 'Communities').
- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a climate change mitigation perspective, as this location is thought to be less suited to minimising transport emissions. Sittingbourne town centre and rail station would be over 2.5 km distant via the problematic B2006), and whilst the Stantec *Assessment of Stage 2 submissions (2019)*³⁵ states that the latest proposal "*refocuses its emphasis on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus*", this is not entirely evident from the latest proposals on the scheme website, with the 'Connectivity Plan' focusing only on links within this site. Whilst the possibility of growth at Bobbing and Rushenden (also noting committed growth at Iwade, NW Sittingbourne and SW Sittingbourne) supporting 'sustainable transport' interventions along the A249 corridor might be envisaged, no particular opportunities have been highlighted.
- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. In respect of built environment emissions, it is fair to highlight that more piecemeal growth could result in some opportunities missed (although the site at Rushenden is subject to delivery and viability challenges, such that funds available for low carbon measures could be limited).

With regards to transport emissions, it is difficult to draw strong conclusions. On hand additional growth at Sittingbourne is potentially supported; however, on the other hand:

¹¹⁶ Regulated emissions are those covered by the building regulations. It is common for Local Plan policies to require levels of emissions below the Building Regulations requirement, and potentially even to require net zero regulated emissions for major schemes (which almost invariably necessitates offsetting). At the current time the Government is consulting on a Future Homes Standard, which would be a national requirement set out in the Building Regulations. The Government's proposal is that Local Plan policies would no longer be able to require levels of emissions below the Building Regulations (Future Homes Standard); however, there would still be the potential for the promoters of individual development schemes to choose take a best practice approach, including by achieving net zero regulated emissions.


- Growth at Minster, Eastchurch and Leysdown, in place of growth at Rushenden could lead to additional transport emissions. Queenborough has a rail station, and is thought to be quite well connected to Sheerness and Sittingbourne by bus and cycle routes (and/or there is good potential for enhancement). Also, Queenborough/Rushenden is an employment growth and regeneration area, such that the potential to reach destinations by walking/cycling is set to improve over time. The site at Minster would relate closely to the recent Thistle Hill development, which has come forward alongside community infrastructure; however, the site is not particularly well connected to Minster or higher order settlements, including noting that there is no footpath or cycle lane along either Scoccles Road or Lower Road (which suffers from problematic traffic, likely to discourage cycling). Finally, Eastchurch and Leydown are associated with very limited potential to access a higher order centre by bus or cycling.
- Lower growth at Teynham is not supported, on balance, from a transport emissions perspective, given the rail station (albeit there would also be additional growth at Newington under this scenario, which also has a rail station). Also, there is a possibility – albeit highly uncertain - of strategic growth at Teynham supporting the aspiration of delivering a cycling link between Sittingbourne and Faversham.
- Scenario 4 (E/SE Faversham + Bobbing) – a focus of growth at two strategic sites is supported, from a perspective of seeking to minimise built environment emissions, albeit neither of these strategic schemes have, to date, demonstrated that any particular locational opportunities exist, nor demonstrated a particular ambition. There is little reason to suggest that decarbonisation would be masterplanning / design / funding priority.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy does not necessarily give rise to an inherent concern, given that the focus must be on *per capita* emissions more so than total emissions (albeit the 2030 net zero target relates to total borough-wide emissions). However, the assumption is that additional growth would be achieved through additional allocation of small or modest-sized urban extensions, which would be unlikely to deliver strategic low carbon infrastructure (e.g. a heat network), and might not be well-suited to achieving building-level emissions standards over-and-above Building Regulations. Furthermore, certain of the urban extensions in question give rise to concerns from a transport emissions perspective, as discussed. However, having said this, there is a strong possibility that a high growth strategy for the Isle of Sheppey (allocations totalling 1,665 homes) could support strategic investment in transport infrastructure in support of improved bus services, greater opportunities for cycling, electric vehicle charging and more.

In **conclusion**, it is inherently challenging to differentiate the reasonable growth scenarios, including because there are tensions between objectives around minimising built environment emissions on the one hand and, on the other hand, minimising transport emissions. In the absence of modelling or other detailed analysis, there is a need to weigh-up competing objectives on the basis of professional judgement, in order to arrive at an overall conclusion.

On this basis, Scenario 1 (the emerging preferred scenario) and Scenario 4 (two strategic growth locations) are judged to be joint best performing. It is not possible to differentiate the other scenarios with any confidence.

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 influencing spatial strategy, site selection and development of site-specific proposals.

Communities

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
	3	3	3	2

Discussion

There is a need for growth to avoid creating or exacerbating issues around community infrastructure capacity, and support growth strategies that would deliver new or upgraded community infrastructure, both to ‘consume the smoke’ of new communities and in response to any existing known issues or opportunities.

Beyond this, there is a need to support *high quality* community infrastructure provision; for example, there is a focus nationally on masterplanning and designing new communities with health and wellbeing as a central consideration, including via access to gardens, sports facilities, greenspace and countryside.¹¹⁷

Beyond the matter of ensuring access to high quality community infrastructure, there are also wide ranging other 'communities' considerations, for example, supporting regeneration in the Thames Gateway part of the Borough. Also, traffic congestion is often a key issue for many communities. However, it is considered appropriate for this section to focus primarily on matters relating to capacity of / access to community infrastructure.

In light of the above points, perhaps the key consideration relates to support for growth via strategic sites well suited to delivering new and upgraded community infrastructure, as opposed to growth via more 'piecemeal' urban extensions, where opportunities can be missed, despite mechanisms for gathering funds for infrastructure.¹¹⁸

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is supported, from a 'communities' perspective, particularly as the scheme would certainly enable delivery of a new secondary school (specifically, serviced land in an appropriate location would be made available). Following discussions with Kent County Council (KCC), secondary school capacity is understood to be a significant issue in this part of the Borough, given limited surplus capacity at the two existing secondary schools (one grammar and one non-selective), limited potential for expansion (particularly the grammar school, which is in a constrained central location) and committed growth (noting that catchment areas stretch to include Canterbury District). KCC has been actively exploring potential locations for a new secondary school, but options are limited. Latest understanding is that the secondary school would come forward at the site directly to the east of Faversham.

Another important consideration, in respect of strategic growth to the E/SE of Faversham, relates to engagement, joint working and stewardship. Focusing on Southeast Faversham, the Stantec *Assessment of Stage 2 submissions* (2019) finds: *"The essence of this scheme is the use of the Duchy model and product. This is a now well-established and high profile approach which is the only example received where the landowner takes control of the design process in considerable detail so as to ensure that it is implemented in accordance with agreed principles and detail... As part of this, the Promoter would retain the ability to enforce ongoing covenants over design quality and estate management standards... Some of the evidence studies for this scheme is in hand, but it is the early public engagement work through use of the Enquiry by Design process promoted by the Princes Trust, which is by far and away the most advance of all the schemes. In addition, two classicist architects have been appointed to develop the detailed design principles and as a result, the promoters are considerably further along the route of addressing design issues than the other proposals. However, the principles being advocated are not entirely synonymous with the Garden Community Principles and there could be tensions between them that might lead to trade-offs. Setting a clear approach in the Local Plan and any Supplementary Design Guidance is likely to be important going forward to resolve these issues."*

This finding of the Stantec work is in many ways encouraging; however, there is perhaps a concern regarding an early focus on detailed design to the detriment of effective planning to realise strategic infrastructure, environmental and socio-economic objectives, including at the Faversham scale and wider scales. It is also noted that no updated proposals or evidence has been made publicly available to update the August 2018 submission following the Garden Communities Prospectus (although the promoter did engage well with Stantec as part of the 'assessment of submissions' process). There is no website for this scheme, unlike Bobbing.

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a 'communities' perspective. The proposed scheme is notably smaller, with no secondary school proposed (although the committed school at NW Sittingbourne would be in close proximity, and presumably would have capacity over-and-above that needed to meet committed housing growth at Sittingbourne and Iwade), and there is a need to factor-in the possibility of the scheme expanding in the future. Also, relative viability challenges in this part of the Borough could constrain potential to deliver new high quality community infrastructure, relative to E/SE Faversham.

Also Bobbing - a historic village (six listed buildings, including a grade 1 listed church) with a primary school - would be largely enveloped by the scheme, although development would deliver a bypass of the village, serving to greatly reduce traffic through the village, along Sheppey Way.

¹¹⁷E.g. see england.nhs.uk/ourwork/innovation/healthy-new-towns; and tcpa.org.uk/guidance-for-delivering-new-garden-cities

¹¹⁸ All new development is expected to contribute towards the cost of new infrastructure. Infrastructure funding by developers is most often secured through planning obligations (either through a Section 106 agreement or Section 278 Highway agreement with Kent County Council) or the Community Infrastructure Levy (CIL); however, there is no CIL in place for Swale. On-site infrastructure will be secured based on the needs of each proposal and delivered directly by the developer or through financial contributions and/or the provision of land. Off-site infrastructure will be secured through developer contributions.

Also, the package of urban extensions at Faversham under this scenario (c.1,000 in total) gives rise to a significant concern, given the secondary school capacity constraint. There would be significant growth to the east under this scenario, as per Scenario 1; however, it is not clear (and considered unlikely) that land would be made available for a secondary school (unlike under Scenario 1) given reduced economies of scale.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Rushenden – the aim is for a major mixed use development here to support regeneration at Queenborough/Rushenden, which is a well-established regeneration priority area (Policy Regen 2 of the adopted Local Plan). In addition to new high quality homes and employment opportunities, growth at this scale (850 homes) would typically enable delivery of targeted new community infrastructure (e.g. perhaps a primary school for Rushenden), and there is also an opportunity around new green/blue infrastructure delivery, as understood from the Green and Blue Infrastructure Strategy (2020), and recognising the coastal location. However, details of the proposed scheme are not known at the current time, and are subject to change given the need for further work to address constraints and delivery challenges.
 - Teynham – as discussed, the aspiration to deliver a village bypass, to the benefit of the village centre, would not be realised under this scenario, and there might be lower likelihood of delivering a new A2 cycle link. More generally, there is a need to consider the possibility of achieving a critical mass of housing growth at Teynham alongside new employment land (in particular, the committed new employment land at Frognaal Land) and improvements to the village centre. The Settlement Hierarchy Study (2020) serves to suggest that Teynham is already the best served of the tier 4 settlements (see the Settlement Audit Matrix), and the possibility of Teynham moving up a tier in the hierarchy can be envisaged.
 - Sittingbourne – there is an anecdotal concern that recent and committed growth at Sittingbourne is putting pressure on infrastructure; however, it is difficult to pin-point specific issues. There are four secondary schools to the south of the A2 (two grammar schools and two non-selective schools), which is the part of Sittingbourne that would likely be a focus of growth, and the NW Sittingbourne strategic allocation is set to deliver a new secondary school (although not in the short term).
 - Leysdown – there is an argument for housing growth in support of village vitality objectives, e.g. with a view to supporting shops and services outside of the tourism season. The Settlement Hierarchy Study (2020) explains: *“Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services.”*
 - Minster – it is not clear what community infrastructure would be delivered by the 650 home scheme assumed under this scenario. The site is notably adjacent to Thistle Hill, which is a new community that has come forward over the past thirty years (near completion) alongside new community infrastructure.
- Scenario 4 (E/SE Faversham + Bobbing) – on one hand, a focus of growth at two strategic sites is supported, from a perspective of seeking to bring forward new strategic community infrastructure to ‘consume the smoke’ of new housing/communities. However, on the other hand, growth related opportunities elsewhere would be missed, e.g. Rushenden and Leysdown.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy potentially gives rise to a degree of concern, as additional growth could lead to increased risk of in-combination impacts (pressures on community infrastructure), particularly at Sittingbourne and on the Isle of Sheppey. However, it is not possible to pinpoint specific concerns.

In **conclusion**, 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 an up-to-date masterplan.

Scenarios 2 - 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 impacting on existing community infrastructure capacity in combination 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 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. Three adjacent sites are being promoted as a combined scheme that would also deliver a new footpath link to Selling (c. 1.5km to the west), where

there is a primary school and other facilities; however, there is a need for further work to confirm deliverability of the footpath link (which will be within the AONB).

The other scenarios would all lead to mixed effects.

Economy and employment

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
★ 1	3	4	4	2

Discussion

The Employment Land Review (ELR) sets out the amount of new employment land that must be delivered through allocations in the LPR (having factored-in existing committed supply and likely future losses of existing employment land, e.g. loss to housing), breaks down the overall requirement according to a series of employment land types and indicates where in the Borough delivery of each type of employment land should be focused.

The headline recommendation of the ELR is as follows:

“A) Up to 40ha of new land for industrial uses is allocated. This should be in the West of the Borough (Sittingbourne, Isle of Sheppey) on sites that are market attractive for larger warehouses.

B) Up to 15 of new land for offices and light industrial uses is allocated. This should be focused to the east of the Borough in or around Faversham on one or more sites.”

However, it is important to note that there is a considerable range that underpins recommendation (A). Specifically, the figure decreases if a lower “5-year ‘margin’” is assumed, meaning an assumption that future losses of industrial land will not follow past trends. There is a strong argument for assuming a lower 5-year margin, because past trends (see Table 5.2 of the ELR) are skewed by an abnormally large loss in 2011 (Sittingbourne Paper Mill). Furthermore, the ELR is clear that if the margin does need to be provided for, then it *“does not necessarily need to be provided today because the logic of the margin is that it may only be needed towards the end of the plan period”*.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - there is good potential to bring forward new employment land as part of a strategic urban extension to the E/SE of Faversham. Specifically, there is the potential to deliver c.10ha of new industrial land to the east of Faversham and another c.10ha to the southeast (adjacent to M2 J7), as well as smaller scale ‘pockets’ of employment throughout the scheme (this aligns with the emerging design ethos). On this basis, ELR recommendations in respect of locally arising demand for offices, light industrial and industrial land would be met; however, opportunities to deliver large-scale new industrial land in well-connected locations in the west of the Borough, with a view to providing for the long term needs of footloose strategic warehousing and distribution operators serving London and the Southeast, could be missed. The new industrial land at E/SE of Faversham (in particular the 10ha employment area adjacent to M2 J7) could prove attractive to strategic warehousing and distribution uses; however, this is unclear. The ELR explains:

“Although Faversham is an untested market for larger unit demand (which fuels the need for additional land) such a highly accessible area is likely to be in demand. The part of the area (closest to the motorway uncton) would be particularly attractive to strategic warehouse operators (min area 10 ha), because of the excellent access to the M2. But should areas in the west of the Borough come forward these are likely to be preferable given they are closer to the M25 and benefit from better north / south access (A429).”

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from an ‘economy and employment’ perspective, as it could be challenging to meet borough-wide employment land targets. Whilst there is merit to the location of the site in the west of the Borough in theory (given recommendation A of the ELR), the current scheme proposal includes limited new employment land, and would certainly not support warehousing. Specifically, the current proposal is to deliver a fairly modest area of “flexible employment space” at the southeast corner of the site. There might feasibly be potential for additional employment land, should it be required (see further discussion in Box 8.1).

There is also a need to factor-in concerns regarding traffic at the A249 junctions with the B2006 and M2, with the concern being that traffic could affect the functioning of existing, committed and potential future employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, it is fair to assume that expansion to the east would deliver 10 ha of new employment land, as per Scenario 1; however, there is some uncertainty.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. This approach is not supported, because the Rushenden scheme, as currently proposed, would deliver significant new employment land (complimenting the existing/committed employment area at Neats Court), and there is also the potential for new employment land to come forward alongside new housing at Teynham (potentially complimentary to the committed new employment area). It is not thought likely that the ‘replacement’ urban extensions would deliver significant new employment.
- Scenario 4 (E/SE Faversham + Bobbing) – as discussed, meeting the employment land targets set out in the ELR could prove challenging, because the potential to deliver new employment land as part of a strategic scheme at Bobbing is seemingly lower than as part of a mixed use scheme at Rushenden.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy is not supported, on balance. The additional growth locations in question would deliver limited new employment land, but would give rise to concerns regarding traffic congestion in the west of the Borough.

In **conclusion**, Scenario 1 performs most strongly. New employment land supply would be delivered such that ELR target (B) would be met, and target (A) possibly met in part. 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; Scenario 3 performs least well, because there would be a loss of 10ha of supply at Rushenden (also potentially some missed opportunity at Teynham). However, in practice, there would be the potential to allocate one or more additional employment sites.¹¹⁹

With regards to significant effects, it is appropriate to flag a degree of risk under all scenarios, and predict that the worst performing scenario (Scenario 3) would lead to significant negative effects. These conclusions are reached in light of the headline targets set out in the ELR, albeit some 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

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	2	★1	★1	2

Discussion

Large parts of the Borough are constrained by flood risk, as set out within the Strategic Flood Risk Assessment (SFRA, 2019); however, most potential growth locations suitably avoid the flood risk zones.

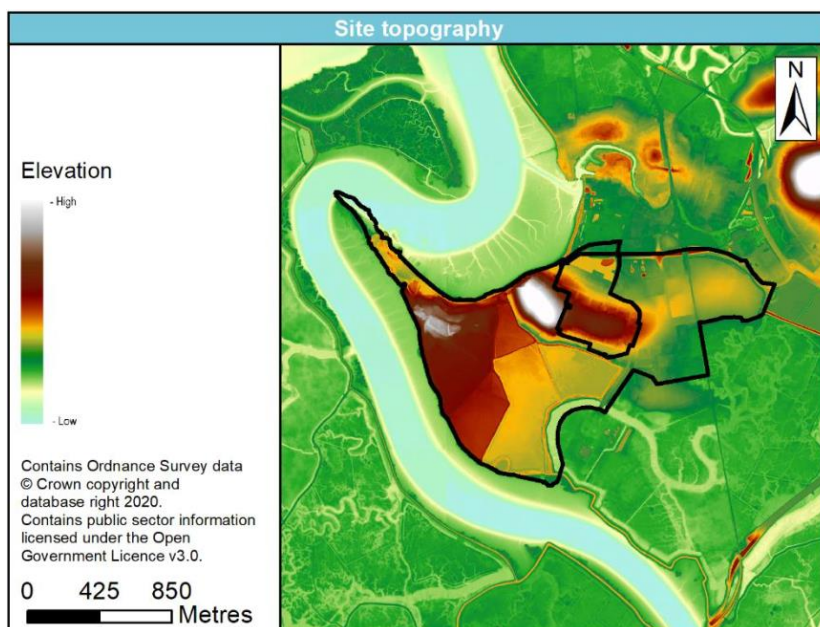
The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE Faversham gives rise to limited concerns, from a flood risk perspective. Perhaps the key point to note is that Preston Fields - an existing Local Plan allocation that would see intensification of development as part of the E/SE Faversham scheme - is associated with a shallow valley, within which there is a band of surface water flood risk associated with ‘pools’ to the north of the site (due to linear infrastructure in the form of the A2 and railway), and which becomes an area of fluvial flood risk further to the north (i.e. downhill), affecting the Cyprus Road area of Faversham.

¹¹⁹ Sites that might be considered for allocation include: **18/007** (Land east of Sheppey Way, Bobbing; 1 ha) – however, suited to offices rather than industry; **18/018** (Land off Lower Road, Minster; 4 ha) – however, viability / deliverability on Sheppey is challenging; **18/105** (Halfway Egg Farm, Featherbed Lane, Sittingbourne; 2.9 ha) – promoted for retail, but the option of employment land might be explored, given its location adjacent to the A249 Grovehurst junction.

However, this scenario also sees an allocation for 850 homes at Rushenden, where flood risk is a significant constraint, as it is for much of the western part of Sheppey, with the notable exceptions of Rushenden itself and the historic core of Queenborough, where the land is slightly raised (see figure, below). Some parts of the site are somewhat raised; however, this is due to past use as a landfill, which could be a constraint to housing.

Figure 10.1: Elevation of land at Queenborough and Rushenden¹²⁰



The site has been the subject of a Level 2 SFRA (currently in draft), which concludes “*part of the site is within Flood Zone 3b where more vulnerable development is not permitted. However, the site area is quite large and it may be possible to adopt a sequential approach to the site layout with more vulnerable development located outside of Flood Zone 3a or 3b.*” It is understood that detailed work is ongoing, in respect of avoiding and mitigating flood risk, plus there would be a need for further detailed flood risk assessment work at the planning application stage. As part of this, it is expected that options for managed retreat / coastal realignment will be explored (see discussion above, under biodiversity). However, concerns remain.

The following are select quotes from the Level 2 SFRA:

- “... the majority of the site flooded in February 1953 as a result of the overtopping of defences... This dataset has been used to define Flood Zone 2 at this site, however it should be noted that changes in both sea level and ground levels since 1953 are likely to have resulted in a change to flood risk at this site...”
- “The site is shown to be very sensitive to the impacts of climate change in comparison to the present day, with significant increases in flood extents across the site for both the 2080 and 2120 epochs for both higher central and upper end allowances for climate change. Flooded areas of site also include the existing industrial estate along Argent Road with depths indicated to be in excess of 1m... The 2120 epoch shows the most significant increase in flood extent, with the majority of the eastern side of the site and a large proportion of the centre of the site indicated to be within these flood extents in addition to areas where there are existing dwelling in Rushenden. The centre of the site is not within these extents, however it is unclear whether safe access and egress would remain in the event of flooding and there is a risk that development could be cut off from surrounding infrastructure. A commitment would be required to the improvement in the standard of existing defences so that proposed development would be safe for its intended life.
- The provisions should seek to improve the safety of the existing community in Rushenden.”
- Scenario 2 (Bobbing + Faversham UEs) – with regards to strategic growth at Bobbing, a key consideration is the northern extent of the site, where a shallow valley is associated with surface water flood risk channel, which then becomes a fluvial flood risk channel at the northern extent of the site, and then affects a significant number of existing homes downstream in Iwade. The emerging masterplan shows areas of greenspace and SuDS at the northern extent of the site, in response to the flood risk issue; however, there is also a proposed housing area, which possibly gives rise for a cause for concern around growth leading to increased surface water runoff and, in turn, increased flood risk downstream. The Swale Level 1 SFRA (2019) explains:

¹²⁰ This figure is one of a range of figures presented as part of the draft Level 2 SFRA for site 18/113 (JBA, 2020)

“The Iwade catchment is an area identified by Kent County Council where the effective implementation of SuDS features is likely to be key to enabling future development. There is a history of flooding in Iwade that is exacerbated by large areas of flow paths being culverted, with future development likely to have a reasonably significant impact on flood risk. As such, it is important that SuDS features and landscaping in potential developments are designed to attenuate surface water before it enters the Iwade Stream. Potential development in the Iwade catchment will only be permitted if it is demonstrable that betterment of runoff rates will be achieved.”

With regards to the package of urban extensions at Faversham, the sites in question would encroach very close to the flood risk zone that constrains land to the north of Faversham (also an area of SPA, wider biodiversity and landscape sensitivity), and there is a need to consider the risk of flood risk zones extending under climate change scenarios; however, on balance there would appear to be the potential for limited further northward expansion of Faversham, from a flood risk perspective.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. The site in question at Leysdown partially intersects the fluvial flood risk zone, but there would appear to be good potential to leave areas at risk as greenspace. With regards to surface water flood risk, there are notable channels flowing from south to north at both Newington and Teynham, and at both settlements there appear to be issues around surface water pooling where its flow is hindered by infrastructure (namely the A2 and the railway); however, at all of the sites in question there should be good potential to deliver green and blue infrastructure within site boundaries in response to any flood risk that is found to exist, following detailed assessment at the planning application stage.
- Scenario 4 (E/SE Faversham + Bobbing) – there is no reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in-combination flood risk impact.

The assumption under this scenario is that support for two strategic growth locations would be accompanied by a lower growth strategy elsewhere, including at Rushenden (i.e. site SLA18/113 would not be allocated)..

- Scenario 5 (Preferred scenario + low risk UEs) – this higher growth strategy does not give rise to any particular concern, over-and-above any site specific concerns (discussed above). There would not be any additional risk of sites acting in combination to worsen flood risk. Higher growth strategies can sometimes be supportive of investment in interventions to manage flood risk, for example new strategic flood storage areas; however, it is not possible to highlight any particular opportunities in this instance.

In **conclusion**, 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 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	3	3	1	3

Discussion

A key consideration is the risk of development being directed to parts of the Borough associated with one or more conservation areas or clusters of listed buildings indicating historic settlement, with a need to take into account the grade of listed buildings and also the extent of their setting, for example parish churches are often in prominent locations, and rural farmsteads can also have an extensive setting. Furthermore, there is a need to consider ways in which designated assets relate to one another as part of historic landscapes.

Other important designated heritage and historic environment assets in the Borough include scheduled monuments and registered parks/gardens, and both can be associated with extensive settings or clear positions within historic (or ancient) landscapes; however, these assets tend to be located in parts of the Borough unlikely to come into contention for growth.

Another important consideration for planning is the location of non-designated assets and archaeology, as understood from the Kent Historic Environment Record; however, it is difficult to use this dataset for strategic planning at this (very high) level, because the dataset shows a very large number of assets and does not categorise assets according to significance.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, from heritage perspective. Faversham is highly sensitive to growth, with the Swale Heritage Strategy (2020) explaining: *“It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough”*. However, in this context, there is potentially merit to a strategic urban extension to the E/SE of the town, as the effect should be to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the E/SE of Faversham is relatively unconstrained in historic environment terms, given 20th and 21st Century expansion focused in this direction (although it is important to recognise the presence of the small Preston-next-Faversham Conservation Area, at the junction of Salter’s Lane and the A2). Also, there could be good potential to deliver a new community that supports Faversham as a thriving market town and visitor/tourist destination. However, there are other risks and uncertainties, including around:
 - Traffic (including through the Ospringe Conservation Area);
 - A new retail offer competing with Faversham town centre;
 - Impacts to the historic agricultural and horticultural landscape setting of the town, including as experienced by motorists approaching along the A2 from the east, with the Swale Landscape Sensitivity (2020) explaining: *“The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area.”*
 - Impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. Key considerations include views from footpaths and cycle routes, and the rural landscape setting of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone. One of the farmsteads is associated with a grade 2* listed building and another associated with two grade 2 listed buildings. The third farmstead is not associated with any listed buildings, but is visible on the pre-1900 OS map.
- Scenario 2 (Bobbing + Faversham UEs) – strategic growth at Bobbing is thought to give rise to relatively limited concerns, from a heritage or historic environment perspective. The new settlement would envelop the string of ten listed buildings that stretches between Bobbing in the south (where there is a grade 1 listed church) and Howt Green in the north; however, there is no designated conservation area; the historic character of this area is presumably somewhat affected by the nearby A429; and development would deliver a bypass of Bobbing. Development would envelop only one historic farmstead (with one grade II listed building), although the possibility of further expansion (in the future) encroaching upon two further farmsteads can be envisaged.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, the two sites to the north would abut the extensive Faversham Conservation Area but are likely to have relatively limited visual connectivity. However, sensitivities do exist, particularly given extensive views across flat, marshland-edge landscapes that potentially hold historic environment value, including views from public rights of way. The Swale Landscape Sensitivity (2020) states the following in respect of one of the locations in question: *“The wider views and visual relationship with the surrounding marshland and tidal creek (including a boat yard) and the local landmark of St. Mary’s Church, Faversham on the skyline provide a relatively strong sense of place. The disused 19th century sewage pumping station and brick works buildings also have some historic and visual interest, the small surviving chimney of which forms a local landmark and contributes to the sense of past industry around the tidal creek area.”*

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – the southern-most urban extension would be in close proximity to the series of conservation areas associated with the parishes of Borden and Tunstall, and the possibility of a southern access point at the edge of the Tunstall Conservation Area is potentially a cause for concern. The site appears to be currently in use for fruit growing, which is the traditional land use of this area, with the Landscape Sensitivity Assessment (2019) explaining that the ‘time-depth’ of the broad landscape to the south of Sittingbourne

“relates predominantly to the continuity of agriculture and fruit cultivation within the area [and other factors]”. The site relates quite well to the existing urban edge in built form terms; however, footpaths surround the site, and the existing urban edge appears suitably ‘soft’, in that it mostly comprises mature back gardens.

- Minster – site SLA18/038 likely contributes to the setting of grade II listed Scoccles Court, which was associated with an extensive rural setting prior to development of Thistle Hill, over the past decade or so. There is also a need to consider the possibility of long distance of views across this site, across historic landscapes, including towards Minster, which is associated with raised ground to the north.
 - Newington – the historic core of Newington is located approximately 300m to the east; however, there is a grade 2 listed farmhouse adjacent to the site. There would be potential to mitigate impacts through masterplanning and design measures; however, the farmhouse might currently serve to mark a transition between village and countryside (albeit noting 20th Century frontage housing on the opposite side of the A2, and other development along the A2 to the west). The site appears to be currently in use for fruit growing, which is the traditional land use of this area, with the Landscape Sensitivity Assessment (2019) explaining that the ‘time-depth’ of the broad landscape to the southwest of Newington *“relates predominantly to the continuity of fruit cultivation within the area [and other factors].”*
 - Eastchurch – an extension to the village to the northwest could well have an effect on the setting of the small historic village core, which is nearby (within 200m) and includes a grade 1 listed church.
 - Leysdown – the site in question has little or no historic environment sensitivity.
 - Rushenden – the site in question appears to have limited sensitivity (although there are landscape sensitivities), and regeneration of Queenborough/Rushenden is supported from a heritage perspective. The Queenborough Conservation Area is the only conservation area on Sheppey outside of Sheerness, with the Swale Heritage Strategy describing Queenborough as a ‘planned medieval town’ with a castle (the castle mound is a scheduled monument). The Strategy also describes Sheerness and Queenborough as *“beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey”.*
 - Teynham – the lower growth strategy under this scenario is potentially supported, as there would be reduced risk of impacts to the conservation area. Under a higher growth scenario (Scenarios 1, 2 and 5) there could be modest housing growth within the conservation area, plus there would be a risk of impacts from a village bypass (although a bypass might also reduce traffic in that part of the conservation area associated with the A2). There are also two grade 2* listed buildings, to the west of the village (outside of the conservation area), that are adjacent to potential development sites, one of which is assumed to come forward under this lower growth scenario. It is noted, however, that the sites in question are not currently used for fruit growing.
- Scenario 4 (E/SE Faversham + Bobbing) – there is no reason to suggest that strategic growth at both E/SE Faversham and Bobbing would lead to an in-combination historic environment impact.

The assumption under this scenario is that support for two strategic growth locations would be accompanied by a lower growth strategy at other locations, including at Teynham (where the assumption is that there would be nil LPR allocations). This approach is potentially supported, given that most potential growth locations are constrained either by the conservation area or one of the two grade 2* listed buildings to the west of the village.

- Scenario 5 (Preferred scenario + low risk UEs) – this higher growth strategy gives rise to limited concerns over-and-above the site specific concerns discussed above. Higher growth to the west of the Borough could mean increased traffic impacting on conservation areas along the A2, but the significance of any such effect is unclear.


In **conclusion**, Scenario 4 performs best as it would involve a focus at two strategic growth locations with limited historic environment sensitivity. There has already been work undertaken to understand and respond to the historic environment sensitivities at the two strategic sites in question (see Appendix C of the October 2019 Stantec *Assessment of Stage 2 Submissions*)³⁵ and, moving forward, there would be good potential to avoid and mitigate impacts through masterplanning, design and other measures (e.g. interpretation), working with Historic England.

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. It is a challenge to differentiate these scenarios, for example weighing up the cumulative impacts of extensions to Faversham under Scenario 2 versus a package of dispersed extensions under Scenarios 3 and 5 (plus there is a need to factor-in the growth-related opportunity at Rushenden).

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. There would be a need to engage Historic England prior to allocating a number of the urban/village extensions in question.

Housing

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
4	3	2	3	1 

Discussion

All five of the reasonable growth scenarios would involve a total housing land supply in excess of Local Housing Need (LHN), with the buffer ranging between 13% and 23%. A 'supply buffer' is important given the risk of unforeseen delays to supply, i.e. the risk of sites not coming forward for development as anticipated and/or not delivering homes at the rate anticipated. The size of buffer required is dependent on the 'riskiness' of the sites that make-up the supply, with strategic sites tending to be at relatively high-risk of delay, due to the range and complexity of the issues involved, for example around delivering required infrastructure upgrades.

Also, in addition to the question of how many homes are provided for over the plan period, there is a need to ensure a steady (or otherwise acceptable) trajectory of housing delivery across the plan period, including in the early years of the plan period. This necessitates a supply comprising a good mix of sites, both in terms of size/complexity and geographic location. In this respect, it is important to recall that there is a very good mix of committed sites following the adopted Local Plan (and windfall sites that have come forward since the adopted Local Plan). As discussed in Section 8, committed sites are expected to deliver around 11,000 homes in the LPR plan period (2022 to 2038).

On one hand it is difficult to conclude that delivery risk is a 'housing' consideration for this assessment, as the NPPF puts in place mechanisms to redress unanticipated shortfalls in housing delivery (the presumption in favour of sustainable development); however, on the other hand, delivery risk is an important issue in Swale, with a desire to resist windfall schemes in unplanned locations.

As stated within the officer's report to the 29th October 2018 Local Plan Panel (which reported back on the *Looking Ahead* consultation):¹²¹ *"Perhaps the single greatest influence on delivery levels will be the settlement strategy and the choice of sites that will be pursued by the next Local Plan. Here, matters such as the viability of specific parts of the Borough and the ability of infrastructure to be in place at the right time will be key considerations."* Viability need not necessarily constrain delivery if development costs are kept low, but this can lead to tensions with wider objectives, for example affordable housing and decarbonisation.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) – there would be a focus of growth at sites associated with delivery risks and uncertainties; however, the proposed supply buffer of 13% serves to reduce concerns.

Furthermore, E/SE of Faversham is thought to be associated with relatively low risk, for a strategic growth location of this scale. The Stantec Assessment of Stage 2 Submissions (2019) drew the following conclusion in respect of Southeast Faversham: *"Of the four schemes promoted this is 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 Junction 7..."*

- Scenario 2 (Bobbing + Faversham UEs) – strategic growth at Bobbing also gives rise to relatively limited delivery concerns, for a strategic growth location, with Stantec (2019) finding: *"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."*

Under this scenario there would also be a package of urban extensions to Faversham that are assumed to be associated with low delivery risk, and potentially able to deliver in the early part of the plan period.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban/village extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. This approach is quite strongly supported, from a housing perspective, as the urban/village extensions in question are thought likely to be associated with low delivery risk, relative to Rushenden and the Teynham opportunity area.

¹²¹ See <https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2094>

Also, the Rushenden scheme is expected to deliver only around 10% affordable housing, and whilst viability is also a challenge to delivering housing elsewhere on Sheppey (notably Leysdown), it is possible that more than 10% affordable housing could be achieved.¹²²

- Scenario 4 (E/SE Faversham + Bobbing) – is tentatively supported, because there would be a larger supply buffer (LHN plus 17%) and both strategic sites are currently proposing 40% affordable housing. However, there would still be significant delivery risk given reliance on two strategic growth locations, albeit both are relatively low risk strategic sites, and the two sites are distant from one another. Further considerations are:
 - Risks and uncertainties - there is a need for considerable further work ahead of bringing forward both strategic sites, meaning that additional development costs could emerge leading to a need to reconsider the mix of housing, including affordable housing (and the mix of affordable housing), that can be delivered. At Bobbing there is notable uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme; whilst at E/SE Faversham there remains uncertainty ahead of further detailed work in respect of masterplanning, infrastructure delivery and viability, taking account of local market conditions (there will be a need to deliver housing at a pace that avoids any concerns around local saturation).
 - Growth beyond the plan period - one or both of the strategic sites could be expanded further so as to deliver additional housing beyond the plan period, with this having been discussed as an option for Bobbing. However, it is difficult to suggest this is a notable 'positive', from a housing perspective, as housing needs beyond the plan period can be met through a future Local Plan Review.
 - Specialist accommodation - there can be good potential to integrate specialist accommodation, including Gypsy and Traveller Pitches (for which there is a need locally), as part of strategic development schemes; however, neither of the strategic sites are known to have made any firm proposals.
- Scenario 5 (Preferred scenario + low risk UEs) – supply would amount to LHN plus 17%, and there would be a good mix of sites, both in terms of the size/complexity and geographic spread. As such, there would be flexibility to either: A) set the housing requirement at LHN, with a large supply buffer; or B) set a housing requirement in excess of LHN (e.g. LHN plus 7%, leaving a supply buffer of 10%).

Approach (A) would lead to a very low risk of the housing requirement not being met at any point in the plan period, i.e. a situation whereby the presumption in favour of sustainable development could apply and there is a need to allow windfall schemes in unplanned and potentially problematic locations.

Approach (B) could help to address any unmet needs arising from the wider sub-region (specifically, locations that are suitably well connected to Swale); however, current understanding is that there are no such unmet needs (see discussion in Section 5.2).

In **conclusion**, 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. Housing needs could be met under the other scenarios, although there is a degree of uncertainty in respect of Scenario 1.

¹²² Variations in development viability are reflected in Policy DM8 (Affordable Housing) of the adopted Local Plan, which requires 0% affordable housing on Sheppey and 10% affordable housing at Sittingbourne, in comparison to 35% affordable housing at Faversham and 40% affordable housing in the rural area. The situation is thought to have improved, and the LPR will adjust the affordable housing policy accordingly; however, there will still be a need to account for variations in viability.

Land

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
★ 1	★ 1	★ 1	2	3

Discussion

A key consideration is the need to avoid loss of best and most versatile (BMV) **agricultural land**, particularly that which is of the highest quality nationally, namely grade 1 land. Swale has an extensive resource of grade 1 land.

The belt of grade 1 agricultural land in the Borough – known as the fruit belt – is centred on the A2 corridor, hence it is very challenging to deliver growth whilst avoiding loss of BMV land, including that which is grade 1. Sheppey is relatively unconstrained, with low-lying land shown by the nationally available dataset as being non-BMV (grade 4) and higher ground shown as grade 3 (which may or may not be BMV); however, there are barriers to growth.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE Faversham would result in the loss of high quality agricultural land, with the national low resolution dataset indicating that virtually all of the land is likely to be of grade 1 quality. None of the land has been surveyed in detail, other than the committed Preston Fields part of the site (it is typically the case that detailed survey work is undertaken as part of planning applications, but it can be undertaken to inform Local Plans), which was found to mostly comprise grade 1 land.
- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is marginally supported, as the low resolution national dataset shows a small proportion of the site to comprise land of either grade 2 (still BMV) or grade 3 (potentially BMV) quality. Also, a portion of the site has been surveyed in detail and found to be of grade 3b quality (non-BMV).

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, all are currently farmed and likely to comprise BMV quality land. Two sites have been surveyed in detail, showing one to comprise grade 1 quality land (the low resolution national dataset indicates that it is urban land) and the other to comprise grade 3a land (the national dataset indicates grade 1).

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – the national dataset indicates a swath of grade 2 land to the south of Sittingbourne; however, the urban extension to the south of Sittingbourne assumed under this scenario has been partly surveyed in detail and been found to comprise grade 1 quality land (it is currently used for fruit growing). As for the other urban extension assumed under this scenario, which is to the southeast of Sittingbourne, this has been surveyed in detail and found to comprise a mixture of grade 1 (BMV) and grade 3b (non-BMV) quality land. It is currently used in part for fruit growing.
 - Bobbing – the assumption under this scenario is that one or more modest sites would be allocated, potentially through a Neighbourhood Plan. The entire area in question is likely to comprise grade 1 land.
 - Minster – whilst the site in question has not been surveyed in detail, much of the adjacent land at Thistle Hill was surveyed in detail prior to development and found to be of grade 3b quality.
 - Teynham and Newington – both villages are strongly associated with grade 1 quality land (although detailed survey work at Teynham has found there to be some grade 2 quality land) and historical imagery (available for 1940 and 1960)¹²³ shows near ubiquitous fruit growing; however, of the sites in contention for allocation, it appears that only the site at Newington is currently used for fruit growing.
 - Eastchurch and Leysdown – the national dataset indicates grade 3 quality land. The Eastchurch site has been surveyed in detail and found to comprise grade 3a quality land (i.e. BMV).

¹²³ See <https://webapps.kent.gov.uk/KCC.KLIS.Web.Sites.Public/Default.aspx> or Google Earth

- Rushenden – the national dataset indicates that the site is a mixture of grade 4 and grade 5 quality land. Part of the site comprises a former landfill (dredged materials, as opposed to waste), hence development could enable remediation and therefore represent a good use of despoiled or contaminated land.
- Scenario 4 (E/SE Faversham + Bobbing) – as discussed, both sites would involve significant loss of BMV agricultural land. Further considerations relate to the assumed nil growth Teynham (extensive BMV land) and Rushenden (extensive non-BMV land).
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy for Swale naturally gives rise to a cause for concern, given the sensitivity of Swale in the regional and national context; however, higher growth would be partly achieved allocation of additional sites on the Island of Sheppey, which is less sensitive.

In **conclusion**, it is appropriate to conclude that 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. 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;¹²⁴ 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 and meaningfully differentiate the growth scenarios in respect of impacts to minerals safeguarding areas. In practice, the presence of a safeguarding area does not necessarily mean that extraction would be viable, and it can be possible to extract minerals prior to development.¹²⁵

Landscape

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
2	3	3	1	4

Discussion

There is a wide range of evidence to take into account, when considering the landscape merits of Swale LPR growth scenarios. In addition to avoiding impacts to the Kent Downs AONB, and its setting, there is a need to avoid impacts to locally designated landscapes and countryside gaps, as understood from the Landscape Designation Review (2018) and the Important Local Countryside Gaps study (2020). Additionally, the Landscape Sensitivity Assessment (2019) examines the sensitivity of all landscape parcels surrounding the main settlements. More broadly, there is a need to consider topography across the Borough, historic landscape character and important views, including from roads and public rights of way. There is also a need to be mindful of wide ranging ecosystem services delivered by landscape units (see discussion in Appendix II).

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is supported, from a landscape perspective, in light of the Landscape Sensitivity Assessment (2019), which finds the entire site to fall within a parcel of moderate sensitivity (parcel FM1), which equates to relatively limited sensitivity in the context of the Borough and, in particular, Faversham. The assessment notes that the “presence of major road infrastructure and heavy traffic” has a significant impact on “the sense of rurality and tranquillity”. Despite this, however, the assessment also finds that the area “retains a strongly agricultural character” and that this character together with the “visual exposure of the area” results in a degree of sensitivity. It is important to recognise that development would breach a longstanding settlement boundary feature to the southeast of the town, namely the A2 which has historically marked the limit of the southern extent of the town (with the town centre focused on the creek, more so than the road and railway); however, existing Local Plan allocations have already breached the boundary of the A2 to the south of the town. Furthermore, expansion to the southeast has the benefit of being able to draw upon the M2 (with the AONB beyond) as a new strong/defensible long-term boundary. Having said this, the current proposal falls short of comprehensively planning for land as far as similarly defensible boundaries to the east (either the A299 or, should employment be a suitable use

¹²⁴ See kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

¹²⁵ See further discussion at: mineralproducts.org/19-release20.htm

surrounding the motorway junction, the need to maintain a landscape buffer to Boughton) and the northeast (flood risk and heritage including farmsteads and the Goodnestone Conservation Area).

- Scenario 2 (Bobbing + Faversham UEs) – strategic growth at Bobbing is also supported, from a landscape perspective. The site is distant from the AONB and associated with broad landscape units assigned ‘moderate’ and ‘low-moderate’ sensitivity scores by the Landscape Sensitivity Assessment. The southern part of the site is more sensitive, given existing narrow settlement gaps; however, the current proposal is for development to extend only as far south as the railway line, meaning that, whilst the Bobbing settlement gap would be eroded or lost, the gap(s) between Sittingbourne and Newington would not be affected. In this respect, it is important to note that an earlier masterplan proposed a large area of parkland to the south of the railway. Finally, it is important to note that the *Stantec Assessment of Stage 2 Submissions* (2019) identifies the potential for the scheme to expand beyond its current ‘red line boundary’ (see page 15 of the report). There is an argument for comprehensive long-term planning for this part of the Borough, rather than piecemeal growth. The possibility of comprehensively planning for the entire area of land between the A249 in the east, the A2 in the south, the Lower Halstow – Iwade Ridge in the west and Iwade in the north might be envisaged, with a view to securing infrastructure, environmental protection/enhancement and employment land.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, it is thought likely that it would be possible to avoid impacts to the most sensitive landscapes around the town. Two modest extensions to the north would impact on expansive views across marshland-edge landscapes, including from public rights of way, but there would be little or no further risk of further urban creep in the future, given the extent of flood risk zones. The modest urban extension to the south would be well contained in the landscape, but is still associated with a degree of sensitivity as this is a ‘gateway’ location on the approach to Faversham from the west. Further expansion to the east would be into a landscape with relatively low sensitivity, in the Faversham context, but ‘urban sprawl’ might be a concern.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. Key considerations relate to:
 - Sittingbourne – both of the urban extensions assumed under this scenario fall within landscape parcel SE4, which extends across much of the southern edge of Sittingbourne, and is judged to have overall moderate-high sensitivity, with a key conclusion: *“The landscape has a distinctive dry valley in the east, evidenced by its local landscape designation, and a rolling and undulating landform in the centre and west. There is a strong rural character through much of the area, and a resource of valued natural features and semi-natural habitats. There are high levels of enclosure and a well-defined urban edge to Sittingbourne. It is in close proximity and partially visible from the AONB which lies to the south of the M2.”* The site to the southeast is potentially most sensitive, as it is located on the edge/crest of the Rodmersham dry valley, which is a locally designated landscape, with a bridleway passing along the edge of the site, from which there might well be an appreciation of the valley and the fruit growing heritage of the area. Sensitivities in respect of the site to the south have already been discussed above, under ‘heritage’.
 - Bobbing – the assumption under this scenario is that one or more modest sites would be allocated, potentially through a Neighbourhood Plan. There are certain sites that are quite well contained in the landscape, and it is considered likely that modest expansion of the village could occur without problematic expansion uphill towards Keycol / Keycol Hill.
 - Minster - the Landscape Sensitivity Assessment (2020) identifies all land surrounding Minster as having moderate-high sensitivity to housing growth, with inherent sensitivities associated with the raised rolling landscape of Sheppey’s clay “backbone”. The site in question is not one of the more sensitive parts of the wider landscape parcel; however, there are still likely to be sensitive views across the site, both north towards Minster on higher ground, and south across the Swale. There could be merit to strategic planning for the broad area south of Minster/Halfway, drawing on lessons learned from Thistle Hill, and avoiding piecemeal expansion that could lead to environmental and socio-economic opportunities missed.
 - Newington and Teynham – sensitivities associated with the villages have already been discussed above, including associated with their fruit growing heritage; however, the Landscape Sensitivity Assessment (2019) serves to indicate that, in the Borough context, there is a degree of relative landscape capacity at both villages. There is a notable concern associated with further expansion of Teynham to the east; however, the assumption is that any further expansion would not break the prominent north/south ridgeline (associated with public footpaths). There are also challenges associated with expansion of Teynham to the west, given the need to maintain a settlement gap to Bapchild (this is explored within the Local Countryside Gaps study, 2020), and the possibility of delivering the final section of the Sittingbourne Northern Relief Road is a related consideration. With regards to expansion to the SW of Teynham, there is a degree of

sensitivity, given views across this land from footpaths and Claxfield Road, which is designated as a rural lane. In contrast, views across the potential village extension to the SW of Newington may be more limited.

- Eastchurch – the proposed site does not relate very well to the existing village, and would give rise to landscape concerns given topography, limited landscape features to bound expansion and ‘moderate-high’ landscape sensitivity.
- Leysdown – has low-moderate landscape sensitivity and the site in question is in use as a holiday park.
- Rushenden – despite partly comprising a former landfill, the site is thought to be associated with considerable landscape sensitivity, as it forms the western extent of the North Swale (Sheppey) Marshes locally designated landscape. Furthermore, there is a likelihood of a mixed use scheme, and the Landscape Sensitivity Assessment identifies this area as having a *high* sensitivity to employment development.
- Scenario 4 (E/SE Faversham + Bobbing) – as discussed, both strategic sites are supported, from a landscape perspective, and support for two strategic sites would enable lower growth elsewhere, including at Rushenden.
- Scenario 5 (Preferred scenario + low risk UEs) – a higher growth strategy does give rise to concerns, given sensitivities associated with the sites that would come into contention for additional allocation (over-and-above Scenario 1). Whilst the AONB is not likely to be a constraint to higher growth, there would be concerns around impacts to locally designated landscapes, important settlement gaps, landscapes judged to have moderate-high sensitivity by the Landscape Sensitivity Assessment and other landscapes with a degree of sensitivity, including in light of historic landscape character. However, under this scenario 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. It is recognised that other neighbouring authorities in the sub-region equally face landscape constraints, for example undeveloped land around the edge of the Medway Towns is likely to be associated with inherent sensitivity.

In **conclusion**, 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 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
★ 1	2	2	2	3

Discussion

Transport connectivity and traffic congestion is a key issue in Swale, given the inherent constraints that exist. The Borough is very well connected by rail; however, main settlements and potential growth locations feed onto a limited number of strategic road corridors, including the A2 which passes through the centre of settlements (the only bypasses are at Sittingbourne town centre and Boughton). Enabling longer distance trips via the M2 rather than the A2 is an important objective, but there are junction constraints, and just three junctions serving the Borough, which contrasts to four serving the Medway towns.

The following bullet points consider the reasonable growth scenarios in turn:

- Scenario 1 (the emerging preferred scenario) - strategic growth to the E/SE of Faversham is tentatively supported, from transport perspective. Key statements made by the Stantec *Assessment of Stage 2 Submissions* (2019) include:
 - “The primary issue is the M2 J7 [Brenley Corner] which currently operates above capacity. Greater detail is required to understand the impact and mitigation... 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.”

- *“The proposal appears to rely on the upgrades to Brenley Corner, however, the extent to which highway capacity is an existing constraint on development in this location will need further investigation and may be being under appreciated...”*
- *“While there is mention of the Preston Fields link [to M2 J6], 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.”*
- *“The proposal seeks improvements and benefits provided in terms of traffic calming along the A2, as well as securing enhancing cycle and pedestrian links. Whilst it is understood that the promoter has experience of calming a major A road at Poundbury, the situation at Faversham is different, with the A2 continuing to need to function as a major through route. The full success of any ‘calming’ may be predicated on achieving a road link between the A2 and A251/J6. This is a matter which has yet to be resolved and secured as part of this scheme.”*

In short, there is merit in the location and the proposed scheme, as has been discussed above under other headings, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6. It may be that the latest proposal, which involves bringing forward a combined scheme involving growth both to the east and southeast of Faversham, leads to greater potential to deliver timely road infrastructure upgrades, but there is no certainty in this respect.

Additional evidence, in respect of E/ SE Faversham, comes from the April 2020 re-run of the Swale Transport Model (discussed in Appendix I), which serves to highlight limited concerns regarding the capacity at junctions in the area (see Table C in Appendix I).

- Scenario 2 (Bobbing + Faversham UEs) – replacing strategic growth to the E/SE of Faversham with strategic growth at Bobbing is not supported, from a transport. Stantec conclude: *“There is a risk of a ‘showstopping’ highways issue here – associated with the local network, A249 and the not fully funded J5 improvements.”* The latest situation is that M2 J5 improvements are expected to commence in 2021; however, the question of headroom is uncertain, and other concerns remain. Stantec suggest that: *“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.”* However, there is no discussion of links to Newington Station on the scheme website.

With regards to the package of urban extensions at Faversham, that are together assumed to deliver around 1,000 homes under this scenario, these are all broadly supported, although expansion to the east would not be particularly well linked to the town centre, as has been discussed above.

- Scenario 3 (E/SE Faversham + low risk UEs) – under this scenario the assumption is that a package of urban extensions at Sittingbourne, Minster, Teynham, Newington, Eastchurch and Leysdown would replace growth at Rushenden and the Teynham opportunity area. A detailed discussion is presented above, under climate change mitigation, although it is difficult to draw an overall conclusion as to whether this approach is supported.
- Scenario 4 (E/SE Faversham + Bobbing) – a focus at strategic sites is supported in theory, as strategic concentrations of growth can support investment in road infrastructure and sustainable transport measures, plus there is greatest potential to deliver mixed use schemes that lead to a degree of self-containment / trip internalisation. However, as discussed, there are concerns regarding the proposed Bobbing scheme.
- Scenario 5 (Preferred scenario + low risk UEs) – assuming that the effect of this scenario is to provide for genuine higher growth (as opposed to seeking to provide for LHN with a large supply buffer, and thereby minimising the risk of problematic windfall schemes), then this scenario potentially gives rise to an inherent concern, on the basis that Swale is a constrained Borough. Equally, the specifics of this high growth strategy give rise to cause for concern. In particular, a higher growth strategy for the Isle of Sheppey (allocations totalling 1,665 homes) in combination with allocations for 500 homes at Sittingbourne (plus town centre regeneration) and higher growth strategies for Newington and Teynham could well impact in-combination on problematic junctions on the strategic road network, in particular M2 J5 (A249),¹²⁶ the A249 junctions (in particular the Bobbing junction) and junctions along the A2500 Lower Road on Sheppey (although a higher growth strategy

¹²⁶ The adopted Local Plan (2017) explains: *“The main strategic risk to the plan overall relates to any significant deferral in the improvement to Junction 5 of the M2”*. Highways England consulted on upgrade options in 2017 (see highwaysengland.citizenspace.com/he/m2-junction-5-improvements) and identified a preferred option, but there have been funding challenges. The September 2019 Stantec report explained that the scheme was still “not fully funded”, and discussions have continued through 2020. However, latest understanding is that upgrades will commence in 2021. A planning inquiry closed on 4th December 2020; however, this is specifically in respect of one element of the proposes scheme (a flyover), as opposed to the scheme as a whole. There is also a need to consider the possibility that the M2 may see increase traffic following the Lower Thames Crossing and potentially given an increase in traffic to/from ports, in light of emerging national ports strategy.

for Sheppey could assist with securing funds for strategic upgrades). If the Swale LPR were to make any provision for unmet needs arising from elsewhere there would also be a need to give careful consideration to where the needs are arising from, so as to avoid risk of problematic long distance travel by car.

In **conclusion**, 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 poorly, although there could be some potential for growth locations along 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

Scenario 1 Preferred scenario	Scenario 2 Bobbing Faversham UEs	Scenario 3 E/SE Faversham Low risk UEs	Scenario 4 E/SE Faversham Bobbing	Scenario Preferred scenario Low risk UEs
★ 1	★ 1	2	★ 1	3

Discussion

An important strategic consideration is waste-water treatment capacity. The latest Stantec report includes a section on utilities capacity, which overall highlights very limited concerns, concluding:

“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.”

However, there is a need to apply caution, in the sense that there is a need to minimise any residual risk of capacity breaches (in respect of either treated or untreated effluent), with resultant water quality impacts.¹²⁷ In turn, there are arguments for directing growth to locations where there is existing capacity at the receiving Wastewater Treatment Works (WwTW), as opposed to relying on timely capacity upgrades.

There is some evidence to suggest that capacity at Faversham WwTW is a particular concern. In particular, the Kent Water Sustainable Growth Study (2017) noted that headroom capacity at Faversham WwTW would be exceeded by planned growth to 2031 (as set out in the adopted Local Plan), hence there would be a need for upgrades. However, as part of the assessment of the Southeast Faversham strategic site option, the Stantec *Assessment of Stage 2 Submissions* (2019) explains:

“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... costs, options and works duration [are being discussed].”

Further considerations are as follows:

- Bobbing - it is unclear whether there is a need for a new pumping station, though the promoter has suggested that costs of any network reinforcement that may be required would not be borne by Southern Water.
- Rushenden – the site in question is near adjacent to the large Queenborough WwTW;
- Teynham and Eastchurch have a WwTW, whilst it appears (from the Ordnance Survey map) that Newington and Leysdown do not. In the case of Newington, whilst details of sewage treatment are not known, the location of the village could serve to suggest that wastewater treatment could be a constraint to growth.

¹²⁷ N.B. as discussed within the Swale LPR Habitats Regulations Assessment (HRA) report, there are relatively limited concerns around sewage effluent impacting the North Kent Estuaries European sites from treated sewage effluent. This is because these estuaries have a high sediment load, low water temperatures and high wave action. As such, smothering macroalgal growth, which has caused issues for European sites on the south coast, is not considered a threat to achievement of conservation objectives for these European sites.

- In March 2020 Southern Water pleaded guilty to 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events alleged to have taken place between 2010 and 2015, and it is understood that another investigation by the Environment Agency is under way that covers pollution incidents after 2015.¹²⁸

As for other 'water' considerations:

- Pollution to surface water in the vicinity of growth locations – whilst there may be variation in water quality across the Borough's surface water bodies, it is inherently difficult to differentiate the growth scenarios, because there is very good potential to deal with water pollution arising from development schemes through Sustainable Drainage Systems (SuDS). Water pollution from breaches of capacity at WwTWs is considered to be a much more important strategic consideration for the LPR.
- Pollution to groundwater in the vicinity of growth locations – groundwater source protection zones are associated with the parts of the Borough associated with a chalk geology, with Sheppey, Bobbing, and most land at Faversham (bar land directly to the south) falling outside of a source protection zone. However, it is again the case that there is very good potential to suitably avoid/mitigate impacts through the development management process. Groundwater source protection zones can be a particular constraint for polluting developments (e.g. heavy industry, petrol stations).
- Water resources – water scarcity is an issue that applies across the Borough as a whole, hence it is a challenge to differentiate the growth scenarios. It would not be appropriate to highlight a concern with scenario 5 on the basis that it is a higher growth strategy, as genuine higher growth (as opposed to aiming to provide for LHN by supporting a strategy that involves a large supply buffer) would only be supported if there are unmet needs arising from elsewhere within the sub-region where water scarcity is equally an issue.

In **conclusion**, 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 distant from a WwTW.

With regards to effect significance, 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.

¹²⁸ See <https://www.ft.com/content/3efb3e7b-3388-4f27-85ac-44b00aa1fd37>

Summary and conclusions

The matrix below draws together and summarises appraisal findings from Section 10.2.

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

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.