

Appendix I – Summaries of main issues raised in respect of the Swale Borough Council Local Plan Review (Regulation 19) Pre-submission Consultation

The summaries below aim to draw out the ‘headline’ issues raised during the Swale Borough Council Local Plan Review (Regulation 19) Pre-submission Consultation, which took place between 08 February and 30 April 2021. The representations received expressing support for the Local Plan Review have, on the whole, not been listed here.

Table 1 – Summary of main issues in document order.

Chapter/Policy	Main Issues
Chapter 1 – Introduction	<ul style="list-style-type: none"> • Some residents did not understand, and/or did not support the reasons for the review and the extended plan period, although there was an acknowledged frustration with the planning system as a whole. • A number of developers and residents felt dissatisfied by the lack of an Issues and Options and Draft Preferred Option consultation, which was considered to have been a legitimate expectation by various people. • The consultation process was sometimes thought to have been too short, given the current circumstances (Covid-19), with a hard to use consultation system and an incomplete document lacking in some evidence.
Chapter 2 – Our vision, challenges and strategic objectives	<ul style="list-style-type: none"> • The principles of the vision were well received, but it has been said that they could be even more ambitious, particularly with reference to the environment, health and wellbeing and transport. • The strategic objectives, for some, were felt to be somewhat generic and repetitive of national policy rather than specific to Swale. • Various consultees considered that there is limited evidence demonstrating how key allocations meet, or will deliver, the objectives, in particular those relating to sustainability, climate change and infrastructure. • A proportion of residents thought there to be a contradiction with certain key principles in that almost all proposed allocations comprise greenfield rather than brownfield land.
Chapter 3 – Local Plan strategy for Swale	<p>The Local Plan Review strategy received objections, particularly from residents living close to proposed allocations, as well as from developers promoting alternative sites. Issues referred to include:</p> <ul style="list-style-type: none"> • the justification given to, and the size of, the proposals at Teynham and Faversham • the comparatively small housing number proposed for Sittingbourne • the size of the proposed Rushenden South allocation given the historically slow delivery of the Queenborough and Rushenden Masterplan • the sustainability of the proposed Neames Forstal allocation; and

	<ul style="list-style-type: none"> the small number of large allocations proposed, with further consideration of smaller development sites within, or on the edges of, other settlements wanted.
Chapter 4 – Strategic Policies	
ST 1 – Development needs for the Borough	<p>The most common issue here was the housing need figure, as follows:</p> <ul style="list-style-type: none"> residents and town/parish councils considered the figure to be too high and would like the Council to explore justifications for meeting this figure, including the possibility of seeking assistance from neighbouring authorities; however on the contrary, landowners and developers took the view that the Local Plan Review strategy would not sufficiently meet the development needs for the Borough, and they promoted several alternative development sites.
ST 2 – Swale Settlement Strategy	<ul style="list-style-type: none"> A high number of residents, and some of the statutory consultees, are concerned about the amount of development proposed on greenfield land, particularly agricultural land. A range of developers questioned why the strategy does not follow the settlement hierarchy, surmising that it misses the opportunities posed by potential development sites closer to transport corridors and higher tier settlements.
ST 3 – Delivering sustainable development in Swale	<ul style="list-style-type: none"> The sustainability ambitions of the policy have been well received but there is a concern that the development strategy proposed, and indeed any with the housing figure stated, will make them hard to achieve. Highways England considers that more emphasis could be given to transport’s contribution to sustainable development.
ST 4 – Building a strong, competitive economy	<p>The biggest issue raised here was Covid-19 and the uncertain impacts upon future working patterns and office space requirements, acknowledging how difficult it is to plan for at this stage. Other headlines related to:</p> <ul style="list-style-type: none"> giving more support to expanding existing employment locations supporting start-ups and entrepreneurs; and linking green and blue infrastructure to the employment strategy.
ST 5 – Delivering a wide choice of high-quality homes	<ul style="list-style-type: none"> The most common issues raised by residents on this topic was the need for more social and affordable housing, as well as housing types for specific groups of people, such as the elderly. Some landowners felt that all settlements, including villages, should have a role in widening the choice of homes, and that this is lacking in the development strategy. The role of, and need for, self-build and custom housebuilding was also highlighted.
ST 6 – Good design	<p>This policy was generally well received, with some suggestions for further enhancements such as environmental standards and masterplanning, and dementia friendly design.</p>

ST 7 – Health and wellbeing	<p>A topic which residents and NHS response were passionate about, there was some good support for this policy, but significant concerns remained as follows:</p> <ul style="list-style-type: none"> • the provision of health infrastructure and Swale’s poor GP to patient ratio • the need for health infrastructure to be considered on a par with education and transport when it comes to receiving funding; and • the need to safeguard existing services and facilities and allow flexibility within the NHS estate.
ST 8 – Planning for infrastructure	<p>Infrastructure more generally was also an area of significant concern for residents, including:</p> <ul style="list-style-type: none"> • the provision and quality of the full range of infrastructure, the most common being health, education, water and wastewater and transport • commitments/obligations made by, or given to, developers which are then relaxed or removed at later dates • the quality of the viability report supporting the strategy, and whether infrastructure requirements allow the plan to be deliverable; and • specific road issues such as the M2 (Junctions 5 and 7), the Bobbing junction of the A249 as well as the A249 and A2 corridors as a whole.
ST 9 – Promoting sustainable transport and active travel	<ul style="list-style-type: none"> • Some residents and agencies were concerned that the proposed development allocations will result in car dependant developments, contrary to this policy. Suggestions made included giving more consideration to railway station parking/access, cycling provision and park and ride schemes. • A number of residents and developers questioned the adequacy of the supporting transport modelling and strategy.
ST 10 – Conserving and enhancing the natural environment	<ul style="list-style-type: none"> • Residents, parish/town councils, and environmental agencies were all very supportive of this policy and the principle of achieving 20% biodiversity net gain. • Conversely, landowners and developers were of the view that the 20% principle is too high, unjustified and contrary to the forthcoming Environment Bill.
ST 11 – Conserving and enhancing the historic environment	<p>Some developers considered that the policy elevates heritage matters to a point that it would prevent development and frustrate delivery of the Local Plan Review strategy, explaining that there will be cases where the relative importance of heritage will need to be weighed up in the planning balance.</p>
Chapter 5 – Land allocations for new development	
A 1 – Saved allocations for housing and mixed-use	<p>Residents in areas with current and proposed future development were concerned about the cumulative impacts and whether this was taken into account when considering infrastructure requirements.</p>
A 1a – Allocations on sites within existing settlements	<p>Local concern was raised about the addition of the proposed Garden Hotel allocation in Boughton.</p>

A 2 – Kent Science Park	Residents living close to Kent Science Park were concerned that further development here may enable, and be a precursor to, future residential development in a sensitive location (in terms of landscape and the environment specifically).
A 3(a-g) – Existing committed employment allocations	No significant issues raised.
MU 1 – East of Faversham Expansion	<p>Objections were received from local residents (100+), as well as from a few developers promoting alternative development sites to this proposed allocation, the most common issues being:</p> <ul style="list-style-type: none"> • the volume of housing proposed, particularly in comparison to the rest of the Borough – the justification given for this was queried • similarly, the fact that Faversham would receive the highest level of development despite not being the Borough’s Tier 1 settlement. • the potential harm to the character of Faversham, in particular its heritage and market town status • insufficient infrastructure of all types, but particularly health (with no new facilities proposed) and transport (Brenley Corner) and; • harm to the natural environment (including the amount of best and most versatile agricultural land that would be lost).
AO 1 – Teynham Area of Opportunity	<p>Objections were received from local residents (200+), as well as from a few developers promoting alternative development sites to this proposed area of opportunity, the most common issues being:</p> <ul style="list-style-type: none"> • the process through which the policy has emerged and a perceived lack of compliance with the Council’s Statement of Community Involvement and earlier intention to carry out more consultation. • a considered lack of complete evidence such as air quality and transport modelling to support matters such as the southern link route and air quality • insufficient infrastructure across the board • harm to the natural and built environment; and • the lack of clarity without defined sites and boundaries.
A 4 – Land at Neames Forstal, Selling	<p>Objections were received from local residents (100+), as well as from a few developers promoting alternative development sites to this proposed allocation, the most common issues being:</p> <ul style="list-style-type: none"> • the sustainability of the sites (lack of general infrastructure) • the justification perceived to be relying on the presence of a train station which is not well serviced • the infringement upon the Area of Outstanding Natural Beauty • traffic issues, particularly around the safety of the rural lanes • Increased surface flooding issues; and

	<ul style="list-style-type: none"> • harm to biodiversity.
A 5 – Lambergurst Farm, Yorkletts	<p>Environmental agencies, some residents and developers promoting alternative employment laid raised issues such as:</p> <ul style="list-style-type: none"> • the sustainability of the site for both employment and potential future housing, • the transport impacts, particularly with regards to Brenley Corner; and • the potential for harm to the natural environment, with particular reference to Victory Wood.
Regen 1 – The Port of Sheerness Regeneration Area	No significant issues raised.
Regen 2 – Sittingbourne Town Centre	Landowners and developers promoting alternative development sites considered the potential loss of employment land to 850 town centre dwellings with doubt that this is a deliverable policy due to a lack of specified sites and their timeframes.
Regen 3a – Queenborough and Rushenden Regeneration Area	No significant issues raised.
Regen 3b – Rushenden South Regeneration Area	<p>This proposed allocation received fewer objections than others, but concern was still raised by residents, agencies and the town council regarding:</p> <ul style="list-style-type: none"> • the flood risk of the site and lack of evidence demonstrating its safety and resilience • the deliverability of the site, given the slow delivery of the existing allocations in the area • the provision of services, facilities and infrastructure; and • harm to the natural environment and lack of evidence demonstrating avoidance, mitigation and enhancement – particularly with relation to biodiversity and the adjacent SSSI and SPA designations.
Chapter 6 – Neighbourhood plans	
NP 1 – Faversham Creek Neighbourhood Plan	No significant issues raised.
Chapter 7 – Development Management policies	
DM 1-44	<p>Development Management policies, which emerge from Strategic Policies, do not generally receive the same level of concern. However, those that have relate specifically to:</p> <ul style="list-style-type: none"> • DM 1 General Development Criteria – considered to be repetitive, unnecessary, and unclear • DM 7 Loss of employment floorspace and land – considered to need reviewing in light of Covid-19 • DM 18 Park Homes – considered to be potentially harmful to the Isle of Sheppey’s tourism industry

	<ul style="list-style-type: none"> • DM 19 Accommodation for Gypsies, Travellers and Travelling Showpeople – considered to require specific site allocations • DM 28 Local Green Spaces – many proposed designations were objected to by landowners; and • DM 29 Woodlands, orchards, trees and hedgerows – environmental agencies felt that the policy wording has diminished protection for ancient woodland and other irreplaceable habitats.
Chapter 8 – Implementation and monitoring arrangements	No significant issues raised.
Chapter 9 – Glossary of terms	No significant issues raised.
Chapter 10 – Appendices	No significant issues raised.

Table 2 – Summary of main issues raised on key pieces of evidence

Evidence	Main Issues
Sustainability Appraisal (SA)	<p>Mainly developers, but some local residents made the following comments about the SA:</p> <ul style="list-style-type: none"> • the scoring of growth scenarios is flawed, inconsistent, retrofitted and unjustified • it requires updating once the full suite of evidence is available • it fails to identify appropriate reasonable alternatives and justify them; and • it acknowledges risks identified for the chosen Local Plan Review strategy.
Habitat Regulations Assessment	Environment agencies felt that there is insufficient evidence to rule out likely significant effects in Faversham and Rushenden, with no imperative or over-riding public interests given to justify the proposed allocation of these sites.
Transport Modelling/Strategy	Developers promoting alternative development sites, and some agencies and local residents considered that the incomplete transport modelling does not allow for a full assessment of the proposed development strategy to be made, and a comprehensive transport strategy to be implemented.
Strategic Flood Risk Assessments	Developers promoting alternative development sites and flooding agencies note that there is missing evidence in relation to the proposed Rushenden South allocation and an Exceptions Test demonstrating that the site has over-riding opportunities and that it can be made safe over its lifetime.