

Sustainability Appraisal (SA) of the Swale Local Plan

Interim SA Report

October 2021

Quality information

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Non-technical Summary

This report has presents an appraisal of the five broad development options that are a focus of the current Issues and Preferred Options consultation. A summary of the appraisal is presented in the table below. Within the table the performance of each of the broad development options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)¹ and the options are also ranked in order of preference (where “1” is best performing).

Broad development options – summary appraisal

	Option 1	Option 2	Option 3	Option 4	Option 5
	Rank of preference and categorisation of effects				
Air quality	=	=	=	=	=
Biodiversity	=	=	=	=	=
Climate change mitigation	3	3	★1	3	2
Communities	3	3	2	2	★1
Economy and employment	2	2	2	2	★1
Flood risk	3	3	2	★1	★1
Heritage	2	3	★1	3	★1
Housing	4	3	2	★1	5
Land	★1	★1	2	2	★1
Landscape	4	4	2	3	★1
Transport	?	?	?	?	?
Water	?	?	?	?	?

¹ **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.

Summary discussion

It is immediately apparent that Option 5 (two strategic growth locations; one in the west of the Borough and the other in the east) performs well in a number of respects, as indicated by the relatively high number of stars and the relatively low number of red scores assigned. However, it does not necessarily follow that Option 5 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 concluding that Option 5 performs least well overall. Also, in respect of Option 5, it is important to state that the appraisal reflects some very significant assumptions, both in respect of the specific strategic sites that would be allocated, and the potential to deliver a mix of uses, infrastructure upgrades and wider 'planning gain' alongside housing growth.

A second immediate point to note is that both Option 1 (roll forward the Bearing Fruits Strategy) and Option 2 (adjust the Bearing Fruits strategy to a modest extent) are shown to relatively poorly in most respects (it is only under 'heritage' and 'housing' that the appraisal finds there to be a degree of relative merit). This is certainly an indication that these options perform relatively poorly overall; however, it is important to state that a number of the topic-specific conclusions are quite finely balanced, and associated with assumptions and uncertainties.

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

- **Air quality** – it is not possible to differentiate between the options with any certainty. There are a range of uncertainties, including in respect of the achievability/deliverability and timing of road infrastructure upgrades. With regards to significant effects, it is appropriate to flag a notable degree of risk under all growth scenarios. 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.
- **Biodiversity** - it is not possible to differentiate between the broad development options with any certainty. With regards to Option 5, whilst strategic growth locations can give rise to particular opportunities in respect of securing biodiversity net gain, there is little confidence that this applies in the case of the sites in question, and one of the sites (SE Sittingbourne) gives rise to notable concerns. With regards to the other options, there are issues with growth at both Sittingbourne and Faversham, and there is a need to factor-in concerns regarding growth at Rushenden South (in particular) and Teynham. With regards to significant effects, on one hand, limited concerns were raised through the consultation in early 2021, either in respect of biodiversity impacts or a risk of opportunities missed; however, on the other hand, on the basis of an initial review of consultation responses reviewed from site promoters, there is a noticeable lack of proactive proposals in respect of responding to biodiversity issues and opportunities, and the number of site promoters arguing against the proposed requirement for 20% biodiversity net gain is noted.
- **Climate change mitigation** – it is inherently challenging to differentiate between the 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. On balance, it is considered appropriate to highlight: Option 3 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 around both transport and built environment decarbonisation; and Option 5 as second best performing, given the inherent opportunities associated with strategic growth; however, there is a very high degree of uncertainty, including on the basis that the locations in question are not ideal from a transport connectivity perspective, and recognising that scheme promoters have provided limited information to generate confidence that decarbonisation opportunities exist and will be realised in practice. With regards to effect significance, 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 requirements/proposals.
- **Communities** - it is fair to conclude that Option 5 is preferred on the basis of the potential to deliver new secondary school capacity at both Sittingbourne and Faversham, although there is uncertainty at the current time, particularly in respect of the potential to deliver a new secondary school at Faversham. This is a departure from the conclusion of the equivalent appraisal presented within the SA Report, which was undertaken on the basis of an assumption that a key issue for the Local Plan is to address existing secondary school capacity issues at Faversham. With regards to significant effects, on the basis of the consultation response received from KCC it is certainly appropriate to predict significant negative effects under Options 1 and 2. It is also fair to highlight uncertain positive effects under Options 5.
- **Economy and employment** - there is uncertainty with employment at the current time, recognising that the ELR was completed prior to the Covid-19 pandemic and employment strategy is in a state of flux nationally. Option 5 potentially performs relatively well, but it is not possible to differentiate further between the options. It is appropriate to flag a risk of negative effects under all of the options other than Option 5. Whilst the South East Local Enterprise Partnership (SELEP) did not respond to the consultation in early 2021, it is fair to

assume that providing for warehousing and distribution needs remains a key issue for the sub-region; and there are also important links to matters relating to transport infrastructure capacity, as discussed below.

- **Flood risk** - it is appropriate to highlight those broad development options 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 Options 1 / 2. **Heritage** - it is appropriate to highlight those options involving a focus on further piecemeal urban extensions as giving rise to a significant degree of concern, and it is appropriate to highlight Options 2 and 4 as performing worst, as Faversham is very sensitive in historic environment terms. It is suggested that negative effects would be notably less significant under Option 3 and Option 5; however, this conclusion is subject to the views of Historic England. The consultation response received from Historic England in early 2021 focused only on the preferred sites, and focused on policy wording more so than site suitability, but this current consultation provides an opportunity for a more strategic discussion. It is also important to highlight uncertainty regarding the implications of the broad development options for growth at Teynham and Newington, both of which have historic cores, a network of surrounding historic farmsteads (towards which development has encroached over recent decades) and a surrounding landscape with a sense of time-depth strongly associated with the area's fruit growing heritage (see aerial imagery from WWII). There is also a need to carefully consider historic environment / heritage issues associated with options for a new road link to the south of Teynham, particularly mindful of the designated conservation area, which is strongly associated with a north-south dry valley.
- **Housing** - Option 5 performs poorly, given delivery risks associated with a strategy that relies on two strategic sites. Option 1 also performs relatively poorly given viability challenges in the west of the Borough; however, there is considerable uncertainty. Option 4 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 associated economy of scale benefits and inherently good potential to deliver a good housing mix) and additional smaller urban extensions likely associated with low delivery risk and able to deliver early in the plan period, thereby alleviating concerns around delay to delivering the strategic site leading to a shortfall in housing supply early in the plan period (albeit, as discussed, the NPPF puts in place mechanisms to redress shortfalls against required trajectory); and support for a strategic site (SE Faversham) where the current proposal is to prioritise affordable housing (40% has been suggested; however, this is unconfirmed and 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** – it is likely that any reasonable broad development option, in the Swale context, 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 Option 1, 2 and 5 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.
- **Landscape** - it is appropriate to highlight Option 5 as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and to the east / south east 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 for the other broad development options, Option 3 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. It is not possible to confidently suggest any risk of significant negative effects to the setting of the AONB.
- **Transport** - at the current time it is not possible to differentiate between the broad development options with any certainty. This is a departure from the conclusion of the equivalent appraisal completed in 2020. With regards to effect significance, on the basis of the representation received from KCC in early 2021, it is fair to conclude that there are significant uncertainties and concerns regarding all of the options.
- **Water** - it is considered appropriate to highlight uncertain negative effects for all scenarios, albeit it is understood that limited concerns were raised through the consultation in early 2021. A particular consideration is wastewater treatment capacity, and whilst the firm proposals for SE Faversham are encouraging, there is less certainty regarding capacity to support growth elsewhere.

Within the consultation document the Council explains that Option 3 is the emerging preferred option, and presents detailed reasons including:

“Large scale strategic growth at Faversham would provide good potential to successfully masterplan and deliver a new community, or series of new communities, in line with established best practice principles and to ensure that it was planned in a holistic way. It would also deliver a much needed new secondary school.

This option performs well in terms of air quality because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns as sustainable and active travel measures are easier to implement at these scales of new development as the critical mass is there. Trip internalisation can be implemented, funds can be directed to walking and cycling infrastructure, masterplanning and design measures can focus on supporting walking and there is some potential to walk/cycle to the town centre

It also allows for larger scale biodiversity and net gain achievements; again, due to the critical mass.”

This report has also sought to present a brief, informal commentary on select thematic policy areas, with a particular focus on climate change mitigation / decarbonisation, which is seen to be a key issue for the LPR.

Next steps

The next step, subsequent to the current consultation, will be to revisit the question of reasonable alternative growth scenarios. In practice, this will mean revisiting the process set out in Section 5 of the SA Report, which lead to five mapped growth scenarios for appraisal. Once growth scenarios have been defined they will then be subject to appraisal, in good time to inform plan-making. Consideration will also be given to the possibility of whether there are other aspects of the LPR, aside from spatial strategy / site selection, that warrant being a focus of dedicated work to formally define and appraisal alternatives.

Once work to explore alternatives has been completed, then the Council will be in a position to finalise the LPR, at which point it will be subjected to appraisal 'as a whole', and then the SA Report prepared for publication alongside the Pre-submission LPR, under Regulation 19 of the Local Planning Regulations. Subsequently the intention is to submit the Local Plan and SA Report for Examination in Public.

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 effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.²

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. 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.
- 1.2.2 More specifically, the SA Report must answer **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 Interim SA Report

- 1.3.1 The Council is not consulting on a draft plan at the current time, but rather 'issues and preferred options', having previously consulted on a draft ('pre-submission' version) LPR and SA Report in early 2021.
- 1.3.2 This current consultation reflects a desire to 'take a step back' and reconsider issues, opportunities and options for the LPR, including in light of a new National Planning Policy Framework (NPPF, 2021) and emerging understanding of priorities for local economic recovery following the Covid-19 pandemic. This current consultation is held under Regulation 18 of the Local Planning Regulations.
- 1.3.3 There is no strict requirement for SA work at the Regulation 18 stage; nonetheless, this 'Interim' SA Report is produced with the intention of informing plan-making and consultation.

Structure of this report

- 1.3.4 This report is focused on an appraisal of the five broad development options that are the focus of the current consultation. Additionally, a brief commentary covers thematic policy issues and options.
- 1.3.5 This report is structured differently to the SA Report, which was structured in three Parts to reflect the three questions listed above, at paragraph 1.2.2. It is important to be clear that this report is an informal output of the SA process, and does not aim to present the information required of the SA Report.

² 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, 2018). 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 Spatial strategy

2.1 Introduction

- 2.1.1 The aim here is to present an appraisal of the five broad development options that are a particular focus of the current consultation (Section 5.1 of the consultation document).

2.2 Background

- 2.2.1 The SA Report published alongside the Pre-submission Local Plan in February 2021 included a focus on spatial strategy. In particular, Part 1 of the report presented information on defining (Section 5; also a series of appendices and a stand-alone Technical Appendix) and appraising (Section 6 and Appendix VII) a set of 'growth scenarios', essentially in the form of alternative key diagrams. These growth scenarios were presented across a series of maps, which also featured in the SA Report Non-technical Summary.
- 2.2.2 One of the steps in the process of arriving at the reasonable growth scenarios (in 2020) involved appraising five 'broad growth scenarios', as discussed at [paragraph 5.2.30](#) of the SA Report. Summary appraisal findings, in respect of the broad growth scenarios, were presented in Appendix III, and detailed appraisal findings were presented in a stand-alone Technical Appendix.
- 2.2.3 At the current time, the aim is to 'take a step back' and return to the broad growth scenarios previously considered in 2020. The aim is to ensure that the broad growth scenarios – henceforth referred to as broad development options – are brought to the attention of stakeholders and the public, with a view to stimulating discussion and debate, and new evidence to inform plan finalisation.

2.3 The broad development options

- 2.3.1 The broad development options are introduced in detail in the Issues and Preferred Options consultation document. In summary, the broad development options are:
1. Business as usual (development focused on extensions to main settlements with a focus on the Thames Gateway area);
 2. More even distribution of the additional development requirements across the borough's main urban centres and rural areas;
 3. More even distribution of the final requirements across the main urban centres (when combined with allocations in the current local plan, Bearing Fruits);
 4. More of the overall development requirements at the eastern end of the borough; and
 5. Focus on Strategic Development Sites and/or urban extensions primarily located within existing rural areas.
- 2.3.2 Further introduction to the broad development options was also presented across [paragraphs 5.2.25 – 2.2.27](#) of the SA Report, with a focus on considering likely implications for site selection. For example, under Option 1 it is fair to assume that a focus of growth at Sittingbourne would reduce the potential to be selective in respect of the sites at Sittingbourne that are allocated (or, in other words, there would be pressure to allocate sites that are sequentially less preferable, from a suitability/sustainability perspective). Conversely, under Option 4 there would be reduced potential to be selective at Faversham.
- 2.3.3 Ultimately, the appraisal must be undertaken with limited assumptions made regarding the specific sites / broad locations (henceforth sites) that would be allocated under each of the options. This is beneficial in the sense that it allows for consideration of wide ranging issues, opportunities and potential significant effects, unencumbered by site-specifics ('seeing the wood for the trees'). However, an inevitable drawback is the limited potential to draw strong conclusions on likely significant effects, both positive and negative. In this light, the appraisal presented below aims to strike a balance, discussing site-specific issues/opportunities/effects whilst at the same time caveating appraisal findings in the knowledge that final decisions on site allocations will be made subsequent to the current consultation.

2.4 Appraisal methodology

2.4.1 Appraisal findings are presented below within 12 separate tables, with each table dealing with a specific sustainability topic (see [Section 3](#) of the SA Report). Within each table the performance of each of the broad development options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)³ and the options are also ranked in order of preference (where “1” is best performing).

2.4.2 Further points on methodology are as follows:

- Site-specific assumptions – the appraisal must be undertaken with limited assumptions made regarding the specific sites / broad locations, as discussed above. However, it would be remiss for the appraisal to be undertaken entirely blind to the sites that are available and potentially suitable for allocation, and the schemes that are being promoted by land-owners and developers (as understood on the basis of the Strategic Housing Land Availability Assessment (SHLAA) and consultation responses received in early 2021). There is a need to strike a sensible balance, as per the approach taken to the equivalent appraisal in 2020.

N.B. the consultation document is clear that a strategic scheme at SE Faversham would be necessary under Options 3 and 4, and a similar assumption also fed-into the equivalent appraisal in 2020. Another site specific assumption to state upfront is in respect of the ‘North Street, Sheldwich, Faversham’ strategic site option. This option was considered closely over the period 2018-19, but was ultimately identified as poorly performing relative to the three other strategic site options in contention for allocation (see [paragraph 5.3.11](#) of the SA Report), and then no representation was received from the site promoters in early 2021. As such, this site is not a focus of discussion below.

- Evidence – the methodology discussion presented ahead of the equivalent appraisal completed in 2020 (see [Section 2](#) of the SA Report Technical Appendix) explained that a key source of evidence was a host of evidence-base studies completed or commissioned by the Council, including two reports prepared by Stantec in 2019 that examined four key strategic site options in detail.⁴ At the current time, new evidence is primarily in the form of consultation responses received in early 2021; however, the great majority of this new evidence is submitted by site promoters, and is often contradictory or, at least, not aligned. It is a major task to review all of the evidence submitted by the various site promoters, and synthesise key messages for this appraisal, with due caution applied, e.g. recognising that site specific proposals are subject to change (for example, the Stantec workstream scrutinised scheme proposals over a period of months, and was focused on just four sites). It has not been possible to review all site specific representations in detail, for the purposes of this appraisal.
- Significant effects – the aim is to identify, describe and evaluate significant effects in respect of each element of the established appraisal framework in turn.⁵ 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 involve 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.
- Consistency with the 2020 appraisal – the appraisal below is an evolution of the appraisal completed in 2020, and presented in the SA Report. Significant changes are highlighted in the appraisal text.

³ **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.

⁴ *Assessment of Submissions* (February 2019) examined four strategic site options and recommended a range of further work;⁴ and then *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.

⁵ 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’.

2.5 Appraisal findings

2.5.1 The tables below present appraisal findings in relation to five broad development options under each of the thematic policy headings that together comprise the spine of the established SA framework.

Air quality

Option 1	Option 2	Option 3	Option 4	Option 5
=	=	=	=	=

Discussion

Air quality is a widespread issue along the A2, given the number of homes and other sensitive receptors located in proximity to the 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 (St. Pauls Street) in Sittingbourne, where HGV traffic is a particular issue, and the Air Quality Modelling Report (2020) also highlights the A251 (which links to Ashford) as problematic. [Appendix II](#) of the SA Report presented a summary.

Nitrogen dioxide is a key air pollutant at the current time, but emissions are set to decrease rapidly due to the switch-over to lower emissions petrol/diesel and electric vehicles (EVs). Particulate matters (PMs) are the other key air pollutants, and levels are also set to decrease due to the EV switch-over, although issues will remain, given particulates from tyre wear, braking and road dust. The A2 Clean Air Zone Feasibility Study (2020) concluded that: *“Air quality along the A2 is expected to improve significantly... as the vehicle fleet renews... As such by 2022 a standard reference forecast suggests the annual average NO₂ limit values will be achieved. However, there is... a risk of remaining exceedances especially in the St Pauls Street AQMA.”*

It is very difficult to suggest that either Sittingbourne or Faversham is more constrained in respect of air quality, given uncertainty regarding traffic flows between likely or potential growth locations and key destinations - perhaps most notably flows of traffic along the A2 to and from the motorway junctions - and also uncertainty regarding the transport infrastructure upgrades that would be delivered alongside growth, and the timing of upgrades, including major road upgrades (most notably M2 J7, Brenley Corner) and ‘sustainable transport’ measures set out in the Swale Transport Strategy. The equivalent appraisal within the SA Report Technical Appendix suggested that *“... once the location of available development site options is taken into account, there is reason to suggest that higher growth at Sittingbourne [Option 1] is preferable to high growth at Faversham [Option 4]”*; however, it is now judged appropriate to revisit that conclusion.

The SA Report highlighted particular concerns with growth in the Ospringe area, where *“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).”* However, it is now considered important to emphasise that it is not only growth at Ospringe itself that could lead to pressure on the AQMA, but also growth to the west (Teynham) and potentially also to the east (east and southeast of Faversham). It is also noted that a key site option at Ospringe (SLA18/028 West of Brogdale Road) is now proposing measures to respond air quality and other issues (notably, the scheme is now reduced from 600 homes to 450 homes, and land for a primary school is proposed), although concerns raised in the SA Report regarding a new junction onto the A2 in very close (near adjacent) to the Ospringe AQMA remain.

In light of these initial points, the following bullet points consider the options in turn.

- **Option 1** - 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. There is also a need to recognise that the potential for growth to impact on the St Pauls Street AQMA, including the option of strategic growth at Bobbing,⁶ although equally there might be strategic growth at South East (SE) Sittingbourne, which is supported from an air quality perspective. This is because the proposed scheme would deliver a new motorway junction and relief road,

⁶ The SA Report explained the following regarding the option of strategic growth at Bobbing: *“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.”* The consultation response received from the site promoter in early 2020 did not respond proactively to air quality concerns (but did discuss air quality concerns with growth at Teynham).

reducing HGV traffic through the St. Pauls Street AQMA on route to Eurolink. The consultation response received in early 2021 sets out reasons why the effect of growth could be a 'betterment' of air quality.

- **Option 2** - there would be the potential to avoid the most problematic sites at Sittingbourne; however, higher growth at Faversham (without strategic growth to the south east) could necessitate growth in the Ospringe area.
- **Option 3** – would involve strategic growth at SE Faversham, where there is relatively good potential to deliver growth without increasing traffic through an AQMA, given proximity of two motorway junctions, and also recognising the potential to support a degree of trip internalisation and modal shift away from the private car (also potentially EV charging infrastructure, and other measures in support of future mobility). However, it is recognised that there are uncertainties ahead of transport modelling and further work on infrastructure delivery.
- **Option 4** – could lead to pressure for growth at Ospringe, over-and-above Option 3.

However, conversely, there could potentially be reduced pressure for growth at Teynham, which another air pollution hotspot. Teynham is distant from a motorway junction and, in turn, there is 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.

Equally, there could be reduced pressure for growth at Newington, where air quality is also an issue.

- **Option 5** – it is difficult to draw strong conclusions, particularly without knowing whether growth at Sittingbourne would be directed to Bobbing (which gives rise to an air quality concern) or SE Sittingbourne (which potentially represents an opportunity to deliver new road infrastructure to alleviate existing air quality issues).

In **conclusion**, it is not possible to differentiate between the broad development options with any certainty, which is a departure from the equivalent appraisal conclusion presented within the SA Report. There are a range of uncertainties, including in respect of the achievability/deliverability and timing of road infrastructure upgrades.

With regards to significant effects, it is appropriate to flag a notable degree of risk under all growth scenarios (as per the SA Report). 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 St Paul's Street AQMA amended to include PM10 after the monitoring stations registered an increase in pollution.⁷

Biodiversity

Option 1	Option 2	Option 3	Option 4	Option 5
=	=	=	=	=

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. 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.

Beginning with Sittingbourne (high growth under **Option 1**), there is 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.⁸ It is also noted that the promoters of Land at North East

⁷ See <https://swale.gov.uk/news-and-your-council/news-and-campaigns/latest-news/keycol-hill-aqma-approved>

⁸ 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.

Sittingbourne, which is an allocation within the adopted Local Plan (Policy MU2), are now proposing a revised scheme involving additional homes and reduced greenspace, which is concerning as the SPA is within 400m.

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. Under Option 1 there could well be pressure for growth in this area; however, it is difficult to suggest that this would necessarily give rise to a significant concern. The largest site being promoted is SLA18/017 Land at Ufton Court, which directly adjoins the south west edge of Sittingbourne, and is currently under cultivation for fruit growing (this is not thought to suggest biodiversity sensitivity). A detailed consultation response received from the site promoters in early 2021, including with explanation that: *“A preliminary biodiversity offsetting exercise has been completed using the DEFRA Metric 2.0 calculation tool (beta test). At this initial stage of the application process, the calculations have only included the creation of new baseline habitats; and have excluded any enhancement measures on existing habitats and also specific planting/habitats within the broader habitat types. The score is currently positive for habitats and hedgerows.”* From this statement it is unclear whether there is a need to offset biodiversity loss onsite through offsite measures, and whether the outcome would be biodiversity net gain (as measured using the Metric).

A final consideration, in respect of Option 1 (also Option 2), is the potential for 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; Rushenden South) is flagged by the Biodiversity Baseline Study (2020) as notably constrained. Biodiversity issues associated with growth here were explored in detail in the SA Report published alongside the Local Plan in early 2021, as well as through a Habitats Regulations Assessment (HRA) Report, and the site promoters responded very proactively through the consultation, presenting detailed evidence in respect of the potential to avoid and mitigate adverse effects and realise opportunities. However, at the current time, and ahead of further detailed work to explore site options, it remains appropriate to conclude that the overriding consideration is that this is a constrained location from a biodiversity perspective, in an absolute sense and relative to other potential growth locations in the Borough. Natural England’s comments on the proposed spatial strategy in early 2021 were mostly limited to the proposed Rushenden South allocation, with the following clear statement made: *“Natural England is very concerned about this allocation”*. It is recognised that further work has been ongoing since the time of the consultation, which will be taken onboard in due course.

Option 1 (also Option 2) could also see a degree of higher growth at Eastchurch and/or Leysdown, with both settlements thought to be relatively unconstrained. The Sheppey Cliffs and Foreshore SSSI is nearby, but is assumed to have limited sensitivity to modest housing growth.

At Faversham, under **Options 2 and 4** 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. There would be a need for detailed work to understand the issues.⁹

As for strategic growth at SE Faversham (**Options 3 and 4**), 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, there could well also be strategic growth to the east of Faversham (north of the A2), and if this 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 SPA would be c.2.25km by public footpath; and there would also be a convenient driving route to the SPA, via Goodnestone.

Under Options 3 and 4 there could also be reduced pressure for strategic growth at 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 potentially support a strategic approach to achieving biodiversity net gain at an appropriate landscape scale, whilst key sites previously examined have been found to be relatively unconstrained in biodiversity terms (on an assumption that current use for intensive fruit growing is not a significant biodiversity consideration).

⁹ It is noted that a planning application has been submitted for a 180 home scheme at one of the site options in question, to the north of Faversham (Abbey Fields, [20/500015/OUT](#)), with the submitted HRA Report concluding: *“Taking into account the avoidance and mitigation measures... it is considered that the development proposals will avoid any potential significant adverse effects when the project is considered alone or in combination. At worst, the plan / project would give rise to effects which would be classed as de minimis.”*

A further consideration, under Options 3 and 4, is the likelihood of strategic growth east and/or southeast of Faversham 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 **Option 5**, there is a need for caution as one of the four sites in contention - SE 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 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.

The final key strategic site option for consideration here is Bobbing, which is also associated with biodiversity constraint. This is for two reasons. Firstly, the site is slightly closer to the SPA than is the case for SE Sittingbourne, 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 North West 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. There is a need to consider functional connectivity between Rook Wood and Hawes Wood to the west.

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 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**, it is not possible to differentiate between the broad development options with any certainty, which is a departure from the equivalent appraisal conclusion presented within the SA Report. With regards to Option 5, whilst strategic growth locations can give rise to particular opportunities in respect of securing biodiversity net gain, there is little confidence that this applies in the case of the sites in question, and one of the sites (SE Sittingbourne) gives rise to notable concerns. With regards to the other options, it is no longer judged appropriate to conclude that higher growth at Sittingbourne is preferable to higher growth at Faversham, from a biodiversity perspective. Furthermore, there is a need to factor-in concerns regarding growth at Rushenden South (in particular) and Teynham (which is strongly associated with a concentration of traditional orchards).

With regards to significant effects, it is appropriate to flag a notable degree of risk under all growth scenarios. On one hand, limited concerns were raised through the consultation in early 2021, either in respect of biodiversity impacts or a risk of opportunities missed.¹⁰ However, on the other hand, on the basis of an initial review of consultation responses reviewed from site promoters, there is a noticeable lack of proactive proposals in respect of responding to biodiversity issues and opportunities, and the number of site promoters arguing against the proposed requirement for 20% biodiversity net gain is noted.

¹⁰ Natural England was the only organisation with a strategic biodiversity focus to respond, but their comments on spatial strategy were mostly limited to Rushenden South, as discussed above. Comments received from KCC were focused on a small number of site specific and DM policy matters, and did not consider links between spatial strategy and landscape-scale / long term biodiversity objectives, for example relating to the established network of Biodiversity Opportunity Areas. A note on "planning for inter-relating issues and impacts at landscape scales" was presented within [Appendix III](#) of the SA Report.

Climate change mitigation

Option 1	Option 2	Option 3	Option 4	Option 5
3	3	1	3	2

Discussion

Section 9.4 of the SA Report began with a one page discussion of key decarbonisation issues and opportunities for the LPR, and this is considered an important point of reference (although understanding moves on quickly, for example in light of the evolving national context, e.g. the recently published Transport Decarbonisation Plan).

An initial point to note is the need to consider greenhouse emissions from both transport and the built environment (also, in respect of transport, it is important to note inevitable cross-over with discussion under other 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 or otherwise ambitious levels of regulated (operational) emissions;¹¹
- 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. Higher density development at Sittingbourne town centre could feasibly facilitate a heat network; 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 is a feasibly opportunity to explore).

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 Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and the recent Hydrogen Strategy (2021) proposes a new ‘hydrogen town’ by the end of the decade (also, a consultation is due on the case for enabling, or requiring, new natural gas boilers to be easily convertible to use hydrogen (‘hydrogen-ready’) by 2026).

Finally, it is appropriate to briefly review the latest site-specific proposals at the key strategic site options that submitted a consultation response in early 2021:

- Bobbing – the representation does not discuss any site-specific opportunities, or scheme proposals, in respect of built environment decarbonisation. Neither is this a focus of the scheme [website](#).
- SE Sittingbourne – the representation does not discuss any site-specific opportunities, or scheme proposals, in respect of built environment decarbonisation. The scheme website includes a [section](#) on opportunities, setting out that: “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.” However, there is a need to recognise that the scheme comprises a series of linked smaller settlements, as opposed to a single nucleated scheme, which could affect opportunities.
- SE Faversham – the representation does not discuss any site-specific opportunities, in respect of built environment decarbonisation, but does include a section commenting on proposed decarbonisation focused borough-wide development management policies. The comments are reasonable, and serve to highlight the importance of clarity on proposals to go beyond the requirements of Building Regulations, and also clarity on approaches to the electrification of heating, including definition of ‘heat networks’. The scheme website includes a helpful [section](#) on opportunities; however, some of the statements require clarification, for example:
 - “100% powered by renewable energy” – this requires clarification. The scheme will presumably not be connected to the gas grid, but will it be connected to the national grid? The possibility of connecting to the proposed Cleve Hill Solar might be explored.

¹¹ 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 invariably necessitates offsetting).

- “... a level of energy performance in-use in line with national climate change targets” – how could performance against national climate change targets be measured? Also, there is a clear need to recognise the Borough Council’s committed decarbonisation trajectory, which goes well beyond national commitments. The focus, in respect of regulated operational emissions should be on achieving a percentage improvement on the requirements of Building Regulations, and a focus on unregulated operational emissions (e.g. plug in electrical appliances) is also encouraged. The focus on the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide is supported, but there is a need to recognise the conceptual framework that is at the heart of the LETI guide, and there might also helpfully be a focus on an ‘energy hierarchy’ approach, as set out within the recently adopted London Plan, and its supporting guidance.
- “Follow best practice targets for embodied carbon by responsible sourcing of materials with the ability to be disassembled at end of life” – best practice, in respect of non-operational emissions, goes beyond these two specific matters, e.g. key opportunities are around ‘modern methods of construction’. Good practice is set out within recent Mayor of London guidance on whole-lifecycle emissions and a circular economy.
- Individual household heat pumps versus heat pumps linked as heat networks – there is a need to explore site specific opportunities (and opportunities that reflect scheme masterplanning and design principles) to support a rapid and effective transition to the use of electricity for heating. There is a need to elaborate on the proposal for “systems in each building to connected to shared ground loop array”. It will be important to take account of the context provided by the forthcoming national Heat and Buildings Strategy.
- Key principles – it is noted that none of the key principles to emerge from the Enquiry by Design process are decarbonisation related. There is a need to ensure a scheme that is driven by ‘top down’ strategic priorities as well as, and potentially to the same extent as, ‘bottom up’ community aspirations. The following concern raised within the SA Report potentially still holds true: “[T]here 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... There is a degree of uncertainty regarding the extent to which the masterplanning and design ethos of the scheme is supportive of minimising emissions...”
- Rushenden South – is a smaller strategic site option, but warrants consideration here, on the basis that the scheme promoters submitted a detailed representation in early 2021. The detailed submission is supported in a number of respects; however, there is a lack of focus on built environment decarbonisation, with only a very brief discussion of high-level principles, and a questionable (or, at least, unclear) commitment to “16 – 18% improvement over building regulations for energy efficiency”. Viability is a challenge on the Isle of Sheppey, which is inevitably a barrier to ambitious low carbon interventions. The representation received from the site promoter states: “It is requested that... policy wording is amended to allow for flexibility in meeting the energy and emissions requirements, by allowing a review of site specific circumstances to establish whether there are constraints that might affect the nature and deliverability of low carbon energy technology on a specific site.”
- East of Faversham – whilst the aspiration is for a comprehensive approach to growth to the east and southeast of Faversham, with a view to realising wide ranging growth-related opportunities, including in respect of decarbonisation, it is apparent from consultation responses received in early 2021 that fragmented land ownership is a barrier to a comprehensive scheme. SE Faversham has been discussed above; with regards to land east of Faversham, representations were received from several different land-owners, with the representations discussing little or nothing in the way of built environment decarbonisation opportunities.

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.

Strategic growth to the east and/or south east is tentatively supported, given the inherent opportunities associated with strategic growth locations, and because land here 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, e.g. recognising that 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). Also, as discussed, there is uncertainty regarding potential to deliver growth to the south of the A2 in combination with growth to north, as a combined strategic scheme that leads to additional economies of scale and potential to deliver ‘sustainable transport’ in-line with the Swale Transport Strategy.

- Sheppey – which would likely see highest growth under Options 1 / 2, is less well connected, and so more likely to be associated with entrenched car dependency; however, Queenborough/Rushenden (one of the locations under consideration for growth) benefits from a rail station, and there is also a good cycle route to Sittingbourne (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. Minster is a tier 3 settlement (as per Queenborough/Rushenden), and the Thistle Hill development has come forward alongside community infrastructure; however, likely growth options are not very well connected to Minster or other higher order settlements, including noting that there is no footpath or cycle lane along either Scocles Road or Lower Road (which suffers from problematic traffic, likely to discourage cycling). Finally, Eastchurch and Leysdown are associated with low potential to access a higher order centre by bus or cycling.
- Other strategic site options (Option 5) are all less well related to a higher order centre than is the case for land to the east and south east of Faversham. SE Sittingbourne potentially performs relatively 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 2.5km distant, via the problematic B2006), and whilst the Stantec work in 2019 reported a focus “on Newington Station with routes through the site to it and car parking to be provided and a shuttle bus” the proposed scheme is now understood to be focused on connectivity to Sittingbourne. 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.

In **conclusion**, it is inherently challenging to differentiate the broad development 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, and *as per* the conclusion of the equivalent appraisal within the SA Report, it is considered appropriate to highlight:

- **Option 3** 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 around both transport and built environment decarbonisation; and
- **Option 5** as second best performing, given the inherent opportunities associated with strategic growth; however, there is a very high degree of uncertainty, including on the basis that the locations in question are not ideal from a transport connectivity perspective, and recognising that scheme promoters have provided limited information to generate confidence that decarbonisation opportunities exist and will be realised in practice.

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 requirements/proposals.

Communities

Option 1	Option 2	Option 3	Option 4	Option 5
3	3	2	2	1

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.¹² In light of the consultation response received from Kent County Council (KCC) in early 2021, it is

¹² 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.

considered appropriate to particularly focus on the matter of **secondary school provision**. KCC explain that secondary school provision “is a serious concern”, before going on to discuss issues for:

- **Faversham** – “... the planned expansion of Abbey School and potential expansion of Queen Elizabeth’s Grammar School... is to meet the demands arising from current Local Plan developments. A site for a new secondary school to serve Faversham is required, alongside contributions towards site and build costs. Without [this] all proposed developments for Faversham would be considered unsustainable...”
- **Sittingbourne** – “the position... is a serious one. The site for the all-through school to the north of the A249 is still not due to transfer until 2023. Original plans to meet current demand were through the transfer of this site by 2019 allowing the opening of a new school for 2021 or 2022. It is likely that 2025 will be the earliest that this new school will be able to open. By 2023 there will be more students requiring secondary school places than places available in Sittingbourne and Sheppey schools. Temporary measures will have to be put into place until the new school can be brought forward but these put additional pressure on the schools and on the road network around the schools. Current proposals do not enable a re-balance between secondary education provision in Sittingbourne and on the Isle of Sheppey.”
- **Isle of Sheppey** – “there are more secondary age pupils on the Isle than there are... school places, and KCC has more secondary school places in Sittingbourne than resident children. The result of this is that children travel off the Isle and into Sittingbourne in large numbers. A site for a secondary school... would provide the opportunity to re-balance the school travel flows and provide more sustainable... secondary provision.”

In light of these comments, it is difficult to differentiate between the broad development options with any certainty, in respect of realising opportunities to deliver new secondary school capacity to meet existing need. At the time of the Local Plan / SA Report consultation in early 2021 there was understood to be a particular need and growth-related opportunity at Faversham, but it is now less clear that this is the case. Also, through the consultation responses received from the promoters of land to the east and south east of Faversham it is clear that fragmented land ownership is a barrier to securing land for a new secondary school (let alone a contribution to build costs), for example, one site promoter explains: “The Council have encouraged the five primary landowners to meet and agree the principles for the masterplan. To date, three meetings between the parties have taken place and an agreement cannot be reached between the parties. The key matter for agreement is the principle of each landowner agreeing to the principle of contributing towards allocation wide education infrastructure, this includes a contribution to the land acquisition costs by Kent County Council (KCC) for all new education provisions.” It is recognised that the situation may have improved since the time of the consultation, but this is uncertain.

Another important consideration, aside from secondary school provision, is supporting wider regeneration objectives for the Thames Gateway part of the Borough, with particular issues and opportunities at **Queenborough and Rushenden**. In this respect, it is important to note that under Options 1 / 2 there could be an increased likelihood of a strategic scheme at Rushenden South; however, there is a need for more work to confirm the potential regeneration benefits of growth here. The Design Framework submitted by the site promoter in early 2021 begins with a helpful discussion of the “long term vision” for regeneration of Rushenden, and the term ‘regeneration’ appears throughout the document, but there is limited detail in respect of specific opportunities and proposals (other than in respect of green/blue infrastructure, for which proposals are strong), and whilst ‘social value’ is listed as a key principle within the Introduction section, there is no further discussion. However, it is recognised that the associated consultation response explains that a Supplementary Planning Document (SPD) would “seek to maintain existing employment activity and contribute towards improved community infrastructure and facilities.” The consultation response also notably explains: “The relocation/consolidation of port related car storage will release existing brownfield for residential use... This mixed use development will... improve linkages between the Port and Sheerness whilst providing for new facilities for the local area.”

There are also other regeneration priority areas within the Thames Gateway part of the Borough (higher growth under Options 1 and 2). For example, at 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.”

Finally, as for **Option 5**, as an initial point, it is important to consider the matter of land value capture, which is discussed within the current Issues and Preferred Options consultation document as a potential benefit of Option 5. This could be the case if there is a degree of healthy competition between the three competing strategic site promoters, and given an assumption that there is a likely need to allocate only one of these three sites (and given an assumption that planning permission is unlikely in the absence of a Local Plan allocation). Good progress on comparing and contrasting the ‘offer’ from the competing sites was made in 2019 through the Stantec-led workstreams; however, at the current time there is limited clarity. Having made these initial points, the following bullet points consider the three key strategic site options:

- **Bobbing** – the consultation response refers to ‘school provision’, with the scheme website clarifying that the proposal is to deliver a three-form-entry primary school (as well as certain other community infrastructure, notably a health centre, village hall and cricket pitch). The consultation response criticises the analysis presented in the SA Report on the basis that *“little/no weight has been afforded to the new secondary provision to be made at Quinton which is a short distance from the site at Bobbing. The fact that new secondary provision on site is not required, as an existing new provision is to come forward, should not result in our score being reduced.”* However, we maintain that there is a need to direct growth to locations where the effect will be to support new or upgraded community infrastructure that serves to address an existing issue / benefit the existing community, as far as possible, and where such issues exist. It appears to be the case that such issues do exist in the Swale context, on the basis of the KCC consultation response, discussed above.
- **SE Sittingbourne** – conclusions are broadly as per those set out in the SA Report, which recognised the potential for strategic growth here to perform well from a community infrastructure perspective, despite clear competing costs, most notably in respect of transport infrastructure upgrades. The consultation response received in early 2021 committed to: *“high-quality primary, secondary and further education facilities to the benefit of everyone in Swale [and] a sports hub to encourage the health and wellbeing of current and future residents alike, anchored by a new facility for Sittingbourne Football Club.”* However, there is a need to be mindful of the equivalent statement on the scheme website, which could be more up-to-date: *“... we are currently anticipating: Four new primary schools [and a] six form entry secondary school plus sixth form... The proposal also represents a unique opportunity to potentially deliver a Further Education facility, with Sittingbourne currently not benefiting from such a provision. As a whole, this education infrastructure has the ability to transform the opportunities for young people in the Borough. This will in turn further support the employment market in the Borough and ensure resilience... in the long term, making the area more attractive to employers.”*
- **East and south east of Faversham** – has already been discussed above. Also of note is the representation received from the Faversham Society in early 2021, which included a focus on strategic community infrastructure upgrades that should or could be delivered alongside growth. The response presents a particularly helpful discussion of strategic green infrastructure investment opportunities, including in respect of overcoming the barrier presented by the A299/Thanet Way. Options should be explored further.

Further matters discussed within the SA Report, in respect of the competing strategic site options, related to “impacts to existing communities” (particular concerns relate to Bobbing) and “engagement, joint working and stewardship” – see discussion within [Section 3](#) of the SA Report Technical Appendix.

In **conclusion**, it is fair to conclude that Option 5 is preferred on the basis of the potential to deliver new secondary school capacity at both Sittingbourne and Faversham, although there is uncertainty at the current time, particularly in respect of the potential to deliver a new secondary school at Faversham. This is a departure from the conclusion of the equivalent appraisal presented within the SA Report, which was undertaken on the basis of an assumption that a key issue for the Local Plan is to address existing secondary school capacity issues at Faversham.

With regards to significant effects, on the basis of the consultation response received from KCC it is certainly appropriate to predict significant negative effects under Options 1 and 2. It is also fair to highlight uncertain positive effects under Options 5. With regards to Options 3 and 4, it is difficult to reach a conclusion.

Economy and employment

Option 1	Option 2	Option 3	Option 4	Option 5
2	2	2	2	★1

Discussion

The Employment Land Review (ELR, 2018) 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 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.

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

- **Option 1** - it is difficult to envisage any of the available non-strategic sites at Sittingbourne delivering significant new employment land; however, there could also be modestly increased growth on Sheppey under this option (also Option 2), 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 new strategic employment land at a location fairly well linked to the A249. A detailed consultation response was received from the site promoter in early 2021, setting out the potential to consolidate the employment land offer at the western extent of the Island, and support operations of the Port of Sheerness; however, further detail on the opportunity would be welcomed.

At Faversham there would be low growth under this scenario; however, one or more of the non-strategic allocations could potentially come forward as a mixed use scheme, delivering offices and/or light industrial uses.

- **Option 2** – broadly as per Option 1, although there could be greater potential to bring forward employment land at Faversham at mixed-use sites. It is fair to assume that the Local Plan would be able to provide for new offices and light industrial land in accordance with recommendation (B) of the ELR.
- **Option 3** – there is good potential to bring forward new employment land as part of strategic growth at Faversham. On this basis, ELR recommendations in respect of locally arising demand for offices, light industrial and industrial land could potentially be met, to some extent; 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 South East, could be missed. New industrial land at Faversham (particularly in proximity 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 junction) 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).”

However, there is a need to be mindful of consultation responses received from key site promoters at Faversham through the consultation in early 2021, notably:

- SE Faversham – the site promoters raised a concern regarding the proposed Local Plan requirement to provide at least 20 hectares of land for “economic land uses”, stating: *“We are concerned that this appears to reflect an outdated view of land use planning, where, in particular, “housing estates” and “industrial estates” were strictly separated. Modern good town planning practice, as well the needs of the modern economy, both point towards there being a much more sophisticated approach, with emphasis on homeworking, and small/medium sized worker and office spaces integrated with housing areas and local centres.”* The response also went on to request *“insertion of the word “potentially” before “warehouse and distribution uses” in Policy MU1c/2, to reflect the fact that much work has yet to be done to establish what mix of uses is desirable and/or feasible between Brenley Corner and the railway line.”*
- East of Faversham - the promoters of the land directly to the north of the railway line and directly to the east of the existing urban edge, which is allocated primarily for employment land in the adopted Local Plan and earmarked for significant employment within the concept masterplan for land east and south east of Faversham published for consultation in early 2021, are now proposing: *“a smaller area of locally focused employment land... [to] integrate within the surrounding residential and community spaces encouraging placemaking... This area would accommodate smaller forms of employment such as local retail and ‘enterprising units’ offering flexible spaces to be offered as either light industrial or office spaces.”* The representation also suggests that employment uses should be “relocated” to the SE Faversham site.
- **Option 4** – performs broadly as per Option 3, 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 development option.

- **Option 5** (Strategic sites) – the key point to note is that strategic growth at SE Sittingbourne represents a very significant opportunity, from an ‘economy and employment’ perspective, given the potential to: deliver a new motorway junction, which will improve transport connectivity to Eurolink, Kent Science Park and potentially the Port of Sheerness (from the east); support objectives for Kent Science Park (the scheme website suggests: *“With Kent Science Park at the heart of the proposals for Highsted Park – Swale can become a leader for inward investment especially targeting growth sectors”*); and potentially support new warehousing/distribution in a location well-linked to a motorway junction, thereby fully reflecting ELR recommendations, although proposals are less clear in this respect. However, there are additional considerations to factor-in, when considering the merits of strategic growth at SE 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”).

With regards to Bobbing, the SA Report explained *“the 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 representation received from the site promoter through the consultation in early 2020 provides no added detail in respect of the employment land proposal, beyond a suggestion that weight should be afforded to *“the likelihood of the employment land actually being delivered, which we considered to be significantly greater here than anywhere else in the Borough. This isn’t a simple matter that quantity trumps quality.”* The SA Report also questioned the possibility of expanding the employment land offer (see [Box 5.1](#)), and comments on this would be welcomed.

In **conclusion**, there is uncertainty with employment at the current time, recognising that the ELR was completed prior to the Covid-19 pandemic and employment strategy is in a state of flux nationally. Option 5 potentially performs relatively well (as per the conclusion of the equivalent appraisal completed in 2020), but it is not possible to differentiate further between the options (this is a departure from the previous appraisal).

It is appropriate to flag a risk of negative effects under all of the options other than Option 5. Whilst the South East Local Enterprise Partnership (SELEP) did not respond to the consultation in early 2021, it is fair to assume that providing for warehousing and distribution needs remains a key issue for the sub-region; and there are also important links to matters relating to transport infrastructure capacity, as discussed below.

Flood risk

Option 1	Option 2	Option 3	Option 4	Option 5
3	3	2	★1	★1

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 potential to select sites outside of flood risk zones under all options.

The main concern relates to the increased emphasis on the Isle of Sheppey under **Options 1 / 2**; 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 Options 1 / 2. With regards to the option of a strategic scheme at Rushenden South, flood risk associated with the site was explored in detail within the SA Report (Section 9.7), and the representation subsequently received from the site promoter explains: *“The technical appendix and associated reports... address flood risk, and conclude the site is suitable for the development proposals following the incorporation of flood residence measures including the application of minimum floor and access road levels.”* Progress has been made on resolving the issues, which are significant; however, there is a need to explore the matter further in collaboration with the Environment Agency.

A second consideration relates to the likelihood of one or two small urban extensions to the north of Faversham under **Options 2 and 4**. 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, there is likely to be the potential for further modest expansion without giving rise to undue flood risk concerns.¹³

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**, as per the conclusion of the equivalent appraisal within the SA Report, it is appropriate to highlight those broad development options 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 Options 1 / 2.

Heritage

Option 1	Option 2	Option 3	Option 4	Option 5
2	3	1	3	1

Discussion

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.

Other important designated assets 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.

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

- **Option 1** – 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), with the Kent Historic Environment shows numerous areas with a ‘horticulture’ historic character, and 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 largest site being promoted is SLA18/017 Land at Ufton Court, which directly adjoins the south west edge of Sittingbourne, and is currently under cultivation for fruit growing. The site is in close proximity to the series of conservation areas associated with the parishes of Borden and Tunstall. Also, footpaths surround the site, and the existing urban edge appears suitably ‘soft’, in that it mostly comprises mature back gardens. However,

¹³ It is noted that a planning application has been submitted for a 180 home scheme at one of the site options in question, to the north of Faversham (Abbey Fields, [20/500015/OUT](#)), with the submitted Flood Risk Assessment concluding: “*The Flood Risk Assessment confirms that the development is located in Flood Zone 1 which is defined as having a low risk of flooding from rivers and sea. The Flood Risk Assessment also demonstrates that there is a low risk of flooding due to other sources.*”

it could be suggested that the site relates quite well to the existing urban edge in built form terms, and the consultation response received from the site promoter in early 2021 explores heritage issues/impacts. Whilst the SA Report highlighted a particular concern regarding potential site access adjacent to the Tunstall Conservation Area, the current proposal involves access from elsewhere, and the site promoters conclude no concerns regarding the Tunstall Conservation Area “*due to vegetative buffering and long gardens*”.

Another possibility, under Option 1, 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 with a designated conservation area. It is also noted that the promoters of Land at North East Sittingbourne, which is an allocation within the adopted Local Plan (Policy MU2), are now proposing a revised scheme involving additional homes and reduced greenspace, which is concerning given the adjacent grade 1 listed parish church.

Finally, there is a need to consider the implications of modestly increased growth on the Isle of Sheppey under Options 1 / 2. Sheppey is associated with wide ranging heritage constraints and opportunities, as explored in detail within the Swale Heritage Strategy (2020). Most of the 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 and distant views to Minster Abbey on raised land. One of the larger site options in contention for allocation is SLA18/038, which likely contributes to the setting of grade II listed Scoccles Court, which was associated with an extensive rural setting prior to the 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.

With regards to Rushenden South, the site 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*”.

- **Option 2** – under this broad growth scenario there would be decreased pressure to allocate problematic sites at Sittingbourne, 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. 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 Assessment (2019) 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... 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 Assessment (2019) 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,¹⁴ 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.

¹⁴ 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.

- South: Faversham historically extended between the marshes and creekside industry in the north and the A2 in the south, with Ospringle 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 development option 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 Ospringle in the west and the Brogdale Road in the east. This area is clearly constrained by the Ospringle 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. However, having said this, it is recognised that the site promoters for ‘Land west of Brogdale Road’ set out a proactive response to identified issues and constraints through the consultation in early 2021 and, as part of this, are now proposing a scheme comprising reduced housing and increased greenspace.
- 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).
- **Option 3** – 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 growth 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 Ospringle Conservation Area),¹⁵ 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.¹⁴

Historic England’s response to the consultation in early 2021 included a focus on the proposal for strategic growth to the east and south east of Faversham; however, comments were mostly around policy requirements to ensure that impacts can be avoided/mitigated through the development management process. One notable comment was that: *“Ewell Farm is... one of several historic farmsteads surrounding the town of Faversham which illustrate a historic landscape character intimately connected with agriculture.”*

- **Option 4** – it is fair to conclude that this option performs worse than Option 3; however, in practice it could be possible to deliver one or two modest urban extensions with limited historic environment impact.
- **Option 5** – of the other strategic site options (in addition to SE Faversham, which is discussed above), it is SE Sittingbourne that stands-out as most constrained. Unlike the other new settlement options, there is the potential to draw upon a valley topography to frame growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and landscape containment / lower risk of ‘sprawl’); 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 (2019) 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*

¹⁵ The representation received from the Faversham Society in early 2021 suggested: *“Heritage at risk’ should include Ospringle, which is potentially to be inundated with traffic.”*

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”.

With regards to Bobbing, the site is subject to notably lower constraint. 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.

Finally, it is worth commenting on North Street, to the south of Faversham, although in practice it is not clear that the site is being actively promoted, with no consultation response having been received from the site promoter in early 2021. Growth here would likely 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 (2019) 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**, as per the conclusion of the equivalent appraisal within the SA Report, it is appropriate to highlight those options involving a focus on further piecemeal urban extensions as giving rise to a significant degree of concern, and it is appropriate to highlight Options 2 and 4 as performing worst, as Faversham is very sensitive in historic environment terms. It is suggested that negative effects would be notably less significant under Option 3 and Option 5; however, this conclusion is subject to the views of Historic England. The consultation response received from Historic England in early 2021 focused only on the preferred sites, and focused on policy wording more so than site suitability, but this current consultation provides an opportunity for a more strategic discussion.

It is also important to highlight uncertainty regarding the implications of the broad development options for growth at Teynham and Newington, both of which have historic cores, a network of surrounding historic farmsteads (towards which development has encroached over recent decades) and a surrounding landscape with a sense of time-depth strongly associated with the area’s fruit growing heritage (see [aerial imagery](#) from WWII). There is also a need to carefully consider historic environment / heritage issues associated with options for a new road link to the south of Teynham, particularly mindful of the designated conservation area, which is strongly associated with a north-south dry valley.

Housing

Option 1	Option 2	Option 3	Option 4	Option 5
4	3	2	1	5

Discussion

It is assumed that all of the broad development options 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). Option 5 could well involve allocating one or more sites that continue to deliver homes beyond the plan period; 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 tenures**. There are inherent uncertainties, and in many ways this is a detailed consideration for the planning application stage; however, it is a strategic consideration for Swale 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 than at Faversham. There are also concerns about market saturation affecting viability (and/or deliverability) in the Sittingbourne area, given that several strategic sites are due to start building out now that the M2 J5 improvements have been secured. There is also some finer-grained variation of note (as understood from the house prices 'heat map' presented in Appendix II of the SA Report). 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 Local Plan Review will adjust the affordable housing policy; however, there will still be a need to account for variations in viability, when determining spatial strategy and allocating sites.

As for the three competing strategic site options, two are currently proposing to deliver 40% affordable housing, whilst one – SE Sittingbourne – is proposing to deliver 20% (having previously proposed 10-20%). The proposed approach at SE Sittingbourne reflects an understanding that there will be other funding priorities, in particular major transport upgrades. It is also noted that SE 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 and, 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 a 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 Faversham and Bobbing there is uncertainty regarding the extent of transport infrastructure upgrades required to support the scheme.

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, delivery risk is considered to be an important issue in the Swale context. 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 was a focus of the Stantec work completed in 2019:

- 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..."*

N.B. uncertainty about Junction 7 remains, and has potentially increased since the time of the Stantec work.

- 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 reiterate, it is not clear that this scheme is still being actively promoted) – *"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."*
- SE 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 delivery 20% affordable housing."*

N.B. further detailed work has been ongoing since the time of the Stantec work, to the point where a planning application has now been submitted (for a particular scheme, which should not necessarily be assumed to be the scheme that would be supported through the Local Plan, were any scheme to be supported), hence it is fair to assume that delivery risks and uncertainties are lower now, in comparison to the time of the Stantec work.

In **conclusion**, as per the conclusion of the equivalent appraisal within the SA Report:

- Option 5 performs poorly, given delivery risks associated with a strategy that relies on two strategic sites. There would still be a large supply of homes from sites that are already committed (the Borough is in a strong position, with a large number of commitments set to deliver homes in the early part of the LPR plan period) and from windfall sites; however, there would be a delivery risk over the plan period as a whole. In practice there would be good potential to manage this risk by additionally allocating a package of low risk settlement extensions; however the effect would be ‘over-allocation’ against established housing needs, leading to tensions with other sustainability objectives.
- Option 1 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 in respect of decarbonisation.
- Option 4 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 associated economy of scale benefits and inherently good potential to deliver a good housing mix) and additional smaller urban extensions likely associated with low delivery risk and able to deliver early in the plan period, thereby alleviating concerns around delay to delivering the strategic site leading to a shortfall in housing supply early in the plan period (albeit, as discussed, the NPPF puts in place mechanisms to redress shortfalls against required trajectory); and
 - support for a strategic site (SE Faversham) where the current proposal is to prioritise affordable housing (40% has been suggested; however, this is unconfirmed and 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.

In respect of significant effects, the key point to note is that there is confidence in the ability to provide for LHN – which is likely to be set as the housing requirement – at a steady (or otherwise appropriate) rate across the plan period under all of the options bar Option 5. Having said this, there is a need to temper conclusions on significant positive effects ahead of further detailed work to explore site and strategy options, taking particular account of the costs and timing of strategic infrastructure upgrades, particularly transport infrastructure.

Land

Option 1	Option 2	Option 3	Option 4	Option 5
★ 1	★ 1	2	2	★ 1

Discussion

A primary consideration is the need to avoid the loss of best and most versatile (BMV) **agricultural land**, particularly grade 1 land that is of the highest quality nationally. Swale has a very extensive resource of such 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 the option of growth to the east and south east of 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. The ‘Environment’ page of the scheme website for SE Faversham suggests that “a strategy based on healthy soils” is a key principle underpinning the scheme, but it is not clear how this is reflected in the scheme.

SE 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 some of the land has been surveyed in detail and found to comprise a mix of grade 1, 2, 3a and 3b quality land, somewhat contrary to the low resolution national dataset, which suggests grades 1 and 2).

In **conclusion**, it is likely that any reasonable broad development option, in the Swale context, 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. As per the conclusion of the equivalent appraisal within the SA Report, it is appropriate to highlight Option 1, 2 and 5 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 (SE Sittingbourne potentially stands-out as being subject to relatively low constraint). As such, it is not considered appropriate to differentiate the option 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.¹⁶

The consultation response received from the SE Sittingbourne site promoters in early 2021 sought to draw attention to the fact that they have undertaken a Minerals Assessment (MA), which highlights an area of “good potential for brick earth of economic value” within the site. The consultation response goes on to explain why there is no potential to extract the brickearth in practice, and suggests that an MA should be undertaken for other proposed allocations. This aligns with statements made within the KCC consultation response. However, it is unclear when, in the site selection process, an MA should be undertaken. For example, should it be undertaken for a shortlist of site options, ahead of proposed allocations being selected; or should an MA be undertaken for the final list of proposed allocations, with the list subsequently adjusted in response to the MA? Clarity is sought on this matter.

Landscape

Option 1	Option 2	Option 3	Option 4	Option 5
4	4	2	3	1 

Discussion

There is a wide range of evidence to take into account, when considering the landscape merits of the broad development options. 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 III](#) of the SA Report).

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

- **Option 1**– 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. Specific options were explored in the SA Report.

Another possibility, under this option, 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 open space and landscaping set out in the conceptual masterplans for the NE Sittingbourne allocation within the adopted Local Plan (the site promoters proposed increased homes / reduced greenspace through the consultation in early 2021), 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,

¹⁶ See further discussion at: mineralproducts.org/19-release20.htm

from a pure 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 Landscape Sensitivity Assessment (2019) 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.”* See further discussion above, under Biodiversity and Heritage.

Also, under this option (also Option 2), 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. Issues were explored in detail in the SA Report, subsequent to which the site promoters submitted a detailed consultation response setting out proactive measures in response to the issues raised. There would clearly be a need to explore matters further ahead of any decision on allocation.

- **Option 2** – there would be decreased pressure to allocate problematic sites at Sittingbourne, 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’.
- **Option 3** – there would be strategic growth to the east of the town, a strategy that is tentatively 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, in the context of 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. 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).

It is noted that the SE Faversham site promoters suggest the potential for a landscape betterment, including because of the potential for landscaping measures to screen the motorway.

- **Option 4** – this option performs worse than Option 3, due to the need for one or more non-strategic urban extensions in addition to the strategic urban extension assumed under Option 3; however, there could be the potential for one or more modest urban extensions to Faversham that give rise to limited concerns.

Another notable consideration is the potential for lower growth at Teynham under this broad development option. 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, hence the assumption has been that any further expansion would not break the prominent north/south ridgeline (associated with public footpaths). However, the consultation response received from the main site promoter in early 2021 calls into question this assumption, proposing a scheme that would extend across the valley, as far as White Leaf Bungalow. The associated Landscape Appraisal supports this approach on the basis that it would “prevent any potential landscape impacts on the

valley further east”, and elsewhere describes the Lyn Valley as “further east”, which requires clarification. It is important to carefully consider any expansion in light of topography and landscape character.

- West - there is a need to maintain a settlement gap to Bapchild (this is explored within the Local Countryside Gap 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. It is noted that the consultation response received from one of the key site promoters (Land at Claxfield Farm) proposes a large scheme that would extend to the south, beyond the suggested extent of the Teynham Opportunity Area shown in the Pre-submission Plan (2021), and which itself might deliver up to 978 homes. The site promoters suggest that this development extent is logical from a landscape perspective given existing field boundaries and the existing built form at Batteries Close.
- **Option 5** – matters are discussed in detail in the SA Report, but key considerations are:

- Bobbing stands-out as least constrained. 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.
- SE Sittingbourne was explored in detail in the SA Report Technical Appendix, with issues as follows:

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 AONB Unit subsequently 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.”*¹⁷ No further comments were received through representations in early 2021.

Secondly, there is a need to consider Important Local Countryside Gaps (ILCGs; see the Swale Important Local Countryside Gaps report, 2020), the purpose of which is *“to retain the individual character and setting of settlements”*. In addition to the existing designated gap between Sittingbourne and Bapchild, 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 site promoter has proposed significant landscape buffering between the areas of new development and the existing settlements to help preserve their identity; however, it is likely that urbanisation of the area would erode the perceived and actual gap between settlements.

Thirdly, the Rodmersham, Milstead and Highstead Dry Valley locally designated landscape constrains the southern half of the site. The Statement of Significance (2019) 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; however, the net effect of strategic growth would likely be a significant erosion of valued landscape character.

Fourthly, the Swale Landscape Sensitivity Assessment (2019) finds that the landscape parcels in question have **moderate-high** and **high** sensitivity, including as much of the landscape has *“a high degree of visual prominence, and provides a rural landscape providing separation between Sittingbourne and Bapchild”*.

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] away 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 Cromer’s wood, Rodmersham

¹⁷ See swale.gov.uk/planning-and-regeneration/local-plans/sd-options

Green, Rodmersham, Bapchild and Tonge Conservation Area / Church, thereby achieving a scheme that is more contained in landscape terms, in that it remains ‘facing’ Sittingbourne. 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 ‘infilling’ or ‘rounding off’.

N.B. it has not been possible to review materials submitted as part of the current planning application)

- North Street also warrants brief discussion, despite an assumption that the site is no longer in realistic contention for allocation (as discussed), due to its significant sensitivity within the landscape, with the site occupying a ‘notch’ into the Kent Downs 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 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.

In **conclusion**, as per the conclusion of the equivalent appraisal in 2020, it is appropriate to highlight Option 5 as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and to the east / south east 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 for the other broad development options, Option 3 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. It is not possible to confidently suggest any risk of significant negative effects to the setting of the AONB, in light of the comments received from the AONB Unit through the consultation in early 2021.

Transport

Option 1	Option 2	Option 3	Option 4	Option 5
?	?	?	?	?

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 serve the Borough, which contrasts to four serving Medway BC.

Further context, which serves to indicate a significant transport challenge, is set out at paragraph 11.1.4 of the Infrastructure Delivery Plan (IDP, 2021): *“The Inspector who examined the Bearing Fruits Local Plan was satisfied that the level of growth in the first part of the plan period could be accommodated on the local road network. Beyond this there were implications in delivering the full housing need figure for both the strategic and local road network that would require the implementation of improvement works. At the time of the examination, the nature of improvement works had not been determined, but the Inspector did not consider this to be a showstopper to the Local Plan being adopted. The Inspector, therefore, found the Local Plan sound subject to a commitment to undertake an early review of the Local Plan to address the highway capacity issues.”*

The IDP goes on to explain that initial transport modelling has been completed, but that a final model run needs to be undertaken. The IDP explains (paras 11.1.1.3 / 4) that the further model run will *“identify additional, if any, transport mitigation measures that may be required... A key infrastructure requirement, therefore, will be the junction and corridor improvements identified below and in the Infrastructure Delivery Schedule. It is expected that developer contributions will be needed to contribute towards the funding of the majority of these improvements.”*

Transport matters were explored in detail in the SA Report (2021); however, the latest situation is that significant concerns were raised through consultation responses, most notably the response provided by KCC, who stated:

“The County Council notes that whilst there are a number of welcomed positive policy inclusions with regards to reducing congestion, safety incidents, air quality and promoting sustainable access and development, KCC is concerned that the consultation is missing critical highway evidence to justify the Local Plan strategy and as a consequence the Local Plan is currently supported by an inaccurate evidence base. There are fundamental changes from the modelling used as evidence for the Local Plan and the housing proposals within this regulation 19 consultation. Specifically, the housing numbers are higher in the Teynham area, greater levels of employment land and a reliance on a design solution for Brenley Corner that cannot at this stage be relied upon. The County Council, as Local Highway Authority, requires further supporting transport modelling that accurately reflects the proposed housing and employment strategy as presented before it can make a fully informed comment on the proposals. KCC is seeking to continue working with the Borough Council over the coming months on the provision of accurate modelling and commensurate and viable mitigation such that would move the proposed plan from its currently unjustifiable position.”

Further detailed work is ongoing at the current time, and so it is difficult to comment further here.

The following bullet points are largely unchanged from the equivalent appraisal undertaken in 2020, as presented in Section 2 of the SA Report Technical Appendix:

- **Option 1** – 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”*. 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.

The situation has been complex; however, at the current time the Issues and Preferred Options consultation document explains: *“The solutions to the existing infrastructure issues are now coming forward (M2 junction 5 and capacity issues on the A249) which opens Sittingbourne and the Isle of Sheppey back up for development”*.

- **Option 2** – as discussed above, under Air Quality, Option 2 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.
- **Option 3** – transport issues associated with strategic growth at SE Faversham are discussed in detail in the latest Stantec report (2019). In short, Stantec found that there is merit in the location and the proposed scheme, but there is a concern regarding capacity at M2 J7 and the potential to achieve a link to M2 J6 (through the committed Preston Fields site to the west). These uncertainties currently remain. However, there is increased clarity on the potential to support wider transport infrastructure upgrades, and support modal shift. As set out in the current Issues and Preferred Options consultation document, there is an opportunity *“to look at the role of the A2 at Faversham and divert traffic to the M2 allowing greater integration of sites south of the A2.”*
- **Option 4** – 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.
- **Option 5** – the SA Report concluded that *“there is least concern with E/SE Faversham”*; however, there is now greater uncertainty. There is a need to recognise that SE Sittingbourne could potentially deliver transformational transport benefits, and whilst there have been concerns regarding deliverability, these concerns are potentially now reduced. A planning application has been submitted for the scheme, although it has not been possible to review that information for the purposes of this appraisal. There is a need for further work.

In **conclusion**, at the current time it is not possible to differentiate between the broad development options with any certainty. This is a departure from the conclusion of the equivalent appraisal completed in 2020.

With regards to effect significance, on the basis of the representation received from KCC in early 2021, it is fair to conclude that there are significant uncertainties and concerns regarding all of the options.

Water

Option 1	Option 2	Option 3	Option 4	Option 5
?	?	?	?	?

Discussion

An important strategic consideration is waste-water treatment capacity. The latest Stantec report (2019) included a section on utilities capacity, which overall highlighted 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.¹⁸ 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.

This point is made in the knowledge that pollution of rivers from WwTWs is high on the agenda national at the current time, and recognising that Southern Water recently accepted 51 sewage pollution charges, including permit breaches at Eastchurch, Queenborough, Sittingbourne and Teynham WwTW. The charges cover historic events between 2010 and 2015.¹⁹

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].”

Also, and importantly, the representation received from the SW Faversham site promoter in 2021 suggests the potential to deliver a new WwTW, and further detail is available here: <https://sefaversham.co.uk/environment/>.

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 (although potentially with capacity issues / a need for upgrade ahead of receiving additional wastewater from nearby growth);
- 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.

In **conclusion**, as per the equivalent appraisal completed in 2020, it is considered appropriate to highlight uncertain negative effects for all scenarios, albeit it is understood that limited concerns were raised through the consultation in early 2021 (it has not been possible to review consultation responses from all relevant consultees in detail). A particular consideration is wastewater treatment capacity, and whilst the firm proposals for SE Faversham are encouraging, there is less certainty regarding capacity to support growth elsewhere.

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

¹⁸ 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.

¹⁹ See kentonline.co.uk/sheerness/news/8-000-sewage-breaches-admitted-223567/

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.

It is noted that KCC are currently undertaking a Spatial Risk Assessment (SRA), with a focus on climate change resilience, including in respect of the water environment. This study is soon to be published.

Appraisal summary

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

	Option 1	Option 2	Option 3	Option 4	Option 5
	Rank of preference and categorisation of effects				
Air quality	=	=	=	=	=
Biodiversity	=	=	=	=	=
Climate change mitigation	3	3	1★	3	2
Communities	3	3	2	2	1★
Economy and employment	2	2	2	2	1★
Flood risk	3	3	2	1★	1★
Heritage	2	3	1★	3	1★
Housing	4	3	2	1★	5
Land	1★	1★	2	2	1★
Landscape	4	4	2	3	1★
Transport	?	?	?	?	?
Water	?	?	?	?	?

Summary discussion

It is immediately apparent that Option 5 (two strategic growth locations; one in the west of the Borough and the other in the east) performs well in a number of respects, as indicated by the relatively high number of stars and the relatively low number of red scores assigned. However, it does not necessarily follow that Option 5 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 concluding that Option 5 performs least well overall. Also, in respect of Option 5, it is important to state that the appraisal reflects some very significant assumptions, both in respect of the specific strategic sites that would be allocated, and the potential to deliver a mix of uses, infrastructure upgrades and wider 'planning gain' alongside housing growth.

A second immediate point to note is that both Option 1 (roll forward the Bearing Fruits Strategy) and Option 2 (adjust the Bearing Fruits strategy to a modest extent) are shown to relatively poorly in most respects (it is only under 'heritage' and 'housing' that the appraisal finds there to be a degree of relative merit). This is certainly an indication that these options perform relatively poorly overall; however, it is important to state that a number of the topic-specific conclusions are quite finely balanced, and associated with assumptions and uncertainties.

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

- **Air quality** – it is not possible to differentiate between the options with any certainty. There are a range of uncertainties, including in respect of the achievability/deliverability and timing of road infrastructure upgrades. With regards to significant effects, it is appropriate to flag a notable degree of risk under all growth scenarios. 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.
- **Biodiversity** - it is not possible to differentiate between the broad development options with any certainty. With regards to Option 5, whilst strategic growth locations can give rise to particular opportunities in respect of securing biodiversity net gain, there is little confidence that this applies in the case of the sites in question, and one of the sites (SE Sittingbourne) gives rise to notable concerns. With regards to the other options, there are issues with growth at both Sittingbourne and Faversham, and there is a need to factor-in concerns regarding growth at Rushenden South (in particular) and Teynham. With regards to significant effects, on one hand, limited concerns were raised through the consultation in early 2021, either in respect of biodiversity impacts or a risk of opportunities missed; however, on the other hand, on the basis of an initial review of consultation responses reviewed from site promoters, there is a noticeable lack of proactive proposals in respect of responding to biodiversity issues and opportunities, and the number of site promoters arguing against the proposed requirement for 20% biodiversity net gain is noted.
- **Climate change mitigation** – it is inherently challenging to differentiate between the 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. On balance, it is considered appropriate to highlight: Option 3 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 around both transport and built environment decarbonisation; and Option 5 as second best performing, given the inherent opportunities associated with strategic growth; however, there is a very high degree of uncertainty, including on the basis that the locations in question are not ideal from a transport connectivity perspective, and recognising that scheme promoters have provided limited information to generate confidence that decarbonisation opportunities exist and will be realised in practice. With regards to effect significance, 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 requirements/proposals.
- **Communities** - it is fair to conclude that Option 5 is preferred on the basis of the potential to deliver new secondary school capacity at both Sittingbourne and Faversham, although there is uncertainty at the current time, particularly in respect of the potential to deliver a new secondary school at Faversham. This is a departure from the conclusion of the equivalent appraisal presented within the SA Report, which was undertaken on the basis of an assumption that a key issue for the Local Plan is to address existing secondary school capacity issues at Faversham. With regards to significant effects, on the basis of the consultation response received from KCC it is certainly appropriate to predict significant negative effects under Options 1 and 2. It is also fair to highlight uncertain positive effects under Options 5.
- **Economy and employment** - there is uncertainty with employment at the current time, recognising that the ELR was completed prior to the Covid-19 pandemic and employment strategy is in a state of flux nationally. Option 5 potentially performs relatively well, but it is not possible to differentiate further between the options. It is appropriate to flag a risk of negative effects under all of the options other than Option 5. Whilst the South East Local Enterprise Partnership (SELEP) did not respond to the consultation in early 2021, it is fair to

assume that providing for warehousing and distribution needs remains a key issue for the sub-region; and there are also important links to matters relating to transport infrastructure capacity, as discussed below.

- **Flood risk** - it is appropriate to highlight those broad development options 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 Options 1 / 2. **Heritage** - it is appropriate to highlight those options involving a focus on further piecemeal urban extensions as giving rise to a significant degree of concern, and it is appropriate to highlight Options 2 and 4 as performing worst, as Faversham is very sensitive in historic environment terms. It is suggested that negative effects would be notably less significant under Option 3 and Option 5; however, this conclusion is subject to the views of Historic England. The consultation response received from Historic England in early 2021 focused only on the preferred sites, and focused on policy wording more so than site suitability, but this current consultation provides an opportunity for a more strategic discussion. It is also important to highlight uncertainty regarding the implications of the broad development options for growth at Teynham and Newington, both of which have historic cores, a network of surrounding historic farmsteads (towards which development has encroached over recent decades) and a surrounding landscape with a sense of time-depth strongly associated with the area's fruit growing heritage (see aerial imagery from WWII). There is also a need to carefully consider historic environment / heritage issues associated with options for a new road link to the south of Teynham, particularly mindful of the designated conservation area, which is strongly associated with a north-south dry valley.
- **Housing** - Option 5 performs poorly, given delivery risks associated with a strategy that relies on two strategic sites. Option 1 also performs relatively poorly given viability challenges in the west of the Borough; however, there is considerable uncertainty. Option 4 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 associated economy of scale benefits and inherently good potential to deliver a good housing mix) and additional smaller urban extensions likely associated with low delivery risk and able to deliver early in the plan period, thereby alleviating concerns around delay to delivering the strategic site leading to a shortfall in housing supply early in the plan period (albeit, as discussed, the NPPF puts in place mechanisms to redress shortfalls against required trajectory); and support for a strategic site (SE Faversham) where the current proposal is to prioritise affordable housing (40% has been suggested; however, this is unconfirmed and 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** – it is likely that any reasonable broad development option, in the Swale context, 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 Option 1, 2 and 5 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.
- **Landscape** - it is appropriate to highlight Option 5 as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and to the east / south east 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 for the other broad development options, Option 3 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. It is not possible to confidently suggest any risk of significant negative effects to the setting of the AONB.
- **Transport** - at the current time it is not possible to differentiate between the broad development options with any certainty. This is a departure from the conclusion of the equivalent appraisal completed in 2020. With regards to effect significance, on the basis of the representation received from KCC in early 2021, it is fair to conclude that there are significant uncertainties and concerns regarding all of the options.
- **Water** - it is considered appropriate to highlight uncertain negative effects for all scenarios, albeit it is understood that limited concerns were raised through the consultation in early 2021. A particular consideration is wastewater treatment capacity, and whilst the firm proposals for SE Faversham are encouraging, there is less certainty regarding capacity to support growth elsewhere.

3 Commentary on thematic policy

3.1 Introduction

- 3.1.1 The aim of this section is to present a brief commentary in respect of the issues and options discussed in Section 5.2 to 5.6 of the Issues and Preferred Options consultation document, which deal with a series of five broad thematic policy areas in turn.
- 3.1.2 Much of the discussion here relates to the scope of the SA (see [Section 3](#) of the SA Report), with a view to encouraging comments and further evidence, which will be taken into account as part of work to update the SA scope subsequent to this current consultation.

3.2 Climate change

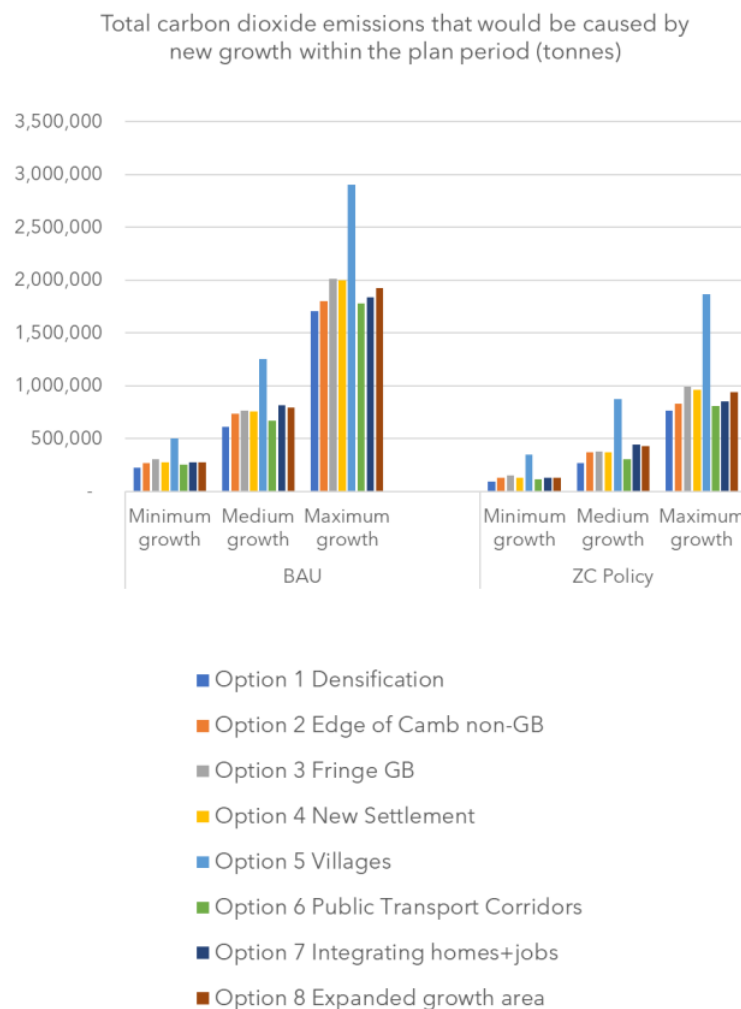
- 3.2.1 The SA Report gave detailed consideration to the effects of broad growth scenarios, strategic site options, mapped growth scenarios and the LPR as a whole in respect of: A) climate change mitigation; and B) flood risk, which is a centrally important climate change adaptation considerations for Local Plans.
- 3.2.2 In respect of (A), a particular focus of discussion under the four 'climate change mitigation' headings was greenhouse gas emissions from the built environment, as transport emissions (or, more specifically, issues relating to minimising the need to travel, supporting modal shift away from the private car and supporting EVs and wider 'future mobility') were a focus of discussion under other SA framework topic headings.
- 3.2.3 In respect of (B), firstly it is important to note that there are other wide-ranging climate change considerations of relevance to the LPR, including in respect of the health and well-being (not least the risk from overheating, with implications for building design and masterplanning), biodiversity and the water environment; however, there is less potential to conclude the likelihood of significant effects (in comparison to flood risk), hence it is considered appropriate to discuss matters under 'other' SA framework headings (e.g. Biodiversity, Communities, Water) as appropriate, rather than presenting stand-alone discussions under 'climate change adaptation / resilience' headings. Comments are welcomed on this approach.
- 3.2.4 Secondly, in respect of (B), it is recognised that a robust legislative and policy framework is in place to avoid undue development in flood risk zones, such that it can be suggested that avoiding flood risk is something of an objective technical exercise more so than a policy objective to be 'weighed in the balance' through Local Plans; however, the reality is that concerns do persist nationally regarding the number of homes coming forward in flood risk zones, hence there is a need for a strategic approach through Local Plans. There can be challenges understanding the nature of flood risk, including because there is a need to consider the degree of risk associated with areas within a flood zone but protected by flood defences (also accounting for plans for the future of the defences), and because there is a need to consider the degree of risk associated with surface water flood zones as opposed to fluvial flood zones; both of these issues are highly relevant to Swale.²⁰ There can also be challenges demonstrating that a scheme in a flood risk zone is justified on the basis of there being no alternative way of achieving the same socio-economic benefits, because the socio-economic benefits of any given scheme will often be very scheme specific. Comments on the role for the Local Plan and SA process, in respect of flood risk, are welcomed.
- 3.2.5 Having made these initial remarks, the following bullet points consider issues and options for the LPR:
- There is a need to ensure a clear conceptual framework, recognising that planning for climate change is a relatively new and evolving policy area, and is highly cross-cutting. As part of this, there is a need to: clearly differentiate between mitigation / decarbonisation and adaptation / resilience; differentiate between greenhouse gas emissions from the built environment and from transport; differentiate between operational and non-operational built environment emissions (the concept of 'whole lifecycle' built environment emissions is helpful); ensure a clear 'energy hierarchy' approach to minimising operational built environment emissions (i.e. a 'fabric first' approach, with offsetting as a last resort); and prioritise the various climate change adaptation / resilience matters of relevance to the LPR.

²⁰ The Welsh Government has very recently published new [guidance](#) on planning for flood risk and coastal erosion, including with a focus on the role of strategic planning (i.e. plan-making). There is an associated [on-line mapping](#) resource that helpfully shows not only areas of fluvial flood risk, but also areas at risk but protected by defences and surface water flood risk, with surface water flood risk helpfully divided into two categories (as per fluvial flood risk), and clarified as also relating to small watercourses.

- There is a need to consider if and how the performance of the LPR can be assessed, and evaluated over time, against the benchmark of the committed decarbonisation trajectory necessary to achieve the Borough’s 2030 net zero target, mindful of: the distinction between total borough-wide emissions, which is the focus of the 2030 net zero target, and per capita emissions (mindful that the population of the Borough is set to increase, and it is largely outside the scope of the Local Plan to change this); and the fact that the influence of the LPR is in many ways limited (e.g. retrofitting existing buildings) and indirect. Comments on this matter are encouraged, in the spirit of ensuring a proactive approach.
- Methods for planning for climate change mitigation / decarbonisation through Local Plans are evolving, and are considered to have some way to go prior to reaching ‘maturity’; however, the [work](#) recently undertaken in support of the emerging Greater Cambridge Local Plan should be reviewed as an example of good practice. The study notably presents 48 scenarios for “emissions caused by new growth in the plan period”, where the variables are: 1) growth quantum; 2) spatial strategy; and 3) ‘zero carbon policy’ – see Figure 3.1. A key point to note is that the performance of ‘spatial strategy’ options is highly dependent on emissions from transport (with Option 5 - dispersal to villages - performing very poorly).

Emissions from transport are a very significant consideration for Local Plans; however, there is also a need to recognise the role of spatial strategy in respect of minimising built environment emissions. For example, a spatial strategy option might be seen to perform well where it directs growth to: areas with strong development viability; larger schemes with economies of scale; sites with land-owners willing to accept land value capture for public benefit; sites controlled by developers with a proactive approach to decarbonisation; sites associated with inherent opportunities around sharing waste heat (e.g. a WwTW, industrial operation, leisure centre) or capturing or ambient heat (e.g. a watercourse); sites with inherent opportunities around renewable power (solar, wind, hydro), albeit recognising that major schemes typically feed into the national grid; and schemes where the masterplanning/design concept is supportive of decarbonisation, e.g. with high densities and a use mix supportive of fifth generation heat networks.

Figure 3.1: Emissions scenarios to inform the Greater Cambridge Local Plan (Etude, 2021)



3.3 Place shaping/design

- 3.3.1 The matter of place-shaping is highly relevant to the SA process, as key decisions on spatial strategy and site selection through the LPR can clearly have an impact on local character, distinctiveness, sense of place etc. With regards to design, there is clearly a need to consider the effect of thematic policy set through the LPR, and certain sites can be associated with inherent locational constraints and opportunities, but ultimately many of the key decisions will be made through the development management (i.e. planning application) process, rather than through the LPR.
- 3.3.2 Place shaping and design are considered under the Communities and Landscape headings within the SA framework; however, within the SA Report, discussion under the Communities heading does focus primarily on community infrastructure, which is understood to be a key issue for the Local Plan. Under the Landscape heading there is a major focus on place-making, including with a long term perspective, in that there is merit to planning comprehensively for long term growth – and securing associated investment from land owners and developers – rather than risking long-term piecemeal growth (i.e. sprawl; albeit it is recognised that there are also arguments in favour of supporting growth locations that can evolve organically over time, responding to evolving understanding of issues, opportunities etc.).
- 3.3.3 Moving forward, it is recommended that place shaping should be a key concept to guide preparation of the LPR, with a particular focus on ensuring a long-term perspective. This is particularly important for Swale given A) regeneration objectives for the Thames Gateway, and perhaps the Isle of Sheppey most notably; and B) the inherent pressures on the A2 corridor, where the historic settlement pattern will invariably be placed under pressure under coming years and decades. This aligns with one of the main changes recently made to the NPPF, namely new paragraph 22, which identifies that, in some cases, Local Plans must reflect a vision that looks ahead at least 30 years.

3.4 Environment and heritage

- 3.4.1 AECOM recently prepared an appraisal of two Biodiversity Net Gain (BNG) reasonable alternatives for the purposes of the Guildford Local Plan Development Management Policies (LPDMP) SA Report – see Section 5 of the report [here](#). In some ways the appraisal is specific to the Guildford Borough context, in that biodiversity decline in Surrey is considered to be quite severe in the national context; however, in most respect the appraisal is quite generic, such that appraisal findings would also apply to the Swale context. The appraisal conclusion is as follows:

“In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is an element of risk in respect of housing and employment land objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden on the developer. With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.”

- 3.4.2 More specifically, one of the arguments for a 20% BNG requirement considered to be of direct relevance to the Swale context is as follows:

“... there are naturally concerns regarding the BNG approach failing to achieve stated biodiversity objectives, and perhaps even resulting in perverse long-term effects that are currently difficult to foresee or fully appreciate, because approaches and methods are in their infancy, and recognising that a focus on BNG will be, to some extent, at the expense of a focus on more traditional approaches to biodiversity conservation and enhancement. The 2020 Interim SA Report discussed a concern that a 10% net gain requirement could be “within the margin of error”, such that it doesn’t deliver “real benefits” in practice.²¹ At the current time, the Biodiversity Metric 3.0 is a proactive and positive step, and progress on bringing forward effective LNRs, both nationally and locally, is very encouraging; however, ze Ermgassen et al. (2021) highlight some significant concerns, including around a piecemeal approach whereby the combined effect is less than the sum of its parts. Biodiversity must be considered at landscape scales and with a long-term perspective, hence it is important that BNG approaches lend support to strategic initiatives, and certainly do not distract from or lessen the focus on such initiatives... this lends support for requiring a higher (20% net gain figure).”

²¹ See [cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf](https://www.cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf)

- 3.4.3 With regards to the research by ze Ermgassen et al. (from the University of Kent), the report presents the following summary:

“Research... is emerging on the benefits and risks of BNG strategy. A key study was published in June 2021,²² setting out a concern around effective use of habitat offsetting / offsite compensation. Whilst the Government had previously anticipated 25% of biodiversity units being achieved offsite, the research found the figure in practice to be much lower, raising “doubts about the size of the biodiversity unit market.” The study authors are concerned about an over reliance on onsite measures as this could lead to opportunities missed in respect of “*strategic investments in the local nature recovery networks*” and “*investments in regional biodiversity priorities that can help restore biodiversity at a landscape scale*”. Equally, the authors are concerned about the effectiveness of onsite measures, having identified a prevalence of “small habitat patches” at risk of not developing/maturing as anticipated, and being subject to high levels of human pressure (related to this, a concern is that “*49% of the biodiversity units generated within residential developments in our sample come from on-site grasslands and scrub habitats*”). The authors recognise that there are strong ‘access to greenspace’ arguments in favour of generating biodiversity units onsite, and that an onsite focus has “*broad support from across stakeholders*”, but suggest “*this urgently deserves further debate*” because “*this priority risks overwhelming the biodiversity goals of the policy... potential trade-offs should be explicitly discussed.*””

- 3.4.4 In conclusion, whilst it is recognised that there are arguments in favour of a standard national approach, at least ahead of guidance in the form of a Local Nature Recovery Strategy (likely for Kent), and there is a need to ensure that development management policy requirements do not unduly impact on development viability, there is clear merit to requiring 20% BNG where this is justified in the local context.

3.5 New homes

- 3.5.1 Matters relating to housing for older people and space standards are discussed under the Housing heading within Section 9 of the SA Report. Of particular note is paragraph 9.9.11 of the SA Report, which explained:

“*Ensuring that new housing is well suited to an ageing population is considered to be a priority issue locally, with the proposal being to deliver the maximum level, hence this policy is proposed despite significant viability implications, as explored through the Viability Study (see Table 8.2 of the study). However, as explained within the supporting text to the policy, there would ideally be “universal” achievement of standard M4(2).*”

- 3.5.2 As well as thematic / development management policy, it will also be important to consider the implications of spatial strategy and site options for the achievement of objectives relating to housing for older people. For example, the appraisal of Broad Development Options presented in Section 2 of this report explains:

“*As for the three competing strategic site options, two are currently proposing to deliver 40% affordable housing, whilst one – SE Sittingbourne – is proposing to deliver 20% (having previously proposed 10-20%). The proposed approach at SE Sittingbourne reflects an understanding that there will be other funding priorities, in particular major transport upgrades. It is also noted that SE 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 and, in any case, this proposal could be subject to change.*”

- 3.5.3 Equally, there is a need to take a proactive approach to meeting the accommodation needs of Gypsies and Travellers through spatial strategy and site selection. As part of this, consideration can and should be given to the possibility of accommodating needs as part of large strategic mixed-use schemes (which is not to suggest that this is necessarily an ideal way of meeting needs, or should necessarily be progressed as a preferred option). The appraisal in Section 2 of this report explains: “*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 a local need.*”

²² zu Ermgassen et al; see <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820>

3.6 Economy and town centres

- 3.6.1 As explained within Section 2 of this report: "...there is uncertainty with employment at the current time, recognising that the ELR [Employment Land Review] was completed prior to the Covid-19 pandemic and employment strategy is in a state of flux nationally. This uncertainty is potentially manifesting itself in something of a lack of strategic direction, e.g. direction from organisations with an interest in meeting economic objectives at the sub-regional, regional and national scales. For example, there is a need for direction on the role of Swale in respect of meeting the needs for freight and logistics employment space, although it is recognised that an important strategy for the South East Region is soon to be published: <https://transportforthesoutheast.org.uk/our-work/freight-and-logistics/>.
- 3.6.2 Aside from traditional employment land needs, as explored through the ELR, it is recognised that there is a need to consider how matters relating to planning for employment and economic growth have evolved from the experience of the C-19 pandemic and national lockdown. The promoters of the South East Faversham (Duchy of Cornwall) strategic site option made the following comment through the Regulation 19 consultation in early 2021: *"We are concerned that this appears to reflect an outdated view of land use planning, where, in particular, "housing estates" and "industrial estates" were strictly separated. Modern good town planning practice, as well the needs of the modern economy, both point towards there being a much more sophisticated approach, with emphasis on homeworking, and small/medium sized worker and office spaces integrated with housing areas and local centres."* There is clearly a need to strike a balance.

4 Conclusions and next steps

4.1 Conclusions

- 4.1.1 This report has presented an appraisal of the five broad development options that are a focus of the current Issues and Preferred Options consultation. Within the consultation document the Council explains that Option 3 is the emerging preferred option, and presents detailed reasons including:
- "Large scale strategic growth at Faversham would provide good potential to successfully masterplan and deliver a new community, or series of new communities, in line with established best practice principles and to ensure that it was planned in a holistic way. It would also deliver a much needed new secondary school.*
- This option performs well in terms of air quality because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns as sustainable and active travel measures are easier to implement at these scales of new development as the critical mass is there. Trip internalisation can be implemented, funds can be directed to walking and cycling infrastructure, masterplanning and design measures can focus on supporting walking and there is some potential to walk/cycle to the town centre*
- It also allows for larger scale biodiversity and net gain achievements; again, due to the critical mass."*
- 4.1.2 The appraisal presented within Section 2 of this report shows Option 3 to be associated with relative merit in a number of respects, but also does serve to highlight that there are equally certain draw-backs relative to other options, most notably Options 4 and 5.
- 4.1.3 This report has also sought to present a brief, informal commentary on select thematic policy areas.

4.2 Next steps

- 4.2.1 The next step, subsequent to the current consultation, will be to revisit the question of reasonable alternative growth scenarios. In practice, this will mean revisiting the process set out in Section 5 of the SA Report, which lead to five mapped growth scenarios for appraisal. Once growth scenarios have been defined they will then be subject to appraisal, in good time to inform plan-making. Consideration will also be given to the possibility of whether there are other aspects of the LPR, aside from spatial strategy / site selection, that warrant being a focus of dedicated work to formally define and appraisal alternatives.
- 4.2.2 Once work to explore alternatives has been completed, then the Council will be in a position to finalise the LPR, at which point it will be subjected to appraisal 'as a whole', and then the SA Report prepared for publication alongside the Pre-submission LPR, under Regulation 19 of the Local Planning Regulations. Subsequently the intention is to submit the Local Plan and SA Report for Examination in Public.