

Appendix 1 – Summary of main issues raised in representations to the Issues and Preferred Options consultation

Long term vision

Q1 - How do you think the Local Plan should be amended to address the NPPF requirement for Local Plans to set larger scale developments within a 30 year vision?

- General public and conservation groups advocated long term view (e.g. to address climate change and infrastructure issues) whilst also being concerned that this may lead to more large scale development
- **KCC** welcomed recognition in Vision and Objectives for some allocations to deliver housing and development beyond the Local Plan period and highlighted need for close working with infrastructure providers to ensure right infrastructure is delivered alongside growth, at the right timer
- Developers were split between those with large sites advocating long term strategic approach (30 year vision) and those with smaller sites arguing that their sites could come forward soon to help achieve 5 year housing land supply. PPG has clarified this issue since the I&PO was published and number of responses highlighted that the answer depends on what strategy is advocated by Swale
- LDS timetable was challenging and that the plan period would need to be extended to allow for 15 year time-frame

Sustainability Appraisal

Q2 - Do you have any comments on the interim Sustainability Appraisal? Please explain the reasons for your comments.

Do you think any changes to the interim Sustainability Appraisal are necessary? If so, please set out these changes and the reasons why you think they are needed.

- Number of respondents argued that SA is based on an incomplete evidence base, relies on (sometime subjective) assumptions and is incomplete in itself (e.g. on transport and rural roads, brownfield land analysis, air quality, water resources, water quality, education, health, soils, biodiversity, heritage, energy, cultural and recreational facilities) or incorrect (e.g. settlement hierarchy, agricultural land). As such SA conclusions can't be relied on.
- Some respondents argued SA was difficult to understand e.g. mismatch between Option 5 performing well and Council's preferred option; Option 5 contains a variety of different sites making headline conclusions difficult and skewing results; SA scoring system insufficiently granular to be used in decision making; SA biased to favour preferred option
- SA doesn't test growth options against Local Plan objectives, and this should be done for next Regulation 19 Plan, and justification for preferred level of growth at Sittingbourne is needed. SA should also test option of reduced quantum of housing
- General public concern about unsustainable development particularly large-scale and in rural areas and lack of upfront infrastructure.
- Site promoters disagree with certain conclusions regarding their sites and subsequent conclusions. Comments made included concern about heavy reliance on windfalls; Rushenden South site skewing assessment results for whole of Isle of Sheppey; SA doesn't sufficiently consider role of small and medium sites in contributing to sustainable development
- SA needs to demonstrate how mitigation hierarchy has been followed and that less damaging options are not available (**Natural England**)
- **KCC** had particular concerns around air quality and highways impacts for many options, preferring Option 5. Also concern about the way in which the 'community' objective is dealt with as well as waste. Disappointed that health and well-being is not an SA objective.
- **Kent Wildlife Trust** had concerns with Highsted Park as an element of Option 5. SA should also consider carbon sequestration and habitat creation to address climate and ecological crises
- **CPRE** stated that the SA needs to address whether new road delivery is entrenching car dependency.
- **Kent Downs AONB Unit** reiterated their concern regarding AONB impacts in respect of Strategic Development Sites and the impact of a major development comprising a new motorway junction within the AONB itself

Key Issues and Challenges

Q3 - Do you agree with the key issues and challenges that we have identified? If not, what other issues do you think need to be considered further and addressed by the Local Plan Review?

There was general agreement with the issues and challenges identified. The following were identified as issues/challenges to be addressed:

- Diversification of housing market through allocation of broader range of sites/locations including smaller sites to support SME housebuilders

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- Provision of right quantum and type of employment land in locations where most required to fully meet employment land needed over plan period
- Improving the Borough's road network, including mitigation strategy to manage traffic on A2 and roads that feed into it and achieving modal shift
- Reducing health inequalities and deprivation (**KCC**)
- Converting unused office, retail and commercial space to housing to encourage town centre regeneration and brownfield development
- Ensuring that the right quantum and typologies of employment land are provided at locations where it is most required to fully meet need for additional employment land over the Plan period

A number of general points were also made:

- Issues and challenges listed are generally vague and must be made more specific to Swale, so purpose of the Council's planning policies is clear
- There is a conflict between identified key issues and preferred option in terms of transport (i.e. locations are not close to main employment) and climate change
- Should demonstrate how the mitigation hierarchy has been followed and can demonstrate with confidence that any alternative, less damaging options are not available prior to allocation (as per NPPF para 32) (**Natural England**)

Vision and Objectives

Q4 – Do you agree this is the right Vision for the borough? If not, please explain what changes you would like to see made to the Vision and why.

The main elements for greater emphasis/consideration in the vision are:

- Combating air quality issues from all sources
- Protecting and supporting rural communities
- Protection of Grade 1 agricultural land
- Improved health and wellbeing for our communities
- Encompass the desire to conserve and enhance natural environment (**Kent Downs AONB Unit**)
- **Natural England** suggested the following should be referenced: climate change mitigation, reference to a Green Infrastructure Master Plan and a requirement to recover nature, AONB protection, place making and good design
- Maintaining a predominantly rural character
- Delivery of the infrastructure required to support sustainable communities
- Tackling congestion
- Supporting and creating jobs and employment (**Kent Science Park**)
- Include commitment to action the Kent Local Nature Recovers Strategy (LNRS) (**Kent Wildlife Trust**)
- Mix of housing types to meet needs of all sectors of the community
- Greater focus for development at Sittingbourne as the principal town in the borough
- Specifically reference key characteristics of the three settlements, e.g. arts and culture at Faversham
- Brownfield development as a priority
- Include reference to existing vision for regeneration of Queenborough and Rushenden (**Peel Ports**)
- Reference to smaller and medium sizes sites as well as strategic sites to deliver the borough's future development needs (developers)
- Various requests for vision to be revisited to support the promotion of individual sites/ broad locations (development community)

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Q5 – Do the draft Objectives support the Vision and set appropriate goals for the Local Plan? Please give your reasons, identifying the objectives that you support or objectives that you oppose, explaining any changes you would like to see and why.

Comments on the proposed objectives:

- Objectives adequately support the vision and are clear
- Objective 4
 - Objectives are likely to contribute to development of sustainable lifestyles by residents and employees working within Swale, reducing overall vehicle trips and the need to travel, consistent with national policy, ‘transport hubs’ in Objective 4 should be defined and include all modes of travel (**National Highways**)
 - Objective 4 assumes (wrongly) that all railway stations are transport hubs
 - Objective 4 could constrain development and would therefore be contrary to national policy
- Objective 5
 - Greater emphasis needed in Objective 5 for the provision of low cost starter and affordable homes for families
- Objective 6
 - Support for objectives, particularly Objective 6 (**Kent and Medway CCG**)
- Objective 7
 - Concerns that Objective 7 cannot be achieved because of the harm large sites have on small villages and settlements

Additional objectives suggested

- Additional objective should be included – “To enhance the natural environment by developing and implementing a Swale Nature Recovery Strategy to reduce habitat fragmentation and increase ecological connectivity” (**Faversham Society**)
- Additional objective needed to include measurable recovery for nature (**Natural England**)
- Additional objective that protects the nationally important landscape of the Kent Downs AONB
- An objective to inform, agree and action the Kent LNRS must be included, committing the Borough to embedding local nature recovery within the planning system.
- Objectives are supported but amendments suggested to include waste in the list of infrastructure. More emphasis should be included to emphasis Swale’s environment and heritage in the objectives and reference to public health should be more explicit (**KCC**)

General comments regarding objectives

- Active travel is only applicable to urban areas
- Concerns around safety for cycling on existing network making it an unrealistic choice
- Investment needed at transport hubs in sustainable locations, e.g. increased car parking provision at Sheerness station
- Objectives not adequately evidenced and not specific enough to Swale
- Objectives need to cover significant issues such as transport and delivering affordable housing
- Climate change mitigation by any reasonable means, including buildings and how they are constructed and powered should be included in an objective
- Objectives need to include reference to the key role of small and medium sites needed to comply with the NPPF and to support a five year housing land supply and support town centres
- Would like information provided on how the objectives will be achieved
- Larger sites should not be supported because they do not integrate with existing communities
- The role of the agricultural sector should be acknowledged in the objectives

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Spatial strategy
Local housing need
<i>Q6 – Do you think that the council should attempt to justify not complying with the Government’s Standard Method for calculating the borough’s housing need figure (due to the constraints of Swale, such as the natural environment, flood risk, infrastructure), which means that the council would not fully meet the housing target? Please explain why and say what you believe the “exceptional circumstances” would be for Swale not to meet the figure.</i>
<ul style="list-style-type: none"> • Support for a departure from the Standard Method from members of the public and town and parish councils with suggestion that alternative data sets (i.e. more up to date ONS figures) should be used • Agreement that landscape, infrastructure and highway capacity constrain the ability of the borough to deliver its local housing need as determined by the Standard Method. • Development community cited that there were no exceptional circumstances to depart from the Standard Method • Some respondents suggested that should be seeking to deliver above the Standard Method figure to deliver more affordable housing
<i>Q7 – Do you believe that if we do not fully meet our target, we should consider asking our neighbours to provide for our unmet development needs? If so, what reasons would the council give, who would we ask and why would they be well placed to help? Likewise, if asked by a neighbouring council to consider meeting their unmet development needs, what should be our response and why?</i>
<p>Respondents who supported not fully meeting the Borough’s housing need cited the following:</p> <ul style="list-style-type: none"> • Government targets should be challenged • Constraints in the borough are so great that we cannot meet our own “needs” without significant damage to cherished areas and we cannot take unmet needs from other areas • Housing should be concentrated in other areas to deliver the ‘levelling up’ agenda • Areas that are in need of regeneration and investment should take the housing development <p>Respondents who thought there were no grounds not to fully meet the Borough’s housing need referenced that:</p> <ul style="list-style-type: none"> • The constraints in Swale are no greater than neighbouring boroughs and do not amount to 'exceptional circumstances' to justify a reduced housing target, expect Swale to meet objectively assessed need in full and to fully explore the capability of the borough to meet the unmet needs of neighbouring authorities as required • There are enough suitable sites in the borough to deliver Swale’s development needs and more
Rolled forward allocations
<i>Q8 – Do you agree that the allocations listed in Appendix 2 should be rolled forward into the reviewed Local Plan? If not, please explain why you think this, supporting your response with reference to any evidence.</i>
<ul style="list-style-type: none"> • Responses confirmed the list of sites should or should not be rolled forward without explanation • Arguments were made against rolling forward the remaining allocations on the basis that they had been allocations since 2017 and were not likely to come forward • Arguments were made in support of rolling forward the remaining allocations on the basis that the sites were still deliverable but specific circumstances had impacted the timing of bringing forward development • Developers of some sites wish to see amendments to the initial allocations to increase site size and/or amend the type of development set out by the initial allocation policy.
Windfall allowance
<i>Q9 – Do you agree with the proposed windfall allowance rate of 250 dwellings per annum? If not, what evidence do you have to support a different windfall allowance rate.</i>
<ul style="list-style-type: none"> • Respondents supported the inclusion of a windfall allowance on the grounds that it has always provided a constructive contribution to address housing need and should remain so • A number of specific comments were made about the proposed windfall allowance rate of 250 dwellings per annum <ul style="list-style-type: none"> ○ Makes a mockery of a plan-led system, does not provide for certainty of delivery ○ Insufficient evidence to justify proposed windfall allowance ○ Windfall allowance should be lower with more allocations made to meet the housing need numbers

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- Windfall allowance should be a representative percentage of new development needs
- Windfall allowance of this number is unlikely to come forward because most of the opportunities will already have been taken up through historic delivery

Development in villages

Q10 - Do you agree that the strategy for allocating future development needs in the borough should include small scale development at thriving villages? If not, please explain why you think this?

- A large number of respondents felt that a definition of ‘small scale’ and ‘thriving villages’ was needed to be able to answer this question.
- Members of the public generally did not support this as an approach because:
 - It would open the floodgates for rural development and leave these communities with uncertainty.
 - They could not identify any thriving villages.
 - Government and council policy has seen the withdrawal of village services, leaving them unsustainable locations.
 - It would result in the use of greenfield sites.
 - It would harm the rural character of the Borough’s villages.
 - The towns should be prioritised first.
 - Villages often have constraints such as rural lanes, congestion and flooding issues.
- A significant proportion of respondents made specific reference to Teynham and Lynsted in their disagreement with this strategy because:
 - Teynham cannot be described as a thriving village – services have been declining for some 30 years and the remaining GP is due to retire soon.
 - It would be a strategy of building for cars.
 - The train station has a small car park and is not a highly serviced stop. It was not considered likely that additional population would increase this service.
 - Services would not be increased or enhanced by the additional population, as evidenced by closing of a GP service on the Isle of Sheppey.
 - Evidence suggests that the preference is moving towards health centres being located in main towns. Placing large new populations away from these is unsustainable.
 - The primary school’s OFSTED rating is in decline.
 - The infrastructure cannot take further population without enormous investment.
 - It is considered to be one of the least sustainable locations for significant growth in Swale.
 - The only significant employment is just outside the village and does not contribute to its identity and culture.
 - Generally, new homes here would be isolated from the economic and service hubs of the Borough – the main towns.
- Developers were more supportive, citing a need to help maintain the existing services and facilities. It was also felt that villages with more services and facilities closer to higher order settlements could take more than small scale growth. This was used as an opportunity to promote sites; locations included (but were not limited to) Dargate, Eastchurch, Graveney, Minster, Teynham, Queenborough, Faversham, Iwade and Dunkirk.
- Some parish councils and members of the public felt that they may be able to support this strategy subject to:
 - The key point being small scale, and what this would be defined as.
 - Proportionate increases being no more than 10% of the village size.
 - Developments being carefully planned.
 - Having used brownfield land first.
 - Neighbourhood plan agreement.
 - The strategy still being in accordance with the settlement hierarchy.
 - The focus not just being on thriving villages – development could also help declining villages recover.
 - It being accepted that some villages, such as Newington, are at the point of being unable to take further development.
- Some respondents made more general comments as follows:

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- **Natural England** would seek a strategy which has the lowest environmental and landscape impact.
- The **Kent and Medway CCG** will need to consider the health infrastructure needs of any strategy/option carefully.
- There is a great need to protect the character of villages, and they should only take high quality infill development.
- The **Kent Downs AONB Unit** felt that village development should be considered on a case by case basis only and if any were to be placed in the AONB, it must be small scale.
- **KCC** said that the Council will need to consider the sustainability of locations, heritage matters, and where a critical mass can be achieved to support services and facilities.
- **The Woodland Trust** objects to any strategy/option resulting in the loss of ancient woodland.
- If growth in the towns has been exhausted, the Council should identify one suitable rural location for growth on low quality agricultural land only.

Growth Options

Option 1

Q11 - Do you agree that the broad locations shown above will help to deliver this development option? If not, why not?

A very significant number of respondents felt that the maps were not clear or specific enough to be able to answer this, or the other related questions. The pins were not considered to give a sense of spread, scale or balance of the development options described.

As such, the question was largely not answered in the way intended. Instead, comments on the Option itself were given. These have not been listed here because they all also feature in the summary to Question 12 below.

Q12 - Do you agree with the potential advantages and disadvantages listed above for this development option? Can you think of any others that you would add?

A small number of respondents felt that a fair assessment of the advantages and disadvantages of Option 1 has been made. However, a number of additional points, as well as more general comments were made.

Additional disadvantages/comments:

Additional disadvantages mainly came from members of the public and parish/town councils, but also included some developers who were promoting alternative sites. These can be summarised as:

- For the Isle of Sheppey, only identifying growth at Rushenden which is a very complex site would result in the slow delivery of housing here, particularly affordable housing.
- It would also mean no investment in the eastern end of the Island and more generally, would fail to address deprivation and improve access to community services and facilities where it is required.
- Extensive loss of high-quality agricultural land.
- Biodiversity loss.
- An overreliance on windfalls resulting in uncertainty and unplanned developments.
- There is no evidence to suggest the required infrastructure could be delivered (includes the full range of infrastructure such as transport, community, water etc.).
- The mitigation of transport and air quality issues not possible here.
- Relies on a strategy which has failed thus far and will result in continued pressure in the Borough's most constrained areas.
- Does not realise the vision and objectives.
- Loss of character of surrounding villages, including points of cultural, historical and landscape interest.
- Relies on a small number of large sites.
- Draws investment away from villages.

General comments:

There were also a lot of comments more general to this option and indeed any strategy that is taken forward. These can be summarised as:

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- Viability issues in Sittingbourne and on the Isle of Sheppey will still result in pressure for sites elsewhere, leading to unplanned growth in sensitive locations. Some developers felt that Faversham can take more growth as a more sustainable location in the Borough requiring investment.
- The advantages and disadvantages appear to contradict each other in places.
- Infrastructure around Faversham cannot take further growth without major investment.
- Overall housing figures should be dramatically reduced, Swale is too constrained.
- Development should remain in the west of the Borough where there has been significant investment in infrastructure.
- A new junction on the M2 would be more sustainable.
- Concern re-iterated about the lack of scale and clarity in the options maps, making it hard to answer the subsequent questions.
- Teynham and Lynsted are unsuitable locations for any option.
- The disadvantages of Option 1 far outweigh the advantages.
- J5 improvements should not be seen as a catalyst for further growth here as the additional capacity will quickly be used up and no results seen. It would also put pressure on J7 of the M20.
- By admitting it is not the most effective way to deliver infrastructure, Option 1 should be eliminated at the outset.
- All options should avoid development along the A2 corridor. KCC does not support Option 1 for this reason.
- Smaller developments should be evenly throughout the Borough, provided the issues of the adopted Plan are mitigated adequately.
- This is all based on pre-pandemic data.
- CIL should be used to deliver infrastructure.
- Continuing to put the majority of growth in Sittingbourne is becoming a burden.
- The concept of the Thames Gateway is no longer relevant.
- All options should prioritise brownfield land.

Option 2

Q13 - Do you agree that the broad locations shown above will help to deliver this development option? If not, why not?

Main issues raised in respect of the identified broad locations:

- More even distribution of development requirements across the borough's main urban centres and rural areas will support meeting a wider range of housing needs and support long-term viability of smaller rural communities
- Reduces reliance on Grade 1 agricultural land and takes advantages of highway improvements (M2 J5)
- Does not support growth across the whole of Sheppey
- Largely focusing on A2 corridor does not take advantage of opportunities offered by other sustainable rural settlements with access to public transport
- Would not bring forward significant infrastructure other than what is already in the pipeline
- Objection to identification of some locations (Faversham, Teynham, Selling, Minster) for proposed development on grounds of: unsustainable scale of development, coalescence of settlements and erosion of individual character, traffic congestion, inadequate infrastructure, few local services, loss of green spaces, loss of best and most versatile agricultural land

Q14 - Do you agree with the potential advantages and disadvantages listed above for this development option? Can you think of any others that you would add?

Comments on the potential advantages and disadvantages included:

- As does not present a spatial strategy that seeks to deal with the existing issues of traffic and air quality along the A2 question why even considered as cannot deliver Vision and Objectives
- Omits number of villages in north of Borough, each village should be assessed on their own sustainability credentials and settlement hierarchy and appropriate and proportionate levels of growth attributed to each

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- Assessment will be required of impacts associated with any additional allocations reflecting this option including justification of how sustainable modes will be prioritised, including how public transport routes and services will be supported and maintained over time, as pattern of distribution poses potential risks in terms of car dependency (**National Highways**)

Other advantages/disadvantages identified:

- Loss of opportunity to reduce dependence of private vehicles, promote modal shift and ability to comply with the proposed net-zero vision. There is also concern regarding highway capacity within central and eastern Sheppey (and particularly the constraints along the A250 and the A2500 corridors). Additionally, there is no indication of improvements to highway infrastructure (**KCC**)
- Harm to heritage assets and their setting, and valued landscapes (**Bredgar, Rodmersham and Milstead Parish Councils**)

Option 3

Q15 - Do you agree that the broad locations shown above will help to deliver this development option? If not, why not?

Main issues raised in respect of the identified broad locations:

- Distribution of some growth across Borough recognises role of delivery across different locations to meet localised need and reflecting local conditions, services and facilities
- Reliance on 35% windfalls makes nonsense of strategic planning, will not give rise to certainty of delivery, place significant burden on existing infrastructure and that funded by allocations
- Development should be of sufficient scale to support delivery of required investment (**KCC**)
- Locations to east of Sittingbourne along A2 corridor have significantly more landscape impact than focusing some development to west of Sittingbourne
- No evidence to support case for rebalancing distribution of growth – east and west of Borough are very different and no justification for treating them the same
- Sittingbourne should be centre for growth as robust infrastructure and better accessibility to road network and motorway links
- Capacity constraints of road network will lead to delays in sites in eastern part of Borough coming forward, will result in need for sites to west of Borough being identified
- Proportionate development at smaller settlements, particularly Rural Service Centres (RSCs) would provide more balanced distribution of development as currently skewed by omitting number of sustainable locations in west of Borough. Each village should be assessed on their own sustainability credentials. may be best placed to deliver allocations and ensure a range of smaller-scale sites early in the plan period whilst strategic sites are in their preparation phase
- Option is polarised between being focused on settlements located within the A2 corridor or at the coastal fringe, with key intervening, rail-linked settlements such as Teynham and satellite communities such as Iwade, omitted from consideration
- Faversham is a sustainable location for growth but has greater capacity for growth and should not just focus on East Faversham urban extension; need for sufficient small and medium sized sites to be allocated to meet short term housing need
- Objection to identification of some locations (Faversham, Teynham, Selling) for proposed development on grounds of: unsustainable scale of development, resultant traffic congestion, inadequate infrastructure with specific reference to concern about deliverability of growth in light of challenges around funding/delivery of highway infrastructure, few local services, loss of green spaces, loss of best and most versatile agricultural land
- Does not recognise lack of infrastructure on Sheppey (worsening traffic conditions on Lower Road A2500, children will be required to attend school off the Island) and rural nature of Warden and Eastchurch

Q16 - Do you agree with the potential advantages and disadvantages listed above for this development option? Can you think of any others that you would add?

Comments on the potential advantages and disadvantages included:

- Provides more realistic and achievable quantum of development at Sittingbourne but rebalancing has focussed too much growth at Faversham at expense of other parts of Borough
- Does not allow for investment in western side of Borough
- Potential for traffic to be diverted from the A2 corridor to the M2 will require evidence to be produced to quantify any such changes, including their impacts at M2 Junctions 5, 6 and 7 (**National Highways**)
- Increase in population through housebuilding that has happened over past 25 years has not helped to sustain or improve village facilities

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- Question whether 5 year housing land supply would be sustained. Experience of large/strategic allocations in Bearing Fruits has meant delivery has stalled whilst infrastructure improvements are completed – similar infrastructure improvements necessary to support high percentage of growth in Faversham likely to result in further stalled growth

Other advantages/disadvantages identified:

- Loss of opportunity to reduce dependence of private vehicles, promote modal shift and ability to comply with the proposed net-zero vision. There is also concern regarding highway capacity within central and eastern Sheppey (and particularly the constraints along the A250 and the A2500 corridors). Additionally, there is no indication of improvements to highway infrastructure (**KCC**)
- Little commercial development at Faversham and due to no interest in existing commercial consents/allocations these sites are now coming forward for housing, therefore, insufficient employment provision in Faversham to support population growth

Option 4

Q17 - Do you agree that the broad locations shown above will help to deliver this development option? If not, why not?

Reflecting the similarity between Options 3 and 4, the issues raised by respondents about Option 4 were very similar, if not the same, to those made about Option 3. Only additional issues raised are included here.

Main issues raised in respect of the identified broad locations:

- Significant development at eastern end of the borough likely to have impact on services provided by a neighbouring authority unless opportunities for infrastructure developments are considered, particularly around access to general practice services (**Kent and Medway CCG**)

Q18 - Do you agree with the potential advantages and disadvantages listed above for this development option? Can you think of any others that you would add?

Comments on the potential advantages and disadvantages included:

- Limited development on Sheppey will restrict much needed infrastructure and undermine vitality and viability of existing services and facilities
- Approach fails to address important regeneration objectives in other parts of the Borough not least Queenborough and Rushenden
- Question whether 5 YHLS would be sustained given imposition of Grampian conditions delaying delivery of development without necessary improvements to M2 to unlock growth.

Other advantages/disadvantages identified:

- Disadvantages around highway capacity and air quality issues for Faversham Town Centre and the A251. There is also concern regarding highway capacity within central and eastern Sheppey (and particularly the constraints along the A250 and the A2500 corridors) (**KCC**)

Option 5

Q19/21¹ - Do you agree that the broad locations shown above will help to deliver this development option? If not, why not?

Main issues raised in respect of the identified broad locations:

- Only approach where plan to meet housing target rather than relying on significant windfall but need for delivery timescales and associated infrastructure requirements/phasing to be fully understood from the outset
- No evidence to support claim that only two Strategic Development Opportunity (SDO) sites could be delivered due to market conditions
- Question why not tested SDO options at Regulation 18 stage, particularly as spent two years assessing garden communities in detail. Option should be refined via SA ahead of Reg19 and choosing preferred option to allow for most sustainable sites to be selected
- Would allow for more strategic approach to provision of new infrastructure (**Kent and Medway CCG**)

¹ Questions 19 and 21 asked the same question and the responses have been combined

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- Strategy could provide additional highway infrastructure such that may be required to support the additional growth in the borough, however, it would depend on the sites chosen and the infrastructure that they would provide. Advantages therefore could include expected improvements to traffic-related air quality compared to the other options put forward. There would be employment land availability in close proximity to proposed housing and reduced dependence of private vehicles. It is however essential that the sites either include, or can easily access, existing community amenities, employment and transport hubs (**KCC**)
- One dimensional approach by focusing on strategic sites and contrary to NPPF (para 68) that supply of specific and deliverable sites should be identified for years 1 – 5 of plan period

Q20 - Do you agree with the potential advantages and disadvantages listed above for this development option? Can you think of any others that you would add?

Comments on the potential advantages and disadvantages included:

- High risk strategy as relies on complex proposals
- Would not address regeneration objectives or support investment in infrastructure in other parts of Borough, therefore not benefitting existing communities
- Would have greater impact on rural areas
- Only very largest schemes would be self-sustaining
- Developments at this scale risks destroying the ecological integrity of the Borough unless masterplanning of proposals considers locally, nationally and internationally important ecological features from the start and biodiversity net gain is planned, delivered and managed to deliver maximum gains for biodiversity for the duration of its term (**Kent Wildlife Trust**)

Other advantages/disadvantages identified:

- Implementation of option would require a very significant amount of works to the Strategic Road Network (SRN). Type of new SRN infrastructure or upgrades and impacts will need to be assessed as part of comprehensive modelling exercise to enable further comment (**National Highways**)

Alternative options

Q22 - Do you think that we have considered all of the suitable alternative development options? If no, please explain and set out the details of an alternative option that you feel we have missed. (If you have a single site to submit please do so under the next question.)

- All options have been considered
- Evidence base is insufficient to make a judgement on whether all options are reasonable or not
- Evidence base for landscape and biodiversity has not been used to effectively appraise impacts of the different options (**Natural England**)
- Only brownfield sites should be considered or built on before green field development can be allowed
- Local housing need numbers are not achievable and the Council should test options using a lower number
- Options should reflect the impacts of Covid and the decline in demand for commercial space in town centres creating more capacity for residential development.
- Options should further explore the potential for the town centres, including densification
- Options should include sites for housing for older people and sites for park homes
- More smaller and medium sized sites should be allocated in all potential options
- Should consider relocation of employment uses, particularly those that generate heavy goods vehicle movements and redevelop those brownfield sites for homes
- Various suggestions from site promoters that their sites present suitable alternatives for development strategy options and/or support approaches

Q23 - Do you have a site that would be suitable for housing development. If so, please state where it is (and include a location plan if possible) and how many dwellings/quantum of employment floorspace it could provide.

19 sites that had not previously been submitted were put forward for housing and two for mixed development. These included sites in Faversham, Leysdown, Dunkirk, Sittingbourne, Graveney, Newington, Teynham, Sheerness. Oare, Tunstall and Iwade. All sites will be assessed on a comparative basis with previously submitted sites as part of an updated SHLAA.

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Preferred Option (Option 3)

Q24 - Do you think the Preferred Development Option (option 3) for meeting our housing target is the most suitable and meets our vision, objectives and the principles of sustainable development? If not please identify how the preferred option could be changed or if you believe one of, or a mixture of the other options, are more suitable, please say why.

Reasons for supporting preferred option included:

- Will deliver investment to Sheppey, securing regeneration and economic growth and housing where there is local need
- Significant number of large developments in recent years in western area parishes, which has placed considerable pressure on the quality of life for the residents

Some respondents caveated their support by the following issues:

- Allocation of rural sites should consider and mitigate impacts on valued landscapes, countryside and separation of settlements, biodiversity, loss of BMV agricultural land, increased traffic congestion and air pollution
- Approach should include short term allocation of sites around Faversham to meet housing need and provide immediate expenditure in the town centre

There were also a number of general comments identifying issues to be addressed should this option be taken forward:

- Need to clearly demonstrate and evidence why option is preferred (**Natural England, National Highways**) and address impacts on heritage that may arise from the proposed expansion of Faversham (**Historic England**)
- Wide variety of sites in terms of size and location should be allocated as would have greater potential to deliver wide mix of housing types/style and ensure homes come forward consistently across whole plan period with smaller sites identified to support housing delivery in the early part of the plan period
- Need for appropriate buffer to ensure delays in delivery of allocated sites will not prevent needs from being met in full
- Reliance on high windfall allowance undermines fundamental importance of providing certainty through making allocations, to offset reduction in windfalls existing housing allocations should be optimised and/or additional residential development sites should be identified

Changes to options suggested

- More urban centric approach should be considered (Sittingbourne and Bobbing/Iwade were specifically referenced) because of existing infrastructure, access to motorway/strategic road network, existing economic hub
- Combination of options 3 and 5 (replacing development along the A2 with development at Bobbing)
- Combination of options 2 and 4 with development to north and west of Sittingbourne and Sheppey given current ongoing improvements to SRN whilst also realising development concentrated on Faversham to rebalance growth given existing allocations concentrate development mostly within Sittingbourne (**Bredgar, Rodmersham and Milstead PCs**)
- Widen scope for growth at RSCs and settlements further down settlement hierarchy to reflect sustainability
- Same spatial distribution as Option 5 but with reduced windfall allowance and compensatory provision through extensions to those rural settlements which already have access to primary public transport or have a good functional existing relationship with a nearby main urban centre which can be strategically improved as part of any additional new development
- Delivery of key services (particularly employment, industrial and retail provision) should align with the analysis of demand in ELR - emphasises Sittingbourne as a key location for future development. Wider distribution of development could allow Borough to benefit from key infrastructure improvements that are planned in the long-term. More 'clustering' of development could be promoted along key transport connections (i.e. M2 and A249) to make Swale a key location for alternative employment provision.

Respondents who did not support the preferred option cited the following issues:

- Option does not come out as best performing option in SA
- Ability of Sittingbourne or other sustainable locations to make greater contribution to growth should be recognised

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- Option is not the most suitable as on the evidence presented appears to have significant detrimental impact on traffic, air quality and the ability for sustainable modal shift within the borough. The option reduces the ability of the Local Plan to deliver necessary highway infrastructure, exacerbating the already heavily congested and polluted network in the Borough (KCC)
- Evidence base does not necessarily suggest Faversham would be viable location for new housing and house prices/cost of living comparatively higher than other parts of Borough. Limited demand for retail/employment at Faversham could lead to it not having capacity for number of future occupants
- Concerns relating to impacts on infrastructure capacity, environmental, landscape and townscape impacts, traffic congestion and air pollution, lack of employment/commercial development to support increase in number of residents

Areas of Opportunity

Q25 - Do you think that any of the areas identified for potential development should be progressed as 'Areas of Opportunity' to enable a more comprehensive approach to master planning for their development and infrastructure needs? If not, please say why.

- Quite a few respondents, both developers and members of the public, answered no for a number of reasons:
 - It would not be cost effective.
 - "Areas of Opportunity" have no evidenced definition.
 - Site allocation for areas should be applied instead.
 - It encourages developers to assume that speculative planning applications relating to those areas are highly likely to succeed.
 - The use of broad locations increases uncertainty to both the local community, infrastructure providers and development industry as to when such sites will come forward and the infrastructure required to support this development. Hence whilst in the later years of the plan, the NPPF allows for such broad locations for development to be identified, people considered it to be preferable for sites to be allocated to meet development needs in full rather than identifying broad locations for development.
 - It is more important that the Strategic Development Areas are planned holistically to grow and should be master planned.
- **Historic England** would welcome the principle of developing an SPD or masterplan to guide future development to guide planning and development rather than an “area of opportunity.”
- **CPRE** do not support the "Areas of Opportunity" idea.
- **Natural England** answered ‘yes’ as they felt that understanding the bigger picture of an area could be useful when integrating aspects of their advice because they are more effective when implemented on a larger scale. The biodiversity and green infrastructure network they encourage benefits from connectivity because it allows mobile species to migrate and this increases stability of populations. This increases their resilience to threats such as climate change. And this also could be a measure against some of the shortcomings identified in a Sustainability Appraisal.
- One respondent suggested an interesting idea that some areas could be identified as 'Areas of Opportunity' for rewilding and climate change mitigation.
- There were a number of general, but related, comments including:
 - All planning should be given a comprehensive approach to meet development and infrastructure needs.
 - Any locations identified for growth need to be site specific in order to ensure deliverability and to understand which sites will deliver when.
- The **Kent Downs AONB Unit** note that decisions on allocating sites within the AONB should be 'landscape led' and allocations should be small scale.
- A number of respondents suggested other areas that they felt were suitable as “Areas of Search.” These included:
 - Brenley Corner in conjunction with Canterbury City Council.
 - Site south of A2 between Ospringe and Faversham
 - The vision of ‘East Faversham’ must qualify as an Area of Opportunity because of its scale and requirement for significant infrastructure needs.
 - Upchurch as it is a Tier 4 Service Centre.
 - Both Warden and Leysdown as it would enable the existing settlements to benefit from improved infrastructure and help to secure the viability of the existing centres.

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- The town centres.
- Rushenden Marshes area and how it can contribute to the wider objectives of the LPR; potentially through an Area of Opportunity.
- The residential development of current employment areas such as the area to the north west of Faversham as it would reduce pressure on local roads by heavy good vehicle movements.
- Garden Hotel, Boughton as its relatively sustainable location with good access to services and facilities.

Teynham Area of Opportunity (AoO)

- There were a number of respondents, mostly developers and landowners but some residents, that supported Teynham's identification as an AoO. This was because:
 - It already has some valuable assets (train station, bus routes, pubs, shops, doctor, primary school)
 - It could provide sites coming forward in the next 1 to 5 years.
 - It would be a sustainable development.
 - It could deliver the final part of the Northern Relief Road which will provide an easier route to the employment and port areas and will ease air quality issues on the A2 corridor.
- **KCC** would support comprehensive master-planning requirements for strategic sites and would welcome early engagement as key infrastructure provider to ensure that infrastructure can be funded and delivered in a timely manner over the long term.
- One respondent felt that a defined site allocation/AoO at Teynham would deliver a greater quantum and range of social, economic and environmental benefits, and also provide far greater benefits to the local community and economy. A larger site area would help enable the creation of a more holistic urban to rural built and landscaped transition which is an aspiration of the Council for this part of the Borough.

There were a large number of very specific and detailed points that did not support a Teynham AoO which are summarised below but which can be viewed in full at <https://swale-consult.objective.co.uk/kse/event/36546/peoplesubmissions/section/s162996595290622?consultation=ID-5894203-1202>

- It would increase traffic congestion and cause gridlocks throughout the Borough, in towns and villages, the A2 from Faversham to Newington, and the A249 southbound from Bobbing to the M2 and M20 interchanges.
- The proposed link road would cut the village of Lynsted in half and cross best and most fertile land, destroy the narrow rural lanes and destroy footpaths. There is no economic argument for it.
- There is inadequate local rail and bus services.
- Any suggestion that those buying the new houses will use walking, cycling and public transport is foolish at best.
- There is no traffic modelling or pollution modelling to support the Teynham Area of Opportunity.
- The primary school in Teynham is full and although there is some capacity at Lynsted and Norton Primary this is limited by the problems of access/parking by car and on foot. Expansion of either of these schools would be problematic due to location and accessibility.
- Faversham Secondary Schools are full.
- Need to preserve and enhance the character of the open countryside within Teynham and neighbouring parishes and the locally important countryside gaps.
- The value of the soil itself should be regarded as part of our natural wealth.
- The dominant grading of agricultural land where both housing and/or a 'movement corridor/bypass' would be built is Grade 1 (excellent). The Fruit Belt, Best and Most Versatile (BMV) agricultural land is being threatened and cannot be restored or 'mitigated'.
- Brownfield sites should be identified and prioritised over green spaces.
- The area under consideration in Teynham has subterranean water issues.

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- Teynham wastewater treatment works is already at capacity so further development should be restricted at least until the sewage treatment authority can demonstrate it has the capacity.
- Water supply in Kent is subject to significant levels of stress and will continue to be in the future.
- Poor air quality is a particular concern along the A2 – with four AQMAs on the A2. The new Environment Act 2021 requires Local Authorities to tackle air quality. This Local Plan (reg 18) doesn't sufficiently address these new requirements.
- There are no supermarkets or major shopping facilities in Teynham, other shops are closing and the doctors are full and retiring – it lacks services and facilities.
- Teynham is specifically identified in paragraph 5.1.97 and is referred to as a 'rural service area' which it is not.
- The principle of large-scale growth in Teynham has not been sufficiently justified through evidence at this stage of plan making.

Climate change

Q26 - Do you agree with the view that the targets for climate change and active travel are too ambitious, inconsistent with national policy on sustainability standards and may lead to deliverability/viability issues

- Respondents were split between those arguing for keeping to national standards and national Building Regulations for reasons of viability and deliverability (majority of developers, although some supported higher standards and others suggested their sites could deliver net zero and should therefore be allocated) and the community and organisations who believed the Council should be more ambitious.
- Should be more viability testing (**Kent SME Network**)
- Higher standards laudable but should be too high as to deter investment (**Ospringe Parish Council**)
- Swale's Climate and Ecological Declaration should be setting context for the Local Plan – prioritising environmentally sustainable growth over economic growth. Swale must be more ambitious (on climate, water, sustainable transport etc) as national targets are not enough. Planning has a key role. Current standards will be outdated soon and inadequate for the task.
- price of not mitigating and adapting now will be higher in long term; forward thinking developers include required measures and economies of scale will bring prices down (**Friends of the Earth**)
- Nature Based Solutions essential, Environment Act is strengthening national policy (**Kent Downs AONB, Woodland Trust**)
- Views of developers should not be given greater weight than those of community (**CPRE**)
- Many respondents used this question to voice general environmental concerns:
 - loss of agricultural land (at odds with net zero ambition/loss of food security)
 - congestion and air pollution
 - threats to historic environment
 - poor public transport
 - scarce water resources and lack of sewerage capacity.
 - uncertainties around carbon offsetting and reluctance of some developers to deliver 20% BNG
 - protection of nature and landscapes for climate and wildlife

Q27 - Do you think the council should accept this view or seek to be more ambitious and continue to aim to embed sustainable/active travel measures across new developments? What are the reasons for your answer?

- Several developers argued that viability is an issue and that costs need to be considered to ensure deliverability with evidence of transport impacts and costs needed
- Several respondents argued that current infrastructure (poor public transport, poor quality cycle network, road/junction capacity) does not support growth and will lead to negative environmental impacts. North South connections in Swale particularly tricky. Some used this as a reason for reduced housing numbers.

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- Others argued that the starting point is to ensure the right development is in the right place. Then sustainable transport/active travel principles should be embedded at design/master-planning stage. Integrating this from the start will ensure it will not be an extra cost and it is more expensive to attempt retrofit.
- Should be more ambitious as costs of not mitigating will be higher – especially if include health and climate impact costs such as flooding (**Friends of the Earth**)
- Active travel has benefits for health, tourism, carbon reduction, air quality and economy and funds need to be made available. Suggestions made to achieve this included: 20mph for new development and town centres; mixed use developments; more car and bike parking at stations; car-pools; reduced parking in new developments; improved bus infrastructure; electric shuttle buses; more EV and hydrogen infrastructure; A2 to become a ‘street’; school buses; culture change away from cars
- Developers of larger/strategic sites argued for these to be intensified/promoted as more deliverable and would include active travel measures.
- Rural sites should be avoided as will be dependent on private car
- Cycling and walking infrastructure should be separate from busy roads and integrated into green/wildlife corridors and recreational spaces as has benefits for health, biodiversity and air quality (**Natural England**)
- Provision of cycle/multi-user (reduced traffic) routes in rural areas to enable access to AONB and promote recreation (**Kent Downs AONB Unit**)
- New technologies should be considered as part of wider green infrastructure strategy to enable active transport to connect people to nature (**Kent Wildlife Trust**)

Place shaping and design

Q28 - Do you think the policies on design (as contained in the Pre-Submission Local Plan, February 2021) should be updated to reflect the changes in the NPPF?

If you answered yes, what changes do you think need to be made to the policies?

- A number of respondents felt that further requirements for better designed developments can only be a positive benefit and that anything that can be done to enhance and add a natural setting to developments should be implemented.
- Most respondents felt that policies should be designed as necessary to meet the needs of the updated NPPF/NPPG’s.
- **KCC** drew attention to the consultation underway on the refresh of the Kent Design Guide, which should be captured in any revisions around design, to ensure that all development is of high quality.
- Some respondents suggested that the policies will need to be looked at regularly in order to check that they are currently viable.
- One respondent did point out that Paragraph 129 goes on to note that there is no requirement for design policies unless Councils wish to set specific policies to safeguard local distinctiveness.
- It was noted by a few respondents that SBC must be mindful that their policy is not ambiguous or overly restrictive to ensure high quality development proposal can come forward.
- Some respondents suggested that ‘good design’ should not just be defined in terms of aesthetics but also in terms of sustainability and tangible environmental improvements (e.g. eco-design / zero carbon design that reduces or minimises carbon emissions) in order to help to meet SBC’s ambitious carbon reduction targets for the borough.
- **National Grid** advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets. Future Design Policy must be consistent with national policy and requested inclusion of text in any policy to reference to site constraints including utilities
- The **Kent Downs AONB Unit** stated that design that enhances sense of place is a most important matter to support sustainable development in the context of the AONB.
- There were many other general design points made such as that trees should be mandatory, design and architectural standards should reflect local styles, high quality design should be a requirement in all new development and redevelopment schemes.

Q29 - Do you think the policies on trees (as contained in the Pre-Submission Local Plan, February 2021) should be updated to reflect the changes in the NPPF?

If yes, what changes do you think need to be made to the policies?

- Most respondents felt that the policy should be updated to reflect the changes in the NPPF but some commented that local policy should not just reword national policy.

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- Lots of respondents felt that we should favour native species but should consider avoiding water-demanding trees.
- Support NPPF objectives for tree-lined streets as it achieves benefits to health and wellbeing alongside economic benefits of helping nature to manage temperature changes.
- Opportunities taken to incorporate trees elsewhere in developments (such as parks and community orchards).
- Need for enforcement to ensure trees are maintained, and measures needed to ensure their long-term maintenance.
- Detailed and prescriptive policy on how trees are provided in new development can be a barrier to both new development and the most effective approach to onsite delivery of trees, adding to costs and prevent the flexible delivery of trees whether this be on streets, in public open space or in front and rear gardens. Other requirements regarding lighting, parking, signage, vehicle charging will also impact on a sites ability to deliver trees, in particular street trees. It is essential that policy relating to trees in new development should consider the whole site.
- Flexibility is needed to enable developers to meet the requirement to provide trees without compromising other aspects of the scheme, including viability. Future costs of maintaining and managing street trees in addition to other policy costs, could render some development unviable.
- For new development, the **Woodland Trust** advocates for a minimum 30% canopy cover. This level, and higher, has been shown to have significant health and wellbeing benefits. Delivering new and enhancing access to green spaces, including woodland should also be supported through design codes.

Protecting and enhancing environment and heritage

Q30 - Do you agree that the council should be ambitious in its requirement for biodiversity net gain on new developments and that 20% is justified even though the emerging Environment Bill 10% is "a minimum"?

- Wide ranging support from the public, parish and town councils and national and local organisations for implementing a 20% target, citing biodiversity decline and the need to reverse it as appropriate justification.
- Conversely, large proportion of developers and planning agents felt that a 20% target has not been justified, would not be compliant with national policy and viability would be impacted to the detriment of matters such as affordable housing.
- Some respondents were supportive but felt that the target should allow for flexibility on a case-by-case basis

New homes

Q31 - Do you agree that the Local Plan should be clearer on how the needs of older people will be met?

- Support from most developers, the community and KCC that Local Plan should address this on grounds that would meet needs and free up existing large houses for families.
- Any policy requirements i.e. specifying number of specialist units, needs to be evidenced with monitoring of need and supply to ensure delivery
- Housing should be better designed from the start to avoid need for later adaptation
- Specific types of housing that were identified as being needed included: bungalows, adaptable housing, housing for disabled people, dementia-friendly housing, sheltered housing, multi-generation housing, retirement villages i.e. more than just care homes and retirement flats
- Importance of good access to services and a variety of social infrastructure highlighted as well as need for high quality pedestrian environment to facilitate access. A developer of Chalet and Park Homes argued that this could help meet needs.
- Several respondents took the opportunity to stress the need for more affordable housing for local people and **Faversham Community Land Trust** wanted Community Land Housing to be recognised and included within the Local Plan

Q32 - Do you agree with the view that new dwellings should be built to the Nationally Described Space Standards? What evidence do you have to support your answer?

- Majority support for inclusion of Nationally Described Space Standards (NDSS). Several developers pointed out that their schemes already meet these standards so continuing to do this would not impact viability

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- Some developers pointed out that evidence on need and viability is required by the PPG although reference was made to the SBC Viability Study that already proves these standards are viable
- Some respondents were more cautious and while welcoming improved standards, were concerned that this may hinder development of smaller, high density units which might be appropriate for first homes/downsizing.
- Some respondents pointed out that high quality design was more important than space standards and others suggested that gardens should be big enough to allow self-built extensions rather than rely on space standards.
- Number of respondents identified space/other design issues that are not covered by the NDSS including: storage; good ventilation; accessibility (including for disabled users); space for home working; garages big enough to park cars, bike storage and appliances; bin storage and decent sized gardens.

Q33 - Do you agree that the current Local Plan approach is the most appropriate or should we have a specific policy for self build homes?

If we were to have a specific policy, should we allocate sites and/or require a percentage of self build plots on development allocations, for people wanting to build their own homes? If you think we should allocate sites, can you suggest any sites suitable for self build we should consider allocating? If submitting a site, please provide a location plan and brief details about the site.

- Some members of the public and developers felt that leaving the delivery self-build to the market is appropriate,
- Majority of respondents, including the **Home Builders Federation**, felt the following, or a mixture of the following, is necessary:
 - Allocating sites using council owned land.
 - Allocating sites by working with willing landowners, which is the best way to achieve the kind of sites that people really want.
 - Requiring a % of residential/mixed-use allocations to be set aside for self-build plots, but after the 2 points above have been exhausted.
 - Wording a supportive policy which allows sites to come forward in appropriate locations, such as on the edge of settlements, and acknowledging that the need cannot be met by brownfield sites alone.

Q34 - Do you agree with the view that a lower site threshold should apply to sites within the Kent Downs Area of Outstanding Natural Beauty? What evidence do you have to support your answer?

- Support for lower threshold as need to sustain local communities and increase access to affordable homes where they are currently in limited supply (**Kent Downs AONB Unit, CPRE, Bredgar, Rodmersham, Milstead, Boughton under Blean Parish Councils**)
- Need for caution in using a landscape designation to determine the level of affordable homes that should be provided in an area (**Tunbridge Wells BC**)
- Need to protect AONB and ensure any development is justified, sensitive and of a high quality.

Q35 - Do you think that the Local Plan should continue to use a criterion-based policy only to deal with the accommodation needs of Gypsies, Travellers and Travelling Showpeople?

If not, do you agree with the view that the council should re-consider allocating sites to meet this need? Please say why.

If you answered yes, do you think this should be done via individual site allocations, or by requiring provision to be made within larger mixed use/residential allocations?

- The **Showmen's Guild of Great Britain** supported the continued use of a criterion-based policy, accepting that site allocations have not worked, both in Swale and elsewhere in the country. It was stressed that equal consideration should be given to members of travelling community from the wider area who seek to settle within the Borough, as to those already within the Borough.
- Whilst a significant number of contributors supported the continued use of a criterion-based policy, a number of additional and alternative points of view were given as follows:
 - Planning agents, bodies such as **CPRE** and the **Kent Downs AONB Unit**, and some parish councils believed that site allocations are necessary to avoid unauthorised sites.
 - Requiring site provision as part of housing/mixed-use allocations would be hard to see through to fruition, with no examples of this having successfully worked elsewhere.
 - Large sites do not tend to work.
 - Concern with the accuracy of the most up to date GTAA.

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Q36 - Do you have a site that you think would be suitable for Gypsy, Traveller and Travelling Showpeople accommodation? If so, please state where it is (and include a site location plan if possible) and how many pitches/plots it could provide.

Only one site was suggested (by member of public) but an agent who has submitted planning applications for these communities commented that a high level of need remains in the Borough, and that the Council should re-consider the suitability of sites with temporary permission and/or those that are occupied with appeals pending.

Economy and town centres

Q37 - Do you agree that the Local Plan should not allocate specific locations for the creative industries but instead draft the development management policies to provide flexibility to allow these businesses to set up, establish and grow.

- The majority of respondents felt that the creative industries should be allowed to grow organically and that they should not be allocated specific locations and should be governed instead by the development management policies applicable to other commercial uses and activities, rather than afforded special treatment.
- People felt that creative industries in themselves depend on flexibility, adaptability and the need for decisions to be responsive to often immediate needs.
- One respondent suggested that "creative industries" are not evidenced to require any specific locations. Apart from the possibility of gaining some government funding, there appears scant case to distinguish "creative industries" from any other given their scope, size, and diversity.
- It was noted that at present there is no creative/cultural strategy for Swale.
- A member of the public suggested that the Council could take opportunities to promote the re-purposing of vacant and hard-to-let space in town centres and thus also improve the vitality and viability of the borough's town centres.
- A number of respondents felt that the creative industries need to be encouraged with real opportunities, not Arts Council based so called initiatives that give nothing back to local artists or the community in terms of skill sharing or the passing of knowledge.
- A number of members of the public suggested that Swale needs small skills centres, educational centres and low rents.
- A couple of respondents felt that by not identifying specific sites or locations for creative industries the Local Plan may miss an opportunity to support and enhance this sector that may underpin the revitalisation and regeneration of some locations within the borough.

Q38 - Do you agree with our assessment of what we need to provide to ensure that the economy is sustained in Swale and that we can provide the right environment to attract new businesses to Swale and new employees? How else can Swale ensure that its current positive economic forecasts and ambitions come to fruition and are sustained?

- The majority of respondents agreed in principle with our assessment, but a number said that this needs to be reassessed in light of the pandemic and new working practices.
- **KCC** agreed with the recognition that planning for long-term prosperity goes well beyond just finding employment land, but also requires having access to an appropriately skilled work force in place. The County Council agrees that a strong quality of place is fundamental to achieving a fit and strong economy – which will be achieved through ensuring that sites are well connected and that high quality communities are delivered. Detailed consideration will need to be given to access and movement requirements across the Borough.
- A number of developers and business owners noted that insufficient land was proposed to meet the need identified in the Employment Land Review.
- Many respondents thought that we should grow and support micro businesses - in town centres, housing estates, domestic homes, defunct churches, empty offices, public parks, street corners and laybys. Offer free or subsidised combined residence and shop outlet for first year of creative start-ups.
- There was support from a variety of respondents for green businesses to be given preference. They felt that the Plan needs more on how Swale Borough Council can encourage the use of the borough as a future hub for 'green' business investment and local employment to promote a green, sustainable and diverse local economy. This is not set as a priority when identifying development in the draft and risks Swale missing out on the huge opportunities for our younger generations from a 'green industrial recovery'.
- There were mixed views around our existing industrial estates and any future ones with some people feeling that large businesses parks are not the answer due to problems with their transport links - all business centres in Swale are accessible by car only as they tend to be on the outskirts of town. Others pointed out that distribution and warehousing operations are expensive in terms of land, and create fewer high value jobs. Whilst others noted how much success and employment they have brought to Swale over the years.
- **TWBC** queried whether the Retail and Leisure Needs Assessment from December 2018 can be wholly relied upon and whether it requires a refresh given the changes in the retail market as a consequence of COVID.

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- Many respondents stressed the importance of horticulture and agriculture making sure we retain our Best and Most Versatile agricultural land.
- There was some support for supporting and growing the two major strategic employment locations of Port of Sheerness and Kent Science Park as it would ease pressure on other areas of the borough and has the potential to create centres of excellence.
- Some members of the public pointed out that consideration needs to be given to the intensity of employment development within the Boroughs existing employment sites, which would ensure the land is used efficiently and provide more employment opportunities.
- A number of local employers noted that the Council should recognise the role SMEs can make in delivering local jobs for local people with local suppliers, etc.

Q39 - Where should we be locating the next generation of employment sites? For example, as extensions to existing sites? Close to the strategic road network? Adjacent to existing and/or new housing sites?

- There was a wide range of responses to this question and ideas as to where to locate new employment sites. They included:
 - Close to strategic railway lines/bus network and road network and adjacent to new housing sites.
 - Everywhere - micro business will employ more people if allowed to flourish with minimal interference.
 - Sheppey provides scope for manufacturing given its location and network access to sea freight.
 - As extensions to existing sites.
 - In proximity to new housing sites to achieve the three strands of sustainable development at the heart of the NPPF.
 - On brownfield sites before greenfield.
 - Depends on type of industry. Large delivery/service buildings to be near wide main roads for easy access by lorries. Offices could be near to town centre. Noisy, smelly, 24hour operations away from residential. These should be closer to the motorway network in order to reduce the amount of commercial transport on our poor local infrastructure.
 - Preferably as extensions to existing sites.
 - The **AONB Unit** noted that within the AONB the focus should be on facilitating smaller, workshop type units or conversion of existing redundant buildings that can be achieved without compromising AONB objectives.
 - Possible new town with good rail and road network but needs new schools and infrastructure to support it.
- A number of general comments were made which didn't suggest a location but which are relevant. These included:
 - Avoid new homes with overly restrictive policies on the types work occupants are allowed to do from home. In 10 years' time there may even be types of home working we are not aware of now.
 - Re-adapting old buildings creating hot desking centres.
 - Provision of Electric Charging Points, provision of cycle ways, ensuring highspeed broadband as a requirement to any and all developments.

Q40 - Do you have an alternative site that hasn't been considered before that could be suitable for employment use? If so, please provide a site location plan and some key details about the site such as how much and what type of employment it could provide.

- Three new sites were put forward for commercial development (Sittingbourne, Dargate, Newington) and two for mixed use (Tunstall, Faversham)
- There were some other useful suggestions made for finding new sites such as:
 - Existing retail sites could be converted.
 - Consider an audit of all office buildings and employment sites to assess vacancies and suitability for 21st century before building on green fields. If units are empty and out of date consider rebuilds.

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Q41 - Should there be a more flexible development management approach to building uses at ground and second floor and above in our town centres, to encourage occupation by a range of business types?

- An overwhelming number of respondents agreed that there should be a more flexible development management approach as people felt that:
 - More people living locally means greater footfall and would certainly give them a much needed boost.
 - Better to have town centre buildings in use than preserved in aspic.
 - It must be subject to appropriate design measures being in place.
 - A sensitive and flexible development management approach to town centres which supports and encourages a range of uses and activities might assist in keeping and enhancing their vitality.
 - All for creative use of town centres. As long as there is consultation and review important to try new approaches. Need to be cautious with some types of retail e.g. betting shops, vape shops and aspects that may not enhance people's wellbeing.
 - With fewer people commuting to city based offices daily, internet/shared office facilities would be useful.
 - Making our town centres more viable and vital, which in turn will make them more sustainable - reducing out-of-town shopping and road transport and encouraging more walking and cycling and the viability of small, independent retailers who produce locally (e.g. lower food miles).
 - It was suggested that impact assessments should be required.
- **KCC** would support a more flexible approach, to include the provision of libraries, cultural uses, youth, adult education and the full range of community services.
- One respondent felt that it would be appropriate to consider greater flexibility in some town centres where appropriate, e.g. outside primary retail frontages, and to encourage diversification of uses and sectors; the cultural sector could play a significant role in revitalising town centres as seen elsewhere (e.g. Margate, Ramsgate, Hastings).
- The **NHS** said that this approach could support more flexible considerations regarding provision of services.
- A couple of respondents felt that there should be a more flexible development at first and second floor but not at ground floor level.
- **CPRE** agrees in principle that there should be a flexible approach to uses in the town centre, provided that such uses can co-exist and won't adversely impact each other.

Q42 - How can we adapt and improve town centre environments to make them more attractive places to dwell and spend time and to encourage greater investment and activity?

- A large number of respondents mentioned parking and felt that free or much cheaper parking would attract more visitors into the town centres.
- There were also a lot of comments on traffic free areas/pedestrianisation being implemented which would allow people to eat and drink outside, weekly markets and pop up events to take place, more seating could also be provided. It was felt that this would all attract more activity.
- A number of respondents felt that the planning process needed to ensure that repairs to existing buildings are sensitive to the area and respect the history of the location.
- Both the public and businesses suggested that we should create town plans/town centre strategies for the main town centres, in consultation with local business and users, to increase their attraction as places to visit by both residents and tourists, and try and make the town centres more of an 'experience', whilst also improving the quality of the shopping/leisure experience.
- There were comments by a variety of respondents about the general appearance of our town centres and the need to remove clutter and unnecessary street signs, the required enhancement of the public realm, the need for more trees and landscaping to improve the attractiveness and air quality of the area, improved lighting to encourage the night-time economy, improvements required to the general condition/appearance of existing buildings and the need to find uses for empty shops (e.g. displays, tourist information, local crafts or galleries).
- Respondents felt that more cycle racks and safe routes for active travel were required both into and within town centres with better connectivity/signage/designated routes.
- **Tunbridge Wells BC** felt that Swale should adopt a flexible approach to commercial uses within the town centre to ensure long term adaptability and resilience as a mix of commercial, leisure, community and cultural uses alongside residential are considered key to sustaining town centres in the future.