



Sustainability Appraisal (SA) of the Swale **Borough** Local Plan



SA Report Addendum
May 2016

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INTRODUCTION

1 BACKGROUND

- 1.1.1 The Swale Local Plan Part 1, once adopted, will set out strategic policies, allocate sites and set out a framework of development management policies to guide the determination of planning applications.
- 1.1.2 The plan is at an advanced stage of preparation, having been formally published in December 2014 ahead of being submitted to Government for examination in April 2015; and then having been the focus of Examination Hearings in November/ December 2015.
- 1.1.3 Following the Examination Hearings, in February 2016, the appointed Planning Inspector wrote to the Council stating that Objectively Assessed Housing Need (OAN) is 776 dwellings per annum, and that the Council should **allocate additional sites** in order to make provision for meeting OAN (the submitted plan having made provision for 540 dwellings per annum).
- 1.1.4 Subsequent to receipt of the Interim Report, the Council began in earnest¹ the process of considering omission sites (i.e. sites that are available and deliverable, but not allocations within the submitted plan) with a view to identifying those that should become allocations.
- 1.1.5 The aim was to develop **draft modifications to the plan** as submitted (covering additional allocations primarily, but also changes to various other elements of the submitted plan) that could then be published for consultation.
- 1.1.1 At the current time, work has been completed and draft modifications are published for consultation.

2 THIS SA REPORT ADDENDUM

- 2.1.1 The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 2.1.2 The aim of **this SA Report Addendum** is essentially to present information on the draft modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation.
- 2.1.3 In order to achieve this aim, this SA Report Addendum sets out to answer three questions:
1. What has plan-making / SA involved up to this point?
 - Particularly in terms of the consideration given to reasonable alternatives
 2. What are the SA findings at this stage?
 - i.e. in relation to draft modifications.
 3. What happens next?

N.B. This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report submitted in April 2015. Whilst the focus of this report is on draft modifications (alternatives), there is a need to bear in mind that the draft modifications will (if taken forward) be implemented alongside the rest of the Local Plan, i.e. that part which is not the focus of 'modification-making'. Hence there is some need to read this SA Report Addendum alongside the 2015 SA Report.

¹ In practice, the process commenced immediately after Examination Hearings, as it had become apparent through discussions at the Hearings that the Council's OAN would be set at c.776 dpa, and that the Council would be expected to allocate additional sites.

3 WHAT’S THE SCOPE OF THE SA?

3.1 The SA framework

3.1.1 The scope of SA work, with respect to the Swale Local Plan, is introduced within the SA Report submitted alongside the Local Plan in April 2015. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological ‘framework’ for appraisal. The SA objectives are listed below in **Table 3.1**.

Table 3.1: The SA framework

Sustainability objectives / topics		Sub-objectives
The environment	Reduce air pollution and ensure air quality continues to improve across the borough	<ul style="list-style-type: none"> • Contribute to reductions in air quality monitoring pollutants at monitoring locations
	Conserve and enhance biodiversity and the natural environment	<ul style="list-style-type: none"> • Maintain and enhance relevant habitats and species • Protect and enhance habitat corridors and linking routes • Continue the protection of designated areas and propose appropriate enhancement • Conserve and enhance the populations of protected and/or BAP priority species • Allow for the creation of new areas of BAP priority habitats
	With regards to climate change : Minimise the need for energy, increase energy efficiency and to increase the use of renewable energy; and encourage sustainable construction materials and methods	<ul style="list-style-type: none"> • Limit the emissions of greenhouse gases • Ensure preparedness for the effects of climate change • Increase the energy efficiency of housing stock • Increase the proportion of energy generated from renewables
	Reinforce local distinctiveness, environmental quality and amenity through the conservation and enhancement of built and cultural heritage	<ul style="list-style-type: none"> • Protect archaeological sites, historic buildings, conservation areas and other culturally important features
	Protect and enhance the valued landscape and townscape of Swale	<ul style="list-style-type: none"> • Preserve and enhance the nationally important landscape of the AONB • Contribute positively to the borough’s established high quality landscape • Contribute to the establishment of the green grid network
	Protect and enhance soil quality and reduce contamination	<ul style="list-style-type: none"> • Reduce contaminated sites and increase remediation of redundant industrial land • Maintain the resource of high quality agricultural land • Protect an identified brownfield site with conservation value
	Promote traffic reduction and encourage more sustainable alternative forms of transport	<ul style="list-style-type: none"> • Provide improvements and new routes for cyclists and pedestrians • Reduce need to travel by car • Lead to adverse impacts on the Strategic Road Network, including junctions of the M2

Sustainability objectives / topics		Sub-objectives
	Achieve the sustainable management of waste	<ul style="list-style-type: none"> • Reduce waste arisings • Ensure waste management in accordance with the waste hierarchy
	Manage and reduce the risk of flooding; and maintain and enhance water quality (ground and surface) and make efficient use of water	<ul style="list-style-type: none"> • Improve the quality of water • Reduce the demand for water (water efficiency measures) • Ensure that development does not increase vulnerability to flooding • Provide SuDS and other flood prevention systems and ensure integration into the wider green grid network
Communities	Reduce crime and anti-social behaviour and the fear of these	<ul style="list-style-type: none"> • Help reduce the fear of crime • Incorporate designing out crime measures into new development
	Improve health and well-being and reduce inequalities in health	<ul style="list-style-type: none"> • Improve access to health services • Contribute to fuel poverty reductions • Improve access to recreation
	Provide affordable and decent housing adaptable to future needs of the community	<ul style="list-style-type: none"> • Deliver the appropriate mix of housing to deliver long term regeneration schemes • Reduce the number of people homeless or in temporary accommodation • Contribute to the provision of affordable, social and key-worker housing • Reduce the number of unfit housing and those failing decent homes standards • Deliver adaptable housing to meet the lifelong needs of the population
	Meet the challenges of a growing and ageing population ; reduce poverty and social exclusion; and improve accessibility for all to key services and facilities.	<ul style="list-style-type: none"> • Assist with regeneration of deprived areas • Improve access to key services • Improve access to recreation, amenity and community facilities
The economy	Ensure high and stable levels of employment in accessible locations; raise the educational achievement levels across the borough; and help people to acquire the skills needed to find and remain in employment	<ul style="list-style-type: none"> • Increase the numbers of knowledge based and higher paid jobs • Create new employment opportunities to meet the needs of the residents • Contribute to increased learning opportunities
	Sustain economic growth and competitiveness	<ul style="list-style-type: none"> • Contribute the development of eco-tourism industry • Provide for opportunities to attract new businesses to the borough • Contribute to infrastructure improvements

3.2 Updating the SA scope

3.2.1 It has not been necessary to update the SA framework (Table 3.1); however, it is appropriate to consider how understanding of more detailed issues/objectives has evolved over the past year or so (i.e. since the time that the plan and SA Report were published and then submitted for Examination), and how in turn understanding of the SA scope has evolved.

3.2.2 Presented below is a brief discussion of some key matters, in terms of which evidence/understanding has evolved.

Objectively Assessed Needs

3.2.3 The Strategic Housing Market Assessment (SHMA, September 2015) updated the previous SHMA, and determined that the objectively assessed need (OAN) for housing in Swale was 776 dpa (13,192 dwellings for the plan period) and that this included 190 dpa for affordable housing. Employment forecasting also indicated as necessary some supporting 10,900 jobs or 130,000 sq. m (60 ha) of employment floorspace ('B' class). The SHMA led to the publication of a Council position statement (PS) via which the findings of the SHMA were accepted. It indicated that should further sites be required, this would be achieved in accordance with the strategy of the plan, whilst addressing environmental constraints (inc. best and most versatile agricultural land) in accordance with paras. 110/112 and 113 of the NPPF.

Landscape issues/opportunities

3.2.4 In recognition of the landscape issues associated with some of the prospective allocations, landscape architects David Huskisson and Associates were appointed to undertake landscape-led concept diagram work and policy recommendations for a number of sites in contention for allocation through modifications.

Agricultural land

3.2.5 Para. 112 of the NPPF indicates that where significant development of agricultural land is demonstrated to be necessary, Councils should seek to use areas of poorer quality land in preference to that of a higher quality – known as Best and Most Versatile (BMV). Use of BMV land will be necessary, due to insufficient levels of available and suitable brownfield sites, and the locations of lower quality agricultural land. Read in conjunction with para. 110 of the NPPF, this means the approach should be that use of BMV (Grades 1,2 and 3a) should be avoided as far as possible by use of lower quality land (i.e. grades 3b and above) until such point as consistency with other policy objectives becomes unsustainable.

3.2.6 Para. 112 of the NPPF also requires the economic and other benefits of BMV land to be taken into account. As such, a report (SBC/PS/088) was presented to the Examination in October 2015 that explored 'Agricultural Land Value in Swale'. The report finds that losses of BMV are likely to be irreversible, with the estimation that for every 100 ha of BMV land lost, £0.7 million - £1.7 million of output and between 5 and 13 jobs in agriculture could be lost.

Other thematic issues

3.2.7 Understanding of numerous other issues has evolved, in light of representations received on the plan, discussions at Examination and the Inspector's Interim Reports of 2016. In some cases, this has led to statements of common ground, e.g. with the Highways Agency.

Area / site specific issues

3.2.8 Understanding of various area and site specific issues also increased greatly over the course of 2015, as a result of written representations received and also discussions at the Examination Hearings. Whilst it is not possible to summarise matters here, evidence of up-to-date understanding should be readily apparent within the analysis presented in subsequent sections of this report.

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

4 INTRODUCTION (TO PART 1)

4.1.1 The Local Plan-making / SA process has been ongoing since 2011, as explained within the section of the SA Report (April 2015) that answers the question: *What has the SA / plan-making process involved up to this point?*

4.1.2 At the current time there is no need to recap the whole story; rather, there is a need to explain the work undertaken in early 2016 that led to the development of draft modifications.

4.1.3 Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account alternatives appraisal findings when finalising draft modifications.²

4.1.4 As such, this part of the report is structured as follows -

Chapter 5 - explains reasons for selecting the alternatives dealt with

Chapter 6 - presents an appraisal of the reasonable alternatives

Chapter 7 - explains reasons for selecting the preferred option.

What about site options appraisal?

4.1.5 Throughout the plan-making / SA process, in addition to appraisal of reasonable alternatives (i.e. mutually exclusive approaches to addressing policy issues), there has been a focus on appraising site options (i.e. the pool of sites that are available and deliverable, and thereby in contention for allocation).

4.1.6 The Local Plan SA Report (April 2015) presented information on site options in Appendix IV, and then updated site options appraisal findings were presented within Post Submission Interim SA Report II (October 2015). Also in 2015, site options appraisal findings (non-SA) were reported within the Council's Strategic Housing Land Availability Assessment (SHLAA) and the 'Ranked Assessment of Non-allocated Site Options' report prepared by AECOM.

4.1.7 Subsequent to the Local Plan Examination Hearings in late 2015 the Council recognised the need to update site options work, to reflect latest understanding of site availability/deliverability and latest understanding of the evidence/issues.

4.1.8 It is not the intention of this SA Report Addendum to encourage a focus on site options at the current time (rather, the intention is to focus attention on alternatives); however, those interested in the details of site options appraisal work are signposted to the -

- The list of reasonable site options, and an explanation of how this list was arrived at - see **Appendix I**;
- GIS analysis of reasonable site options - see **Appendix II**;
- Discussion of reasonable site options at each settlement in turn - see **Appendix III**;
- An updated list that ranks site options in a (very rough)³ order - see **Appendix IV**; and
- Updated SHLAA - see <http://www.swale.gov.uk/examination-document-library/>.

² In line with the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present appraisal findings in relation to 'reasonable alternatives', as well as 'an outline of the reasons for selecting the alternatives dealt with'.

³ The 2015 'Ranked Assessment of Non-allocated Site Options' report proved a useful point of reference at examination hearings; however, it was widely accepted that, because the methodology was necessarily limited (i.e. necessarily formulaic/mechanistic), limited reliance should be placed on its findings. Perhaps most usefully, the report served to highlight sites with 'showstopper' and 'significant' constraints, and highlighted that of the remaining sites potentially in contention there is much variation in terms of the landscape impact that would result from development. In 2016 consideration was given to the possibility of not updating the ranking exercise - because understanding of site options had been refined considerably (i.e. the focus was on a shortlist of better performing sites) making ranking more of a challenge - however, on balance it was determined appropriate to update the exercise. It is important to emphasise that the ranking exercise is not SA. The outputs are simply included within this SA Report Addendum for ease of reference.

5 DEVELOPING REASONABLE ALTERNATIVES

5.1 Introduction

- 5.1.1 This chapter explains steps taken to develop 'reasonable alternatives'. Specifically, this chapter -
- explains the **background** to alternatives development; and
 - explains how background understanding enabled **development of reasonable alternatives**.

5.2 Background

- 5.2.1 Early discussions between the Council and AECOM centred around three questions:

- 1) What should be the focus of alternatives appraisal?
- 2) What strategic / 'top-down' understanding must factor-in?
- 3) What 'bottom-up' understanding must factor-in?

- 5.2.2 Each of these three questions is discussed in turn below.

What should be the focus of alternatives appraisal?

- 5.2.3 The Inspector tasked with examining the Local Plan wrote to Swale Borough Council on 4th February 2016 stating that Objectively Assessed Housing Need (OAN) for Swale equates to 776 dwellings per annum (dpa). The Inspector does not accept the argument, put forward by some Examination participants, that OAN is higher than this.

- 5.2.4 Furthermore, the Inspector stated that the plan should make provision for OAN, stating: "*The Council's work to update the evidence base demonstrates that there are sufficient sites available to enable it to deliver the full OAN for the plan period whilst maintaining the settlement strategy of two planning areas. The Council should therefore proceed to allocate sites to meet a revised target of 776 dwellings pa.*"

- 5.2.5 The Council accepts the Inspector's finding that it is appropriate to make provision for OAN in full, and therefore accepts that there is a need to allocate additional sites accordingly, through modifications to the submitted plan (recognising that the submitted plan makes provision for a level of housing below 776 dpa). Whilst the Council's position at the time of submission was that delivery constraints were a barrier to providing for OAN, this can no longer be sustained.

- 5.2.6 Therefore, the Council identified a need to explore **alternative approaches to providing for OAN** through the allocation of additional sites.

- 5.2.7 *In theory*, making provision for OAN necessitates allocating additional sites to deliver 2,224 homes.⁴ However, *in practice* there is a need to allocate additional sites to deliver a higher figure, i.e. there is a need to make provision for a **buffer**. This is because there is a risk that some sites will not deliver within the plan period, or deliver at a slower rate than anticipated (i.e. with some delivery beyond the plan period). Also, there is a need to consider the possibility of an additional buffer to ensure a robust 'trajectory' of delivery across the whole plan period, recognising that some sites will have a long lead-in time and hence only be ready to deliver in the latter part of the plan period. There is a need to avoid troughs in the housing trajectory; and specifically ensure a continual 'five year land supply' (i.e. a list of ready-to-go sites capable of delivering $776 \times 5 = 3,880$ homes).

- 5.2.8 Therefore, the Council identified a need to explore **alternative approaches to providing for 2,224 homes plus an appropriate buffer**.

⁴ This number of additional dwellings would mean delivering 13,192 over the 17 year plan period, or 776 dwellings pa on average.

5.2.9 The Council recognised that the allocation of additional sites is the key issue to be addressed through modifications to the plan, and so appraisal of alternatives was necessary. There was some discussion of whether **other plan issues**, set to be the focus of draft modifications, might ‘reasonably’ need to be the focus of alternatives appraisal - notably affordable housing, Gypsies and Travellers, local greenspaces, Kent Science Park and the Port of Sheerness - however, it was determined that they did not. Rather, it was determined proportionate and reasonable for the Council to draft modifications on the basis of representations received, discussions at Examination Hearings and other evidence. The matter of how these issues might best be resolved through policy is appropriately discussed as part of the draft plan appraisal, (see ‘Part 2’ below), rather than through formal alternatives appraisal.⁵

What ‘top-down’ understanding must factor-in?

5.2.10 Over the course of the plan-making process (stretching back over five years), much work has focused on the consideration of alternative approaches to housing distribution.⁶ On the basis of this work, the Inspector’s Interim Report (Feb 2016) was able to conclude that:

“The settlement strategy successfully addresses the core principles set out in paragraph 17 of the NPPF, particularly with regard to driving and supporting economic development and conserving the natural environment and heritage assets, whilst taking account of the different roles and character of different areas... The settlement strategy is soundly based and consistent with national policy subject to allocating additional sites to meet OAN whilst maintaining the broad proportional balance of growth between the two planning areas [i.e. the two planning areas of: A) the Thames Gateway; and B) Faversham and the rest of Swale].”

5.2.11 The Council understood the implication to be that **any ‘reasonable’ option** (for distributing the additional dwellings) **must**:

- A) As per Policy ST3, involve delivering roughly 87% within the Thames Gateway planning area, and roughly 13% within the rest of Swale; and accord with the settlement strategy, which establishes Sittingbourne as the main borough urban centre, above Faversham and Sheerness and the supporting other urban local centres within the West Sheppey Triangle, followed by the six rural local service centres and finally the villages
- B) Accord with all aspects of Policy ST1, including the policy of conserving and enhancing the natural environment.
- C) More broadly accord with the plan objectives.

What ‘bottom-up’ understanding must factor-in?

5.2.12 Having answered the two questions above, there was an understanding that: the aim was to develop a single set of alternative approaches to distributing ‘2,224 dwellings plus a buffer’; and only certain distribution options need (‘reasonably’) be given consideration.

5.2.13 However, even with this understanding, it was recognised that there remained a plethora of alternative approaches that might be taken. With a large number of site options in contention, it was recognised that the number of potential site combinations was far too large to appraise (let alone meaningfully consult on).

⁵ In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what ‘reasonably’ should be the focus of alternatives appraisal should be made in-light of the plan objectives. In early 2016, given the task of preparing draft modifications to the Swale Local Plan, it was recognised that the overriding objective was to plan for OAN. N.B. Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

⁶⁶ See discussion at paras 3.2.3 and 3.2.4 of Post Submission Interim SA Report I (2015) [online] available at: <http://www.swale.gov.uk/examination-document-library/> (document PS/033)

5.2.14 As such, it was recognised that there was a need to undertake work to **explore site options**, with a view to narrowing down the number of distribution alternatives in contention, and ultimately establishing a set of reasonable alternatives.

5.2.15 Findings of initial work to explore site options are presented in **Appendices I - IV**.

5.3 Establishing reasonable alternatives⁷

5.3.1 On the basis of ‘top-down’ / strategic considerations (essentially the need to plan in-line with the established strategy, and respond to the advice of the Inspector) and ‘bottom-up’ / site specific considerations (see discussion of sites in Appendices I - IV and the SHLAA) the Council was in a position to establish reasonable alternatives.

5.3.2 In practice, this involved: 1) considering each settlement in turn and considering whether the approach to growth should be taken to be a **constant or variable**, for the purposes of developing alternatives; and then 2) establishing borough-wide alternatives.

5.3.3 Each settlement (or settlement grouping) is discussed in turn below, before a final section presents the borough-wide alternatives. For each settlement, strategic and site specific considerations are discussed in turn, before a conclusion is reached regarding whether the approach to growth should be taken to be a constant or a variable.

N.B. To reiterate, the ‘analysis of site options’ referenced below can be found in **Appendices I-IV** of this report and within the Council’s SHLAA.

Sittingbourne

5.3.4 There is a need to focus additional allocations at Sittingbourne, recognising the need to plan in-line with the established broad settlement strategy. However, at the same time there is a need to recognise certain strategic constraints, notably in relation to landscape/ settlement-separation/ heritage sensitivities to the south (which is where site options are concentrated).

5.3.5 Analysis of site options showed a number of sites in contention, and indeed showed there to be a number of ‘stand-out’ sites that could be taken to be a ‘given’, for the purposes of developing alternatives. Specifically, sites identified as a ‘given’ were: Former Bell Centre, Bell Road (SW/343; 120 dwellings); and SW Sittingbourne (SW/703; 564 dwellings).

5.3.6 Allocation of these sites would involve an additional 684 dwellings at Sittingbourne. However, there is potentially scope to deliver higher growth at Sittingbourne, and there are sites that could come into contention under such a scenario, specifically: sites southeast of Sittingbourne (SW/050, 107, 204).⁸

5.3.7 As such, the approach to additional allocations at Sittingbourne was identified as a **variable**, for the purposes of developing alternatives. Two **options** were established:

- 1) Lower growth (684 dwellings) at the broadly supported sites
- 2) Higher growth (c.1,300) at the broadly supported sites, plus an additional urban extension to the southeast.

⁷ Responsibility for establishing reasonable alternatives ultimately falls with the Council, rather than the SA consultant (AECOM, whose primary task is to *appraise* reasonable alternatives). However, in practice, the Council and AECOM worked closely on the task of establishing reasonable alternatives. It is also worth reiterating a point already made above, which is that Councils may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal.

⁸ Another cluster of sites is to be found more or less directly south of Sittingbourne. It would be possible to deliver an extension to Sittingbourne on a similar scale to that which could be delivered to the southwest or southeast; however, the option of an extension to the south can be discounted, for the purpose of developing reasonable alternatives. To reiterate once again, analysis of site options (and combinations of site options) can be found within the Council’s SHLAA, and within Appendices I-IV of this report.

Faversham (and Boughton)

- 5.3.8 There is a need to deliver a 'proportional boost' at Faversham, i.e. a boost in-line with the strategy of directing c.13% of growth to Faversham. Faversham is a heavily constrained town; however, at the same time it is suited for housing growth in the sense that there is high demand and therefore high development viability. This is an important strategic consideration, given that viable/deliverable sites are needed to ensure a robust housing trajectory.
- 5.3.9 Analysis of site options showed a number of sites in contention, and indeed showed there to be a number of 'stand-out' sites that could be taken to be a 'given', for the purposes of developing alternatives. Specifically, sites identified as a 'given' were: Brogdale Road (SW/441; 66 dwellings; has planning permission); SW/413 (Perry Court Farm; 370 dwellings; has a resolution to grant outline planning permission); Lady Dane Farm (SW/080; 60 dwellings; an existing allocation); Former Nova premises (SW/334; 90 dwellings; an existing employment allocation, but not viable for employment); and Preston Fields (SW/233; 217 dwellings; as a more suitable site - see discussion in the SHLAA and in Appendices I-IV).
- 5.3.10 Allocation of these sites would involve an additional 803 dwellings at Faversham, which could arguably mean delivering notably more than is necessary to achieve a 'proportional boost'. However, this approach was nonetheless established as suitable, for the purposes of developing alternatives, on the basis of site specific and strategic considerations.
- 5.3.11 There is no need to consider the possibility of further allocations (such that the total allocations would involve in excess of 803 dwellings), given strategic considerations and no further 'stand-out' sites; and so the approach to additional allocations at Faversham was identified as a **constant**, for the purposes of developing alternatives.

West Sheppey

- 5.3.12 There is a need for additional allocations at West Sheppey, recognising the need to plan in-line with the established broad settlement strategy (Minster/Halfway being an other urban local centre, defined by Policy ST3 as supporting nearby Sheerness). However, there are also strategic constraints to account for - notably in relation to landscape and road infrastructure/traffic congestion - and it is the case that development viability is poor.
- 5.3.13 Analysis of site options showed a number of sites in contention, and indeed showed there to be a number of 'stand-out' sites that could be taken to be a 'given', for the purposes of developing alternatives. Specifically, sites identified as a 'given' were: Chequers Road, east of Minster (SW/457; 6 dwellings); Scocles Road/Elm Lane, southeast of Minster (SW/705; 50 dwellings); Barton Hill Drive, southwest of Minster (SW/194; 620 dwellings); Belgrave Road, Halfway (SW/165; 140 dwellings).
- 5.3.14 Allocation of these sites would involve an additional 816 dwellings at West Sheppey. However, there is potentially scope to deliver higher growth at West Sheppey, and there are sites that could come into contention under such a scenario, specifically, smaller sites including Scocles Road, east Minster (SW/459) and R/o 33 Highfield Road, Halfway (SW/158).
- 5.3.15 As such, the approach to additional allocations at West Sheppey was identified as a **variable**, for the purposes of developing alternatives. Two **options** were established:
- 1) Lower growth (816 dwellings) at the broadly supported sites
 - 2) Higher growth (c.1,400) at the broadly supported sites, plus additional smaller sites

Iwade

- 5.3.16 Recognising the need to plan in-line with the established settlement hierarchy, there is not necessarily a need to allocate additional sites at Iwade (a Rural Local Service Centre). There are some strategic opportunities - e.g. related to its position on the strategic road network and proximity to employment opportunities at Sittingbourne, Ridham and Neatscourt - however, there are also constraints (e.g. landscape), and it is the case that Iwade has seen considerable growth over recent years.
- 5.3.17 Analysis of site options showed there to be one 'stand-out' site - East of Iwade (SW/123; 572 dwellings)⁹ - however, it was not the case that its allocation could be taken to be a 'given', for the purposes of developing alternatives.
- 5.3.18 As such, the approach to additional allocations at Iwade was identified as a **variable**, for the purposes of developing alternatives. Two **options** were established:
- 1) Nil additional allocations
 - 2) Allocation of East of Iwade (SW/123; 572 dwellings)

Newington

- 5.3.19 Recognising the need to plan in-line with the established settlement hierarchy, there is not necessarily a need to allocate additional sites at Newington (a Rural Local Service Centre); and from a strategic perspective, it is difficult to draw strong conclusions in relation to Newington. It is notable for having a train station, but equally there are transport constraints associated with Air Quality Management Areas (AQMA) on the A2, and the village is surrounded by attractive countryside.
- 5.3.20 However, analysis of site options showed there to be two 'stand-out' sites that could be taken to be a 'given', for the purposes of developing alternatives. Specifically, sites identified as a 'given' were: The Tracies (SW/010; 5 dwellings) and North of High Street (SW/407; 115 dwellings).
- 5.3.21 Allocation of these sites would involve an additional 120 dwellings at Newington, and there is no need to consider the possibility of further allocations beyond this. As such, the approach to additional allocations at Newington was identified as a **constant**, for the purposes of developing alternatives.

Teynham

- 5.3.22 Recognising the need to plan in-line with the established settlement hierarchy, there is not necessarily a need to allocate additional sites at Teynham (a Rural Local Service Centre); and from a strategic perspective, it is difficult to draw strong conclusions in relation to Teynham. The situation at Teynham is similar to that at Newington (see discussion above), although Teynham is more constrained from a transport / AQMA perspective.
- 5.3.23 No stand-out sites were identified at Teynham, and so nil additional allocations was established as a **constant**, for the purposes of developing alternatives.

⁹ This site incorporates SW/116, 117, 183.

East Sheppey

- 5.3.24 Recognising the need to plan in-line with the established settlement hierarchy, there is not necessarily a need to allocate additional sites at East Sheppey (where there are two Rural Local Service Centres); and from a strategic perspective there is a strong argument for restricting growth here given its isolation / poor transport connections. Whilst in theory it can be argued that growth could address the problem of isolation (and associated relative deprivation), in practice it is not clear that opportunities exist at the current time. Another factor in support of growth here is the resource of lower quality agricultural land, but this is not an overriding factor.
- 5.3.25 No stand-out sites were identified at East Sheppey, and so nil additional allocations was established as a **constant**, for the purposes of developing alternatives.

Villages

- 5.3.26 Recognising the need to plan in-line with the established settlement hierarchy, there is little in the way of strategic arguments for allocating additional sites at the villages.
- 5.3.27 No stand-out sites were identified at the Villages, and so nil additional allocations was established as a **constant**, for the purposes of developing alternatives.

The reasonable alternatives

- 5.3.28 On this basis, a set of borough wide alternative spatial strategies ('reasonable alternatives') was established - see **Table 5.1**.

Table 5.1: Reasonable spatial strategy alternatives to inform ‘modification-making’

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at Sittingbourne (extension to the SE)
Sittingbourne	700	700	1300
West Sheppey	800	1400	800
Iwade	600	0	0
Faversham	800	800	800
Newington	100	100	100
Teynham	0	0	0
East Sheppey	0	0	0
Boughton	0	0	0
Other villages	0	0	0
Total additional allocations through mods	3,000	3,000	3,000

N.B. Figures in this table are rounded to the nearest 100.

5.3.29 These were determined to be the ‘reasonable’ alternatives on the basis that their appraisal should facilitate discussion of numerous important issues. Whilst it was recognised that there are **other spatial strategy options** that could potentially feature, it is appropriate to limit the number of alternatives given explicit consideration in order to ensure effective public engagement. Interested parties are, of course, welcome to comment on spatial strategy options other than those presented, drawing upon the analysis of site options (i.e. analysis presented within the SHLAA and within appendices I - IV of this report).

5.3.30 These are the reasonable alternatives that were appraised in early 2016, at the time of finalising proposed modifications for publication. Chapter 6 presents appraisal findings.

6 APPRAISING REASONABLE ALTERNATIVES

6.1 Summary appraisal findings

6.1.1 **Table 6.1** presents summary appraisal findings in relation to the alternatives introduced above. Detailed appraisal findings are presented in **Appendix V**.

6.1.2 Detailed appraisal methodology is explained in Appendix V, but in summary:

Within the table the alternatives are appraised in terms of the topics established through past 'scoping' work. Within each topic row, the alternatives are ranked in order of preference (1 being best) and efforts are also made to categorise the performance of each option in terms of 'significant effects' (using red/green shading).

Table 6.1: Summary appraisal of the spatial strategy alternatives

Conclusions						
	Option 1 Higher growth at Iwade (extension to the east)		Option 2 Higher growth at West Sheppey (at smaller sites)		Option 3 Higher growth at S'bourne (extension to the SE)	
Air	★1		★1		3	
Biodiversity	3		★1		★1	
Cultural heritage	=		=		=	
Landscape	★1		2		3	
Soil	3		★1		3	
Transport and traffic	★1		3		3	
Water	=		=		=	
Health	=		=		=	
Housing	★1		2		★1	
Population	=		=		=	
Economy / employment	=		=		=	
Rank summary ¹⁰	Best in terms of: • Air • Landscape • Transport • Housing	Worst in terms of: • B'diversity • Soil	Best in terms of: • Air • B'diversity • Soil	Worst in terms of: • Transport • Housing	Best in terms of: • B'diversity • Housing	Worst in terms of: • Air • Landscape • Soil • Transport
Significant effects summary	Positive in terms of: • Housing	Negative in terms of: • B'diversity • Soil	Positive in terms of: • Housing	Negative in terms of: • Landscape	Positive in terms of: • Housing	Negative in terms of: • Landscape • Soil
Summary discussion	<ul style="list-style-type: none"> • Option 1 (Iwade) stands-out as performing best in terms of a number of objectives, although it performs worst in terms of 'biodiversity' (see the HRA for detailed discussion) and 'soil', as there would be some loss of 'best and most versatile' agricultural land. • Option 2 (West Sheppey) notably performs best in terms of 'soil', but performs relatively poorly from a 'housing' perspective given poor development viability. • Option 3 (Sittingbourne) is notably worst performing in terms of 'landscape', and also gives rise to some transport / air quality concerns. 					

¹⁰ N.B. The aim is to discuss the relative merits of the alternatives in terms of the SA framework - i.e. in terms of competing sustainability objectives - rather than to identifying an option that is best performing or 'most sustainable' overall.]

7 DEVELOPING THE PREFERRED APPROACH

7.1 Introduction

7.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal, i.e. the Council's 'outline reasons' for developing the preferred approach (to the allocation of additional sites, as reflected in the proposed modifications currently published for consultation) in-light of alternatives appraisal.

7.2 The Council's reasons

7.2.1 The Council has been able to identify a preferred approach drawing on various workstreams, namely -

- Work examining site options in isolation (as reported in the SHLAA and Appendices I-IV of this report)
- Appraisal of district-wide spatial strategies
- Other factors, including discussions with site promoters.

7.2.2 The Council's reasons can be summarised as follows -

"Within the context of an increased housing target, the preferred approach is aimed at maintaining the settlement strategy of the Local Plan, via its two planning areas, and via the settlement tiers within Policy ST3.

Sittingbourne is intended to remain the overall focus for growth in the Borough, in recognition that it is the largest settlement with strong opportunities for urban regeneration, employment and new services with overall good transport links. The town's position within the Thames Gateway reinforces the need for growth here. However, there are limitations to its overall growth, not least the presence of best and most versatile agricultural land (BMV) and landscape and heritage constraints to the south of the town. Thus the preferred approach represents a balance between safeguarding the town's position within Policy ST3 and safeguarding its important environmental resources. There will though be development needed in locations where the need for growth will override local constraints; notably through the erosion of important local countryside gaps.

To achieve such a balance requires growth at other locations, principally the Isle of Sheppey where sites can be provided on lesser constrained sites, whilst maximising the use of sustainably located BMV in a way that too reflects Sheppey's overall position within the Thames Gateway. Here though, there too are limits to this emphasis, given that sites toward the centre and eastern end of Sheppey are less well located and are judged to have more significant environmental impact. The focus therefore is on the better connected and less harmful sites on the western side of the Island.

Also important to securing this balance for Sittingbourne and Sheppey is the need to secure a proportionate boost at Faversham and the rural areas. In the case of Faversham, this can be achieved without significant/substantial harm to the strategy and vision for the town. In the rural areas, this can also be achieved with further growth and, amongst the Rural Local Service Centres, Iwade is considered to be the most appropriate main focus for additional growth because of its strong location close to Sittingbourne and the strategic road network. Here, a limited amount of lower quality agricultural land is also available, whilst large areas of land are able to provide potentially significant environmental and green infrastructure benefits for the village and for the Swale Thames Gateway as a whole.

Within the framework of this overall preferred approach, there are risks, not least the achievement of a 5-year supply against the now proposed increased housing target. This is addressed through the allocations of sites able to increase the potential provision, notably at Faversham, the rural areas and south-west Sittingbourne. Whilst this represents an over-provision of sites, no insurmountable adverse consequences have been identified via the SA, HRA or other modelling work, although some further examination of transport impacts is required.

In totality, the preferred approach is judged to achieve sustainable development, as required by para. 14 of the NPPF. Against its three strands, socially, the plan can achieve a significant boost in the supply of housing as required by the NPPF, alongside the provision of new jobs, as well as providing for the infrastructure needs arising. Although it will need to be kept under close review, economically, the plan comfortably provides for sufficient land for economic development to match the planned housing need and to meet the identified economic needs for the Borough. Lastly, environmentally, whilst the plan has some adverse consequences for BMV (including economic loss), settlement separation and landscape character, it also provides for significant levels of green infrastructure involving landscape and biodiversity enhancements and safeguards via the choice of sites and the mitigation proposed for international, national and local designated sites.”

PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?

8 INTRODUCTION (TO PART 2)

8.1.1 The aim of this part of the report is to present appraisal findings in relation to the draft modifications (to the plan as submitted) that are currently published for consultation.

9 APPRAISAL OF DRAFT MODIFICATIONS

[To be completed in time for consultation]

PART 3: WHAT HAPPENS NEXT?

10 INTRODUCTION (TO PART 3)

10.1.1 The aim of this Chapter is to explain next steps in the plan-making / SA process.

11 PLAN FINALISATION

11.1.1 Subsequent to the current consultation the Inspector will consider all representations received, before deciding whether to report on the Plan's soundness (with modifications as necessary), or hold resumed examination hearings.

11.1.2 The latter situation is likely, and it may be that resumed hearings lead to a need for further modifications being identified. If this is the case, there will then be another consultation on draft (further) modifications, with another SA Report Addendum published alongside.

11.1.3 Ultimately, it will be for the Inspector to consider the representations raised through consultation on proposed modifications, and then report on the Plan's soundness (with modifications as necessary).

11.1.4 Assuming that the Inspector is able to find the Plan 'sound', it will then be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

12 MONITORING

12.1.1 The April 2015 SA Report proposed monitoring indicators in-light of appraisal findings. Given the appraisal findings presented in this SA Report Addendum (see Part 2, above), it is suggested that particular emphasis be given to:

- [TBC - in light of Chapter 9 appraisal findings]

APPENDIX I: ESTABLISHING REASONABLE SITE OPTIONS

Introduction

As explained in Chapter 4, throughout the plan-making / SA process, in addition to appraisal of reasonable alternatives (i.e. mutually exclusive approaches to addressing policy issues), there has been a focus on appraising site options (i.e. the pool of sites that are available and deliverable, and thereby in contention for allocation).

The **aim of this appendix** is to introduce the 'reasonable' site options, as understood at the current time.

The reasonable site options

The list of site options identified as 'reasonable' (i.e. potentially in contention for allocation through modifications) comprises:

(A) The reasonable site options from 2015 (as listed in 2015 SHLAA and Table 3.1 of Post Submission Interim SA Report II); **minus (B)** those that are allocations within the submitted plan; **minus (C)** those that are now understood to be unavailable; **minus (D)** those that are now understood to be 'unreasonable'; **plus (E)** new reasonable site options identified through a call for sites in early 2016.

With regards to **(D)**, it is appropriate to screen out sites as unreasonable, given that the amount of land available is far in excess of the amount of land that could ever need to be allocated through modifications (i.e. it is appropriate to take a step-wise approach, with detailed consideration given only to a short-list of sites rather in order to make the process more manageable). Reasons for screening-out relate either to:

- 'show-stopper' constraints, generally as established within the 'ranked assessment of non-allocated site options' exercise (2015), e.g. flood risk, loss of public open space or loss of employment land; or
- parameters established by the Inspector's Interim Report of February 2016, particularly the need for additional allocations to fit with the settlement strategy as established through submitted Policy ST3.
 - In practice, this rules out sites not related to a settlement listed in Policy ST3;¹¹ and sites that, whilst associated with a Policy ST3 settlement, would be otherwise contrary to Policy ST3 if allocated.¹²

With regards to **(E)**, 101 new sites were submitted in total, through the 2016 call for sites. However, 69 of these comprised new sites. The remaining 32 submissions were to propose revisions to sites previously 'in the system', e.g. a revised site boundary or a revised density/yield.

In total, there are **110 reasonable site options** at the current time, as listed in Table A.

¹¹ A number of sites at Bobbing are screened-out despite the fact that Bobbing is closely related to Sittingbourne. For the purposes of 'modification-making' there is not potential to explore the option of treating Bobbing as part of wider Sittingbourne, although it is recognised that may be something to consider through a future plan.

¹² SW/778 (Land at Selling Road, Faversham) is an extremely large site to the south east of Faversham. Given that the Inspector directs the Council to allocate only enough land to deliver a 'proportional boost' to Faversham (i.e. a boost in-line with Policy ST3), there is not potential to allocate this site through proposed modifications. However, it is understood to be an option with some merit that might be explored through a future plan. Development would lead to transport impacts upon J7 of the M2, which would not be capable of mitigation without major and currently unplanned for improvements.

Table A: Reasonable site options 2016

Reference	Name	Area (ha)
SW/001	Land at Marrow Bone Hill, Plough Rd, Minster.	1.8
SW/010	The Tracies, Callaways Lane, Newington	0.3
SW/019	Land situated at the top of Southdown Road, Halfway	2.5
SW/021	Danley Farm, Minster Road	8.0
SW/028	Land at Borden Lane	3.1
SW/038	Danley Farm, Minster Road, Minster	0.7
SW/041	Land off Church Rd, Adj St Marys View	5.7
SW/044	Adjacent 24 & 26 Chequers Road, Minster	3.8
SW/046	Land fronting London Rd	1.3
SW/047	London Road/Water Lane	11.5
SW/049	Chaffes Lane, Upchurch	2.3
SW/050	Chilton Manor Farm, Highsted Road, Sittingbourne ME9 0AA	26.9
SW/078	The Vallance, Lynsted	1.3
SW/080	Land East of Love Lane	67.5
SW/081	Mindon, Ashford Road	2.5
SW/085	Land at Jubilee Fields, Oak Lane, Upchurch	0.4
SW/086	Land west & North of Jubilee Fields	1.7
SW/096	Phase II Lady Dane Farm, Faversham	N/a
SW/101	Land off Hempstead Lane, Bapchild	1.9
SW/107	Land at Chiltern Manor/Muddy Lane	7.8
SW/123	Land East of Iwade	55.0
SW/124	Land West of Church Lane, Newington	4.4
SW/129	The Bunny Bank	4.7
SW/133	Land East of Scocles Rd	27.5
SW/135	Land at Grove End Farm	22.6
SW/143	Land between Claxfield Farm & Lynsted Lane	13.5
SW/155	Chequers Stables, Eastchurch Rd	0.4
SW/158	Land rear of 33 Highfield Road, Minster	1.5
SW/159	Land adj to Dantlings, Plough Road, Minster	0.2
SW/164	Land at Pond Farm, Newington	12.8
SW/165	Land at Belgrave Road	5.2
SW/179	Land at Ruin Barns Road (The Old sale Field)	3.5
SW/184	Land Top of Parsonage Chase	0.9
SW/193	Land Adj Bredgar Village Hall	0.3
SW/194	Barton Hill Drive, Minster	25.3
SW/196	Land adj to Kingsborough Farm	18.5
SW/197	Garretts Farm, Eastchurch	10.7
SW/199	Coleshall Farm, Iwade	1.0
SW/204	Land at Muddy Lane, Sittingbourne	4.4
SW/211	Ruins Barn Road, Tunstall	3.0
SW/216	Land south west of Iwade	29.7
SW/217	Land North of London Rd, Newington	35.9
SW/233	Preston Fields, Canterbury Road, Faversham	14.4
SW/321	Southsea Avenue, Minster	3.4
SW/334	Former Nova Furniture Site, Graveney Road	3.0
SW/343	Bell Centre, Bell Road Sittingbourne	0.9
SW/373	Barrow Green Farm	2.5
SW/407	Land off High Street, Newington	6.9
SW/410	Land at London Road/Scholl Lane, Bapchild	5.4
SW/411	Land adj to School Lane, Bapchild	9.0
SW/412	Bapchild Fruit Stall, Fox Hill, Bapchild	0.5
SW/413	Perry Court Farm, Faversham	30.0
SW/418	Ruins Barn Road, Tunstall, Sittingbourne	0.4
SW/422	Land at Ufton Court Farm, Sittingbourne	27.2
SW/430	Abbey Fields, Faversham	3.8

Reference	Name	Area (ha)
SW/431	Abbey Fields - Option 2	18.8
SW/433	A2/Western Link	3.4
SW/434	Land R/O 111, The Street	0.2
SW/435	Queen Court farm, Water Lane	2.3
SW/440	West of Water Lane, Ospringe.	8.2
SW/441	Land West of Brogdale Road	3.6
SW/450	Halfway Egg Farm, Featherbed Lane	3.0
SW/453	School Lane	0.8
SW/457	Chequers Road	0.4
SW/458	Vicarage Farm, Lynsted	1.3
SW/459	Land off Scocles Road, Minster	0.6
SW/531	Land at East Hall Farm, Sittingbourne - Trenport	1.3
SW/700	East of Ham Road, Faversham	5.5
SW/701	Queen Court Farm, Ospringe	32.0
SW/702	Land East of Painters Farm, Eastling Road	0.8
SW/703	South West Sittingbourne	30.0
SW/704	Lynsted Lane, Teynham	4.9
SW/705	Land at Scocles Road/Elm Lane, Minster	2.8
SW/706	Rear of Chequers Road/Scocles Road	2.2
SW/707	Pond Farm London Road Newington	8.0
SW/714	Land North of the Street, Boughton	5.3
SW/715	Land to the rear of Magnolia, Primrose Lane, Bredgar	1.0
SW/717	Land at School Farm, Iwade	11.8
SW/718	Forge Lane, Upchurch	5.3
SW/721	Land north of Lower Road, Minster	75.5
SW/722	Barrow Green Farm, Teynham	13.7
SW/723	Land at London Road/Cellar Hill, Teynham	1.5
SW/724	Land West of Bredgar / Primrose Hill	4.3
SW/726	Land south of Primrose Lane, Bredgar	0.7
SW/727	Land at Lynsted Lane, Teynham	1.8
SW/732	Land at Ellen's Place, High Street, Newington	2.3
SW/733	Land at Bysing Wood, Faversham	1.0
SW/751	Land adj 9 Ashford Road and Orchard Cottage, Canterbury Road	2.1
SW/753	Bayfield Farm, Painter's Forstal	14.6
SW/757	Land r/o Courtenay Road, Dunkirk	3.5
SW/758	Land at Warden	6.6
SW/759	Bossenden Farm, Dunkirk	0.6
SW/779	Land at Gilbert Hall Farm, Minster	20.5
SW/780	Land at Windy Gap, Chequers Road, Minster	17.8
SW/781	Land adj St Clements School and the George Wharton Centre, Warden Bay	4.0
SW/784	Site A Land at Neames Forstal, Selling	0.8
SW/785	Site B Land at Neames Forstal, Selling	1.2
SW/786	Site C Land at Neames Forstal, Selling	0.5
SW/787	Site D Land at Neames Forstal, Selling	1.1
SW/789	Adj Doddington Playing Field, Dully Hill	0.2
SW/790	Courtenay House, London Road, Dunkirk	0.2
SW/793	Rear of Nelson Road/Scocles Road, Minster	4.0
SW/794	Perry Court Farmhouse and farmyard, Faversham	2.6
SW/795	Land at 39 Abbeyfields, Faversham	1.0
SW/796	179-183 Borden Lane, Sittingbourne	0.4
SW/797	Land at Vicarage Lane, Ospringe	1.6
SW/799	Land south of Elm Lane, Minster	2.5
SW/996	Barrow Green Farm, Barrow Green, Teynham	2.2
Policy MU3	Land at Frogal Lane, Teynham (proposal to switch from MU to housing)	18
Policy MU6	Nova site, Faversham (proposal to switch from employment to housing)	2
Policy A6	Land north of Graveney Road, East of Faversham	2

APPENDIX II: GIS ANALYSIS OF SITE OPTIONS

Introduction

As explained in Chapter 4, throughout the plan-making / SA process, in addition to appraisal of reasonable alternatives (i.e. mutually exclusive approaches to addressing policy issues), there has been a focus on appraising site options (i.e. the pool of sites that are available and deliverable, and thereby in contention for allocation).

The SA Report (April 2015) presented information on site options in Appendix IV, and then updated site options appraisal findings were presented within Post Submission Interim SA Report II (October 2015).

The aim of this appendix is to update the information on site options presented within Post Submission Interim SA Report II (October 2015).

Specifically, the **aim of this appendix** is to

- 1) explain the site options appraisal methodology; and
- 2) present the outcomes of site options appraisal.

The site options appraisal methodology (unchanged since 2015)

It was not possible to simply apply the SA framework (i.e. the list of SA topics/objectives presented in Table 3.1, above) given the number of site options and limited data (to inform qualitative appraisal). As such, work was undertaken to develop a criteria-based (quantitative / GIS) methodology suited to site options appraisal.

The broad scope of the site options appraisal criteria are introduced in **Table A**, below. The table aims to demonstrate that the criteria reflect the SA framework as closely as possible, recognising data limitations (and given that there is a need to appraise site options ‘on a level playing field’).¹³

Table B then lists the criteria concisely alongside the rules that have been applied to categorise the performance of sites. Specifically, Table B explains how, for each of the 29 criteria employed, the performance of sites is categorised on a Red/Amber/Green scale.

Table A: Introducing the site appraisal methodology and its fit with the SA framework

Topic	Relevant criteria (Location in relation to...)	Notes
Air	<ul style="list-style-type: none"> • Air Quality Management Area (AQMAs) 	Good data exists to inform the appraisal, as there is the potential to measure proximity to an AQMA; however there is not potential to model traffic flows between sites and AQMAs.
Biodiversity	<ul style="list-style-type: none"> • Special Protection Area (SPAs) • Special Area of Conservation (SAC) • Site of Scientific Interest (SSSI) • Locally designated wildlife site • Ancient semi-natural woodland • Woodland 	<p>Good data is available to inform the appraisal, as there is the potential to measure proximity to various areas of biodiversity importance. It is fair to assume that sites in close proximity are sensitive, including because development can lead to recreational impacts; however, it is recognised that proximity is not the only determinant of impacts.</p> <p>Ideally, it would be possible to draw on locally commissioned work to identify further areas of constraint/opportunity (e.g. particularly sensitive locally</p>

¹³ It is important to be clear on limitations. Given the broad scope of the SA framework, the number of site options to be appraised and time/data limitations, the decision was taken to apply quantitative proximity/intersect analysis, utilising GIS software. The absence of qualitative analysis (i.e. analysis that employs evidence-based professional judgement) means that this is a limited methodology; however, it nonetheless suited to aiding understanding of the site options and their relative merits.

Topic	Relevant criteria (Location in relation to...)	Notes
		designated wildlife sites or other areas contributing to 'green infrastructure').
Cultural heritage	<ul style="list-style-type: none"> • Conservation area • Historic park or garden • Scheduled monument • Listed building 	<p>Good data is available to inform the appraisal, i.e. there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting.</p> <p>A limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis. It will sometimes be the case that development can enhance heritage assets.</p>
Landscape	<ul style="list-style-type: none"> • Area of Outstanding Natural Beauty (AONB) • Area of high landscape value (AHLV) - Kent level • Area of high landscape value (AHLV) - Swale level • Local countryside gap • Landscape character area 	<p>Good data is available to inform the appraisal, i.e. there is good potential to highlight where development may impact on valued landscape character. Points to note are as follows:</p> <ul style="list-style-type: none"> • The County Council has identified areas of high landscape value across the County, and Swale Borough Council has supplemented this work by identifying areas that are locally valued, and also 'local countryside gaps'. • All of Swale is divided into landscape character areas, and to a limited extent it is understood how capacity/sensitivity varies between these areas. <p>A limitation relates to the fact that site specific factors have not been taken into account, e.g. it has not been possible to take into account the extent to which sites are screened within the landscape.</p>
Soil	<ul style="list-style-type: none"> • High quality agricultural land¹⁴ • Agricultural land under Environmental Stewardship¹⁵ 	<p>Limited data is available to inform the appraisal. It is possible to draw on a national data-set that shows how agricultural land quality varies; however, this data-set is 'indicative' only. To establish agricultural land quality accurately there is a need to apply 'MAFF Post 1988' criteria, which involves field surveys. A number of areas around the borough have been surveyed, such that agricultural land quality has been established accurately; however, relatively few site options have been surveyed. As such, for the purposes of this analysis, it is appropriate to apply the national data-set.</p>

¹⁴ Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.

¹⁵ Environmental Stewardship is an agri-environment scheme which provides funding to farmers who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and potentially 'well farmed' in general terms.

Topic	Relevant criteria (Location in relation to...)	Notes
Water	<ul style="list-style-type: none"> • Flood risk zone • Coastal change management area 	<p>Good data exists to inform the appraisal in terms of flood risk, although the available data relates to fluvial (river) and tidal flood risk only. Data on surface water flood risk is not available.</p> <p>No data is available to inform appraisal in terms of water quality or water resource availability; however, this is not a major problem.¹⁶</p>
Waste		<p>It is not possible to appraise site options in terms of the potential to support good waste management. It would not be fair to assume that larger schemes, or residential development in close proximity to recycling centres, will necessarily lead to better waste management.</p>
Transport and Traffic	<ul style="list-style-type: none"> • Train station • Rural lane 	<p>Limited data is available to inform the appraisal; however, the analysis under the 'Population' heading (see below) will also give some indication of how sites perform in terms of transport/traffic.</p>
Climate change		<p>No data is available to inform appraisal. Whilst some site options may well have inherently greater potential to incorporate on-site low carbon energy technologies (including on account of the scale of development / density of development within the local area), or link to a decentralised source of low carbon energy, there is insufficient evidence to enable robust analysis. As for the potential for development to support building integrated renewables (such as solar PV and solar heating), this is not locationally dependent (to any significant extent, although terrain / aspect is a factor).</p>
Population	<ul style="list-style-type: none"> • Primary school • Secondary school • Local shop • Large shop • Bank • GP surgery / medical centre 	<p>Limited data is available to inform the appraisal. Data-sets are available showing the location of facilities; however, some have been found to be out of date. On the plus side, the data-sets do show facilities outside of Swale, and so it should not be the case that the analysis is unfair in its treatment of sites near the borough boundary.</p> <p>Proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly). However, there is little or no potential to take into account the potential for development at a particular site to put 'strain' on community infrastructure locally, or the potential for development to fund new community infrastructure.</p>
Health	<ul style="list-style-type: none"> • Country Park • National / Local Nature Reserves • Area of overall deprivation • Area of health deprivation 	<p>Development in an area of relative deprivation is assumed to be a positive step given that it can lead to developer funding being made available for targeted local schemes/initiatives; however, it is difficult to draw strong conclusions as viability considerations will come into play and/or because the full impacts can only be examined in the context of a detailed scheme.</p>

¹⁶ Whilst water pollution sensitivity may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), in the absence of a detailed Water Cycle Study there is no mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/ design measures, and so are appropriately considered at the planning application stage. The same can be said for 'drainage'. In terms of water resource availability: water resource availability does not vary significantly within the borough, and hence need not be a consideration here; and it is not possible to appraise site options in terms of the potential to support water efficiency. It might be suggested that large development schemes (i.e. developments on large sites) might be more able to deliver high standards of sustainable design, which in turn support water efficiency; however, this assumption will often not hold true. Finally, it is unnecessary to appraise site options in terms of groundwater 'source protection zones' and 'primary aquifers'. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.

Topic	Relevant criteria (Location in relation to...)	Notes
Housing		No data exists to inform the appraisal. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, is higher at large sites).
Crime		No data exists to inform the appraisal. Whilst the Index of Multiple Deprivation does identify areas of crime deprivation, this data is not suitably reliable.
Employment and skills	<ul style="list-style-type: none"> Area of employment deprivation 	Poor data exists to inform the appraisal. It is possible to consider the implications of development in areas of existing employment deprivation (as defined by the Index of Multiple Deprivation). However, it is difficult to draw strong conclusions.
Economic growth		Much is known about employment deprivation within Swale, and opportunities for regeneration; however, it is not possible to reflect this understanding in a high level appraisal of many site options. Appraisal necessitates knowledge of specific scheme proposals.

Table B: Site appraisal criteria with performance categories

Criteria (Location in relation to...)	Performance categories	Notes
1 Air Quality Management Area (AQMA)	R = <TBCm A = <TBCm	Impact thresholds are unknown, and so the RAG thresholds reflect the spread of the data. N.B. There is no potential to take into account the size of the site option involved, i.e. make the assumption that large sites are problematic. This rule also applies to other criteria below. If small sites were shown to perform relatively well, despite being in close proximity to a sensitive location, there would be a risk that numerous small sites would come forward in close proximity leading to negative effects. It is appropriate to 'flag' sites as potentially problematic, even where they are small and in practice not likely to result in negative effects.
2 Special Protection Area (SPA)	R = <TBCm A = <6km	A 6km impact threshold is established; however, as all site options are within 6km it was determined appropriate to differentiate further. A 1654m threshold was determined on the basis of the spread of the data (half of the site options are within this distance). ¹⁷

¹⁷ There is an argument that it is not appropriate to differentiate between site options as the Strategic Access Management and Monitoring Strategy (SAMMS) for the Thames, Medway and Swale Estuaries has established a methodology for ensuring that recreational impacts can be mitigated regardless of proximity. However, it is also important to remember that there could potentially be 'impact pathways' other than recreation. The Local Plan HRA Report (April 2015) mentions disturbance (other than through recreation) and proximity effects, water quality; and atmospheric pollution.

Criteria (Location in relation to...)		Performance categories	Notes
3	Special Area of Conservation (SAC)	R = <TBCm A = <6km	Natural England has defined a Risk Impact Zone for both SACs that extends to 2km; however, no site options fall within 2km. It is appropriate to 'flag' site options that, despite being outside the Risk Impact Zone, are relatively close. On balance, it was determined appropriate to use the 6km threshold discussed above (i.e. that used for the SPAs), and then to flag half of the sites (i.e. the 50% sites closest to an SAC) red.
4	Site of Scientific Interest (SSSI) not also designated as an SAC or SPA	R = <TBCm A = <2km	All SACs and SPAs in Swale are also designated as a SSSI, and so in order to avoid 'double counting' it is appropriate to focus here only on those SSSIs not also designated as SAC or SPA, of which there are three. Natural England has defined Risk Impact Zones for all three SSSIs that extend to 2km, and hence it was determined appropriate to use that threshold and then to also flag the sites that are in closest proximity (50 th percentile) to each SSSI.
5	Locally designated wildlife site	R = Intersect A = <400m	The thresholds reflect an understanding that LWSs and ASNWs are relatively non-sensitive. 400m is a walkable distance.
6	Ancient Semi Natural Woodland	R = Intersect A = <400m	
7	Woodland	A = Intersect	The threshold reflects an understanding that non-designated woodland tends to be non-sensitive.
8	Conservation Area	R = Intersect A = <TBCm	The 510m threshold reflects the spread of the data (i.e. half of those sites that do not intersect are within m). It is important to remember that impacts can be indirect (e.g. traffic within a village centre) as well as direct (e.g. impacts to setting).
9	Listed building	R = 0m A = <50m	It is appropriate to 'flag' a red where a site intersects or is adjacent. It is also appropriate to flag sites that might impact directly on the setting of a listed building. A 50m threshold is assumed.
10	Area of Outstanding Natural Beauty (AONB)	A = <2km	No sites intersect, and hence it would not be appropriate to 'flag' any sites as red. In the absence of any firm understanding of a distance threshold for 'setting', a 2km threshold is set.
11	Area of high landscape value - Kent level	R = Intersect A = <500m	The thresholds reflect an understanding that the setting of these landscapes is likely to be significantly less sensitive than that of the AONB.
12	Area of high landscape value - Swale level	R = Intersect A = <500m	
13	Local countryside gap	R = Intersect	It is not appropriate to consider the 'setting' of land designated as a local countryside gap.

Criteria (Location in relation to...)		Performance categories	Notes
14	High quality agricultural land ¹⁸	R = Grade 1 A = Grade 2 or 3	Thresholds reflect the spread of the data, i.e. many sites intersect with Grade 1 land. ¹⁹ N.B. In instances where the GIS indicates loss of agricultural land, but the site is known to be brownfield, the site has not been flagged as constrained.
15	Agricultural land under Environmental Stewardship ²⁰	A = Intersect	This is not a major issue, and so it would not be appropriate to 'flag' sites red.
16	Coastal change management area	R = Intersect	The risks associated with coastal change are more significant, and so it is appropriate to 'flag' sites red.
17	Flood risk zone	R = > 10% of site intersects a flood risk zone A = 1 - 10% of site intersects a flood risk zone	The extent of flood risk zone 2 does not extend far beyond the extent of flood risk zone 3. As such, it is appropriate to consider the two together. The thresholds also reflect the fact that small areas of flood risk can be left undeveloped. The 10% threshold is fairly arbitrary.
18	Rural lane	A = Adjacent	It is fair to assume that adjacent sites would include an access point onto the rural lane.
19	Local shop	R = >TBCm A = >TBCm G = <400m G = <TBCm	400m is a walkable distance for most, but as there are a large number of sites within this distance it is appropriate to also flag half (i.e. the 50% closest) as performing particularly well. The other thresholds reflect the spread of the data.
20	Primary school	R = >TBCm A = >TBCm G = <800m G = <TBCm	Department for Transport guidance ²¹ suggests 800m as a walkable distance for those accessing a primary school or GP surgery, but as there are a large number of sites within this distance it is appropriate to also flag half (i.e. the 50% closest) as performing particularly well. The other thresholds reflect the spread of the data.
21	GP surgery / medical centre	R = >TBCm A = >TBCm G = <TBCm G = <TBCm	

¹⁸ Agricultural land is classified into five grades, with grade 1 being of the best quality. Agricultural land is a finite resource.

¹⁹ Another approach would be assign a red categorisation to sites intersecting agricultural land that is grade 1, grade 2 or grade 3. This might be in-line with the NPPF, which states at para 112 that: "Local planning authorities should take into account the economic and other benefits of the best and most versatile [BMV] agricultural land" before defining BMV as Land in grades 1, 2 and 3a. However, this approach would fail to adequately differentiate between sites, given that very few sites options intersect grade 4 land. It is also noted that the NPPF goes on to state at para 112 that: "..., local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."

Also, with regards to agricultural land, it is also worth noting that whilst the NPPF makes reference to 'grade 3a' the available dataset does not show this grade, i.e. it simply shows 'grade 3' land and does not differentiate within this grade.

Finally, with regards to agricultural land, it is important to note that the dataset is of a poor resolution, so much so that large villages are shown to be washed over by agricultural land. Effort has been made to correct the data-set by classifying brownfield sites as such.

²⁰ Environmental Stewardship is an agri-environment scheme which provides funding to farmers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.

²¹ WebTag (January 2014) Unit A4.2 paragraph 6.4.5, Department for Transport

Criteria (Location in relation to...)	Performance categories	Notes
22 Secondary school	R = >TBCm A = >TBCm G = <1000m G = <TBCm	Department for Transport guidance suggests 1000m as a walkable distance for those accessing a secondary school, but as there are a large number of sites within this distance it is appropriate to also flag half (i.e. the 50% closest) as performing particularly well. The other thresholds reflect the spread of the data.
23 Bank	R = >TBCm A = >TBCkm G = <TBCm G = <TBCm	There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
24 Larger shop	R = >TBCm A = >TBCm G = <TBCm G = <TBCm	
25 Train station	G = <TBCm G = <TBCm	The thresholds reflect the spread of the data.
26 Country Park	G = <TBCkm G = <TBCkm	
27 National Nature Reserve	G = <TBCm G = <TBCm	
28 Local Nature Reserve	G = <2km G = <TBCm	People are unlikely to travel far to access a LNR, and so it is only appropriate to flag sites green where they are within 2km. It is also appropriate to flag half (i.e. the 50% closest) as performing particularly well.
29 Area of overall deprivation	G = Site intersects with an 'output area' that is relatively deprived (i.e. in the 0-20% (1 st quintile) most deprived in the borough G = second quintile	It is fair to assume that development in an area of relative deprivation (as measured by the Index of Multiple Deprivation) may support regeneration.
30 Area of health deprivation		
31 Area of employment deprivation		

Appraisal findings

The table below presents appraisal findings in relation to all reasonable site options (i.e. sites in contention for allocation). Specifically, the table presents an appraisal of the 110 site options (see Appendix I) in terms of the 31 appraisal criteria (Table B), with performance categorised on the following 'RAG' scale -

Dark green	Site performs particularly well
Light green	Site performs well
No shading	No issue in terms of this criterion
Amber	Site performs poorly
Red	Site performs particularly poorly

It is important to be clear that:

The aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well / poorly. The intention of categorisation is not to indicate that a 'significant effect' is predicted. As discussed in Table A, in most instances the categorisation thresholds were determined taking into account the spread of the data more so than any understanding of impact thresholds.

The table below should be read with the following understanding of **limitations**.

It is recognised that only limited understanding can be gained from strict GIS analysis; and equally it is recognised that presenting appraisal findings for all site options in tabular format is in practice of limited assistance to those interested in the spatial strategy.

As such, the spreadsheet containing the underlying data is available upon request. The spreadsheet allows for more effective interrogation of the data as it is possible to compare and contrast particular sites (that might be alternatives) and examine sub-sets (e.g. sites around a particular settlement, or sites above a certain size).

Table C: Findings of GIS analysis (N.B. Proposed additional allocations are highlighted)

[Insert table with 110 rows (one for each site option) and a column for each of the 31 appraisal criteria. Each cell within the table will be shaded on a 'Red Amber Green' scale. Data will not be included in the table, but is available upon request (i.e. the spreadsheet underpinning the table is available upon request)]

APPENDIX III: DISCUSSION OF SITE OPTIONS AT EACH SETTLEMENT

Introduction

As explained in Chapter 4, throughout the plan-making / SA process, in addition to appraisal of reasonable alternatives (i.e. mutually exclusive approaches to addressing policy issues), there has been a focus on appraising site options (i.e. the pool of sites that are available and deliverable, and thereby in contention for allocation).

The **aim of this appendix** is to present a discussion of site options at each settlement in turn.

Methodology

The sections below examine each of the borough's main settlements in turn, with each section discussing the merits of the reasonable site options (see Appendix I for an explanation of how these were arrived at), and combinations of site options, in terms of the SA framework (see Chapter 3).

Points to note are -

- Boughton is considered within the Faversham section, as there are only two 'reasonable' site options.
- Rather than assign a section to each of the settlements on the Isle of Sheppey, consideration is given to:
A) West Sheppey, i.e. Minster/Halfway, recognising that there are no 'reasonable' site options at Sheerness or Queenborough/Rushenden; and B) East Sheppey, i.e. Leysdown and Eastchurch.
- Within each section there is a discussion under each of the topics that comprise the SA framework except (for conciseness) -
 - Waste - There is no potential to differentiate between site options with any confidence. Sustainable waste management should be possible under any foreseeable scenario.
 - Climate change - Development viability does vary across Swale (highest in Faversham; lowest on Sheppey), and it can be suggested that larger sites are more 'viable'; however, there are not thought to be any opportunities to deliver low carbon infrastructure (e.g. district heating) in practice.
 - Housing - Development viability does vary across Swale, and it can be suggested that larger sites are more 'viable'; hence the potential to deliver affordable housing is assumed to vary in a simple fashion (i.e. greatest at large sites at Faversham; and least at small sites on Sheppey).
 - Crime - It is unlikely that any site option, or combination of site options, would have bearing.
 - Water quality/resource issues (a factor considered under 'Water', within the SA framework) - It is not clear that there is any potential to differentiate between the site options with confidence. It is recognised that the North Kent Marshes are a sensitive water environment, but it is not clear that development nearby (e.g. on the northern edge of Faversham) would lead to a risk of impacts.

With regards to the evidence-base, there is a need to note the following -

- There is a reliance on reporting on those constraints that can be understood from the available GIS data, i.e. the data used to generate the 'RAG analysis' presented for each site option in Appendix II, and which is available at: [insert [weblink](#) to GIS maps]; and data available from [magic.gov.uk](#).
- Reliance is placed on the findings of the Urban Extension Landscape Capacity Study (UELCS, 2010) as part of the discussion of landscape and heritage constraints.
- The nationally available agricultural land quality data-set is applied cautiously, as this data-set is extremely low-resolution (i.e. not suited for differentiating between site options at the settlement-scale).
- Professional judgement is applied cautiously, e.g. in respect of traffic generation issues/impacts, given an absence of modelling data.

Sittingbourne

Sites examined are - ²²

Southwest Sittingbourne		SW/703
Sites south of Sittingbourne	Borden Lane	SW/028
	Ufton Court Farm	SW/422
	Sites along Ruins Barn Road	SW/135, 211, 179 and 418
Sites southeast of Sittingbourne	Chilton Manor Farm	SW/050
	Highsted Road	SW/107
	Muddy Lane	SW/204

The table below presents a commentary on these sites -

Topic	Commentary
Air	<p>Air quality is an issue at Sittingbourne, with an Air Quality Management Area (AQMA) designated along a stretch of the A2 to the east of the town centre, and another designated along St. Pauls Street (B2006) to the north of the town centre. Also, another consideration is the possibility of increasing traffic through the AQMAs at Newington, Teynham and Ospringe.</p> <p>The situation is currently problematic, and could potentially worsen in the future, recognising that the submitted plan makes provision for 3,585 dwellings in Sittingbourne, alongside 238,091m² industrial and office floorspace and 29,754m² retail and leisure floorspace (and Teynham is set to be a focus of growth, with provision for 423 dwellings).</p> <p>However, it is not possible to differentiate between the site options in terms of the likelihood of increased traffic through these AQMAs. It might be suggested that expansion to the southeast (SW/050, 107, 204) would lead to a significant increase in traffic through the Sittingbourne A2 AQMA (due to car movements west, towards M2 J5) and the Teynham AQMA (if residents travelling east, e.g. to Canterbury, choose not to first 'double-back' to M2 J5), but there is no certainty in this respect.</p>
Biodiversity	<p>Biodiversity sensitivities constrain growth to the north of Sittingbourne, given proximity to the internationally important North Kent Marshes; however, this does not have a bearing on the site options under consideration.</p> <p>Sites to the south and southeast - notably SW/179, which is the eastern most of the southern cluster; and SW/107, which is the southern-most of the southeastern cluster - border a Site of Nature Conservation Interest (SNCI), which is the only such site in the vicinity; however, it is not clear that this is a constraint.</p>

²² Also, there are three further 'reasonable site options' that are not considered within the table below, for conciseness, on the basis that they give rise to few strategic issues:

- Land at the former Bell Centre, Bell Road (SW/343) - could accommodate a considerable number of new apartments (up to 150), together with a possible medical centre. The site has been subject to past viability challenges; however, with many of the adverse development costs (i.e. demolition) addressed by the previous owners, it is now assumed that the prospects for development have considerably improved. As one of the few brownfield sites within a central location available to allocate, it is broadly supported.
- Land at East Hall Farm, Sittingbourne (SW531) - This site, on the northeastern edge of Sittingbourne, has been identified as appropriate for a local centre. However, the site is located within the urban area and as such any potential for development is likely best pursued outside of the Local Plan.
- Land at 179-183 Borden Lane (SW/796) - is a small site currently comprising three houses with gardens.

Topic	Commentary
	<p>Otherwise, sites are unconstrained, in terms of strategic biodiversity considerations, although that is not to say that there is not onsite habitat that has some importance in the wider landscape. One site comprises orchards (SW/107, which is adjacent to the SNCI); however, it is not possible to assume particular biodiversity value.</p>
Cultural heritage	<p>Six Conservation Areas are designated at villages to the south of Sittingbourne (north of the M2), plus there are numerous listed buildings (outside of Conservation Areas). With this in mind, comments on sites are as follows:</p> <ul style="list-style-type: none"> • Southwest Sittingbourne (SW/703) is designated locally as a Countryside Gap between Sittingbourne and Borden (a Conservation Area, CA), and the UELCS identifies the need to: <i>“Maintain a landscape gap between the edge of Sittingbourne and Borden to protect the integrity of Borden.”</i> Development would clearly impact the gap, but a considerable gap would remain; and this is a large site where there is good potential for landscaping. As such, the gap / setting of Borden is perhaps not a major constraints; however, there are also other considerations. Firstly, the proposed access road linking the site to Borden Lane would pass adjacent to a listed building (Cryalls Farmhouse), which is currently passed by a footpath to Borden (although there may be scope for mitigation to limit impacts to its setting). Secondly, access to the site from the south leads to the potential for traffic impacts to three nearby CAs and rural lanes. • Moving east, land at Borden Lane (SW/028) would close the gap between Sittingbourne and the edge of Borden, which the UELCS states should be retained. A gap between Sittingbourne and the Borden CA would remain, but the setting of a second CA (Harmans Corner) could be affected. One listed building is adjacent to the site, and another is nearby, along the road to Borden. • Moving east again, land at Ufton Court Farm (SW/422) would likely impact on the Tunstall CA, as access from the south would be via the CA itself (on a corner where there are currently three listed buildings), and possibly the setting of the Harmans Corner CA to the west (although a c.300m gap would remain). Also, the northern access to the site is non-ideal, in that this is a narrow lane and there is clearly potential for ‘rat-running’, in the direction of M2 J5, through three CAs. • Moving further east, the largest of the four sites at Ruins Barn Road, Tunstall (SW/135) is also constrained by its proximity to the Tunstall CA. The site skirts the gardens of a listed building at the eastern extent of the CA (Cedar House), and would likely impact on its setting. Assuming that much traffic from this site would be along Tunstall Road to the north / west, rather than Ruins Barn Road to the east, then there would also be a likelihood of ‘rat-running’ through CAs. • The other three sites at this southern cluster (SW/211, 179 and 418) are located on Ruins Barn Road, away from the Tunstall CA, and are perhaps less likely to generate problematic rat-running (although this is highly uncertain). • Finally, with regards to the southeast Sittingbourne sites (SW/107, 050, 204) it is similarly the case that there are no CAs or Listed Buildings in close proximity, but question-marks remain regarding rural rat-running (in order to reach the trunk road network). The gap between Sittingbourne and the Rodmersham Green CA would be eroded, but a gap of at least 600m would be remain.
Landscape	<p>The UELCS concludes that: <i>“To the south of Sittingbourne and the A2, the landscape generally has a low capacity to accommodate change because it is often locally distinct, has a strong rural character and is not strongly influenced by the existing urban edge of Sittingbourne. However [an area to the southeast] has a moderate capacity to accommodate change, where it is more strongly influenced by the existing urban edge of Sittingbourne.”</i> With this in mind, comments on sites are as follows:</p> <ul style="list-style-type: none"> • Southwest Sittingbourne (SW/703) comprises land designated locally as a Countryside Gap between Sittingbourne and Borden, and the UELCS identifies this area (in fact, the whole area along this edge of Sittingbourne) as having ‘low’ capacity for change. However,

Topic	Commentary
	<p>development here would be in-line with the UELCS priority to: <i>“Maintain a landscape gap between the edge of Sittingbourne and Borden to protect the integrity of Borden.”</i> This conclusion is reached on the basis that, whilst development would significantly lessen the gap, a considerable gap would remain, and this is a large site where there is good potential for landscaping. It is also noted that the UELCS references land in this area that is <i>“currently influenced by, the existing urban edge.”</i></p> <ul style="list-style-type: none"> • Moving east, land at Borden Lane (SW/028), also within the area identified as having ‘low’ capacity for change, would virtually close the gap between Sittingbourne and the edge of Borden, which the UELCS states should be retained. • Moving east again, land at Ufton Court Farm (SW/422) is a large site that would impinge on the Tunstall Conservation Area and also erode the gap between Sittingbourne and Borden (see discussion above, under ‘Heritage’). The UELCS study identified this area (indeed, the whole area along this edge of Sittingbourne) as having ‘low’ capacity for change; however, the study does note that the northern-most part of this site (a relatively small part of the site) is suitable for development from a landscape perspective. • Moving further east, it is difficult to draw a conclusion on two of the four sites along Ruins Barn Road (SW/135 and 211, to the west of the road), other than to say that: they sit within the broad area identified by the UELCS as having ‘low’ capacity for change; there are some fairly long views over the sites (in particular from Ruins Barn Road, where there is little in the way of hedgerow); and the smaller site would be incongruous (unless frontage development only, in which case it would still be somewhat incongruous). In respect of the other two sites along Ruins Barn Road (SW/179 and 418), these sit within a locally designated landscape (Kent Level), and the UELCS concludes ‘low’ capacity for change, emphasising that: <i>“The existing urban edge is very subtle and does not impinge on the rural and parkland character of the wider landscape”</i>. However, the UELCS also suggests that the smaller site is broadly suitable, stating that <i>“a very minor extension of housing along Ruins Barn Road would be acceptable within the [larger site] where a small parcel of land appears to have no current usage and is physically and visually well contained by field boundaries and existing vegetation belts. It would be most appropriate if any further development in this location comprised a single line of well-spaced out houses, to maintain the subtle character of the urban edge and the transition between the urban and rural areas.”</i> • Finally, with regards to the southeast Sittingbourne sites (SW/050, 107, 204), landscape is a major consideration as the sites lie within a designated area of high landscape value (Kent level); and there are also (less significant) coalescence considerations. Recent site specific work commissioned by the Council (DHA, 2015) has confirmed (after having given consideration to proposed mitigation measures) that there would be impacts to the designated landscape, stating: <i>“the proposed development, given its size and extent, would be likely to result in significant, demonstrable harm to the North Downs Special Landscape Area, as defined within the adopted Swale Borough Local Plan 2008, bearing in mind much of the land designated at the South Eastern edge of Sittingbourne would be physically effected by the development.”</i> The UELCS identifies a land parcel comprising most of this site as having a ‘moderate’ capacity for change; however, on closer examination it seems that there is distinct variation within this landscape parcel. The UELCS states that <i>“[s]ensitivity increases to the south from where the urban edge is not evident and the distinctiveness and remoteness of the landscape are stronger”</i>; and suggests that ‘minor’ (to the west, within the larger SW/050 site) or ‘very minor’ (to the east, within SW/204) expansion of the urban edge would ‘perhaps’ be acceptable. Also, the UELCS mentions the orchards that comprise SW/107 to the southwest, finding that they should be conserved as they <i>“provide scenic quality and a sense of remoteness and tranquillity”</i>.
Soil	<p>The low resolution national dataset indicates that much of the land in question around Sittingbourne is likely to be Grade 1 (to the southwest and southeast) or Grade 2 (to the south). Grade 1 is agricultural land of the highest quality nationally (and Grade 2 is also high</p>

Topic	Commentary
	<p>quality, similarly classed as 'best and most versatile').</p> <p>Some, but by no means all, of the land around Sittingbourne has also been surveyed using the 'MAFF Post 1988' criteria (which involves field work),²³ generally confirming that much of the land is Grade 1 or Grade 2 quality. There is one notable area of Grade 3b (i.e. non-best and most versatile) land identified southeast of Sittingbourne (intersecting with SW/050), thereby contradicting the low resolution national dataset (which indicates Grade 1 for this site).</p> <p>On the basis of this discussion, it is very difficult to confidently differentiate between the sites in terms of the quality of agricultural land that would be lost. SW/050 is known to comprise some non-BMV land, but the same could also be the case for other sites.</p> <p>It is also noted that two sites (SW107 and SW/204, i.e. two of the three sites at southeast Sittingbourne) intersect with agricultural land that is farmed under an Environmental Stewardship 'agri-environment' agreement; however, this is a relatively minor consideration.</p>
Water	<p>SW/204 to the southeast is significantly constrained (c.40% flood zone 3), and flood zone three also skirts the edge of the adjacent site SW/050 (although this is unlikely to be an issue, given the size of this site).</p>
Transport and Traffic	<p>Without the benefit of detailed transport modelling it is difficult to differentiate between the site options, in terms of the impact on the road network. What <i>is</i> known is that the predominant direction of travel from most locations will be south/west to Junction 5 of the M2; and it is known that this junction has major capacity (and safety) issues that are set to be resolved through improvements to commence in 2019/20, with completion by 2024.</p> <p>On balance it seems appropriate to conclude that SW/703 to the southwest performs relatively well, as this site is closest to the junction and there is perhaps the least likelihood of 'rat-running' along rural lanes and through villages and hamlets. However, there is much uncertainty, as reaching the M2 Junction via rural lanes (as opposed to via the A249) could be an attractive option from SW/703.</p> <p>Another important consideration is the potential for development to support good 'accessibility', thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect it is again difficult to differentiate between the sites with confidence; however, it is noted that the sites differ in terms of proximity to the town centre. Sites to the southeast are closest (c.1km), whilst sites on Ruins Barn Road are most distant (c.1.8km); however, it seems likely that all sites could be served by a frequent bus service.</p> <p>Finally, there is a need to consider in-combination effects. In this respect, it is clearly the case that any option involving a combination of sites that leads to high growth at Sittingbourne as a whole will lead to impacts on M2 J5.</p>
Population	<p>The matter of sites to the south being somewhat distant from the town centre has already been discussed, under 'Transport and traffic', and it is not clear that there are any further issues that enable the site options to be differentiated with confidence. Areas of Sittingbourne that are relatively deprived (within the 20% most deprived areas of Swale) are concentrated to the north / northeast of the town centre, i.e. away from the site options under consideration. Along the town's southern edge, the most deprived area is at the eastern extent - adjacent to SW/050, 204 - however, this area is not amongst the 20% most deprived in Swale.</p>
Health	<p>See discussion above, under 'Population'. In respect of health, it is noted that the area of <i>relative</i> deprivation at Sittingbourne's eastern extent (adjacent to SW/050, 204) is the 18th most deprived 'super output area' in Swale, in terms of health and disability (which places it in the second quintile).</p>
Employment and skills	<p>There is little potential to differentiate between the site options, as none would deliver significant new employment (SW/703 would deliver a modest amount of employment</p>

²³ Both agricultural land datasets are available at magic.gov.uk (under the 'Landscape' tab)

Topic	Commentary
Economic growth	<p>floorspace), impact on an existing employment site or necessarily support existing employment sites (which are mainly focused to the north of Sittingbourne).</p> <p>Similarly, it is not clear that higher growth at Sittingbourne (i.e. allocation of numerous sites in combination) would lead to notable benefits.</p>

Conclusions

Sites to the south of Sittingbourne - SW/028, 422, 712, 135, 211, 179, 418 - stand-out as particularly constrained, with issues relating to heritage and/or landscape and/or remoteness from the town centre.

This leaves in contention the options of extending Sittingbourne to the southwest or southeast:

- Southwest Sittingbourne (SW/703) - is constrained in landscape and heritage terms in a similar way to sites to the south, but not to the same extent, and there is known to be good potential for mitigation. Traffic impacts may also be more manageable, given its relative proximity to M2 J5.
- Sites at southeast Sittingbourne (SW/050, 107, 204) - are notably constrained in landscape terms, given impacts to a landscape identified as being important at the Kent-scale, and this may be an over-riding consideration. It is relatively close to the town centre, but distant from M2 J5.

Faversham (and Boughton)

Sites examined are - ²⁴

Bysing Wood Road (west of Faversham)	SW/733
Sites to the southwest and at Ospringe	SW/046, 433, 435, 440, 797
Sites to the east of Ospringe, west of Ashford Rd (A251)	SW/047, 701, 794
Sites to the east of the Ashford Rd (A251)	SW/081, 233, 751
Sites to the east (Extension to Lady Dane Fm and Graveney Rd).	SW/080
Sites to the northeast	SW/430, 431, 795
East of Ham Road (north of Faversham)	SW/700
Sites at Boughton	SW/434, 714

The table below presents a commentary on these sites -

²⁴ Also, there are five further 'reasonable site options' that are not considered within the table below, for conciseness, on the basis that they give rise to few strategic issues:

- Policy MU6 - Land at Graveney Road, Faversham - An existing employment site currently allocated within the submission plan for mixed uses. However, despite its good location, adverse development costs indicate that its future as an employment site may be in some doubt; and on this basis its redevelopment wholly for housing is supported.
- Policy MU5 - Phase II Lady Dane Farm, Faversham - of the submission plan references the potential for a second phase of development, including housing. Taking into account the land required for a second phase of employment, the need for further open space and the possibility of a new primary school, there is potential for a minimum additional 60 dwellings.
- Policy A6 - Land at Graveney Road, Faversham - There is a proposal to reallocate this employment development for housing.
- Brogdale Road (SW/441) was recently granted planning permission at appeal (66 dwellings), hence allocation is something of a 'given'.
- Perry Court Farm (SW/413) has a resolution to grant outline planning permission (370 dwellings and 18,525m2 of employment uses), hence allocation is something of a 'given' (despite issues, e.g. heritage and landscape considerations).
- KCC Highways Depot, Preston (SW/210) - There is uncertainty over the site's availability, but if available it would seem broadly suitable (given that it is a brownfield site).

Topic	Commentary
Air	<p>Air quality is an issue at Faversham, given the designated AQMA at Ospringe. There is a need to avoid increased traffic through the AQMA, recognising that the predominant direction of travel will be towards Canterbury and the M2 (J6 to the south of Faversham and J7 to the east). Also, there is a need to avoid cars queuing at junctions within the AQMA.</p> <p>The situation is currently problematic, and could potentially worsen in the future as planned housing growth increases traffic through the AQMA (albeit mitigation measures are set to be put in place through policy). It could also be that planned growth at Teynham (423 dwellings across four allocations) increases traffic through the AQMA.</p> <p>In light of these issues, sites to the southwest and at Ospringe, that would access the A2 within or west of the AQMA (SW/046, 047, 433, 435, 440, 701, 797), perform relatively poorly. There may be good potential to mitigate effects, but these sites should be avoided if possible, from an 'air' perspective, and in-combination effects are certainly a consideration.</p> <p>It is not appropriate to differentiate further between sites - e.g. sites along the A2 to the east of the AQMA versus sites located away from the A2. However, it is noted the 'Preston Fields' site (SW/233), to the east of the Ashford Rd, benefits from close motorway access.</p>
Biodiversity	<p>Biodiversity sensitivities constrain growth to the north, given proximity to the internationally important North Kent Marshes, and associated locally important marshlands. The proposed allocation at Oare Gravel Works (Policy MU4) abuts the SPA, and two others are within 100m, which on the one hand highlights the potential to avoid/mitigate effects, but on the other suggests the risk of in-combination effects should there be further allocations. Also of note are locally designated woodlands to the west and southwest of Faversham, and to the east of Boughton (the edge of the wider Blean Woodlands complex).</p> <p>On the basis of this discussion, sites to the northeast (SW/430, 431, 795) perform notably poorly. It might be that further investigation would show significant effects to be unlikely (e.g. because onsite habitat does not functionally link to the nearby designated habitat, or because recreational impacts are unlikely given access), and it might be that mitigation is possible; however, for the purposes of this appraisal it is appropriate to flag as an issue.</p> <p>Other sites that perform relatively poorly are: 'East of Ham Road' (SW/700), where the North Kent Marshes SPA is within easy walking distance, and seemingly accessible by public footpath; and 'Bysing Wood Road (SW/733), to the east, which intersects an area of locally designated woodland (albeit part of the site is previously developed). With regards to the site north of Boughton (SW/714), this site is probably not constrained by nearby woodlands (with nationally important SSSI woodland c.1.5km distant, and managed as a National Nature Reserve, albeit other locally important areas of ancient woodland are closer, accessible by footpath and not managed as a nature reserve.</p> <p>Other sites are unconstrained, in terms of strategic biodiversity considerations, although that is not to say that there is not onsite habitat that has some importance in the wider landscape. It is difficult to see that there could be in-combination effects associated with large scale growth to the south of the A2 (given that the broad scale ecological corridors are to the north and south / southwest of the town), but there could be a need for further investigation.</p>
Cultural heritage	<p>Faversham is a historic town, with extensive Conservation Areas, many listed buildings, two scheduled ancient monuments and a clear 'setting' within the landscape.</p> <p>Beginning to the east, SW/080 is relatively unconstrained, as existing development (Graveney Road Industrial Estate) and planned development (Policy MU5, Lady Dane Farm) means that additional growth would not have a direct impact on the nearby Faversham Conservation Area (CA).</p> <p>Sites to the northeast (SW/430, 431, 795) are relatively constrained, as the flat open landscape is understood to contribute to the heritage setting of Faversham.</p> <p>Similarly, 'East of Ham Road' (SW/700), to the north, is constrained by the flat open landscape understood to contribute to the heritage setting of Faversham; however, the degree of constraint may be more limited (and sufficient mitigation possible), recognising that</p>

Topic	Commentary
	<p>the Faversham CA abuts only a small part of the site.</p> <p>To the northwest, 'Byssing Wood Road' (SW/733) is seemingly constrained by the adjacent Gunpowder Works Scheduled Ancient Monument.</p> <p>South of Faversham, all land likely contributes to the historic setting of the town to some extent, given the historic settlement pattern;²⁵ however, on the basis of the Faversham Town Heritage, Landscape Setting and Characterisation Study (2015) it is possible to differentiate between areas where the contribution is 'moderate' versus 'high'.</p> <ul style="list-style-type: none"> • Sites in the vicinity of Ospringe (SW/046, 047, 433, 435, 440, 797) make a 'high' contribution, and several either intersect the Ospringe CA, abut the Syndale Park CA or abut one or more listed buildings. • Moving east, SW/701 is a large site that abuts the Ospringe CA, but is within an area that makes a 'moderate' contribution to the historic setting of Faversham and is some distance (at least 100m) from any listed building. Elsewhere within this central area south of the A2, two sites (Brogdale Road, SW/441; and Perry Court Farm, SW/413) are 'givens' (see discussion above), leaving just one smaller site - Perry Court Farmhouse, SW/794 - which is constrained by the nearby Listed oast house (as explained within the UELCS, 2010). • Moving east, on the other side of the Ashford Rd A251, the two smaller sites (SW/081, 751) perform poorly as they fall within the Faversham CA. This leaves 'Preston Fields' (SW/233), which is a large site identified as contributing to the historic character of Faversham to a 'high' extent. There would certainly be a loss of attractive views along this shallow valley, and some impacts on the adjacent CA; however, masterplanning/design evidence indicates good potential for mitigation. • In respect of growth to the south of Faversham, it is also necessary to highlight the potential for in-combination effects, i.e. it is clearly the case that numerous developments would cumulatively impact on the heritage setting of Faversham. It may also be that higher growth at Faversham, or at certain locations around the town, could result in traffic impacts on the historic centre; however, this is less clear. <p>Finally, at Boughton, SW/714 is open orchard land that is visible in the landscape on the approach to the Staplestreet CA and Mount Ephraim Registered Park/Garden; however, there is no clear evidence to suggest it contributes to setting.</p>
Landscape	<p>Landscapes with a 'heritage setting' value (see discussion above) may tend to have some 'landscape' value; however, this is uncertain. What <i>is</i> certain is that the western side of Faversham is constrained by a locally important (Kent level) Areas of High Landscape Value (AHLV), which is essentially a spur of the AONB (which lies to the south of the M2); whilst land to the north is flat / low lying, with some areas designated as AHLV (Kent Level).</p> <ul style="list-style-type: none"> • Beginning to the east, whilst this land is identified as having 'moderate' capacity to accept change, SW/080 is less well contained than the submission plan allocation at Lady Dane Farm (Policy MU5), the extent of which was defined with the explicit purpose of not breaking a ridgeline. The UELCS is clear that: <i>"Extensive development extending beyond, or visible from, land east of this ridge would be inappropriate because it would impose on the rural character of the landscape to the east."</i> • Sites to the northeast (SW/430, 431, 795) are constrained, with the UELCS identifying low capacity for change and referring to the <i>"unspoilt foreground to the current, attractive urban edge of Faversham."</i> • To the north, 'East of Ham Road' (SW/700) is constrained by the flat open landscape. The UELCS establishes 'low' capacity to accept change and refers to a highly sensitive 'buffer between the urban extent of Faversham and Ham Marshes'. The UELC refers to the potential for development to improve (soften) the urban edge, to the benefit of the landscape; however, it is not at all clear that this is an overriding factor.

²⁵ Faversham pre-1800 was located well north of the A2, associated with the Creek, with Ospringe as a distinct village on the A2 (London Road). It was only in the early 20th Century that development reach the A2 (and spilled over to a very minor extent), and a proportion of this 20th Century development is itself now designated as part of the Faversham Conservation Area.

Topic	Commentary
	<ul style="list-style-type: none"> • To the northwest, 'Byssing Wood Rd' (SW/733) intersects the AHLV, hence performs poorly. • South of Faversham, the UELCS distinguishes between land to the west of the A251 Ashford Rd versus land to the east, but ultimately concludes that both land parcels have 'moderate' capacity to accommodate change. Only one site - 'Perry Court Farmhouse' (SW/794) - is singled out as performing poorly, and this is primarily for heritage reasons. The general conclusion is that small scale, sensitive development could be appropriate at a number of the better contained locations, with development opportunities (cautiously) identified at Land at SW/233 ('the valley sides'); and at SW/047 ('minor residential development'). Also, SW/435 at Ospringe performs well as it is partially developed. With regards to in-combination effects, the comments made under 'heritage' above apply, and there is also a need to consider the setting of the AONB to the south. • Finally, at Boughton site SW/714 is open orchard land that falls within the AHLV (Swale level) and so performs poorly.
Soil	<p>The low resolution national dataset indicates that much of the land around Faversham is likely to be Grade 1 (i.e. of the highest quality) with the likelihood of some Grade 2 land to the south / southwest and the likelihood of some lower quality (Grade 4) to the northeast (i.e. a spur of lower quality land, extending southwards from the marshes). At Boughton, the national dataset indicates a likelihood of Grade 2 and/or Grade 4 land.</p> <p>A good proportion of the land around Faversham has also been surveyed using the 'MAFF Post 1988' criteria (which involves field work),²⁶ suggesting that much of the land is Grade 1, Grade 2 or Grade 3a (i.e. 'best and most versatile'), with some Grade 3b.</p> <p>On the basis of this discussion, it is very difficult to confidently differentiate between the sites in terms of the quality of agricultural land that would be lost. It might be suggested that sites in the Ospringe area (notably SW/797), and the site at Boughton, perform relatively well as the national data-set indicates Grade 2 land; however, it would not be appropriate to differentiate on this basis given that A) Grade 2 land is nonetheless 'best and most versatile'; and B) the national dataset is very unreliable, i.e. not suited for differentiating between sites at this scale. It might also be suggested that land to the north ('East of Ham Road, SW/700) is more likely to be lower quality agricultural land given proximity to the North Kent Marshes, but in fact the national (low resolution) agricultural land dataset indicates a likelihood of this land being Grade 1 (i.e. best quality).</p> <p>It is only possible to identify the non-agricultural sites - SW/733 to the northwest, SW/435 to the south and SW/795 to the east - as performing relatively well; however, there is uncertainty as sites might potentially be available for agriculture in the future.</p> <p>N.B. It is also noted that SW233 intersects with agricultural land that is farmed under an Environmental Stewardship 'agri-environment' agreement; however, it is not clear that this is a strong indication of land quality.</p>
Water	<p>With regards to flood risk, site SW/435 at Ospringe is very constrained. Also, about half of site SW/733 is constrained.</p>
Transport and Traffic	<p>Without the benefit of detailed transport modelling, it is difficult to differentiate between the site options, in terms of the impact on the road network. What <i>is</i> known is that the predominant direction of travel from most locations will be south/east to the M2 Junctions; and it is known that, whilst J6 to the south has capacity, J7 to the southeast has significant capacity issues and no plans for upgrade.</p> <p>On balance it seems appropriate to conclude that sites to the east and northeast of Faversham (i.e. SW/080, 430, 431, 795) perform poorly; however, there is uncertainty. What is more certain is that 'Preston Fields' (SW/233) performs well given its access to J6.</p> <p>Another important consideration is the potential for development to support good 'accessibility', thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect it is again difficult to differentiate between the sites with</p>

²⁶ Both agricultural land datasets are available at magic.gov.uk (under the 'Landscape' tab)

Topic	Commentary
	<p>confidence, but what does seem clear is that the site options ‘on the extremities’ of the town perform less well, with sites to the southwest of Faversham and at Ospringe (SW/046, 047, 433, 435, 440, 701, 797) performing notably poorly. These sites would be some distance from the train station and the town centre (which stretches north from the train station).</p> <p>Finally, there is a need to consider in-combination effects. In this respect, it is clearly the case that any option involving a combination of sites that leads to high growth at Faversham as a whole will lead to impacts on M2 J7.</p>
Population	<p>The matter of sites to the southwest being somewhat distant from the town centre has already been discussed, under ‘Transport and traffic’, and it is not clear that there are any further issues that enable the site options to be differentiated with confidence. Areas of Faversham that are relatively deprived (within the 20% most deprived areas of Swale) are concentrated to the southwest (adjacent to SW/046, 047, 433, 435, 440, 701, 797) and north (adjacent to SW/700); however, there is little reason to suggest that development would stimulate new employment or infrastructure (that might assist with regeneration). In theory it might be suggested that there is the potential for benefits to be realised through the masterplanning of numerous development in-combination; however, in practice fragmented land ownership would be a hindrance.</p>
Health	<p>See discussion above, under ‘Population’. In respect of health, it is noted that the area of relative deprivation to the north performs worse than the area to the southwest. It is the ninth most deprived ‘super output area’ in Swale, in terms of health and disability.</p>
Employment and skills	<p>With regards to in-combination effects, it is fair to say that higher growth at Faversham is to be supported from an ‘economy and employment’ perspective, but it is not clear that opportunities vary at the sub-Faversham scale.</p>
Economic growth	

Conclusions

On the basis of this discussion, it is possible to place the sites in a very rough order of preference (from least preferred to most preferred):

- Bysing Wood Road (SW/733) - constrained in numerous respects, not least flood risk.
- Sites to the northeast (SW/430, 431, 795) - constrained in terms of landscape, heritage and biodiversity. SW/795 is smaller and partially developed, but nonetheless constrained.
- Perry Court Farmhouse (SW/794) - constrained in heritage terms (given proximity to a listed oast house).
- North of the Street, Boughton (SW/714) - constrained in landscape terms (AHLV).
- Land adjacent Mindon, 9 Ashford Road and Orchard cottages (SW/081, 751) - constrained in heritage terms (within a Conservation Area), albeit in close proximity to the train station.
- East of Ham Road (SW/700) - constrained in terms of landscape, and may be somewhat constrained in terms of biodiversity and heritage.
- SW/080 (Lady Dane Farm) - landscape impacts and location / scale would have implications for M2 J7.
- Sites to the southwest of Faversham and at Ospringe (SW/046, 047, 433, 435, 440, 701, 797) - constrained in terms of air quality, heritage (less so SW/701) and proximity to the town centre; albeit the UELCS suggests some opportunities for minor development to be accommodated in the landscape.
- Preston Fields (SW/233) - leads to heritage concerns; however, the UELCS identified some capacity for development, and site promoters have identified good opportunity for mitigation.

West Sheppey

Sites examined are -

Belgrave Road, Halfway		SW/165
R/o 33 Highfield Road, Halfway		SW/019, 158
Danley Farm, Minster Road, Halfway/Minster		SW/021, 038
Southsea Avenue, northwest Minster		SW/321
Sites southwest of Minster		SW/184, 194, 721
East Minster	Chequers Road	SW/457
	Sites r/o Chequers Road / Scocles Road / Nelson Avenue, Minster	SW/459, 706, 793, 779
	Windy Gap, Chequers Road, Minster	SW/044, 780
	Sites at Scocles Road/Elm Lane, southeast of Minster	SW/133, 705, 799

The table below presents a commentary on these sites -

Sustainability topic	Commentary
Air	<p>There are no designated air quality management areas on the Isle of Sheppey, and it is not likely to be the case that there are any locations in West Sheppey where traffic congestion leads to problems in relation to poor air quality. Of course, many trips by car will be off the Island via the A429; however, this does not give rise to air quality concerns.</p>
Biodiversity	<p>The first point to note is that site SW/780 - i.e. Windy Gap, Chequers Road, on the seaward side of Minster - intersects the Sheppey Cliffs and Foreshore SSSI (designated <i>primarily</i> for its geological value, but also with biodiversity interest). It is also noted that the smaller site (SW/044) encroaches to within c.200m, and is seemingly well vegetated.</p> <p>Also, 'East of Parsonage Farm' (SW/184), a small site southwest of Minster, comprises 'traditional orchard' Biodiversity Action Plan (BAP) priority habitat (uncommon on Sheppey); and 'Southsea Avenue' (SW/321), northwest Minster, is thickly vegetated with potential ecological interests. This latter site is mostly surrounded by existing development, but at one point does border the Minster Marshes SNCI, which extend away from Minster to the west.</p> <p>Another consideration is recreational pressure on the North Kent Marshes SPA, which is in proximity to those sites on the southern side of Minster (in particular SW/721); however, there would not appear to be good footpath access. It might be that allocation of SW/721 (which is a very large site), or several sites in-combination, would lead to a risk of impacts; however it is difficult to be certain (as matters would need to be examined through HRA).</p>
Cultural heritage	<p>There are no Conservation Areas that might be affected, whilst listed buildings in West Sheppey are sporadically located. Minster Abbey is a Grade 1 listed building, and the surrounding grounds a Scheduled Ancient Monument.</p> <ul style="list-style-type: none"> • Sites at 'Danley Farm, Minster Road', at Halfway, would impact on a listed building (Danley Farmhouse), i.e. it would be a challenge to develop in line with the following priority established by the UELCS: "Conserve the drove track which passes via Danley Farm, and

Sustainability topic	Commentary
	<p><i>ensure any extended development does not impinge on the setting of the Listed Building.”</i> The listed building is within the larger site (SW/021), and it would seem that the smaller site (SW/038) would also impact.</p> <ul style="list-style-type: none"> • ‘East of Parsonage Farm’ (SW/184), a small site southwest of Minster, is adjacent to a listed building (Parsonage Farmhouse), with the UELCS stating that a priority is to: <i>“Conserve and respect the rural setting of Parsonage Farm Listed Building.”</i> This site is also subsumed within two much more extensive sites (SW/194, 721), which are relatively unconstrained as there would be potential to avoid/mitigate impacts to the listed building. • Another site close to a listed building is ‘East of Scocles Road’ (SW/133), southeast of Minster. Here it would seem that impacts to the setting of the listed building (Scocles Court) are likely to be unavoidable. It is also the case that the UELCS identifies that <i>“historic core of Minster and Minster Abbey would potentially be blocked by any significant development... and the undeveloped foreground to the historic core would be diminished.”</i> • Another constrained area of land is that to the rear of Chequers Road / Scocles Road / Nelson Avenue, east of Minster, which is in close proximity to Minster Abbey albeit to the rear of existing properties. The UELCS did not examine this land, but there are clear heritage concerns given the rising topography, and the bisecting footpath. It is understood that from the footpath there are views to the southeast across the marshes, and that Minster Abbey comes into view to the northwest. As such, sites here - SW/459, 706, 793, 779 - are judged to be constrained (albeit there will be some variability, e.g. SW/459 is the smallest of the sites, and is tight to the rear of existing properties). This conclusion is supported by a Planning Inspector’s decision from 1998, in relation to a 14.5 ha site, likely to have been to have somewhat resembled the largest site currently promoted (SW/779, which is 20.5 ha in size and includes within its boundary the three other sites promoted). • Finally, ‘Windy Gap, Chequers Road’ (SW/044, 780), east of Minster, is located on the approach to Minster Abbey (c.250 to the east, with one listed building along the road between the site and the Abbey), affording a sea view that is identified as valuable by the UELCS. However, the UELCS does not reference heritage concerns.
Landscape	<p>The UELCS drew the conclusion that: <i>“South of Minster and between Minster and Sheerness, the landscape has a moderate capacity to accommodate change within pockets of land which are physically and visually well contained by the landform. East of Minster... has a low capacity to accommodate change because the open landscape is important as the coastal setting and as open space between residential areas within Minster. South east of Minster [has] a low capacity to accommodate change because the open, rising landscape is very prominent in highly sensitive views from the marshland to the south. The cumulative impact of significant development [southwest and/or southeast of Minster] would be substantial in terms of highly sensitive views from the marshland to the south.”</i></p> <p>Beginning with sites to the east of Minster -</p> <ul style="list-style-type: none"> • The UELCS considered a large land parcel to the southeast of Minster (stretching from Lower Road, uphill to the edge of Minster) and concludes ‘low’ capacity for change; however, the only site within this parcel - ‘Chequers Road’ (SW/457) - is a small site at the northwestern extent, well related to the existing eastern edge of Minster. It is therefore not possible to conclude that this site performs poorly (albeit the risk of setting a precedent for further ribbon development east of Minster is a concern). • ‘Windy Gap, Chequers Road’ (SW/044, 780) was examined by the UELCS, with the conclusion reached that: <i>“... it is sensitive in terms of providing an area of open space between residential areas within Minster and acts as a buffer between the existing urban area and the highly ecologically sensitive coastline. Whilst a single line of residential development along the B2008 would not be entirely unacceptable in landscape terms because the landscape is in poor condition, there would be a loss of sea views...”</i> • Land to the rear of Chequers Road / Scocles Road / Nelson Avenue, Minster (SW/459, 706, 793, 779) is a parcel of land that was not examined by the UELCS, but there are clear

Sustainability topic	Commentary
	<p>sensitivities given the rising topography, and the bisecting footpath (see further discussion above, under 'Heritage').</p> <ul style="list-style-type: none"> • Southeast of Minster three sites - SW/705, SW/799, SW/133 - sit within a parcel of land that the UELCS concludes has 'low' capacity to accept change, concluding that: <i>"any significant amount of further development across this prominent higher ground would be exceptionally visible in sensitive views from the low lying marshland to the south. In addition to this views of the historic core of Minster and Minster Abbey would potentially be blocked by any significant development within the Study Area, and the undeveloped foreground to the historic core would be diminished."</i> SW/799 and SW/133 perform poorly; however, SW/705 performs better as it is well contained (lying to the north of Elm Lane). • The next sites to consider are those that sit within the locally designated 'Countryside Gap' to the west of Minster and at Halfway. <ul style="list-style-type: none"> ○ Beginning with the northern-most sites - Danley Farm, Minster Road (SW/021, 038) - the UELC states that: <i>"an extension of the existing edge of Halfway would perhaps be appropriate... where the landscape is well contained by the public open space formed by a small hill to the east and school development to the west."</i> However, it is not thought that this statement supports either site. ○ The western-most site - Belgrave Road (SW/165) - on the southern edge of Halfway, is contained within the landscape given its location to the north of Furze Hill, with the UELCS stating that it would <i>"perhaps be acceptable to extend... slightly where the land is physically and visually contained to the north of Furze Hill."</i> This site would appear to represent a logical 'rounding off' of Halfway, rather than erosion of the Countryside Gap. ○ 'R/o 33 Highfield Road' (SW/019, 158) is located on high ground that "provides wide panoramic views across the marshland to the south" according to the UELCS. The smaller site (SW/158) is on lower land; however, it does not relate well to the existing settlement edge and the previous Local Plan Inspector concluded that development here would be highly intrusive. ○ Finally, sites to the southwest of Minster (SW/184, 194, 721) would erode the Countryside Gap; however, the principle of limited development is seemingly supported by the UELCS, which states: <i>"A degree of residential extension would also perhaps be acceptable around the existing periphery of Minster where the landscape relates well to the urban edge."</i> In conclusion, the largest site (SW/721) clearly performs poorly; the smallest site (SW/184) does not perform poorly; and there is uncertainty in respect of SW/194 (where the site extent has been amended to reflect concerns, and substantial landscaping/open space has been proposed). • The final site is 'Southsea Avenue' (SW/321), west Minster, which is enclosed by existing development and on this basis performs relatively well. <p>Finally, there is a need to consider in-combination effects, particularly in relation to landscapes south of Minster, where the Thistle Hill area (i.e. the area south of Minster, north of Lower road, east of Barton Road and west of Scoccles Road) has been the focus of growth over recent years and is a focus of growth through the submission plan. In light of in-combination effects, it would seem fair to conclude that allocation of numerous sites south of Minster would not be something to support, from a landscape perspective.</p>
Soil	<p>The low resolution national dataset indicates primarily Grade 3 agricultural land (with no indication of whether this is likely to be Grade 3a, and therefore 'best and most versatile'), with some Grade 2 land east of Minster (intersecting SW/779) and Grade 4 land to the north of Halfway (SW/019 and 158).</p> <p>Certain sites have been examined in greater detail - i.e. surveyed using the 'MAFF Post 1988' criteria (which involves field work)²⁷ - are 'Belgrave Road' (SW/165), sites southwest of</p>

²⁷ Both agricultural land datasets are available at magic.gov.uk (under the 'Landscape' tab)

Sustainability topic	Commentary
	<p>Minster (SW/184, 194, 721)²⁸ and sites rear of Chequers Road/ Scocles Road/ Nelson Avenue, Minster (SW/459, 706, 793, 779). ‘Belgrave Road’ and sites southwest of Minster are found to comprise Grade 3b land (the low resolution national dataset having indicated Grade 3), whilst the latter area is found to comprise Grade 3b to the west and Grade 3a to the east. Specifically, the Grade 3a land intersects SW/779, which the low resolution national dataset had indicated would be Grade 2.</p> <p>On the basis of this discussion, it is very difficult to confidently differentiate between the sites in terms of the quality of agricultural land that would be lost. However, it is possible to say with some confidence that SW/779 performs relatively poorly.</p> <p>N.B. It is also noted that four sites (SW/165, 721, 780, 799) intersect with agricultural land that is farmed under an Environmental Stewardship ‘agri-environment’ agreement; however, it is not clear that this is a strong indication of land quality.</p>
Water	<p>Flood risk is a constraint at SW/038 (all flood risk zone 2, with significant zone 3), SW/021 (more than half zone 2, and significant zone 3) and SW/321 (more than half zone 2, and some zone 3).</p>
Transport and Traffic	<p>Traffic is an issue on Sheppey, particularly along the A2500 Lower Rd, which links the east of the Island to the A249. In the summer tourist season the population of the Island can increase substantially, serving to highlight transport deficiencies. The improvement of existing queuing problems on the A2500 Lower Road approaches to the A249 will largely be a matter for the County Council to resolve via its transport strategy for Swale; however, committed and submission plan housing sites at Thistle Hill, Plover Road and other locations may be expected to contribute financially to its solution.</p> <p>On this basis, sites to the west of Minster perform relatively well; and sites to the south/east of Minster, which would put pressure on Scocles Road and its junction with Lower Rd (SW/459, 706, 793, 779, 705, 799, 133) are constrained. It is understood that SW/133 (which is a large site) could potentially provide a ‘bypass’ of Scocles Road; however, this is uncertain. A recent review by Kent Highways, completed for the 2015 SHLAA update, found in relation to SW/133 that: <i>“The level of traffic likely to be associated with a development of this size... is likely to [need] upgrade to local junctions and Lower Road for its length to accommodate the additional traffic that this development could generate. This is likely to require third party land.”</i></p> <p>Another important consideration is the potential for development to support good ‘accessibility’, thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect, most sites perform adequately, given access to Minster (a Local Centre) and/or Sheerness (easily accessible by bus from Minster and Halfway), but sites on the southern periphery of Minster are more isolated. This applies most notably to SW/133, in relation to which the Kent Highways review (2015) found: <i>“It is unclear whether the existing services in the vicinity of the site have the capacity to support a large development such as this. This site is therefore not particularly sustainable in terms of its proximity to public transport links, local amenities and services, although there is scope to include these as part of the development.”</i> With regards to the large sites located to the southwest of Minster (SW/194, 721), these are c.2km the centre of Minster (i.e. Minster Abbey); however, they are much closer to the local centre on the southern edge of Minster and the local centre at Halfway. The Kent Highways review established that that SW/194 has suitable access to services/facilities (although development would necessitate improvements to highways and walking/cycling infrastructure).</p>
Population	<p>The matter of sites being distant from services has already been discussed, under ‘Transport and traffic’, and it is not clear that there are any further issues that enable the site options to be differentiated with confidence. It can be argued that new housing would support the viability of community infrastructure (i.e. shops and services), but there is no certainty. It is</p>

²⁸ Data for Sites southwest of Minster (SW/184, 194, 721) is held by the Council, but is not yet available on magic.gov.uk.

Sustainability topic	Commentary
	noted that Minster/Halfway generally performs better, in terms of the Index of Multiple Deprivation, than Sheerness and East Sheppey (although the output area on the southeast edge of Minster performs more on a par with the most deprived parts of Sheppey).
Health	See discussion above, under 'Population'. In respect of health, it is noted that the output area on the southeast edge of Minster is the fifth most deprived 'super output area' in Swale, in terms of health and disability.
Employment and skills	Building a strong, competitive economy for Sheppey is especially important. Despite investment in new road infrastructure, its economy is performing poorly and bore the brunt of the economic recession in Swale. However, the Island remains well placed to build on the investment in road infrastructure, with significant committed employment land at Neatscourt in Queenborough and on smaller sites at West Minster; and plans for mixed use regeneration at Queenborough/Rushenden set out within the submission plan. Furthermore, there are more long term aspirations to capitalise on major opportunities at the Port of Sheerness (e.g. there is the possibility of land reclamation, which would support a major expansion), and other more modest long term economic aspirations (e.g. evidence suggests potential for a small business centre for business startups in eastern Sheppey).
Economic growth	In light of this discussion, it can be argued that housing growth, particularly to the west in proximity to Sheerness and Queenborough/Rushenden, might help to attract new employers to the island in time; however, there is no certainty.

Conclusions

On the basis of this discussion, it is possible to place the sites in a very rough order of preference (from least preferred to most preferred):

- Danley Farm, Minster Road, Halfway (SW/021, 038) - flood risk and heritage constraints.
- Windy Gap, Chequers Road, east Minster (SW/780) - landscape constraints and intersects a SSSI (albeit designated primarily for geodiversity value).
- East of Scocles Road, southeast Minster (SW/133) - landscape constraints, poorly related to Minster, traffic impacts and would impact a listed building; albeit this is a large site that could deliver mitigation etc.
- South of Elm Lane, southeast Minster (SW/799) - constrained as per SW/133, albeit this is a smaller site.
- Parsonage Chase, southwest Minster (SW/184) - listed building impact, and orchard loss (BAP habitat).
- Sites to the rear of Chequers Road / Scocles Road / Nelson Avenue, east Minster (SW/459, 706, 793, 779) - landscape and heritage impacts, and SW/779 comprises Grade 3a agricultural land. SW/459 is small and is tight to the rear of existing properties, however, it is possibly somewhat incongruous.
- Southsea Avenue, northwest Minster (SW/321) - surrounded by existing development, and hence not constrained from a landscape perspective (albeit there may be some ecological value); however, it is constrained by flood risk (more than half zone 2, and some zone 3).
- R/o 33 Highfield Road, Halfway (SW/019, 158) - constrained by landscape (and whilst the smaller site - SW/158 - is on lower land, it does not relate well to the existing settlement edge).
- West of Barton Hill Drive, southwest Minster (SW/194) - would erode the Countryside Gap, and involve a scale of growth above that which the UELCS supports (i.e. more than 'a degree of residential extension'); however, the site extent has been amended to reflect concerns, and substantial landscaping/open space has been proposed. Development would represent a continuation of expansion to the south of Minster, with landscape and traffic implications; however, in respect of the latter point it is understood that development would support improvements to the Barton Road / Lower Road junction.
- Scocles Road/Elm Lane, southeast Minster (SW/705) - fairly unconstrained although traffic would be generated on Scocles Lane.
- Chequers Road, east Minster (SW/457) - a small site that is well related to the existing eastern edge of Minster, albeit there is a risk of setting a precedent for expansion into a sensitive landscape.
- Belgrave Road, Halfway (SW/165) - contained within the landscape and would represent a logical

Sustainability topic	Commentary
	'rounding-off' of Halfway. This site is also well located, in respect of employment growth area to the west. Finally, with regards to North of Lower Road, southwest Minster (SW/721), it is difficult to draw a conclusion. It is an extremely large site that would greatly erode the Minster/Halfway Countryside Gap, and impact significantly on the landscape more generally; however, it would deliver important new infrastructure.

Iwade

Sites examined are -

School Lane Farm, west of Iwade	SW/717
Coleshall Farm, southwest of Iwade	SW/199
Southwest of Iwade	SW/216
Halfway Egg Farm, Featherbed Lane, south of Iwade	SW/450
East of Iwade	SW/123 ²⁹

The table below presents a commentary on these sites -

Sustainability topic	Commentary
Air	There are no known air quality issues at Iwade, and its location adjacent to the A249 should mean that there is little potential for development to lead to air quality problems (although growth to the west could encourage traffic through Newington, where there is an AQMA).
Biodiversity	<p>Biodiversity is a major consideration at Iwade, given the proximity of the internationally important North Kent Marshes SPA, to the northeast.</p> <p>East of Iwade (SW/123) borders the SPA along its northeastern edge, and a large proportion of the site is within 400m (i.e. an easily walkable distance); however, footpath access is limited (specifically, there is one footpath at the site's northern extent and from that footpath the SPA is not reached for c.700m). This site is constrained; however, it is noted that there is a commitment to deliver extensive greenspace as part of the scheme - i.e. a level well in excess of what might typically be expected - which will perform the role of Suitable Alternative Natural Greenspace (SANG), thereby mitigating recreational effects. It should also be the case that strategically located greenspace has the potential to mitigate other impact 'pathways', e.g. urbanisation effects (e.g. light), disturbance and dust from construction and operational activities, loss of supporting habitat and water related impact pathways relating to surface runoff. These matters are explored through HRA.</p> <p>Other sites perform better, given that they are further from the SPA (SW/717 is linked by a footpath, but the walking distance is approaching 2km), and there appear to be no other strategic factors to take into account (e.g. relating to on-site habitat).</p>
Cultural heritage	Whilst there is no designated Conservation Area, there is a 'historic core' to Iwade, centred on the Grade 1 listed church close to the village's northern extent. The flat landscape to the northeast provides a setting for the church, although there are no viewpoints (e.g. footpaths) in this direction until the A249 is reached (some 800-1000m distant). On this basis SW/123 is constrained; however, given the likelihood of extensive open space provision in this area

²⁹ This site incorporates SW/116, 117, 183. The smaller sites within SW/123 are not discussed individually, as it is not thought likely that any would be progressed in isolation.

Sustainability topic	Commentary
	<p>(given the priority issue of mitigating impacts to the SPA), impacts will be mitigated to a large extent, and there may even be potential to enhance appreciation of the church as an asset.</p> <p>Away from the historic core, there is one other listed building - Coleshall Farm to the south, just beyond the extent of recent housing development. SW/199 would involve developing the land immediately surrounding the farmhouse; and it is also likely that the larger SW/216 would also impact its setting, although there mitigation could be possible. The UELC is clear that any development in this direction should be small-scale and the listed building should not be absorbed within the urban area of Iwade.</p>
Landscape	<p>Dealing firstly with SW/123 -</p> <ul style="list-style-type: none"> • The UELCS gave separate consideration to land east of Iwade and land northwest of Iwade, whereas there is now a site option under consideration - SW/123 - that would extend across both areas (primarily within the eastern area, but with a small part wrapping around to the north of the village). With regards to land to the east, the UELCS suggests ‘high’ capacity to accept change, albeit recognising that erosion of the Iwade/Sittingbourne gap is a concern. With regards to land to the northwest, the UELCS states that: <i>“There is a low capacity to accommodate change... However, a small amount of residential expansion would perhaps be acceptable on the periphery of Iwade providing that the new urban edge does not become visible in sensitive views from the marshes to the north and north west.”</i> Other considerations are - <ul style="list-style-type: none"> ○ To the north, despite ‘low capacity’, it is understood that development would provide an opportunity to improve/‘soften’ the current finished edge of the current village. ○ To the east, despite ‘high capacity’, concerns arise given the submission plan allocation at Northwest Sittingbourne (where the red line boundary extends almost to the southern extent of SW/123, albeit separated by the A249); however, policy is in place (Policy MU1) to ensure that the Northwest Sittingbourne allocation delivers a ‘network of green spaces and corridors throughout the allocation to achieve a minimum open space provision of 22 ha, with the concept diagram showing a ‘linear park’ running along the length of the A249. As such, there is potential for allocation of SW/123 to integrate and form a continuation of this green corridor, and ultimately ensure a legible settlement pattern / sense of place, to the benefit of the wider Swale Thames Gateway. <p>With regards to other sites around Iwade -</p> <ul style="list-style-type: none"> • School Lane Farm, west of Iwade (SW/717) - falls within the ‘northwest of Iwade’ landscape that the UELCS concludes has low capacity to accept change. The UELCS describes how: <i>“There are few urban influences within the Study Area and, despite the Sheppey Crossing and the recent development of Iwade, the landscape has a remote and tranquil character. This landscape borrows a considerable degree of its sense of place from the neighbouring marshlands, such as the flat and exposed nature of the landscape and the big skies.”</i> • Southwest of Iwade (SW/216) - would involve a further extension of a recent housing development. The landscape has ‘moderate’ capacity to accept change; however, the UELCS states that development should be small scale, with Coleshall Farm (Listed Building) avoided, as well as higher land to the north-west where <i>“any significant extended development would impose on the rural character of the landscape around School Lane”</i>. There may be scope to reduce the scale of the site, and implement landscaping, with a view to mitigating impacts; however, this is uncertain. • SW/199 is a smaller site within SW/216 that is not supported by the UELC on heritage grounds. ‘Pure’ landscape implications are unclear, although it is noted that the farmstead does currently provide a logical marker of Iwade’s south-western extent. • Halfway Egg Farm, Featherbed Lane, south of Iwade (SW/450) - would, in all likelihood, involve a southern extension to the SW/123 scheme. It would ‘jut out’ rather than forming a smooth boundary to the urban edge, and this would be a particular issue were the land to

Sustainability topic	Commentary
	<p>the north (within SW/123) to be used for open space (which is highly likely, in-line with the concept of a green ‘half-ring’ to the village). This is also rising land (higher than SW/123), which highlights the value in keeping it open, as part of the Iwade/Sittingbourne gap (albeit part of the site is already developed).</p>
Soil	<p>The low resolution national dataset indicates a mix of Grade 1 (i.e. ‘best and most versatile’, BMV), Grade 3 (<i>potentially</i> BMV) and Grade 4 (not BMV) agricultural land. To the south of Iwade is the high quality ‘fruit belt’, whilst to the north of Iwade is the lower quality land associated with the North Kent Marshes.</p> <p>Importantly, most of the land surrounding Iwade has also been surveyed using the ‘MAFF Post 1988’ criteria (which involves field work),³⁰ - and what this shows is that there is in fact a mix of Grade 3a (which is the lowest grade of BMV) and 3b (which is not BMV). The one area that has not been surveyed is that covered by SW/216 and SW/199; however, land immediately adjacent (which has now been developed) was surveyed and found to comprise a mixture of Grade 3a and 3b land. Of the sites that has been surveyed in detail, Grade 3a land primarily falls within SW/123 (and also intersects SW/450), and there is also a small patch of Grade 2 land here.</p> <p>N.B. It is also noted that all sites except SW/450 and SW/717 intersect with agricultural land that is farmed under an Environmental Stewardship ‘agri-environment’ agreement; however, it is not clear that this is a strong indication of land quality.</p>
Water	<p>Flood risk is an issue, with the Iwade Stream running through the centre of the village. The flood risk zone constrains SW/123; however, it is not thought that this is an issue given the size of the site, and the fact that the area at risk would need to be used as greenspace. Also, to the southwest of the village (i.e. upstream) the flood risk zone runs through the centre of SW/216 and covers c.15-20% of the smaller SW/199.</p>
Transport and Traffic	<p>A large scheme to the east of Iwade (SW/123) is probably to be supported, from a transport perspective, as there would be access directly onto the A249. The part of the scheme that wraps around to the north of the village is less well located, as traffic heading south would pass through the village; however, the site does benefit from a second point of access from the north (which could be used by construction traffic, if nothing else).</p> <p>Development to the south (SW/216, 199) is also to be supported; however, development to the west (SW/717) is problematic as traffic would pass through the village (and there would be pressure on the rural lane to Newington).</p> <p>Another important consideration is the potential for development to support good ‘accessibility’, thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect, all sites perform similarly. Sites to the south - SW/216, 199 - are most distant from the village centre (up to c.1km), but it is noted that there is a GP surgery closer, i.e. within the southern part of the village. SW/123 has the best potential to ‘integrate’ with the village, and would also enable longer distance cycling to Sittingbourne.</p>
Population	<p>The Index of Multiple Deprivation shows Iwade to perform well, relative to other areas locally, although it is noted that there are some issues regarding community infrastructure. Iwade is reasonably close to Sittingbourne (and the school provision being planned at NW Sittingbourne); however, public transport services are not of the quality that they might be. There are question-marks regarding any future growth at Iwade, as it is not clear what potential there would be to fund the delivery of community infrastructure upgrades. SW/123, for example, would deliver extensive high quality open space, but it is not clear what other wider benefits development would bring. There is also a need to consider that villagers have dealt with the impacts of construction since the 1990s, when Iwade was first identified as a growth point, and there was an expectation that growth would cease.</p>
Health	<p>As discussed above, the Index of Multiple Deprivation shows Iwade to perform well, relative</p>

³⁰ Both agricultural land datasets are available at magic.gov.uk (under the ‘Landscape’ tab)

Sustainability topic	Commentary
	to other areas locally. It is also noted that development is potentially to be supported from a perspective of supporting walking/cycling and access to greenspace.
Employment and skills	Iwade is in close proximity to employment growth areas at Sittingbourne, Ridham and Neatscourt, but otherwise there would appear to be no strategic issues.
Economic growth	

Conclusions

On the basis of this discussion, it is possible to place the sites in a very rough order of preference (from least preferred to most preferred):

- School Lane Farm, west of Iwade (SW/717) - would involve an extension to the west, away from the strategic road network and into a sensitive landscape, albeit this is lower quality agricultural land.
- Southwest of Iwade (SW/216) - would involve an extension to recent development. To the north the issue is rising and open land, whilst to the south Coleshall Farm (Listed Building), which is currently logically located at the settlement edge, would be enveloped. Also, the village centre would be c.1km distant.
- Coleshall Farm, southwest of Iwade (SW/199) - would impact the listed farmhouse, which is currently prominent at the settlement edge, with a 'setting' in the rural landscape beyond.
- Halfway Egg Farm, Featherbed Lane, south of Iwade (SW/450) - benefits from being partially brownfield, but is rising land that logically contributes to the Sittingbourne/Iwade gap.
- East of Iwade (SW/123) - would involve an extension in the most logical direction from a perspective of wishing to integrate with the existing village and minimise traffic impacts; and there is an opportunity to deliver strategic green infrastructure. There is the potential to ensure a legible settlement pattern / clear sense of place, with wide ranging benefits; however, there are concerns relating to: the adjacent SPA; landscape / traffic impacts resulting from the northern part of the scheme; and community infrastructure.

Newington

Sites examined are -

Northwest Newington	North of London Road	SW/217
	West of Church Lane	SW/124
Southwest Newington	Pond Farm	SW/164
	Pond Farm II	SW/707
Southeast Newington	The Tracies	SW/010
	Ellen's Place, High Street	SW/732
Northeast Newington	Church Rd, adj St Mary's View	SW/041
	North of the High Street	SW/407

The table below presents a commentary on these sites -

Sustainability topic	Commentary
Air	<p>The A2 through much of Newington is designated as an Air Quality Management Area (AQMA), and acts as a constraint to all sites. Sites at Pond Farm (SW/164, SW/707) perform on the basis that access would be outside the AQMA (perhaps by 100-200m); however, on the other hand, they are constrained on the basis that the predominant direction of travel will be east (through the AQMA) towards Sittingbourne. Another consideration is potentially, that two sites (SW/407, 732) would lead to cars joining the A2 at the eastern extent of the AQMA (which is possibly a positive, on the assumption that the predominant direction of travel will be east towards Sittingbourne). Finally, there is a need to highlight the potential for in-combination effects.</p>
Biodiversity	<p>None of the sites would impact on sites designated for their biodiversity value; however SW/041 to the northeast does comprise Biodiversity Action Plan (BAP) priority habitat ('traditional orchard'). Also, SW/010 to the south is a small wooded site (likely to be former orchard, but not listed as BAP priority habitat).</p>
Cultural heritage	<p>Newington has a tightly defined Conservation Area (CA), centred on the junction of the High Street and Church Lane, as well as a more extensive CA associated with the Church and associated high ground to the north of the village. Sites north of the train-line (SW/041, SW/124, SW/217) perform relatively poorly on the basis that the rising land contributes to the setting of the nearby Church CA, and traffic would pass down Church Lane through the Newington CA. Of these sites, SW/041 actually intersects the Church CA.</p> <p>The other site north of the High Street (SW/407) abuts the Newington CA, but it is not clear that it contributes to its setting. There would be access from the site to Church Lane (within the CA), but it is understood that this would be for walking/cycling only.</p> <p>South of the High Street, SW/010 is a small site that abuts the CA, is wooded and has a footpath running through it (which is possibly the primary walking route south, to higher ground). It abuts the garden of a listed building; however, it appears well contained.</p> <p>Finally, both sites to the southwest (SW/164, SW/707) would impact the setting of an adjacent listed building, although the extent of the smaller site is designed to mitigate impacts.</p>
Landscape	<p>The UELCS did not examine Newington, but it is nonetheless clear that there are a number of sensitivities, including on the basis of the undulating topography. There is also a ridge of higher ground to the north of Newington, upon which the church sits, which stretches north to the marshes and is designated as an AHLV (Swale-level).</p> <p>In light of these points, it seems that the three most northern sites - i.e. those to the north of the railway - are all relatively constrained in landscape terms. The other site to the north of the High Street (SW/407) is understood to be relatively well contained, sitting behind existing houses and bounded on its highest side by the railway.</p> <p>The three large sites to the south would impact on views from the A2 (southward, towards higher ground), and comprise ribbon development (particularly in the case of SW/732), but it is difficult to assign any significance to the landscape impacts that would arise. Views may be most sensitive across SW/732, but this is uncertain; and it is the case that the smaller 'Pond Farm' site is preferable to the larger site.</p> <p>The final site to the south is perhaps not constrained in landscape terms (although see discussion above, under 'Heritage').</p>
Soil	<p>The low resolution national dataset indicates primarily Grade 1 (i.e. best quality nationally) and Grade 2 (also classified as 'best and most versatile') agricultural land; and none of the land around Newington has been surveyed using the 'MAFF Post 1988' criteria (which involves field work).³¹</p> <p>The low resolution national data-set suggests that the only site to intersect Grade 2 land is</p>

³¹ Both agricultural land datasets are available at magic.gov.uk (under the 'Landscape' tab)

Sustainability topic	Commentary
	<p>SW/217, to the northwest; however, it is not clear that this is a significant factor in its favour given: A) the unreliability of the dataset; and B) the fact that whether Grade 1 or Grade 2, the land is still classified as 'best and most versatile'.</p> <p>On this basis, it is only possible to highlight that the two sites in non-agricultural use perform relatively well - i.e. SW/041 and SW/010 - although as wooded sites they could potentially be brought into agricultural use (particularly the case for the larger SW/041).</p> <p>N.B. It is also noted that three of the four sites north of the High Street (i.e. all but the one comprising former orchard; SW/124, 217, 407) intersect with agricultural land that is farmed under an Environmental Stewardship 'agri-environment' agreement; however, it is not clear that this is a strong indication of land quality.</p>
Water	Flood risk is not a strategic issue at Newington.
Transport and Traffic	<p>There are notable traffic issues, given: Newington's location on the A2 between Rainham to the west and Sittingbourne to the east; strong likelihood of 'rat-running' south to the M2 junction via Wormdale Hill / Bull Lane (a rural lane) and also constrained local roads within the historic northern part of the village.</p> <p>These matters highlight the possibility of in-combination effects; however, in terms of differentiating between the alternatives it is only possible to highlight that the three to the north that would rely on Church Lane (SW/041, 124, 217) are constrained.</p> <p>Another important consideration is the potential for development to support good 'accessibility', thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect, none of the sites stand out as performing poorly given easy walking distance to the village centre. Also, the four sites to the north of the High Street perform well on the basis that the train station is very close.</p> <p>It is understood that some of the larger sites could potentially contribute to the delivery of necessary upgrades to community infrastructure in Newington; however, for the purposes of this appraisal there is no certainty.</p>
Population	The matter of accessibility to services/facilities has already been discussed, under 'Transport and traffic', and there are few other further issues that enable the site options to be differentiated with confidence. The Index of Multiple Deprivation shows Newington to perform well, relative to other areas locally, although it is noted that there are some issues regarding the capacity of community infrastructure in the village (notably no GP surgery), which indicates the possibility of in-combination effects. It might be that allocation of a large site could support upgrades to community infrastructure locally; however, this is uncertain.
Health	As discussed above, the Index of Multiple Deprivation shows Newington to perform well, relative to other areas locally, albeit there is an issue locally in that there is no GP surgery. It is also noted that development is potentially to be supported from a perspective ensuring access to high quality countryside.
Employment and skills	Newington is well located from a perspective of accessing employment opportunities in Sittingbourne, Rainham and beyond (given the train station); but otherwise there would appear to be no strategic issues.
Economic growth	

Conclusions

On the basis of this discussion, it is possible to place the sites in a very rough order of preference (from least preferred to most preferred):

- Church Rd, adj St Marys View, northeast of Newington (SW/041) - comprises old orchard, intersects the Conservation Area, and distinct traffic/AQMA implications; albeit very close to the train station.
- North of London Road, northwest of Newington (SW/217) - landscape, heritage and distinct traffic/AQMA implications; albeit very close to the train station.

Sustainability topic	Commentary
	<ul style="list-style-type: none"> West of Church Lane, northwest of Newington (SW/124) - as per SW/217, but constrained to a lesser extent as smaller. Pond Farm (SW/164), southwest of Newington - would impact a listed building, and valued views. Pond Farm II (SW/707), southwest of Newington - as per SW/164, but to a notably lesser extent. Ellen’s Place, High Street, southeast of Newington (SW/732) - would comprise ribbon development, and impact valued views. The Tracies, southeast of Newington (SW/010) - a small wooded site, well contained, but abuts the rear of the Conservation Area (specifically the garden of a listed building). Also, a footpath runs through the site to countryside beyond. Smaller site leads to low AQMA concerns. North of the High Street (SW/407) - seemingly the least constrained of the sites to the north of the village from a landscape/heritage perspective, although some uncertainty given proximity to the CA. As per the other sites to the north, it is well related to the village centre / train station.

Teynham

Sites examined are - ³²

Sites to the south, west of Lynsted Lane	Claxfield Farm	SW/143
	Lynsted Lane	SW/704
Sites to the south, east of Lynsted Lane	London Road/Cellar Hill	SW/723
	Lynsted Lane	SW/727
Sites to the northeast	Barrow Green Farm	SW/722
	Barrow Green Farm II	SW/373
	Barrow Green Farm III	SW/996

The table below presents a commentary on these sites -

Sustainability topic	Commentary
Air	<p>Air quality is a significant issue at Teynham, recognising that an Air Quality Management Area (AQMA) was recently designated for the village itself, and that all car journeys towards a higher order centre (Sittingbourne, Faversham, Canterbury) and/or the M2 will involve passing through another AQMA (either at Sittingbourne or at Ospringe). There is also a distinct risk of issues worsening, given that Teynham is already set to receive considerable growth over the plan period.</p> <p>The AQMA is designated either side of the A2/Lynsted Lane junction, which highlights the need to avoid worsening of queuing at this junction. As such, the two sites on Lynsted Lane</p>

³² Another option at Teynham, not considered in the table for conciseness, is land subject to Policy MU3 of the submitted plan. This land at Frognal Lane is allocated for mixed uses, including some 26,000 sq. m of employment. However, the landowner has offered to bring the employment land area forward as housing if this would be of benefit to the Council in terms of meeting its housing numbers. Whilst this could be achieved without harm to the wider locality, the loss of the employment allocation would diminish the Local Plan’s overall approach toward employment and dilute Teynham’s potential employment role as a RLSC.

Sustainability topic	Commentary
	- SW/704, 727 - are constrained.
Biodiversity	None of the sites would impact on sites designated for their biodiversity value; however SW/723 to the southeast does comprise Biodiversity Action Plan (BAP) priority habitat ('traditional orchard'). There is a particularly high concentration of traditional orchard BAP habitat at Teynham, although it is noted that one area is set to be lost to development as a result of a proposed allocation in the submitted plan (i.e. the baseline situation is set to worsen; albeit this issue may be addressed through modifications).
Cultural heritage	<p>A Conservation Area ('Cellar Hill and Greenstreet') is designated at the eastern extent of the village, and there is a high concentration of listed buildings along the A2.</p> <p>SW/723 performs notably poorly as it abuts the Conservation Area (CA), comprises traditional orchard and would intersect the CA at its access point onto Cellar Hill. It is also noted that the setting of the CA may be impacted over the plan period given the proposed allocation to the north (i.e. the baseline situation may worsen).</p> <p>Other sites are also constrained to some extent, given the risk of impacts to listed building either directly or indirectly (i.e. via traffic generation). Perhaps most notably: SW/143 would impact on the setting of Claxfield Farmhouse, a Grade II* listed building (only 5.5% of listed buildings nationally are Grade II*); and the two sites that would generate traffic on Lynsted Lane (see above) could impact on the cluster of listed buildings at the A2/Lynsted Lane junction. The three sites to the north stand out as having the least potential for impacts (although SW/722 does abut a listed building).</p>
Landscape	<p>The UELCS did not examine Teynham, but it is nonetheless clear that there are a number of sensitivities, including on the basis of the distinct settlement pattern (with the CA at one end of the village, frontage development with listed buildings along the A2, and then more recent housing estates north of the A2) and an undulating landscape that is in places open and in places characterised by traditional orchards.</p> <p>Having made these points, it is difficult to differentiate between the site options, with all being constrained to some extent. Perhaps most notably, development of SW/373 and SW/722 would fail to have regard to the valley and open character of the countryside (with the final site to the north - SW/996, which would involve a southern extension to an existing allocation - also resulting in issues, but to a lesser extent). Other sites would affect the 'frontage only' character of development to the south of A2, and impact views from lanes approaching Teynham (although the larger sites could likely deliver mitigation).</p>
Soil	<p>The low resolution national dataset indicates Grade 1 (i.e. best quality nationally) agricultural land surrounding Teynham.</p> <p>Also, much of the land surrounding Teynham has been surveyed using the 'MAFF Post 1988' criteria (which involves field work).³³ This confirms that much of the land is Grade 1, but also shows some areas of Grade 2 land (which is also understood to be 'best and most versatile'). Three sites - SW/723 to the south, and SW/373, 996 to the north - comprise Grade 2 land.</p> <p>N.B. It is also noted that three of the sites to the south (SW/143, 704, 723) intersect with agricultural land that is farmed under an Environmental Stewardship 'agri-environment' agreement; however, it is not clear that this is a strong indication of land quality.</p>
Water	Flood risk is not a strategic issue at Teynham, although the scale of development proposed over the plan period would highlight the need to consider surface water flood risk.
Transport and Traffic	Whilst Teynham has a train station, it is 6-8km in either direction by car to reach the strategic road network. This suggests the potential for in-combination effects, and also highlights those sites to the south as performing poorly given distance to the train-station (with SW/143 over 1km distant).

³³ Both agricultural land datasets are available at magic.gov.uk (under the 'Landscape' tab)

Sustainability topic	Commentary
	Another important consideration is the potential for development to support good ‘accessibility’, thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect, sites to the south perform better as most facilities are to be found on the A2. However, no sites perform poorly (e.g. there is a GP and school on Station Road, north of the A2).
Population	The matter of accessibility to services/facilities has already been discussed, under ‘Transport and traffic’, and there are few other further issues that enable the site options to be differentiated with confidence. The Index of Multiple Deprivation shows Teynham to perform well, relative to other areas locally, although it is noted that the quantum of growth that the village is set to receive over the plan period may put a strain on local services/facilities.
Health	As discussed above, the Index of Multiple Deprivation shows Newington to perform well, relative to other areas locally. It is also noted that development is potentially to be supported from a perspective ensuring access to high quality countryside.
Employment and skills	There is good access to employment opportunities in Sittingbourne, Faversham and beyond (given the train station); but otherwise there are no strategic issues.
Economic growth	

Conclusions

On the basis of this discussion, it is possible to place the sites in a very rough order of preference (from least preferred to most preferred):

- London Road/Cellar Hill (SW/723), to the south - loss of traditional orchard and impacts to the Conservation Area.
- Barrow Green Farm (SW/722), to the north - landscape impacts, given topography and open nature.
- Claxfield Farm (SW/143) - impacts to a Grade II* listed building, landscape impacts (albeit potential for mitigation) and distant from the train station.
- Barrow Green Farm II (SW/373), to the north - landscape impacts, given topography and open nature; albeit to a lesser extent than SW/722, and comprises Grade 2 (as opposed to Grade 1) agricultural land.
- Both sites at Lynsted Lane (SW/704 and SW/727), to the south - junction impacts within the AQMA, and also some heritage/landscape impacts.
- Barrow Green Farm III (SW/996), to the north - would involve a southern extension to an existing allocation. The linear shape gives rise to some issues (e.g. access), but also leads to fewer landscape concerns. Comprises Grade 2 (as opposed to Grade 1) agricultural land.

East Sheppey

Sites examined are -

Sites at Leysdown and Warden	SW/758, 781
Sites at Eastchurch	SW/129, 197
Sites between Eastchurch and Minster	SW/001, 155, 159, 196,

The table below presents a commentary on these sites -

Sustainability topic	Commentary
Air	There are no designated air quality management areas on the Isle of Sheppey, and it is not likely to be the case that there are any locations in East Sheppey where traffic congestion leads to problems in relation to poor air quality.
Biodiversity	<p>The Sheppey Cliffs and Foreshore SSSI abuts the eastern edge of Warden, with SW/758 being the closest site (c.500m); however, this SSSI is designated primarily for its geological value, and so may have limited sensitivity to recreational pressure.</p> <p>Perhaps a more important consideration is recreational pressure on the North Kent Marshes SPA, which is accessible from all locations (most notably sites at Leysdown and Warden - SW/758, 781 - which are c.1.5-2km distant). It might be that allocation of several sites in combination would lead to a risk of impacts (which would then be examined through HRA).</p>
Cultural heritage	<p>There are no Conservation Areas that might be affected; whilst listed buildings in are sporadically located, with a cluster in Eastchurch near to the Grade 1 listed church.</p> <p>SW/781 at Leysdown is a large site in close proximity to a single listed building. It seems that vegetation screens the building from view; however, the open fields that comprise the site may contribute to setting.</p> <p>At Eastchurch, SW/129 is almost adjacent to the historic core; however, the site is screened by buildings and so may not contribute to setting. As for SW/197 at Eastchurch, there would be a buffer between the site and the historic core, but this is elevated land and so may contribute to setting (and it is noted that a footpath runs adjacent, from the historic core).</p>
Landscape	<p>The UELCS examined the landscape parcel between Eastchurch and Minster, concluding 'low' capacity to accommodate change. Elsewhere, there is some potential for differentiation on the basis of topography and other factors. Relatively constrained sites are:</p> <ul style="list-style-type: none"> • SW/001 - located in a rural location (i.e. unrelated to a settlement), on a pleasant lane; • SW/129 - forms a pleasant vista on the approach to Eastchurch; and • SW/155 and SW/196, between Eastchurch and Minster - located on prominent ground (within a large parcel of land to the east of Minster that the UELCS assigns 'low' capacity for change), with SW/196 particularly likely to result in significant landscape impacts given its size (it being the case that the UELCS does suggest some potential at SW/155); and • SW/197, to the north of Eastchurch - a large site recently been scaled back in extent in order to reduce adverse landscape impacts, recognising its elevated and exposed position. <p>On this basis, the sites at Leysdown and Warden (SW/758, 781) perform well; as does SW/159 between Eastchurch and Minster (which is located along the same 'pleasant lane' as SW/001, but is smaller and adjoins existing frontage development).</p> <p>It is also the case that various combinations of sites could lead to in-combination effects, recognising the rural character of this area.</p>
Soil	<p>The low resolution national dataset indicates widespread 'Grade 3' agricultural land, with the likelihood of some Grade 2 in the northwestern area (i.e. to the east of Minster). However, this data-set gives no indication of whether the Grade 3 land is likely to be Grade 3a (and therefore classified as 'best and most versatile') or Grade 3b.</p> <p>Only one site has been examined in greater detail - i.e. surveyed using the 'MAFF Post 1988' criteria (which involves field work),³⁴ - and that is SW/197 to the north of Eastchurch, which is found to comprise Grade 3a land (the low resolution national dataset having indicated Grade 3). Also, the land adjacent to SW/196, between Eastchurch and Minster, has been surveyed and found to comprise a mixture of Grade 3b and Grade 2 land (the low resolution national dataset having indicated Grade 2).</p> <p>On the basis of this discussion, it is very difficult to confidently differentiate between the sites in terms of the quality of agricultural land that would be lost.</p>

³⁴ Both agricultural land datasets are available at magic.gov.uk (under the 'Landscape' tab)

Sustainability topic	Commentary
	N.B. It is also noted that four sites (SW/196, 197, 758) intersect with agricultural land that is farmed under an Environmental Stewardship 'agri-environment' agreement; however, it is not clear that this is a strong indication of land quality.
Water	The coastal flood risk zone encroaches upon the two sites at Leysdown and Warden (SW/758, 781); however, only to a very minor extent.
Transport and Traffic	<p>Traffic is an issue on Sheppey, particularly along the A2500 Lower Rd, which links the east of the Island to the A249. See further above, under 'West Sheppey'.</p> <p>On this basis, there is clear potential for in-combination effects; however, it is not possible to differentiate between the site options.</p> <p>Another important consideration is the potential for development to support good 'accessibility', thereby reducing the need to travel by car (i.e. supporting walking, cycling and public transport). In this respect, none of the sites perform well in absolute terms - recognising that Eastchurch and Leysdown some 6 and 10 km respectively from the strategic road network - however, the sites at Eastchurch (SW/129, 197) perform relatively well given proximity to the village centre. The site at Leysdown (SW/781) is almost 1km from Leysdown village centre; whilst the site at Warden (a lower order settlement) is more isolated. Similarly, the sites between Eastchurch and Minster (SW/001, 155, 159, 196) perform are relatively isolated (with it possibly being the case that SW155 and SW/196 perform better as busses pass along Eastchurch Rd).</p>
Population	<p>The matter of sites being distant from a higher order centre, and some sites being distant even from a lower order centre, has already been discussed, under 'Transport and traffic', and it is not clear that there are any further issues that enable the site options to be differentiated with confidence.</p> <p>East Sheppey is relatively deprived (within the 20% most deprived areas of Swale); however, there is little reason to suggest that development would stimulate new employment or infrastructure (that might assist with regeneration). It can be argued that new housing would help to ensure the continued viability of existing community infrastructure (i.e. shops and services), but there is no certainty.</p>
Health	See discussion above, under 'Population'. In respect of health, it is noted that the part of East Sheppey closest to Minster performs worse than the area furthest east (despite the isolation of the eastern part of the island). It is the third most deprived 'super output area' in Swale, in terms of health and disability (whereas the eastern-most area ranks sixth).
Employment and skills	There are few arguments for or against housing growth in East Sheppey, from an economy/employment perspective, although it might be suggested that worsened traffic could impact on rural businesses (and potentially functioning of the prison, which is a significant employer).
Economic growth	

Conclusions

On the basis of this discussion, it is possible to place the sites in a very rough order of preference (from least preferred to most preferred):

- Land adj to Kingsborough Farm, Eastchurch / Minster (SW/196) - not well related to either settlement and would result in landscape impacts, given its size.
- Marrow Bone Hill, Plough Rd, Eastchurch / Minster (SW/001) - landscape impacts, unrelated to a settlement and located on a quiet lane.
- North of Eastchurch (SW/197) - despite relating well to the village and having recently been scaled back in size to avoid landscape impacts, would still result in landscape impacts.
- Land at Warden (SW/758) - given that Warden sits at the bottom of the Swale settlement hierarchy, and Leysdown is some way distant.
- Land adj St Clements School and the George Wharton Centre, Leysdown (SW/781) - close to a listed

Sustainability topic	Commentary
	<p>building and comprises open fields across which there are views, albeit c.1km from centre of Leysdown.</p> <ul style="list-style-type: none"> • Chequers Stables, Eastchurch Rd, Eastchurch / Minster (SW/155) - smaller but would still result in landscape impacts (albeit the UELCS supports limited development), and does not relate to a settlement. • Land adj to Dantlings, Plough Road, Eastchurch / Minster (SW/159) - less sensitive from a landscape perspective, but unrelated to a settlement and on a quiet lane. • The Bunny Bank, Eastchurch (SW/129) - landscape impacts, but adjacent to village centre.

Other villages

Sites options are -

Sites at Selling	SW/784, 785, 786, 787
Sites at Dunkirk	SW/757, 759, 790
Sites at Painter's Forstal	SW/702, 753
Sites at Lynsted	SW/458, 078
Sites at Upchurch	SW/049, 085, 086 , 718,
Sites at Bredgar	SW/193, 715, 724, 726
Sites at Bapchild	SW/101, 410, 412, 411, 453
Site at Doddington	SW/789

These sites have not been examined further, recognising that the issues associated with development at lower order villages, and at villages in the AONB, are relatively well understood (e.g. see the findings of GIS analysis in Appendix II).

APPENDIX IV: RANKED ASSESSMENT OF SITE OPTIONS

Introduction

As explained in Chapter 4, throughout the plan-making / SA process, in addition to appraisal of reasonable alternatives (i.e. mutually exclusive approaches to addressing policy issues), there has been a focus on appraising site options (i.e. the pool of sites that are available and deliverable, and thereby in contention for allocation).

The **aim of this appendix** is to

- 1) explain the methodology used to rank site options in order of preference; and
- 2) present the site options, ranked in order of preference.

N.B. Site options that are a focus here are only those that -

- Are 'reasonable' options at the current time (see Appendix I); and
- Are associated with a settlement that falls within one of the top four tiers of the settlement hierarchy (as per Policy ST3 'Settlement Strategy').
 - Whilst a number of site options at fifth tier villages ('Other villages with built up area boundaries') can be considered reasonable site options at the current time (see Appendix I), it has not been possible to rank them using the methodology discussed below. Analysis of these **rural site options** can be seen in Appendix II (GIS analysis) and the Council's SHLAA.

Methodology

The methodology is very similar to that applied in 2015, i.e. that explained across pages 2 and 3 of the 'Ranked Assessment of Non-allocated Site Options' report (2015). The methodology was discussed at Examination Hearings, and determined to be appropriate, despite its obvious limitations.

Sites are placed within tiers as follows -

- Tier A lists sites that may be unconstrained, and broadly suitable for allocation.
- Tiers B - F list those with no significant environmental constraints, but with landscape issues.
 - Tier B sites have the lowest landscape constraint, i.e. a constraint level of 1; whilst Tier F sites have the greatest constraint, i.e. a constraint level of 5
 - Tiers B - D sites, whilst having a landscape constraint, do not intersect a designated landscape
 - Tier E sites intersect a 'Swale-level' AHLV; whilst Tier F sites intersect a 'Kent-level' AHLV
- Tier G lists sites associated with 'significant' environmental constraints.
 - A conservative approach has been taken, particularly in respect of heritage constraint. Almost 50% of sites are identified as having a heritage constraint, often relating to the presence of a listed building in close proximity; however, in practice it is recognised that there is often good potential to mitigate impacts to the setting of listed buildings (and potentially even enhance setting and appreciation).
 - Unlike in 2015, no sites have been identified as having a significant 'air quality' constraint.

Also, within tiers, sites are ordered according to -

- 1) Landscape sensitivity (only applicable to Tier G);
- 2) the location of the site in terms of the settlement strategy, with account also taken of whether a site sits within or outside the settlement boundary; and
- 2) the size of the site, with larger sites ranking higher.

Unlike in 2015, no account is taken of the quality of agricultural land lost. This is because the nationally available agricultural land quality data-set is now understood to be unsuited to the task of differentiating between site options at a given settlement.

For additional methodological discussion, please see the 2015 report.

Ranked assessment of site options

Rank	Tier	Site ref	Address	Significant constraint?	Landscape constraint (1-5)	Settlement tier	Area
1	A	SW/531	Land at East Hall Farm, Sittingbourne - Trenport	None	None	1	1.3
2	A	SW/343	Bell Centre, Bell Road Sittingbourne	None	None	1	0.9
3	A	SW/334	Former Nova Furniture Site, Graveney Road	None	None	2	3.0
4	A	Policy MU6	Nova site, Faversham (proposal to switch from employment to housing)	None	None	2	2.0
5	A	Policy A6	Land north of Graveney Road, East of Faversham	None	None	2	2.0
6	A	Policy MU3	Land at Frognal Lane, Teynham (proposal to switch from MU to housing)	None	None	4	18.0
7	B	SW/796	179-183 Borden Lane, Sittingbourne	None	1	1	0.4
8	B	SW/418	Ruins Barn Road, Tunstall, Sittingbourne	None	1	1	0.4
9	B	SW/413	Perry Court Farm, Faversham	None	1	2	30.0
10	B	SW/441	Land West of Brogdale Road	None	1	2	3.6
11	B	SW/165	Land at Belgrave Road	None	1	3	5.2
12	B	SW/705	Land at Scocles Road/Elm Lane, Minster	None	1	3	2.8
13	B	SW/457	Chequers Road	None	1	3	0.4
14	B	SW/159	Land adj to Dantlings, Plough Road, Minster	None	1	3	0.2
15	B	SW/434	Land R/O 111, The Street	None	1	4	0.2
16	B	SW/758	Land at Warden	None	1	5	6.6
17	C	SW/233	Preston Fields, Canterbury Road, Faversham	None	2	2	14.4
18	C	SW/194	Barton Hill Drive	None	2	3	25.3
19	C	SW/158	Land rear of 33 Highfield Road, Minster	None	2	3	1.5
20	C	SW/155	Chequers Stables, Eastchurch Rd	None	2	3	0.4
21	C	SW/407	Land off High Street, Newington	None	2	4	6.9
22	C	SW/996	Barrow Green Farm, Barrow Green, Teynham	None	2	4	2.2
23	C	SW/450	Halfway Egg Farm, Featherbed Lane	None	2	6	3.0
24	D	SW/080	Land East of Love Lane	None	3	2	67.5
25	D	SW/196	Land adj to Kingsborough Farm	None	3	3	18.5
26	D	SW/044	Adjacent 24 & 26 Chequers Road, Minster	None	3	3	3.8
27	D	SW/019	Land situated at the top of Southdown Road, Halfway	None	3	3	2.5
28	D	SW/799	Land south of Elm Lane, Minster	None	3	3	2.5
29	D	SW/001	Land at Marrow Bone Hill, Plough Rd, Minster.	None	3	3	1.8
30	D	SW/722	Barrow Green Farm, Teynham	None	3	4	13.7

Rank	Tier	Site ref	Address	Significant constraint?	Landscape constraint (1-5)	Settlement tier	Area
31	D	SW/717	Land at School Farm, Iwade	None	3	4	11.8
32	D	SW/197	Garretts Farm, Eastchurch	None	3	4	10.7
33	D	SW/704	Lynsted Lane, Teynham	None	3	4	4.9
34	D	SW/129	The Bunny Bank	None	3	4	4.7
35	D	SW/373	Barrow Green Farm	None	3	4	2.5
36	D	SW/732	Land at Ellen's Place, High Street, Newington	None	3	4	2.3
37	D	SW/727	Land at Lynsted Lane, Teynham	None	3	4	1.8
38	D	SW/211	Ruins Barn Road, Tunstall	None	3	6	3.0
39	E	SW/714	Land North of the Street, Boughton	None	4	4	5.3
40	F	SW/050	Chilton Manor Farm, Highsted Road, Sittingbourne ME9 0AA	None	5	1	26.9
41	F	SW/107	Land at Chiltern Manor/Muddy Lane	None	5	1	7.8
42	F	SW/179	Land at Ruin Barns Road (The Old sale Field)	None	5	1	3.5
43	F	SW/721	Land north of Lower Road, Minster	None	5 ³⁵	3	75.5
44	G	SW/321	Southsea Avenue, Minster	Flood risk	0	3	3.4
45	G	SW/047	London Road/Water Lane	Heritage	1	2	11.5
46	G	SW/440	West of Water Lane, Ospringe.	Heritage	1	2	8.2
47	G	SW/433	A2/Western Link	Heritage	1	2	3.4
48	G	SW/794	Perry Court Farmhouse and farmyard, Faversham	Heritage	1	2	2.6
49	G	SW/081	Mindon, Ashford Road	Heritage	1	2	2.5
50	G	SW/435	Queen Court farm, Water Lane	Heritage	1	2	2.3
51	G	SW/751	Land adj 9 Ashford Road and Orchard Cottage, Canterbury Road	Heritage	1	2	2.1
52	G	SW/046	Land fronting London Rd	Heritage	1	2	1.3
53	G	SW/021	Danley Farm, Minster Road	Heritage, flood risk	1	3	8.0
54	G	SW/184	Land Top of Parsonage Chase	Heritage	1	3	0.9
55	G	SW/038	Danley Farm, Minster Road, Minster	Heritage, flood risk	1	3	0.7
56	G	SW/010	The Tracies, Callaways Lane, Newington	Heritage	1	4	0.3
57	G	SW/701	Queen Court Farm, Ospringe	Heritage	1	6	32.0
58	G	SW/797	Land at Vicarage Lane, Ospringe	Heritage	1	6	1.6
59	G	SW/703	Southwest Sittingbourne	Heritage	2	1	30.0
60	G	SW/422	Land at Ufton Court Farm, Sittingbourne	Heritage	2	1	27.2
61	G	SW/135	Land at Grove End Farm	Heritage	2	1	22.6

³⁵ As this is an extremely large site it has been assigned a landscape constraint score of 5, as a special case.

Rank	Tier	Site ref	Address	Significant constraint?	Landscape constraint (1-5)	Settlement tier	Area
62	G	SW/459	Land off Scocles Road, Minster	Heritage	2	3	0.6
63	G	SW/123	Land East of Iwade	Biodiversity, heritage	2	4	55.0
64	G	SW/216	Land south west of Iwade	Heritage	2	4	29.7
65	G	SW/707	Pond Farm London Road Newington	Heritage	2	4	8.0
66	G	SW/041	Land off Church Rd, Adj St Marys View	Heritage, biodiversity	2	4	5.7
67	G	SW/124	Land West of Church Lane, Newington	Heritage	2	4	4.4
68	G	SW/781	Land adj St Clements School and the George Wharton Centre, Warden Bay	Heritage	2	4	4.0
69	G	SW/723	Land at London Road/Cellar Hill, Teynham	Heritage, biodiversity	2	4	1.5
70	G	SW/199	Coleshall Farm, Iwade	Heritage	2	4	1.0
71	G	SW/028	Land at Borden Lane	Heritage	3	1	3.1
72	G	SW/431	Abbey Fields - Option 2	Biodiversity, heritage	3	2	18.8
73	G	SW/700	East of Ham Road, Faversham	Biodiversity	3	2	5.5
74	G	SW/430	Abbey Fields, Faversham	Biodiversity, heritage	3	2	3.8
75	G	SW/795	Land at 39 Abbeyfields, Faversham	Biodiversity, heritage	3	2	1.0
76	G	SW/133	Land East of Scocles Rd	Heritage	3	3	27.5
77	G	SW/779	Land at Gilbert Hall Farm, Minster	Heritage	3	3	20.5
78	G	SW/780	Land at Windy Gap, Chequers Road, Minster	Biodiversity	3	3	17.8
79	G	SW/793	Rear of Nelson Road/Scocles Road, Minster	Heritage	3	3	4.0
80	G	SW/706	Rear of Chequers Road/Scocles Road	Heritage	3	3	2.2
81	G	SW/217	Land North of London Rd, Newington	Heritage	3	4	35.9
82	G	SW/143	Land between Claxfield Farm & Lynsted Lane	Heritage	3	4	13.5
83	G	SW/164	Land at Pond Farm, Newington	Heritage	3	4	12.8
84	G	SW/204	Land at Muddy Lane, Sittingbourne	Flood risk	5	1	4.4
85	G	SW/733	Land at Bysing Wood, Faversham	Heritage, biodiversity	5	6	1.0

APPENDIX V: SPATIAL STRATEGY ALTERNATIVES APPRAISAL

Introduction

As explained within ‘Part 1’ above, a focus of work in early 2016 (i.e. in the build-up to preparing proposed modifications for publication) was the development and appraisal of ‘reasonable’ spatial strategy alternatives, with a view to informing a decision on best to meet objectively assessed housing needs.

Reasonable spatial strategy alternatives developed/appraised to inform ‘modification-making’

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at Sittingbourne (extension to the southeast)
Sittingbourne	700	700	1300
West Sheppey	800	1400	800
Iwade	600	0	0
Faversham	800	800	800
Newington	100	100	100
Teynham	0	0	0
East Sheppey	0	0	0
Boughton	0	0	0
Other villages	0	0	0
Total additional allocations through mods	3,000	3,000	3,000

Whilst Chapter 7 presents summary appraisal findings, the **aim of this appendix** is to present detailed appraisal findings.

Appraisal methodology

For each of the alternatives, the assessment identifies / evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Chapter 3) as a methodological framework.

Green is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented ‘on the ground’ and what the effect on particular receptors will be.³⁶ Where there is a need to rely on assumptions in order to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

³⁶ Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.³⁷ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Swale Local Plan).



Appraisal findings

Appraisal findings are presented below within 14 separate tables (each table dealing with a specific sustainability topic) with a final table drawing conclusions. The appraisal methodology is explained above, but to reiterate: For each sustainability topic the performance of each scenario is categorised in terms of ‘significant effects (using red / green) and also ranked in order of preference. Also, ‘ = ’ is used to denote instances of all alternatives performing on a par.

Sustainability Topic: <u>Air</u>			
	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	★ 1	★ 1	3
Significant effects?	No		
Discussion	<p>There are five Air Quality Management Areas (AQMAs) in Swale, with four lying along sections of the A2 at Faversham (Ospringe), Teynham, Sittingbourne and Newington, and another along a section of the B2006 in central Sittingbourne. Generation of additional car movements (commuting for work and day to day activities) is a key issue, as it leads to traffic congestion and hence air pollution. There is a need to minimise car movements through the AQMA, and also ensure that traffic flow is maintained (i.e. avoid queuing at junctions). Taking the three options in turn -</p> <ul style="list-style-type: none"> • East of Iwade (Option 1) is well-related to the strategic road network (A249), and hence does not give rise to air quality concerns. • Growth locations on Sheppey (Option 2) might be a little way from the strategic road network, but there are not thought to be air quality concerns on Sheppey. • Expansion southeast of Sittingbourne (Option 3) might lead to an increase in traffic through the Sittingbourne A2 AQMA (due to car movements west, towards M2 J5) and the Teynham AQMA (if residents travelling east, e.g. to Canterbury, choose not to first ‘double-back’ to M2 J5); however, there is much uncertainty. <p>On balance, it is appropriate to conclude that Option 3 is worst performing; however, it is not possible to conclude ‘significant negative effects’, given the uncertainties.</p>		

³⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Sustainability Topic: Biodiversity

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourrne (extension to the SE)
Rank	3		
Significant effects?	Yes	No	
Discussion	<p>Taking the three options in turn -</p> <ul style="list-style-type: none"> • East of Iwade (Option 1) is constrained by the adjacent internationally important North Kent Marshes Special Protection Area; however, examination through Habitats Regulations Assessment (HRA) has identified the likelihood that sufficient mitigation can be implemented (primarily in the form of Suitable Alternative Natural Greenspace, SANG). There would also be the potential for targeted green infrastructure provision on quite a large scale, potentially leading to certain biodiversity benefits. • Higher growth at West Sheppey (Option 2) would probably not give rise to biodiversity concerns, recognising that development 'tight' to Minster/Halfway is some distance from the North Kent Marshes SPA to the south. One site that might come into contention (SW/721, Southsea Avenue) is heavily vegetated (albeit previously developed) and adjacent to Minster Marshes, which is an extensive area of BAP priority habitat (grazing marsh) and designated as a locally important Site of Nature Conservation Importance (SNCI). • Expansion southeast of Sittingbourne (Option 3) gives rise to few concerns. The site abuts an SNCI woodland (former quarry), but there is little reason to believe that impacts are likely (assuming a landscape buffer). <p>On balance, it is appropriate to conclude that Option 1 is worst performing, and it is appropriate to 'flag' the risk of significant negative effects (whilst at the same time directing the reader to the stand-alone HRA, where risks are explored in greater detail).</p>		

Sustainability Topic: Climate change mitigation

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourrne (extension to the SE)
Rank	N/a		
Significant effects?			
Discussion	<p>Development viability does vary across the Swale Thames Gateway (highest at Sittingbourne and the Rural Local Service Centres; lowest on Sheppey), and it can be suggested that larger sites are more 'viable'; however, there are not thought to be any opportunities to deliver low carbon infrastructure (e.g. district heating) in practice.</p>		

Sustainability Topic: Cultural heritage

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourrne (extension to the SE)
Rank	=	=	=
Significant effects?	No		
Discussion	<p>Taking the three options in turn -</p> <ul style="list-style-type: none"> • East of Iwade (Option 1) is constrained by the adjacent Grade 1 listed church (and two nearby listed buildings, which together comprise a small historic core to the village); however, given the likelihood of extensive open space provision in this area (given the priority issue of mitigating impacts to the adjacent SPA), impacts will be mitigated to a large extent, and there may even be potential to enhance appreciation of the church as an asset. . • Higher growth at West Sheppey (Option 2) could give rise impacts were there to be development of the land to the rear of Chequers Road / Scocles Road / Nelson Avenue, east of Minster, which is in close proximity to Minster Abbey, albeit to the rear of existing properties. The Urban Edge Landscape Capacity Study did not examine this land, but there are clear heritage concerns given the rising topography, and the bisecting footpath. There is one smaller site, within this land parcel, that perhaps could be accommodated; however, there is uncertainty. • Expansion southeast of Sittingbourne (Option 3) would not be in proximity to a Conservation Area or Listed Building, but there would be the possibility of rural rat-running through Conservation Areas to the south of Sittingbourne; and the gap between Sittingbourne and the Rodmersham Green Conservation Area would be eroded (with a gap of at least 600m remaining). <p>It is difficult to differentiate between the alternatives with any certainty. Option 1 is perhaps best performing, recognising that the historic core to Iwade is not a Conservation Area and less sensitive than Minster Abbey; however, impacts at Iwade are dependent on matters of masterplanning/design. What is more certain is that significant effects are unlikely.</p>		

Sustainability Topic: Landscape


	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourrne (extension to the SE)
Rank	★ 1	2	3
Significant effects?	No	Yes	
Discussion	<p>Taking the three options in turn -</p> <ul style="list-style-type: none"> • East of Iwade (Option 1) gives rise to some concerns, in-light of the findings of the Urban Edge Landscape Capacity Study (UELCS); however, there is understood to be much potential for mitigation and indeed there is a significant opportunity to be realised. <ul style="list-style-type: none"> ○ To the north, the landscape has 'low' capacity to accommodate change; however, it is understood that development would provide an opportunity to improve/'soften' the less 		

than successful finished edge of the current village.


- To the east, despite the UELCS concluding ‘high’ capacity to accommodate change, concerns arise given the submission plan allocation at Northwest Sittingbourne. However, policy is in place (Policy MU1) to ensure that the Northwest Sittingbourne allocation delivers a ‘network of green spaces and corridors throughout the allocation to achieve a minimum open space provision of 22 ha’, with the concept diagram showing a ‘linear park’ running along the length of the A249. As such, there is potential for a scheme east of Iwade to integrate and form a continuation of this green corridor, and ultimately ensure a legible settlement pattern / sense of place, to the benefit of the wider Swale Thames Gateway.
- Higher growth at West Sheppey (Option 2) will inevitably mean development of relatively prominent land, even if development is directed to the west of Minster where the topography is less of a constraint. For example, sites that might come into contention are ‘R/o 33 Highfield Road’ (SW/019, 158), which are located on high ground that “provides wide panoramic views across the marshland to the south” according to the UELCS. The smaller site (SW/158) is on lower land; however, it does not relate well to the existing settlement edge and the previous Local Plan Inspector concluded that development here would be highly intrusive. Development ‘R/o 33 Highfield Road’ would also impact the Minster/Halfway settlement gap, recognising that a large scheme west of Minster (Barton Hill Drive, SW/194) is assumed under this option (indeed all options).
- Expansion southeast of Sittingbourne (Option 3) is constrained by landscape as the designated area of high landscape value (Kent level) would be impacted; plus there would be (less significant) coalescence considerations. Recent site specific work commissioned by the Council (DHA, 2015) has confirmed (after having given consideration to proposed mitigation measures) that there would be impacts to the designated landscape, stating: *“the proposed development, given its size and extent, would be likely to result in significant, demonstrable harm to the North Downs Special Landscape Area, as defined within the adopted Swale Borough Local Plan 2008, bearing in mind much of the land designated at the South Eastern edge of Sittingbourne would be physically effected by the development.”* The UELCS identifies a land parcel comprising most of this site as having a ‘moderate’ capacity for change; however, on closer examination it seems that there is distinct variation within this landscape parcel. The UELCS states that *“[s]ensitivity increases to the south from where the urban edge is not evident and the distinctiveness and remoteness of the landscape are stronger”*; and suggests that ‘minor’ (to the west) or ‘very minor’ (to the east) expansion of the urban edge would ‘perhaps’ be acceptable. Also, the UELCS mentions the orchards that comprise the south-western part of the site, finding that they should be conserved as they *“provide scenic quality and a sense of remoteness and tranquillity”*.

On balance: Option 1 (Iwade) is best performing, although there are some concerns regarding the part of the scheme that wraps around the north of the village, and there is a degree of uncertainty given that much relies on masterplanning/design measures; and Option 3 (Sittingbourne) performs worst, given impacts to a landscape designated as being of ‘larger than local’ importance. Significant negative effects are predicted for both Option 2 (West Sheppey) and Option 3 (Sittingbourne) as there are clear sensitivities and there is limited potential for avoidance/mitigation.

Sustainability Topic: Soil

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	3		3
Significant effects?	Yes	No	Yes
Discussion	<p>Agricultural land is generally 'best and most versatile' to the south of Sittingbourne (with much highest quality Grade 1 land), whilst there is known to be a significant resource of non-best and most versatile (Grades 3b and 4) on Sheppey. Iwade is situated within something of a transitional zone.</p> <p>On the basis of this discussion, Option 3 might be assumed to be worst performing. However, the situation is not clear cut as site specific survey work has found the site to comprise a mixture of Grade 1, Grade 2 and Grade 3b land. Similarly, at Iwade the situation is not clear cut, as site specific survey work has found the site to comprise a mixture of Grade 3a and 3b.</p> <p>On balance, it is appropriate to conclude that Option 2 (West Sheppey) is best performing, despite there being some uncertainty (without knowledge of specific sites / in the absence of site specific survey work). Options 1 and 3 would lead to the loss of best and most versatile agricultural land, and so would lead to significant negative effects.</p>		

Sustainability Topic: Transport and traffic

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank		3	3
Significant effects?	No		
Discussion	<p>Taking the three options in turn -</p> <ul style="list-style-type: none"> • East of Iwade (Option 1) is well related to the strategic transport network, and its location close to employment growth areas should help to minimise the reliance on commuting by car via Junction 5 of the M2 (which has major capacity / safety issues that are set to be resolved through improvements to commence in 2019/20, with completion by 2024). Bus services are limited, but there is the opportunity for enhancement; and there will be good opportunities for cycling to Sittingbourne. • Higher growth at West Sheppey (Option 2) gives rise to few concerns, on the assumption that there wouldn't be significant growth to the east of Minster such that there would be increased traffic along Scocles Road / Lower Road. Most locations are relatively well located to services and facilities at Minster/Halfway, with bus services to Sheerness and Queenborough. However, there is a high incidence of commuting off the island, and this pattern is likely to continue in the short to medium term. • Expansion to southeast of Sittingbourne (Option 3) would mean that residents need to travel through Sittingbourne to reach the strategic road network by car, and there would be a likelihood of rural rat-running. However, the site benefits from relative proximity (c.1km) to 		

the town centre.

On balance, Option 1 (Iwade) performs best; however, this is marginal. Significant negative effects are not predicted, although there is some uncertainty in the absence of detailed work to explore M2 J5 impacts.

Sustainability Topic: Waste

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	N/a		
Significant effects?			
Discussion	There is no potential to differentiate between alternatives with any confidence. Sustainable waste management should be possible under any foreseeable scenario.		

Sustainability Topic: Water

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	=	=	=
Significant effects?	No		
Discussion	Flood risk is a constraint east of Iwade (Option 1) and southeast of Sittingbourne (Option 3); however, in both cases it should be possible to avoid development encroaching on the flood risk zone (i.e. with land at flood risk retained as open space). At West Sheppey it is fair to assume that the sites at flood risk would be avoided, although it is noted that the coastal flood risk zone encroaches on Southsea Avenue (SW/721) on the western edge of Minster.		



Sustainability Topic: Crime

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	-	-	-
Significant effects?	-	-	-
Discussion	The alternatives do not have notable implications in terms of crime related issues/objectives.		

Sustainability Topic: Health

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	=	=	=
Significant effects?	No		
Discussion	<p>The Index of Multiple Deprivation dataset shows health deprivation to be focused on Sheppey to a large extent; however, it is not clear that there are opportunities to address this through directing additional housing growth to the island (Option 2), particularly given the assumption that additional development under this option would be somewhat dispersed (rather than at a strategic site, that deliver community infrastructure upgrades). It could, in fact, be suggested that additional dispersed housing growth on Sheppey should not be supported, from a health perspective, as there would be additional strain on facilities; however, it is not clear that this is an issue. One other consideration is the potential for Option 1 (Iwade) to involve delivery of high quality green infrastructure that supports walking, cycling and outdoor recreation; however, it is not clear that this is a strategic consideration.</p>		

Sustainability Topic: Housing

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank		2	
Significant effects?	Yes		
Discussion	<p>All options would involve delivering the quantum of additional housing needed to ensure that objectively assessed housing needs are met locally; and so all would lead to significant positive effects. However, it is fair to say that Option 2 performs least well as dispersed development on Sheppey would not enable affordable housing delivery (given poor development viability).</p>		

Sustainability Topic: Population

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	=	=	=
Significant effects?	No		
Discussion	<p>All options would direct additional housing to the Swale Thames Gateway, in-line with the objective of stimulating regeneration within this area. Issues of relative deprivation are particularly concentrated on the Isle of Sheppey, which might suggest that Option 2 performs best; however, it is not clear that this is the case (see discussion above, under 'Health').</p> <p>There are question-marks regarding any future growth at Iwade (Option 1), as it is not clear</p>		

what potential there would be to fund the delivery of community infrastructure upgrades; and there is also a need to consider that villagers have dealt with the impacts of construction since the 1990s. However, it is not clear that there is the potential to conclude that this option is worst performing, given that development will deliver high quality new green infrastructure.

Sustainability Topic: Economic growth, employment and skills

	Option 1 Higher growth at Iwade (extension to the east)	Option 2 Higher growth at West Sheppey (at smaller sites)	Option 3 Higher growth at S'bourne (extension to the SE)
Rank	=	=	=
Significant effects?	No		
Discussion	As discussed above, all options would direct additional housing to the Swale Thames Gateway, in-line with the objective of stimulating regeneration within this area; however, none would directly support employment growth and so significant effects are not predicted. An extension to the southeast of Sittingbourne would be less well related to employment growth areas on Sheppey and north of Sittingbourne, but is well related to Sittingbourne Town Centre.		

Conclusions						
	Option 1 Higher growth at Iwade (extension to the east)		Option 2 Higher growth at West Sheppey (at smaller sites)		Option 3 Higher growth at S'bourne (extension to the SE)	
Air	★1		★1		3	
Biodiversity	3		★1		★1	
Cultural heritage	=		=		=	
Landscape	★1		2		3	
Soil	3		★1		3	
Transport and traffic	★1		3		3	
Water	=		=		=	
Health	=		=		=	
Housing	★1		2		★1	
Population	=		=		=	
Economy / employment	=		=		=	
Rank summary ³⁸	Best in terms of: • Air • Landscape • Transport • Housing	Worst in terms of: • B'diversity • Soil	Best in terms of: • Air • B'diversity • Soil	Worst in terms of: • Transport • Housing	Best in terms of: • B'diversity • Housing	Worst in terms of: • Air • Landscape • Soil • Transport
Significant effects summary	Positive in terms of: • Housing	Negative in terms of: • B'diversity • Soil	Positive in terms of: • Housing	Negative in terms of: • Landscape	Positive in terms of: • Housing	Negative in terms of: • Landscape • Soil
Summary discussion	<ul style="list-style-type: none"> Option 1 (Iwade) stands-out as performing best in terms of a number of objectives, although it performs worst in terms of 'biodiversity' (see the HRA for detailed discussion) and 'soil', as there would be some loss of 'best and most versatile' agricultural land. Option 2 (West Sheppey) notably performs best in terms of 'soil', but performs relatively poorly from a 'housing' perspective given poor development viability. Option 3 (Sittingbourne) is notably worst performing in terms of 'landscape', and also gives rise to some transport / air quality concerns. 					

³⁸ N.B. The aim is to discuss the relative merits of the alternatives in terms of the SA framework - i.e. in terms of competing sustainability objectives - rather than to identifying an option that is best performing or 'most sustainable' overall.]