Sustainability Appraisal (SA) of the Swale Local Plan

SA Report
December 2014
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INTRODUCTION
1 BACKGROUND

1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives. SA of Local Plans is legally required.¹

2 SA EXPLAINED

2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²

2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3 The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as the ‘SA Report’. Essentially, there is a need for the SA Report to answer the following four questions:

1. What is the scope of the SA?

2. What has Plan-making / SA involved up to this point?
   – Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point 'alternatives' are appraised.

3. What are the appraisal findings at this current stage?
   – i.e. in relation to the draft plan.

4. What happens next?

2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. Table 2.1 makes the links between the ten Schedule 2 requirements and the four SA questions.

3 STRUCTURE OF THIS SA REPORT

3.1.1 This document is the SA Report for the Swale Local Plan, and as such each of the four SA questions is answered in turn below.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2012). The Local Planning Regulations (2012) require that ‘the SA Report’ is published alongside the ‘proposed submission’ version of the plan document (Regulation 19).

² Directive 2001/42/EC
Table 2.1: Questions that must be answered within the SA Report

<table>
<thead>
<tr>
<th>SA REPORT QUESTION</th>
<th>SUB-QUESTION</th>
<th>REGULATORY REQUIREMENT (THE REPORT MUST INCLUDE…)</th>
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<tbody>
<tr>
<td>What's the scope of the SA?</td>
<td>What's the Plan seeking to achieve?</td>
<td>• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</td>
</tr>
</tbody>
</table>
| | What's the sustainability 'context'? | • Any existing environmental **problems** which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance  
• The relevant environmental protection **objectives**, established at international, national and local levels  
• The relevant **aspects of the current state** of the environment and **the likely evolution thereof** without implementation of the plan  
• The environmental **characteristics** of areas likely to be significantly affected  
• Any existing environmental **problems** which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance |
| | What's the sustainability 'baseline'? | • Any existing environmental **problems / issues** which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance |
| What are the key issues/objectives that should be a focus of SA? | | • An outline of the reasons for selecting the **alternatives** dealt with (and thus an explanation of 'reasonableness')  
• The likely significant effects on the environment associated with **alternatives**  
… and an outline of the reasons for selecting preferred options and hence a description of how environmental objectives and considerations are reflected in the draft plan. |
| What has Plan-making / SA involved up to this point? | | • The likely significant effects on the environment associated with **the draft plan**  
• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing **the draft plan** |
| What are the appraisal findings at this current stage? | | • A description of the monitoring measures envisaged |
| What happens next? | | N.B. The right-hand column of Table 2.1 does not quote directly from Schedule 2 of the Regulations. Rather, it reflects a degree of interpretation. **Appendix I** explains how the regulatory requirements are interpreted.
PART 1: WHAT IS THE SCOPE OF THE SA?
INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations³, this Part answers the series of questions below.

- What is the Plan seeking to achieve?
- What is the sustainability ‘context’?
- What is the sustainability ‘baseline’?
- What are the key issues/objectives that should be a focus of SA?

4.1.2 Section 5 answers the first question by discussing the content of the Local Plan including its vision and objectives. The other three scoping questions are answered in Sections 6 – 8, with each question answered for the following sustainability ‘topics’:

- Air
- Biodiversity
- Climate change
- Crime and safety
- Cultural heritage
- Employment and skills
- Health
- Housing
- Landscape
- Local economy
- Population
- Soil
- Transport and accessibility
- Waste
- Water

4.1.3 These topics have been chosen to broadly reflect the anticipated aspects of the economy, community and the environment that might be susceptible to significant effects as a result of implementing the Local Plan and to also reflect those issues set out in the Regulations⁴.

4.2 Previous consultation on the scope of the SA

4.2.1 The Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁵ As such, these authorities were consulted on the scope of the SA in 2008. All three authorities responded with views on what should be within the scope. The Scoping Report was then finalised and is now available online at http://www.swale.gov.uk/sustainability-appraisal/. Although the Scoping Report was finalised, it is important to note that our understanding of the appropriate ‘scope’ for the SA has not remained entirely static since that time. This is appropriate given that understanding and evidence regarding sustainability problems/issues/objectives inevitably changes over time.

³ Environmental Assessment of Plans and Programmes Regulations 2004
⁴ biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; and landscape as set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004
⁵ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities[,] they are likely to be concerned by the environmental effects of implementing plans and programme.’
5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include:

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

5.1.1 The Local Plan is the most important planning document for Swale, setting out the vision and spatial strategy for the area and how it will be achieved for the period until 2031. Spatial planning brings together and integrates policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.

5.1.2 The Local Plan is being prepared in two separate parts. At the current time the Council is focused on preparing Part 1, which will set out strategic policies, allocate sites and set out a framework of development management policies to guide the determination of planning applications. Part 2 of the Local Plan will then set out allocations to meet Gypsy and Traveller needs where not met by Part 1.

5.1.3 The principal influence on plan preparation is the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must reflect. The Local Plan is also developed in light of ‘Realising our ambitions for Swale - the Borough strategy to 2031’ published in 2012. This Strategy is both a long-term vision for the Borough and a roadmap for partnership working in the medium term. It has been developed and agreed jointly by all the organisations represented at some level in the ‘Swale Locality Board's partnership structure’, and is thus truly a vision and a strategy for the whole of the Borough.

5.1.4 The Local Plan is also developed in the light of the plans of neighbouring authorities (adopted and emerging). This is important given the ‘Duty to Cooperate’ established by the Localism Act 2011 and discussed further in the NPPF. There is a particular need for Swale to cooperate closely with its neighbouring boroughs of Canterbury City Council, Ashford Borough Council and Maidstone Borough Council. These authorities are also proposing growth in their areas and the levels proposed are discussed further in Part 2 Chapter 11 of this report.

5.1.5 The following ‘vision’ for Swale has been developed for the purposes of the Local Plan –

It is 2031 and Swale is known by the fruits of its endeavours.

We have harnessed our assets – a strategic location, diverse communities and an outstanding natural environment – and are a sustainable, flourishing place in which to enjoy life and do business with: Sittingbourne transformed into an attractive, competitive and prosperous town, with a thriving centre that residents across the Borough are proud to use; Sheerness and Queenborough as beacons of coastal rejuvenation leading the way to success for all communities on the Isle of Sheppey; Faversham, a thriving market town and heritage destination that has grown organically; and successful rural communities across the downs, farmed plains and coast as places of innovation; nurturing enterprise, local produce and greater self-reliance.
5.1.6 A series of Local Plan ‘objectives’ have also been developed:

**Core objectives:**

1. Adapt to climate change with innovation, reduced use of resources, managed risk to our communities and opportunities for biodiversity to thrive.
2. Use our coastal assets to support a strong economy and a sustainably managed environment.
4. Use our historic and natural assets to drive regeneration, tourism, and environmental quality.
5. Strive for high quality design to bring a better quality of life and self-confidence to our communities.
6. Support sectors that can build on our strengths, diversify our economy, promote investment in skills, and develop our distinct opportunities in pursuit of greener and pioneering technologies.
7. Bring economic growth, regeneration and community development, especially to our most deprived communities.
8. Support our farming and food sectors so that they are at the forefront of increasing food security, reducing food miles and increasing local food consumption.
9. Provide the right housing to support regeneration and stronger, greener communities.
10. Develop tourism and culture to support regeneration, employment growth, communities and environmental management.
11. Improve prosperity and environmental quality with efficient and sustainable transport networks.
12. Ensure timely delivery of the services and infrastructure to support strong communities.

**Place based objectives:**

1. Re-establish Sittingbourne as the principal town with investment in retail, leisure, culture and community services and further education, within new and improved green spaces and streets.
2. Reinforce Sheppey's uniqueness by ensuring change supports Sheerness as its commercial and service focus; strengthens and integrates communities at Rushenden, Queenborough and Minster/Halfway; manages coastal and heritage assets; modernises leisure and tourism industries; and supports isolated communities.
3. Sustain Faversham’s role and character as an historic market town for residents and visitors with a range of businesses and services that increase diversity and interest.
4. Address identified needs in our rural communities so that they are sustained in ways that also respects their scale and character.

5.2 What is the plan not trying to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA and the level of detail it enters into.
6 WHAT IS THE SUSTAINABILITY ‘CONTEXT’?

The SA Report must include:

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing sustainability ‘context’ messages set out within relevant published plans, policies, strategies and initiatives (PPSIs). The sustainability context review aims to generate an understanding of broadly the sustainability issues and objectives that should be a focus of SA.

6.1.2 This chapter presents key context messages from the National Planning Policy Framework (NPPF) and a select range of other key context documents. Context messages from a selection of other PPSIs are presented in Appendix II.

6.2 Air

- The NPPF makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants; and states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account Air Quality Management Areas (AQMAs) and cumulative impacts on air quality.

6.3 Biodiversity

- The NPPF and other policy documents emphasise the need to protect important sites, plan for green infrastructure and plan for ecological networks at ‘landscape scales’ taking account the anticipated effects of climate change. National policy reflects the commitment to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.

6.4 Climate change

- In its 2007 strategy on climate change, the European Commission recommends a package of measures to limit global warming to 2° Celsius. On energy, the Commission recommends that the share of renewable energy grows to 20% by 2020 against the 1990 baseline. In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020. The NPPF emphasises the key role for planning in securing radical reductions in greenhouse gas emissions, including in terms of meeting the targets set out in the Climate Change Act 2008. Plan-making should, for example, support efforts to -
  - Reduce transport emissions, by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport.
  - Deliver infrastructure such as low-carbon district heating networks.
  - Increase energy efficiency in the built environment.

- The NPPF also requires Local Plans to take account of the effects of climate change in the long term, taking into account factors such as ‘flood risk, coastal change, water supply and changes to biodiversity and landscape. Planning authorities are encouraged to ‘adopt proactive strategies’ to adaptation.
6.5 Cultural heritage

- There is a need to set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

6.6 Crime and safety

- The NPPF highlights the importance of crime and safety in relation to good design and in the promotions of healthy communities. The emphasis is that good design should create safe accessible environments where ‘crime and disorder, and the fear of crime’ are decreased and do not impact upon the quality of life or sense of community within a place. Transport infrastructure should provide safe options for all road users and enable minimal conflict between road users especially traffic and cyclists or pedestrians.

6.7 Employment and skills

- The NPPF highlights the importance of considering market and economic signals and understanding business needs, including in terms of skills. Employment opportunities in rural areas should be supported, including through support for tourism where appropriate.

6.8 Health

- Planning for good health is high on the agenda, in light of the ‘Marmot Review’ of health inequalities in England, which concluded that there is ‘overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities’. Planning for good health can complement planning for biodiversity (green infrastructure) and climate change mitigation (walking/cycling).

6.9 Housing

- Local planning authorities should significantly boost the supply of housing and seek to ensure that ‘full, objectively assessed needs for market and affordable housing’ are met. With a view to creating ‘sustainable, inclusive and mixed communities’ authorities should ensure provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon ‘current and future demographic trends, market trends and the needs of different groups in the community’. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes. Meeting housing needs in rural areas and ‘rural exception sites’ can be necessary.

- Planning policy for traveller sites (2012) sets out the Government’s planning policy for traveller sites and should be used in conjunction with the NPPF. It aims to ensure travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites - using a robust evidence base and effective engagement with stakeholder groups and other local authorities – and to allocate sites accordingly. The Government’s aims include:
  - Ensuring that Local Plans include, fair, realistic and inclusive policies;
  - Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
  - Having due regard for the protection of local amenity and environment.
6.10 Landscape

- The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines landscape as: “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.” It recognises that the quality of all landscapes matters – not just those designated as ‘best’ or ‘most valued’. The NPPF refers to the need to protect and enhance valued landscapes and identifies that major development should be avoided in designated areas, unless in the public interest.

- In relation to the coast, the NPPF states that local planning authorities should maintain the character of such areas by ‘protecting and enhancing distinctive landscapes’, including in those areas that have been defined as Heritage Coast. Authorities should also look to improve ‘public access to and enjoyment of the coast’.

6.11 Local economy

- The planning system can make a contribution to building a strong, responsive economy by ‘ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’. The NPPF also emphasises the need to:
  - Capitalise on ‘inherent strengths’, and meet the ‘twin challenges of global competition and of a low carbon future’.
  - Support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.
  - Support competitive town centre environments, and only consider edge of town developments where they have good access and there will not be detrimental impact to town centre viability in the long term.

- Furthermore, the NPPF states that local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.

6.12 Population

- A core planning principle is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’. The NPPF also emphasises the need to: facilitate social interaction and creating healthy, inclusive communities; promote retention and development of community services / facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres.

- Planning policy for traveller sites (2012) should be read in conjunction with the NPPF and emphasises the need to provide for travellers in Local Plans. The size of the traveller population should be used to decide upon the number of pitches and/or plots required within a specific area. Policies created must be fair and facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

6.13 Soil

- There is a need to encourage the effective use of land through the reuse of land which has been previously developed, provided that this is not of high environmental value. The NPPF requires an approach to housing density that reflects local circumstances.

- The NPPF calls upon the planning system to protect and enhance soils. It expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development on agricultural land is necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
• New or existing development should also be prevented from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.

6.14 Transport and accessibility

• The NPPF notes that transport and travel policies will have an important role in ‘contributing to wider sustainability and health objectives’. It calls for the transport system to be balanced ‘in favour of sustainable transport’, with developments to be located and designed to facilitate these modes of travel. In order to minimise journey lengths for employment, shopping, leisure and other activities, the NPPF calls for planning policies that aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

6.15 Waste

• National Planning Policy for Waste was recently published, and it is the intention that it should be read in conjunction with the NPPF, the National Waste Management Plan for England and national policy statements for waste water and hazardous waste. All local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management. The National Policy emphasises: by driving waste management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport; providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste; helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and ensuring the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

6.16 Water

• In terms of flooding, the NPPF calls for development to be directed away from areas highest at risk, with development ‘not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere. The NPPF also states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk from coastal change.

• The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include: Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings); Sustainable drainage systems (SuDS); Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; and Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion.

• Within the Thames River Basin District, urban growth can have ‘a wide range of impacts on virtually all aspects’ of the water environment. Badly managed growth could cancel out positive achievements; however, development can also enable improvements to the water environment. Sustainable Drainage Systems (SuDS) are encouraged.

• In relation to water resources, the NPPF states that local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
7 WHAT IS THE SUSTAINABILITY ‘BASELINE’?

The SA Report must include:

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan;
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 Reviewing the sustainability ‘baseline’ is about generating a more detailed understanding of the local situation for the broad sustainability issues and objectives identified through the context review. An understanding of the baseline enables the identification and evaluation of ‘likely significant effects’ associated with the draft plan / alternatives.

7.1.2 A detailed review of the sustainability baseline is presented within the SA Scoping Report and an updated review was presented within the Interim SA Report published alongside the draft plan in 2013.

7.1.3 This section presents a concise summary by key baseline issues. It is important to emphasise that this is not a comprehensive list, and that more information on the sustainability baseline can be found within other documents, including the draft plan document and reports available at: http://www.swale.gov.uk/evidence-base/.

7.2 Air

- Air quality is poor within areas of Sittingbourne and at Ospringe and Newington, with four Air Quality Management Areas (AQMAs) declared between 2009 and 2013.
- Traffic is likely to continue to be a major source of air pollution in the Borough.
- Increased emissions are likely to have an adverse impact on the wildlife and habitats.

7.3 Biodiversity

- Rich biodiversity habitats within the Borough, especially the coastal areas, require greater protection to ensure no loss of habitat or species.
- Biodiversity is threatened by climate change in particular temperature rises and sea level rise, inappropriate built development, pollution and changing land management practices. Recreational uses is also a major cause of bird disturbance at the coast.
- Swale has not traditionally been active in the area of requiring green space or habitats to be created as part of new developments. Steps are required to identify and protect a green grid structure throughout the Borough allowing wildlife to migrate through the built and rural environment as climate changes.

7.4 Climate change

- Steps are required to address the emission of greenhouse gases from a number of sectors including transport, industry and the domestic user.
- The poor public transport system across the Borough creates a car dependency. Transport improvements, such as improved public transport links and locating new development in sustainable locations can contribute to reducing emission levels.
7.5 Crime and safety
- Swale is a relatively safe Borough, with crime having decreased in recent years.
- The highest crime type for Swale was criminal damage, with violence against a person the next most common type of crime.

7.6 Cultural heritage
- There are at least 1,850 listed buildings, with 13 buildings identified on English Heritage’s Buildings at Risk Register\(^6\). The Council has also compiled a list of local at risk buildings.
- The Borough contains 21 scheduled monuments and 2,685 sites on the Sites and Monument Records. Swale contains 50 conservation areas, covering 2.4% of the Borough. There are also four English Heritage Registered Parks and Gardens, as well as other parks and gardens of more local and modern interest.
- Across the Borough (and nationwide) there continues to be a considerable level of unauthorised work to listed buildings and buildings within conservation areas, at times detrimentally damaging these buildings for future generations.
- Across the Borough there are 20 Article 4 directions (a direction removing some or all permitted development rights within the conservation area, issued by local planning authorities), providing additional protection to certain features of conservation areas otherwise not protected.

7.7 Employment and skills
- The Borough as a whole faces growing competition from a number of other locations in Kent and the South East. Swale must respond; however, the Borough faces particular problems because of its narrow economic base which is still shaped by traditional industry and, hence, lower skilled (and lower paid) jobs.
- The levels of commuting for work outside the Borough are a particular issue. Both in an out-commuting are prevalent, but overall Swale is a net exporter of labour. The Swale Employment Land Review (2010) states that earnings in Swale are 15% lower than the South East average, this suggests that many Swale residents are commuting to higher paid jobs outside of the Borough and that there is a need for more, higher paid jobs locally.
- Examining the Borough’s business base by sector indicates that the construction sector accounts for the largest proportion of firms (18.7%), higher than the County and national average. Swale also has higher proportion of businesses operating in the agricultural and production (manufacturing) sectors. However, there are relatively fewer businesses in the information technology and professional/technical services sectors.
- Over 90% of the Borough’s stock of employment space comprises industrial uses, with very modest amounts of office accommodation. The amount of both types of space has increased in recent years, and office growth in particular was significantly higher than growth in adjoining areas (albeit from a much lower base).
- New business start-ups in 2011 stood at 43.6 businesses per 10,000 working population in Swale\(^7\). This was significantly lower than the South East (58.2) and England (54.0) averages.
- The average pay is significantly lower than the south east but is just above the national average. Female workers earn less on a weekly basis than both the national and regional average.

\(^6\) Heritage at Risk Register 2012
\(^7\) http://neighbourhood.statistics.gov.uk/dissemination/info.do?m=0&s=1373450973322&enc=1&page=analysisandguidance/analysisarticles/local-authority-profiles.htm&nsjs=true&nsck=false&nssvg=false&nswid=1276
The attainment of NVQ4 (degree level) qualifications is significantly below the regional average and lower than the national average. The poor skills profile is a problem given the Borough is trying to branch out into the higher skilled knowledge based industries.

Constraints on the labour supply will result from a decline of the working age population.

### Health

- The health of people in Swale is mixed in comparison to the England average.
- Deprivation is higher than average and about 6400 children live in poverty.
- Over the last 10 years, all cause mortality rates have fallen. Early death rates from heart disease and stroke have fallen and are similar to the England average.
- About 18.0% of year 6 children are classified as obese. A lower than average percentage of pupils spend at least three hours each week on school sport.
- The level of teenage pregnancy is worse than the England average.
- Estimated levels of adult 'healthy eating' and obesity are worse than the England average. Rates of hip fractures and smoking related deaths are worse than the England average.
- Rates of road injuries and deaths and hospital stays for alcohol related harm are better than the England average.
- Priorities in Swale include promoting older people’s independence through rehabilitation, addressing health inequalities in relation to heart disease and drug misuse, particularly in families with children.

### Housing

- This is a relative in-affordability in the private housing market, with median prices estimated to be 5.69 times median earnings in 2011, a ratio still relatively more affordable than the rest of Kent, representing the lower cost of housing in Swale in comparison to other parts of the County. This has also led to an increase in demand for affordable housing, with waiting lists increasing from c.1,400 applicants in 1997/98 to almost 4,500 in December 2012. The provision of affordable housing in the Borough is currently below the target set in the adopted Local Plan. Gross affordable housing completions have averaged 126 per annum over the last 15 years.
- The Council needs to continue the improvement programme to ensure that the decent homes standard is achieved in existing and emerging housing stock.
- Average household sizes in Swale have fallen from 2.45 persons per household in 2001 to 2.40 persons per household identified in the Census for 2011.
- There is pressure on housing supply as a result of an ageing population.
- The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) for Swale (2013)\(^6\) indicates that the Gypsy, Traveller and Travelling Showpeople population at the time of the study is housed in a range of accommodation types. This includes two socially rented sites providing over 15 pitches; 35 authorised permanent private sites providing 94 pitches; and 13 authorised private sites with temporary consent providing 19 pitches. There are also three unlawful unauthorised developments and five untolerated unauthorised developments accommodating a total of 10 pitches. 59 Gypsy and Traveller households live in bricks and mortar and there is one unauthorised but tolerated yard for Travelling Showpeople in Swale accommodating five households. The current authorised residential provision for the Gypsy and Traveller population is 112 pitches and 7 plots for the Travelling Showpeople population.

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\(^6\) Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Swale Final Report, Salford Housing & Urban Studies Unit University of Salford June 2013
7.10 Landscape

- Swale contains high quality distinctive landscapes which require protection and enhancement.
- The Council’s Landscape Character and Biodiversity Appraisal 2010 found that of the 42 identified character areas, the condition of 5 was classed as ‘poor’, with a further 16 ‘moderate’.
- There are a number of landscape designations that cover Swale Borough. Most of the landscape south of the M2 forms part of the nationally designated Kent Downs Area of Outstanding Natural Beauty (AONB). Outside the AONB, the lower dip slope, together with some of the dry valleys, are recognised as areas of landscape value which have more than local significance having been previously designated as Special Landscape Areas by Kent County Council.
- The consequences of climate change are a problem facing some of the Borough’s highest quality landscapes including the marshes. The impacts of habitat fragmentation and isolation will become increasingly apparent as climate changes and development expands.
- Although the acreage of fruit production has declined and changed the character of the landscape, there have been recent increases that have presented new challenges to the landscape. For example, poly tunnels can have a negative impact on the quality and appearance of the landscape and on land quality.
- Environmental quality is not distributed evenly across the Borough, access to natural green and open space is limited for many communities.

7.11 Local economy

7.11.1 In addition to the issues listed above, under ‘Economy and employment’ topic heading, the following issues are of note:

- The Borough currently has a poor image with investors.
- Declining retail sectors and out migration of residents to surrounding shopping centres.
- The future economic performance is constrained by poor infrastructure, investment is required to rectify this issue and make the Borough an attractive place to invest.
- The economic recession is placing pressures on the viability of existing employment sites and increasing demands for changes of use to other uses.
- The rural economy has historically been dominated by land-based sector and is still an important part of the Borough’s economy. However it has long been in decline in employment terms and has been affected in recent years by national agricultural trends.
  The Employment Land Review (2010) states that there is a significant demand and development interest in the rural area, spread across many small locations.

7.12 Population

- Quality of life indicators such as health and crime suggest that Swale is a relatively pleasant place to live, though deprivation is an issue.
- Swale ranks 99 out of 326 Councils in terms of the average rank of score on the National Indices of Deprivation 2010. Within Kent, Swale is ranked as third most deprived district, improving from second place in 2007. Swale performs particularly poorly against the ‘concentration of deprivation’ measure, which looks at the relative deprivation of the most deprived 10% of the population within each local authority area. Swale’s lower ranking against this measure indicates that communities in the Borough are polarised, with very

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9 Regeneration Framework 2006
deprived areas, sitting alongside areas of relative affluence. 11% of Lower Super Output Areas (LSOAs) in Kent (94 areas) are within England's 20% most deprived in Indices of Deprivation 2010.

- Across the Borough, deprivation associated with employment, income and education and skills are the principal factors. Education and skills is the key issue affecting the largest area of the Borough, with 32 SOAs falling within the worst 20% nationally. The Isle of Sheppey experiences a particularly poor performance. Sheerness East is the ward currently with the worst ranked SOA in the Borough.

- An increasing ageing population and population growth are expected to put additional pressure on services, health provision and housing supply and could potentially constrain the labour supply.

7.13 Soil

- There is pressure to develop on agricultural land and competing uses resulting from climate change (greater agricultural production linked to self-sufficiency and the need to develop in areas at low risk to flooding).

- Areas of contaminated land exist across the Borough, and will need to be remediated or protected as habitat sites where identified.

- Brownfield land can be important for biodiversity and, in some instances, offer a higher level of biodiversity than agricultural land; therefore there may be competing pressure for new development and biodiversity protection.

7.14 Transport and accessibility

- The Borough is well related to the motorway and trunk network, although capacity constraints exist including at M2 junctions 5 and 7. Swale has seen significant investment in transport infrastructure in recent years.

- The Swale Transport Strategy (Draft, 2014) highlights that key transport issues in Swale include: Congestion at M2 junction 5, which acts a barrier to further development on Swale; Rural areas of the borough being remote and less well served by public transport; and Traffic congestion with school/ employment commuting into Sittingbourne, causing rural rat-runs in the south of town, and air quality issues.

- Car ownership in the Borough generally reflects the regional and national picture with regard to 2 car households which is 28.3%, compared to 29.8% in the southeast and 24.7% nationally. Swale has a slightly greater number of households owning 1 car, 42.4% in comparison with 41.7% in the southeast and 42.2% nationally. The Swale Transport Strategy (Draft, 2014) drills down slightly further, highlighting that: “Walking and cycling in the urban wards in Faversham and Sittingbourne is higher than the district average and higher than the national average but the use of public transport is just below.”

- Box 8.1 gives more detailed consideration to the important issue of commuting.

11 Neighbourhood Statistics [accessed 12.06.13]
Box 8.1: Commuting trends highlighted by the 2011 Census

The preliminary commuting statistics from the 2011 Census are difficult to compare directly with the 2001 results due to the difference in the way people working at home or with no fixed workplace have been counted. The figures suggest that the absolute number of people who live and also work in the Borough has remained fairly constant. However, the figures show increases in the numbers of Swale workers commuting to all other Kent districts for work with the exception of Tunbridge Wells. The most popular Kent destinations continue to be Medway, Canterbury and Maidstone. London continues to be the most popular commuting destination, although showing only a small increase since 2001.

The way in which people access work does seem to be showing increased reliance on car travel, with an increase from 60% to 70% using the car to get to work. The exception appears to be London commuting, where the proportion driving up to town has remained fairly constant at 38%, train at 46% and bus at 11%. Car commuting journeys to Maidstone and Medway increased in both absolute numbers and as a percentage of journeys. Commuting to Canterbury from Swale increased in terms of absolute numbers, but the proportion of those made as car journeys stayed at around 77% with a slight increase in train use.

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These results perhaps also reflect the 2011 Census results for car ownership in Swale. The proportion of households with one or more cars available have increased to just under 80%, which is an increase on 2001 figures and now makes Swale identical to the Kent average. Kent car ownership as a whole is higher than the national average (80% of households compared with 74% nationally). The rate of increase in car ownership in Swale has been twice the national rate of increase over this period.

The commuting data therefore suggests that there has been an increase in out commuting, particularly by car, to other Kent districts, with Medway, Maidstone and Canterbury being the most popular destinations. London commuting has risen only slightly, and whilst car commuting has also increased in absolute terms on this route, train and bus use have maintained their proportionate share of commuters. These figures therefore suggest increasing pressure on the strategic and interurban road network.

7.15 Waste

- The amount of residual household waste collected per household in Kent has been falling over time. The proportion of waste sent for reuse, recycling and composting for Kent has increased over the same time period.

- The following illustrates the performance of Swale Borough against the government’s Best Value Performance Indicators for Waste (2007/08): Household dry recycling - 14,085.55 tonnes (26.07%); Household green recycling - 659.65 tonnes (1.22%); Household waste collected per person - 420kg.

- Defra waste statistical research identified Swale as falling within the top ten authorities with the largest decrease in household waste per head in the 2007/08 period. The Council reduced the household waste collected per person by 9.24% compared to 2006/07.

- The Borough contains 28 waste management sites, as recorded in the Minerals and Waste Annual Monitoring Report 2005/06.

7.16 Water

- The Borough is vulnerable to tidal flooding and from surface water flooding which will be exacerbated by climate change. A relatively high proportion of the Borough falls within the Environment Agency’s tidal flood zones. Strategic Flood Risk Assessment (SFRA) identifies that, in terms of tidal flood risk, Sittingbourne Town Centre, Iwade and Faversham Town Centre have significant proportions of their areas in Flood Zone 1 (low risk). Other areas (including Milton Creek, Faversham Creek, Sheerness and Queenborough and Rushenden) had extensive areas covered by the tidal flood zones. As the SFRA demonstrates, flood risk will increase with climate change.

- Water abstraction and water availability will continue to be an issue, especially as development increases. Water levels will have an increased impact on the biodiversity that inhabits water bodies and water systems.
What are the Key Issues/Objectives That Should be a Focus of SA?

The SA Report must include:
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

8.1 Introduction

8.1.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report (2008) was able to identify a concise list of sustainability ‘objectives’ for each of the 15 sustainability topics used as the basis for scoping.

8.1.2 The sustainability objectives are listed in Table 8.1, which also presents a range of decision-making prompts alongside each objective. These objectives and decision-making prompts provide a methodological ‘framework’ to guide the appraisal of alternatives / the draft plan.

Table 8.1: Sustainability topics and objectives (i.e. the SA ‘framework’)

<table>
<thead>
<tr>
<th>Topic</th>
<th>Sustainability objectives</th>
<th>Will the Policy…</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air</td>
<td>• Reduce air pollution and ensure air quality continues to improve across the Borough</td>
<td>• Contribute to reductions in air quality monitoring pollutants at monitoring locations across the Borough?</td>
</tr>
<tr>
<td>Biodiversity</td>
<td>• Conserve and enhance biodiversity and the natural environment</td>
<td>• Maintain and enhance relevant habitats and species e.g. mudflats or protected bird species?</td>
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<tr>
<td></td>
<td></td>
<td>• Protect and enhance habitat corridors and linking routes?</td>
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<td></td>
<td>• Continue the protection of the internationally, nationally, European and regionally designated areas and appropriate propose appropriate enhancement?</td>
</tr>
<tr>
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<td></td>
<td>• Conserve and enhance the BAP priority habitats within the Borough?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Conserve and enhance the populations of protected and/or BAP priority species within the Borough?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Allow for the creation of new areas of BAP priority habitats?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Meet the principles of decision making on biodiversity in the good practice guide?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Create opportunities to link to and create the green grid network?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Allow for the permeability of new development for biodiversity?</td>
</tr>
<tr>
<td>Topic</td>
<td>Sustainability objectives</td>
<td>Will the Policy…</td>
</tr>
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<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Climate change</strong></td>
<td></td>
<td>• Minimise the need for energy, increase energy efficiency and to increase the use of renewable energy;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Encourage sustainable construction materials and methods</td>
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<tr>
<td><strong>Crime and Safety</strong></td>
<td>• Reduce crime and anti-social behaviour and the fear of these</td>
<td>• Help reduce the fear of crime?</td>
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<td></td>
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<tr>
<td><strong>Cultural Heritage</strong></td>
<td>• Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage</td>
<td>• Protect archaeological sites, historic buildings, conservation areas and other culturally important features?</td>
</tr>
<tr>
<td><strong>Employment and Skills</strong></td>
<td>• Ensure high and stable levels of employment in accessible locations</td>
<td>• Increase the numbers of knowledge based and higher paid jobs?</td>
</tr>
<tr>
<td></td>
<td>• Raise the educational achievement levels across the Borough and help people to acquire the skills needed to find and remain in employment</td>
<td>• Ensure employment locations are sustainable and accessible by public transport, walking and bicycle?</td>
</tr>
<tr>
<td><strong>Health</strong></td>
<td>• Improve health and well-being and reduce inequalities in health</td>
<td>• Improve access to health services?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Improve access to recreation and open spaces?</td>
</tr>
<tr>
<td>Topic</td>
<td>Sustainability objectives</td>
<td>Will the Policy…</td>
</tr>
<tr>
<td>-------------</td>
<td>------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Housing     | • Provide affordable and decent housing adaptable to future needs of the community       | • Deliver on objectively assessed housing needs?  
• Deliver the appropriate mix of housing to deliver the long term regeneration schemes for the Borough?  
• 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 falling below the decent homes standards?  
• Deliver adaptable housing to meet the lifelong needs of the population?  
• Reduce the experiences of fuel poverty?                                                                                                                                 |
| Landscape   | • Protect and enhance the valued landscape and townscape of Swale                         | • Preserve and enhance the nationally important landscape within the Kent Downs AONB?  
• Contribute positively to the Borough’s established high quality landscape?  
• Provide for new open spaces, allotments?  
• Contribute to the establishment of the green grid network?                                                                                                                                 |
| Local Economy | • Sustain economic growth and competiveness                                                | • Contribute the development of eco-tourism industry?  
• Provide for opportunities to attract new businesses to the Borough?  
• Contribute to infrastructure improvements?                                                                                                                                 |
| Population  | • Meet the challenges of a growing and ageing population  
• Reduce poverty and social exclusion  
• Improve accessibility for all to key services and facilities | • Assist with regeneration of deprived areas in the Borough?  
• Improve access to key services?  
• Improve access to recreation, amenity and community facilities?                                                                                                                                 |
<table>
<thead>
<tr>
<th>Topic</th>
<th>Sustainability objectives</th>
<th>Will the Policy…</th>
</tr>
</thead>
</table>
| Soil                          | • Protect and enhance soil quality and reduce contamination                                                                                                                                                               | • Reduce contaminated sites and increase remediation of redundant industrial land?  
• Reduce or improve the quality of agricultural land?  
• Improve the quality of the Borough’s land overall?  
• Protect an identified brownfield site with conservation value or which provides a strategic link within the green grid network?  
• Affect high grade agricultural land?  
• Cause soil pollution/contamination?                                                                                                                                 |
| Transport and Accessibility   | • Promote traffic reduction and encourage more sustainable alternative forms of transport                                                                                                                                                                                      | • Provide improvements and new routes for cyclists and pedestrians?  
• Reduce need to travel by car?  
• Lead to adverse impacts on the Strategic Road Network, particularly junction 5 and 7 of the M2 which cannot be mitigated acceptably?                                                                                      |
| Waste                         | • Achieve the sustainable management of waste                                                                                                                                                                          | • Reduce waste arisings?  
• Increase the re-use of materials?  
• Increase the rates of recycling and composting and/or recovery of energy from waste?  
• Ensure disposal of waste material (where required) in accordance with the waste hierarchy?                                                                                                                   |
| Water                         | • Manage and reduce the risk of flooding  
• Maintain and enhance water quality (ground and surface) and make efficient use of water                                                                                                                                 | • Improve the quality of water within the Borough?  
• Reduce the demand for water (water efficiency measures)?  
• Ensure that development does not increase the Borough’s vulnerability to flooding?  
• Conserve adequate water supply to maintain healthy populations and rich biodiversity and ensure that water bodies are enhanced to increase biodiversity and ecosystems?  
• Affect groundwater resources?  
• Impact on surface water quality?  
• Provide SUDs systems and other flood prevention systems to attract biodiversity, and to ensure that such systems are integrated into the wider green grid network? |

*SA REPORT  
PART 1: SCOPE OF THE SA  
21*
PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?
9
INTRODUCTION (TO PART 2)

The SA Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

9.1.1 Swale Borough Council has been through a number of stages of plan preparation:

1) Pick Your Own: Issues and Strategic Spatial Options (January 2011)
   - The consultation document presented: the agreed vision for the Borough and the plan objectives that stem from the vision; four strategic spatial development options; and a proposed framework of core policies and development management policies.

2) Bearing Fruits: Draft Core Strategy (March 2012)
   - The draft plan was at this time in a Core Strategy format. It essentially set out a preferred suite of policies and identified strategic sites to be allocated.

3) Bearing Fruits: Draft Local Plan (August 2013)
   - At this point the draft plan was presented as a ‘Local Plan’ rather than ‘Core Strategy’, in light of National Planning Policy Framework (NPPF) guidance. What this meant in practice was a much greater emphasis on allocating land.

4) The ‘Publication’ version Local Plan (December 2014)
   - An evolution of the 2013 Local Plan. Includes a review of policies that are currently ‘saved’ by the adopted 2008 Local Plan.

9.1.2 SA work has been undertaken alongside plan-making at every stage. Figure 10.1 illustrates the stages of Local Plan-making / SA to date.

Figure 9.1: The plan-making / SA process
Alternatives appraisal

9.1.3 Of the past SA work that has been undertaken, it is most important to recount here – within the SA Report – information about the appraisal of alternatives. The SEA Regulations are clear that the SA Report should present an appraisal of ‘reasonable alternatives’, as well as ‘outline reasons for selecting the alternatives dealt with’.

9.1.4 The key plan issue that has been the focus of alternatives appraisal is the broad development strategy, and hence it is this issue that is the focus of this part of the SA Report. Understanding of development strategy alternatives has been refined over time. The aim of this part of the SA Report, therefore, is to tell the ‘story’ of events as they occurred, ensuring that the story is brought entirely up-to-date with an explanation of alternatives consideration that has occurred in 2014 in the build-up to finalising the ‘Publication’ version of the Plan.

N.B. Other plan issues have also been the focus of alternatives appraisal in the past, but at the current time there is little to be gained from presenting detailed information about alternatives. Box 9.1 discusses other plan issues that have been the focus of alternatives appraisal in the past.

Structure of this part of the SA Report

9.1.5 In order to tell the full story, and in-line with SEA regulatory requirements, this Part of the SA Report answers the following questions:

1) What are the reasons for selecting the alternatives dealt with?
   - i.e. Why are the development strategy alternatives considered in 2014 the ‘reasonable alternatives’?

2) What are the appraisal findings in relation to the reasonable alternatives?

3) What are the reasons for selecting the preferred approach in-light of the appraisal of reasonable alternatives?
   - N.B. This section also explains how appraisal of site options fed-in. In other words, this section explains the Council’s reasons for selecting the preferred approach in-light of both alternatives appraisal and appraisal of site options.

\[\text{\textsuperscript{12}}\] It is worth noting that SA has also influenced plan-making in other ways, besides through alternatives appraisal. Chapter 15 of this Report explains how appraisal of working draft policy approaches has fed-in and influenced plan-making, over the years.

\[\text{\textsuperscript{13}}\] The National Planning Practice Guidance refers to the need to ‘refine’ alternatives over time as part of the SA process.
Box 9.1: Other plan issues that have been the focus of alternatives appraisal in the past

As discussed above, ‘the broad development strategy’ is the key issue that has been the focus of alternatives appraisal over the course of plan-making, but it is not the only issue. Other issues that have been the focus of alternatives appraisal are as follows:

**Employment land at Faversham**

Over recent years some employment land identified by the Swale Borough Local Plan 2008 has not come forward and whilst Employment Land Review work finds that the majority of these sites continue to be suitable for employment purposes, it is recognised that a new, relatively small scale industrial site should be allocated at Faversham.

The Council recognised the need for an edge of town site, and drew on an Employment Land Review and an Urban Extension Landscape Capacity Study in order to identify the following alternative sites: 1) Land at Perry Court Farm, Brogdale Road (33 ha); 2) Land between Ashford Road and Salters Lane (14 ha); 3) Land at Lady Dane Farm, Love Lane (27 ha).

An appraisal of the alternatives was presented in the 2012 Interim SA Report. Following the 2012 consultation the preferred site was option (3) on the basis that the locations for options (1) and (2) could impact on the character and setting of the town, including on the basis that they could increase pressure to develop other land that could expand Faversham up to the M2. Subsequently, however, there was a change in the situation at Faversham in that it became apparent that the Oare Gravel workings site (a 67 ha site located to the north west of the town close to Oare village) was able to be brought forward for employment with enabling housing. The outcome was a need to revisit the appraisal, with the Oare Gravel Workings site as option (4). An appraisal of the four alternatives was presented in the 2013 Interim SA Report.

In 2013 the Council’s preferred approach was to bring forward the Oare site, with Lady Dane Farm allocated as a reserve site should the Oare site not come forward. The preferred approach has since evolved; with it now the plan to bring forward both the Oare site (300 homes plus 1,500m² employment) and Lady Dane Farm (200 homes plus 20,000m² employment).

Love Lane is relatively unconstrained environmentally, but development would result in the loss of high grade agricultural land and require improvements to access. Significant environmental concerns exist in relation to the Oare site (around landscape, ecology, flood risk, transport and heritage) and will need to be the focus of mitigation; but the site performs well from a socio-economic perspective. A mixed use scheme is appropriate given that, compared with Lady Dane Farm, the Oare site is less accessible and attractive as an employment site. Furthermore, housing is considered the best means to secure major ecological enhancement and management and the restoration of heritage assets.

**Gypsy and Traveller accommodation**

Swale Borough has one of the largest Gypsy and Traveller populations within Kent and the South East of England with over 50 sites as indicated by the latest Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA, 2013). In recognition of this, making sufficient provision for Gypsies and Travellers in a fair fashion for all is a key Council objective.

In 2012 three options for the number of pitches to be provided for the Gypsy and Traveller population were presented for consultation ranging between 11 and 82 pitches (2013-2031). These alternatives were also a focus of the 2012 Interim SA Report. Subsequently the Council commissioned the GTAA which identified an objectively assessed need for 85 pitches to be provided for the Gypsy and Traveller population between 2013 and 2031 (reduced to 82 given completions).

To help meet the Borough's need for new pitches the Council recognises the need to give careful consideration to the policy approach taken. As such, the following alternatives were appraised within the 2013 SA Report:

1) 1% of the total number of dwellings proposed for each Local Plan housing allocation of 149 dwellings or above to be provided as Gypsy and Traveller serviced pitches and 1 pitch to be provided for each Local Plan housing allocation of 50-149 dwellings.

2) No pitch allocations as part of mainstream housing sites, but rather have specific allocations.

3) No pitch allocations and just relying on windfall planning application sites.

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14 Detailed appraisal findings can be found within the past Interim SA Reports @ [http://www.swale.gov.uk/sustainability-appraisal/](http://www.swale.gov.uk/sustainability-appraisal/)
Box 9.1 Cont’d: Other plan issues that have been the focus of alternatives appraisal in the past

In 2013 the Council’s preferred approach was Option 1, albeit with a policy stipulation that a commuted sum can be agreed with the Council as an alternative if it can be clearly demonstrated the housing growth site in question would not be suitable for the Gypsy and Traveller community. This approach is broadly in line with the appraisal findings. The effect would be to locate pitches principally in, and adjacent to, urban areas in the Borough where there is good accessibility to key services and facilities. However, there might be some uncertainty regarding the timing of pitch delivery, given that major housing sites are liable to delay.

The Council’s preferred approach at the current time is similar to that presented in 2013; however, it is less onerous on developers in that:

- 1% provision is now no longer established through policy, but rather is referenced within supporting text as a starting point for negotiation with developers.
- Whilst the developer will make the land available, they will not service them.

The draft plan now states that: “… on developments of 50 or more dwellings, pitches for Gypsies and Travellers will be provided as part of the development as this size of development will enable an imaginative approach to be taken on issues of design and integration. Whilst there will be negotiation over the precise number of pitches on each allocation, the starting threshold will be that pitch provision will be made at 1% of the total number of dwellings proposed, up to a maximum of 10 pitches per proposal. The foundation for negotiations will be the design led approach leading to a positive integration of pitches within the development based on the sites individual capacity and constraints… Although the Council will expect pitches to be achieved on-site in the majority of circumstances, exceptionally, for cases where it can be clearly demonstrated that a housing allocation would not be suitable, provision of pitches off-site, land transfers, or a commuted sum in lieu of provision will be considered. These and other means of provision would have to be directly related to the specific housing development.” The effect of changes since 2013 is to cast some doubt on the ability to meet needs through provision at major housing sites; however, it is not clear that there is a viable alternative approach that would perform better. A Part 2 Local Plan is being progressed, focused on the allocation of sites for Gypsy and Traveller accommodation.

Affordable housing policy

In 2010, 78% of newly forming households could not afford market housing, whilst 71% of single households could not afford a one-bedroom shared-ownership flat. The South East Plan suggested that authorities in the East Kent sub-region set an overall 30% affordable housing target, 5% below the South East norm. The East Kent Strategic Housing Market Assessment (2009) then established factors that might justify targets of higher than 30%. Given the above, the Council identified the following alternative approaches, which were a focus of appraisal in the 2013 Interim SA Report:

1) Percentage of affordable housing units to be determined in accordance with the affordable housing target of 30% (East Kent target of the now revoked South East Plan)
2) Percentage of affordable housing units to be determined in accordance with the affordable housing target of 35% (Kent target of the now revoked South East Plan)
3) Percentage of affordable housing units to be in the range of 30-35% according to the local housing market area (30% at Sheerness/Minster and East Sheppey and 35% at Sittingbourne, Faversham and East Swale Rural Area)

In 2013 the preferred approach was Option 3. However, the Council subsequently commissioned a study that established that this approach would not be viable. The study recommended the following approach:

Seek affordable housing provision to 40% in rural areas, 30% at Faversham, 10% in Sittingbourne and Iwade and 0% on Sheppey; and remove the policy requirement for 70/30 split between affordable rent and intermediate housing.

This approach was agreed, and entered into the draft plan, at a meeting of the LDF Panel on 23 June 2014. The preferred approach is driven entirely by ‘viability’ (and hence deliverability) considerations, as opposed to policy considerations. However, a policy stance is set to be taken through the plan in that it will introduce the concept of commuting or transferring the affordable housing provision from the more viable areas of Faversham and rural areas to Sheppey and Sittingbourne. It commits to an SPD to set out the mechanism.

15 Detailed appraisal findings can be found within the 2013 Interim SA Report @ http://www.swale.gov.uk/sustainability-appraisal/
10 REASONS FOR SELECTING THE ALTERNATIVE DEALT WITH

10.1 Introduction

10.1.1 The development strategy alternatives identified in 2014 as ‘reasonable’ emerged subsequent to a long process of alternatives consideration, stretching back to 2011. As such, there is a need to ‘tell a story over time’, with a view to explaining the ‘reasonableness’ of the 2014 alternatives.

10.2 Alternatives appraisal at the time of the 2011 ‘Pick your Own’ consultation

10.2.1 The Council’s 2011 ‘Pick your Own’ consultation document presented four development strategy alternatives, referred to at the time as ‘strategic spatial options’. The alternatives are summarised in Table 10.1 and shown graphically in Figure 10.1. Appraisal findings were presented within an Interim SA Report published alongside the consultation document.\(^{16}\)

<table>
<thead>
<tr>
<th>Option</th>
<th>Housing quantum</th>
<th>Employment quantum</th>
<th>Broad distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>South East Plan target</td>
<td>Lower</td>
<td>Focus at urban areas</td>
</tr>
<tr>
<td>2</td>
<td>South East Plan target</td>
<td>Lower</td>
<td>Focus at urban areas and larger villages</td>
</tr>
<tr>
<td>3</td>
<td>South East Plan target</td>
<td>Higher</td>
<td>Focus at urban areas</td>
</tr>
<tr>
<td>4</td>
<td>Above South East Plan target</td>
<td>Higher</td>
<td>Focus at urban areas</td>
</tr>
</tbody>
</table>

10.2.2 In arriving at the alternatives the Council discounted a number of other options as ‘unreasonable’ on the basis that they were not in-line the established vision and objectives. Discounted options included:

- Identification of new settlements;
- Major growth outside Thames Gateway;
- Wider dispersal to minor rural settlements;
- Growth within international/national environmental designations; and
- No growth.

**Figure 10.1**: Development strategy alternatives presented at the time of 2011 ‘Pick your Own’ consultation.
Option 3: Step change in employment growth and continuing previous policy provision for housing development concentrated at urban areas.

Option 4: Step change in employment and housing growth.
10.3 Alternatives appraisal at the time of the 2013 ‘Bearing fruit’ consultation

10.3.1 In 2012 a preferred development strategy was established in light of the earlier alternatives appraisal and published within the ‘Bearing Fruit’ draft Core Strategy consultation document. The preferred strategy sought to:

- Establish a housing growth target of 540 dwellings per annum (as per Options 1, 2 and 3);
  - This housing growth target was established largely on the basis of work undertaken by the Council in 2012 that showed this target to be the maximum achievable (deliverable). The need to avoid unacceptable consequences for the loss of countryside and high quality agricultural land was also an important factor.
- Deliver employment growth to meet the future needs of the Borough (as per Option 3); and
- Distribute development at the main urban areas but with some growth diverted away from Faversham (reflecting the town’s compact historic character) / towards Sittingbourne and the Isle of Sheppey (reflecting their position within the Thames Gateway).

10.3.2 Subsequently the Council recognised that there was a need to develop the Core Strategy into a Local Plan, in order to address the new national planning policy context as set out within the National Planning Policy Framework (NPPF, March 2012). In particular, the Council needed to address requirements to meet the objectively assessed need for development.

10.3.3 A ‘Bearing Fruit’ draft Local Plan consultation document was prepared and published for consultation in 2013, with the preferred development strategy (including growth target) remaining broadly the same as that previously published in 2012. At this point the Interim SA Report published alongside the consultation document presented an appraisal of all the alternative strategies considered to date, i.e. the preferred strategy plus the ‘spatial strategy options’ from 2011. Box 10.1 presents summary appraisal findings.

Box 10.1: Development strategy alternatives that were a focus of the 2013 Interim SA Report

As discussed above, the 2013 Interim SA Report presented an appraisal of the preferred strategy against the four alternatives that had been a focus of consultation and appraisal in 2011. The appraisal of the five alternatives (with the preferred approach as ‘Option 5’) highlighted that:

- Options 1, 3, 4 and the 5 propose growth predominantly within existing urban areas (Sittingbourne, Faversham and Sheerness) or as extensions to urban areas. As such, there is greatest potential to avoid impacts on the environment and reduce the need to travel to services, facilities and jobs.
- All options are expected to result in the loss of best and most versatile agricultural land given the spatial extent of this resource in the Borough; however, Options 3, 4 and 5 would involve more development focused on previously developed land relative to Options 1 and 2. A brownfield focus would also assist with the delivery of social and economic objectives by promoting regeneration.
- Option 2 has a larger rural housing focus, directing housing sites towards greenfield land at the identified larger rural centres (Eastchurch, Leysdown, Iwade, Newington, Teynham and Boughton Street). Generally, more development distributed to these locations would lead to negative effects on local character and landscape, and the valued natural environment of the Borough. Potential negative impacts upon health, transport and climate change mitigation would also result, given increased need to travel and reduced accessibility to key services.
- All options would support additional employment land at urban locations contributing to ensuring increased levels of employment in accessible locations and providing the mechanism for economic growth and improved competitiveness in the Borough. Options 3 and 4 would facilitate a major expansion of the Kent Science Park as well as expansion at the Port of Sheerness and, as such, would meet the specific needs of key employment sectors (such as knowledge and green economies). Options 4 and 5 seek to support growth at Sittingbourne as the main centre for the Borough. This has the potential to improve the business image of the town and therefore help stimulate economic growth.

17 The 2013 Interim SA Report is available at: http://www.swale.gov.uk/sustainability-appraisal
The 2013 Interim SA Report also presented an appraisal of the preferred strategy against a series of alternative approaches where each alternative varied solely in terms of the ‘quantum’ of housing and employment growth – see Box 10.2.

**Box 10.2: Further development strategy alternatives that were a focus of the 2013 Interim SA Report**

As discussed above, the 2013 Interim SA Report presented an appraisal of the preferred development strategy and a series of alternatives that varied in terms of the ‘quantum’ of growth only (with the distribution held constant / assumed to reflect the preferred approach, i.e. ‘Option 5’ discussed above).

The alternatives were identified in light of a Strategic Housing Market Assessment Update and Development Needs Assessment (Nathaniel Litchfield and Partners, 2013), which developed ten scenarios for growth -

- Five ‘demographic led’ scenarios (A,B,C,D,E) – varying levels of development to meet projected levels of population change;
- Three ‘economic led’ scenarios (F,G,H) – varying levels of development required to ensure forecasts of future employment change are supported by the local labour supply;
- One ‘policy-led’ scenario - the South East Plan 2006-2026 housing target for Swale and the target previously consulted on at earlier stages of the process; and
- One ‘housing led’ scenario – the level of development required to meet current and future needs for affordable housing.

The Council selected, for further consideration, the following three demographic and economic led scenarios, on the basis that it could be argued that they reflect ‘objectively assessed need’:

- 604 dwellings p.a (12,080 over plan period) and 214 jobs p.a. (4,280 over plan period)
- 741 dwellings p.a. (14,820 over plan period) and 353 jobs p.a. (7,053 over plan period)
- 887 dwellings p.a. (17,740 over plan period) and 414 jobs p.a. (8,271 over plan period)

The figure shows these three options as well as the Council’s preferred approach, which would involve 540 dwellings p.a. (as per the Policy led scenario) but with a fairly high job growth target of 353 jobs per annum.

The appraisal of the four alternatives presented within the 2013 Interim SA Report highlighted that the preferred approach performs relatively well in terms of environmental objectives, but relatively poorly in terms of economic and housing related SA objectives. In particular, the appraisal found the preferred approach to have the potential to result in an imbalance between local workforce and jobs locally, which in the short term could lead to a reduction in the amount of out-commuting, but in the long term could lead to significant in-commuting.
10.4 Establishing broad development strategy alternatives in 2014

10.4.1 The preferred strategy has remained broadly static since 2012. It involves a low (i.e. below the 'objectively assessed need' figure) housing growth approach of 540 dpa, coupled with support for fairly high employment growth. In terms of spatial distribution, the preferred approach is to 'divert' 44% of the housing growth that would go to Faversham (were growth to be distributed according to its share of the Borough’s current population) to the Thames Gateway area reflecting its national status as a priority regeneration area.

10.4.2 At the current time, it is not thought that there is a ‘reasonable’ need to consider in detail how the preferred growth quantum (540 dpa) might alternatively be distributed. An alternative distribution that would involve diverting less growth from Faversham to the Thames Gateway would result in a scale of growth in the Thames Gateway below that which the Council believes is necessary if regeneration objectives are to be achieved. There is a need to achieve a critical mass of growth in the Thames Gateway, which means developing greenfield sites (e.g. NW Sittingbourne) in addition to priority brownfield sites (e.g. Queenborough and Rushenden). There are also various other sustainability arguments in favour of an approach that steers growth towards the Thames Gateway, which have been explored through alternatives appraisal in the past (e.g. the appraisal of ‘Option 2’ from the 2011).

10.4.3 At the current time there does remain a ‘reasonable’ need to give detailed consideration to an alternative approach that would involve a higher growth quantum. Stakeholders at the current time will reasonably question whether a higher growth quantum would, in addition to meeting housing needs to a greater extent, also enable regeneration objectives to be achieved in the Thames Gateway (an overriding objective that cannot be compromised) and lead to adverse impacts that, although significant, are not unacceptable on balance.

10.4.4 A higher growth option could only involve delivering up to 740 dpa. Whilst there is evidence to suggest that delivering ‘objectively assessed housing need’ might involve delivering a figure considerably higher than this, and a higher growth option (887 dpa) was appraised in 2013 and not shown to perform notably worse than the 740 dpa option in terms of any sustainability objectives, it is the Council’s view that there is no potential to deliver a figure above 740 dpa (see discussion of ‘deliverability’ within Chapter 13, below).

10.4.5 A 740 dpa growth option could only feasibly be delivered by distributing growth to settlements broadly in-line with their share of the Borough’s current population. This is on the basis that -

- Poor viability means that a higher growth option with growth weighted towards the Thames Gateway (as per the preferred strategy) would not lead to a sustainable outcome. For example, further growth on Sheppey significantly above that set out under the preferred strategy could lead to the development of unsustainable communities, given that viability considerations mean that developments here cannot be required to include any affordable housing, nor provide serviced provision on site for Gypsies and Travellers; nor contribute much towards delivery of infrastructure in the local area through S106 agreements. Viability considerations also mean that there is very limited potential to collect Community Infrastructure Levy (CIL) funds through development in the Thames Gateway; hence a higher growth option that targets additional growth primarily in the Thames Gateway would worsen the Council’s infrastructure funding deficit (the difference between funds generated through the CIL and the funds required to deliver infrastructure across the borough). It could also possibly lead to situation whereby the Council needs to make policy concessions over and above those that have already been made (e.g. on the basis of viability evidence the Council has already had to remove the policy requirement that new housing should achieve ‘Code for Sustainable Homes’ standards above those legally

18 Thistle Hill on Sheppey is an example of a recent development that has suffered from infrastructure lag. A community centre has been provided, but local shops and a primary school remain outstanding, despite need having been first identified some 15 years previously. The need for a primary school is now acute.

19 There is no CIL yet set for Swale; however, work has been undertaken that indicates what levy would likely be possible.
required), or at least a situation whereby limited funds are directed to key infrastructure areas (education and transport) only, with investment in other areas falling by the wayside.

- Environmental considerations (e.g. around heritage) mean that a higher growth option with growth weighted towards Faversham (i.e. a situation whereby Faversham receives a proportion of growth above that which reflects its share of the Borough’s current population) would not lead to a sustainable outcome. It is also the case that growth weighted towards Faversham could distract from the achievement of regeneration objectives in the Thames Gateway.

The reasonable alternatives

10.4.6 In light of the above discussion, it is considered that there are two reasonable alternative approaches warranting detailed consideration at the current time.

Table 10.2: The reasonable alternatives 2014

<table>
<thead>
<tr>
<th>Option</th>
<th>Quantum</th>
<th>Distribution</th>
<th>Further comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Lower growth with diversion of growth from Faversham to the Thames Gateway</td>
<td>540 dpa</td>
<td>87% Thames Gateway</td>
<td>13% Outside the TG (predominantly Faversham) This is the preferred strategy first established in 2012. It has been the focus of appraisal in the past.</td>
</tr>
<tr>
<td>2) Higher growth, distributed as per the current population split</td>
<td>740 dpa</td>
<td>76% Thames Gateway</td>
<td>24% Outside the TG (predominantly Faversham) A ‘viability-led’ option in that the average CIL receipt received per new home across the Borough would increase leading to more CIL funds available for infrastructure upgrades.</td>
</tr>
</tbody>
</table>
11 ALTERNATIVES APPRAISAL FINDINGS

11.1 Introduction

11.1.1 This chapter presents summary appraisal findings in relation to the development strategy alternatives that were appraised in 2014, i.e. in the build-up to finalising the Draft (‘Publication Version’) Plan. Detailed appraisal findings are presented in Appendix III.

11.2 Appraisal methodology

11.2.1 For each of the options, the appraisal identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see Part 1) as a methodological framework. Red text / shading is used to indicate significant negative effects, whilst green text / shading is used to indicate significant positive effects.

11.2.2 Effects are predicted taking into account the criteria presented within the Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for ‘cumulative’ effects is also a consideration.

11.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. 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 uncertainties, there is a need to make considerable assumptions regarding how options will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

11.2.4 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible 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’.

Limitations

11.2.5 It is important to reemphasise the high-level nature of the alternatives. The alternatives are not site specific, which means that the appraisal focuses on strategic issues, i.e. more on issues associated with particular towns than issues associated with particular sites.

11.2.6 It is also important to emphasise that major assumptions are made regarding infrastructure delivery. This might be thought of as assumptions being made about the benefits that development will bring, or assumptions about the future baseline. Either way, the fact is that infrastructure delivery is often inherently uncertain.

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20 Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004
11.3 Summary appraisal findings

11.3.1 Table 11.1 presents summary appraisal findings in relation to the broad development strategy alternatives. To reiterate, within each row (i.e. for each topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of ‘significant effects’ (using red / green shading) and also rank the alternatives in order of preference.

**Table 11.1: Reasonable alternatives 2014: Summary appraisal findings**

<table>
<thead>
<tr>
<th>Objective</th>
<th>Categorisation / Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Opt 1</td>
</tr>
<tr>
<td><strong>Environment</strong></td>
<td></td>
</tr>
<tr>
<td>Decrease air pollution and ensure air quality continues to improve across the Borough</td>
<td>1</td>
</tr>
<tr>
<td>Conserve and enhance biodiversity and the natural environment</td>
<td>1</td>
</tr>
<tr>
<td>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</td>
<td>1</td>
</tr>
<tr>
<td>Reinforce local distinctiveness, environmental quality and amenity through the conservation and enhancement of built and cultural heritage</td>
<td>1</td>
</tr>
<tr>
<td>Protect and enhance the valued landscape and townscape of Swale</td>
<td>1</td>
</tr>
<tr>
<td>Protect and enhance soil quality and reduce contamination</td>
<td>1</td>
</tr>
<tr>
<td>Promote traffic reduction and encourage more sustainable alternative forms of transport</td>
<td>1</td>
</tr>
<tr>
<td>Achieve the sustainable management of waste</td>
<td>N/a</td>
</tr>
<tr>
<td>Manage and reduce the risk of flooding; To maintain and enhance water quality (ground and surface) and make efficient use of water</td>
<td>1</td>
</tr>
<tr>
<td><strong>Communities</strong></td>
<td></td>
</tr>
<tr>
<td>Reduce crime and anti-social behaviour and the fear of these</td>
<td>N/a</td>
</tr>
<tr>
<td>Improve health and well-being and reduce inequalities in health</td>
<td>1</td>
</tr>
<tr>
<td>Provide affordable and decent housing adaptable to future needs of the community</td>
<td>2</td>
</tr>
<tr>
<td>Meet the challenges of a growing and ageing population; Reduce poverty and social exclusion; and Improve accessibility for all to key services and facilities.</td>
<td>2</td>
</tr>
<tr>
<td><strong>The economy</strong></td>
<td></td>
</tr>
<tr>
<td>Sustain economic growth and competiveness</td>
<td>1</td>
</tr>
<tr>
<td>Ensure high and stable levels of employment in accessible locations; and to raise the educational achievement levels across the Borough and help people to acquire the skills needed to find and remain in employment</td>
<td>1</td>
</tr>
</tbody>
</table>
Summary

The appraisal shows that there is the greatest potential to differentiate between the alternatives in terms of environmental issues. In particular, it is possible to conclude that Option 2 (higher growth distributed as per the current population split) would likely lead to significant negative effects in terms ‘heritage’ considerations, whilst Option 1 would not; the key issue being the sensitive nature of Faversham, and also the service villages that could also see additional growth under Option 2. Loss of best and most versatile agricultural land is another issue in terms of which Option 2 performs notably worse than Option 1, given the higher growth quantum and also the additional steer towards Faversham. It is also suggested that the spatial approach to growth under Option 2 would encourage commuting (with implications for climate change and air quality objectives) relative to Option 1, although there is also a need to take into account the influence that the total growth quantum will have on commuting patterns. This is a complex issue, which is discussed in detail at 14.1.1, below.

In terms of socio-economic issues/objectives, Option 2 clearly performs better in terms of ‘housing’ but otherwise the alternatives perform similarly. It is not necessarily the case that a lower housing growth strategy will significantly hamper delivery of economic growth objectives in the short term, although in the long term it is recognised that a housing shortfall could have a detrimental effect on the local economy if it is the case that an ageing population constrains labour supply. Either option would likely support the achievement of regeneration objectives in the Thames Gateway, although under Option 2 there could be some risks associated with bringing additional housing forward in advance of town centre improvements, employment and community infrastructure. More generally, there might be a risk that Option 2 would have the effect of ‘distracting’ from the regeneration agenda in Gateway, given more attractive greenfield development options at Faversham.
12 REASONS FOR SELECTING THE PREFERRED APPROACH

12.1 Introduction

12.1.1 The aim of this chapter is to explain the Council’s reasons for selecting the preferred spatial strategy, which – in line with Option 1 – involves a housing growth target of 540 dwellings per annum; employment growth to meet the future needs of the Borough; and distributing development at the main urban areas but with some growth diverted away from Faversham (reflecting the town’s compact historic character) / towards Sittingbourne and the Isle of Sheppey (reflecting their position within the Thames Gateway).

12.1.2 As well as explaining the justification for favouring the broad strategy (in light of alternatives appraisal), this chapter also provides information on the Council’s reasons for selecting / proposing to allocate particular sites (and not others). Reference is made to a process of site options appraisal work that has been undertaken and has fed-in. Site options appraisal is discussed in Appendix IV.

12.2 Justification for the preferred broad development strategy

Taking into account deliverability

12.2.1 Although there are signs of economic recovery nationally, there is local caution about its scale and pace. Unemployment benefit levels in Swale in July 2014 were about 2.4%, above the south east average of 1.4%. Furthermore, the scaling back of retail ambitions in Sittingbourne and poor viability in the housing market at Sittingbourne and (especially) on the Isle of Sheppey reinforces a need for some caution, at least in the short term.

12.2.2 The preferred economic growth strategy balances this caution (the jobs growth target is below that achieved prior to the recent recession) with the potential locally to maximise growth in certain sectors. Confidence in the job target also reflects the fact that much of the land bank is already committed and some of the growth forecast for retail/leisure and pharmaceuticals is already being delivered. In contrast to the situation for housing allocations, planning applications are already coming forward for almost all of the key draft local plan employment allocations within the Thames Gateway. For these reasons, it is concluded that a level of jobs based on 353 jobs per annum - 7,053 for the plan period is achievable and desirable as the preferred option.

12.2.3 To support this level of job growth, the Council acknowledge that a housing target of some 14,800 dwellings (740 per dwellings annum) would be required in order to support adequate levels of locally based labour. Failure to achieve this over the longer term could jeopardise the creation of jobs and/or lead to undesirable levels of in-commuting.

12.2.4 However, the National Planning Policy Framework (NPPF, 2012) requires local plans to be effective, which in practice means ‘deliverable’. Setting an undeliverable housing target from the outset puts the Council at risk of being labelled as persistently under delivering and, therefore, its communities at risk of speculative and uncoordinated releases of land for development (given the NPPF’s ‘presumption in favour of sustainable development’).
12.2.5 If housing market signals are considered, they indicate that historic delivery of housing falls well short of 740 dpa, a figure that has only been achieved six times in 33 years, and not at all during the 1990’s. Once account is taken of completions since the start of the plan period, achieving a higher target of 740 dpa would require completions of 822 dpa, which has been achieved only five times in 33 years. The figure that would need to be achieved on average every year increases to 892 dpa if projected underperformance to 2017/18 is taken into account. This is a rate that has been achieved just twice in 33 years. Other market signals also indicate an inability to deliver a higher figure – and more generally the fact that market interest in Swale responds to the ebbs and flows of the wider economy - including performance relative to past housing targets and the number of dwellings permitted relative to the number provided.

12.2.6 In short, a housing target of 740 dpa on average could not be achieved over the plan period, and could only be realistically achieved over a much longer period of time. The Council believes that a deliverable (and therefore effective) approach would involve 540 dpa, although even this rate would be a challenge to achieve. Assuming undersupply up to 2017/18, achieving 540 dpa within the plan period would require completions over the final 14 years at an average rate of 645 dpa. Looking back over 33 years, performance above 645 dpa has been achieved just 11 times, mirroring periods of strong economic growth.

Taking into account sustainability objectives

12.2.7 In addition to concerns over deliverability, there are also concerns that delivering a higher target (740 dpa) would impact significantly in terms of a range of sustainability objectives.

12.2.8 If additional sites (i.e. sites over and above those set to be allocated under the preferred strategy) were to be allocated outside of the Thames Gateway, then viability would be less of a concern and there would be a reduced gap between provision and the target, however:

- Additional high quality (Grade 1) agricultural land would likely be lost, over and above the 134 ha set to be lost under the preferred strategy, on the assumption that additional development would be focused in the A2 corridor.
- The ability to conserve heritage assets in a manner appropriate to their significance (Para. 17, 115 and 133 of NPPF) would be compromised.
  - For example, and in particular, there would likely be a need to allocate land between the A2 and M2 that falls within the setting of the Faversham, Preston and Ospringe Conservation Areas and is contrary to the historic urban morphology of the town This is a matter of concern to English Heritage.
- The plan would be failing to direct growth to where there is greatest potential to encourage use of public transport, walking and cycling.
  - Faversham and rural service centres perform relatively poorly in terms of access to higher order services such as shops, civic and employment provisions when compared to Sittingbourne as the main Borough town.
- Additional growth at Faversham could trigger the need for major upgrades at junctions six and seven the M2, which are not identified within the national roads programme.
- More generally, the effect of additional growth outside the Thames Gateway could be to weaken the strategy of focusing investment at the Thames Gateway, potentially deflecting investment in key regeneration areas and other brownfield sites.
12.2.9 If additional sites (i.e. sites over and above those set to be allocated under the preferred strategy) were to be allocated within the Thames Gateway, then viability would be an issue, and there would be a significant risk of under-supplying against the target. Viability evidence provided by a recent study (PBA, 2014) shows that the preferred balance of growth (between the Thames Gateway and the rest of the Borough) is inversely proportional to the ability of development to proceed. The outcome is that the Council has had to make a number of policy concessions, e.g. setting the requirement for affordable housing provision at 10% and 0% for Sittingbourne and Sheppey respectively.

12.2.10 In terms of sustainability objectives, there are some arguments in favour of higher growth in the Thames Gateway, e.g. around the utilisation of lower quality agricultural land in areas such as the Isle of Sheppey. However, there are also strong sustainability arguments against higher growth in the Thames Gateway:

- The funds raised through the Community Infrastructure Levy (CIL) per dwelling on average would decrease (given that viability is likely to render the Council unable to charge CIL on development at Sheppey, and only able to charge a low CIL at Sittingbourne) meaning an infrastructure funding deficit and a situation whereby there is no reasonable prospect that essential infrastructure would be deliverable in a timely fashion, potentially impacting the achievement of objectives around health and social / cultural wellbeing.

- There are clearly issues in relation to Sheppey’s remoteness and a risk that delivering housing growth in advance of employment growth would worsen existing issues around car dependency and traffic congestion caused by those leaving the island, given little certainty that additional housing would stimulate additional jobs growth in the short term. It is worth noting that:
  - Of the resident workforce on Sheppey, some 57% travel off it for employment. This is a reflection of the poorer availability of local jobs and, to some degree, the levels of new and cheaper housing that has been built. The transport consequences of high levels of commuting are peak time queuing problems on the A2500 (although an upgrade is planned) and at J5 of the M2.
  - The employment site at Neatscourt was first identified in the 1988 Local Plan (with planning permission was granted in 1995), but development at the site did not begin until 2013. Since 1988 the jobs offered by this employment allocation have repeatedly provided justification for housing provision on the Island.

- There is an equivalent issue with regards to Sittingbourne, where the risk is that housing growth in advance of town centre redevelopment will mean that residents become accustomed to driving to other nearby centres.

- In the event that there is an announcement on upgrades to J5 of the M2 it would be some years before it is implemented, leading to severe congestion in the meantime. The Highways Agency currently indicates that growth will not be sustainable beyond 5-8 years, in that the impacts of growth will be ‘severe’ (in terms of Circular 02/2013) and impacts to safety unacceptable. In the meantime, they believe that development levels should be pegged to within acceptable impact levels. Traffic congestion also reflects poorly upon perceptions of Swale as a place for business.

- There are Habitats Regulations Assessment (HRA) considerations, given evidence that points to potential impacts upon the North Kent Marshes Special Protection Area where development is within 6km of access points. Higher growth in the Swale Thames Gateway would lead to risks, although it isn’t possible to define a cut-off quantum of housing above which it would never be possible to mitigate impacts. Current understanding suggests that whilst a higher quantum may be deliverable, the mitigation burden on development would commensurately greater. It is also possible to say that under a higher scenario there is an increased risk that (with the mitigation strategy in place and being monitored) it emerges that housing levels are leading to unmanageable levels of public access, and hence planning authorities have to start turning down planning applications.
In conclusion

12.2.11 The Council believes that a premature commitment to a higher housing target would render the Local Plan undeliverable, and would lead to likely adverse impacts when assessed against the policies in the NPPF taken as a whole.

12.2.12 The Council recognises that to support its economic strategy there is a need for a step-change in housing provision, but the Council’s view is that this should be a focus of a future plan. A decision on a higher growth strategy made within a subsequent plan would likely be made in light of greater certainty around: central Sittingbourne regeneration, employment delivery at West Sheppey; how and when major constraints on the strategic road network will be addressed; and better understanding of longer term development opportunities at the Port of Sheerness and Kent Science Park. More generally, it will be more appropriate to consider committing to a higher growth strategy once economic recovery has progressed and hence development viability increased, enabling the Council to charge higher a CIL rate and hence be in a position to deliver infrastructure upgrades in support of new communities. It is also the case that a labour imbalance / problem with in-commuting is unlikely to arise in the short term (even given progress on some employment allocations and an ageing population) and so in this respect there is no urgent need to deliver additional housing.

12.2.13 On balance, having considered various alternative approaches over the years, the Council is able to come to the conclusion that the preferred approach reflects sustainable development, providing a review of the Local Plan is undertaken once key indicators are triggered.

12.3 Justification for the preferred site allocations

Taking account of the settlement hierarchy

12.3.1 In addition to being allocated in-line with the preferred broad spatial strategy – i.e. the strategy of focusing growth in the Swale Thames Gateway to reflect its status as a national priority area for regeneration, whilst delivering a lower growth strategy at and around Faversham and throughout the Kent Downs AONB – the preferred approach to allocations reflects the following established settlement hierarchy:

1. Main Borough Urban Centre
2. Other Borough Centres
3. Other Urban Local Centres
4. Rural Local Service Centres
5. Other villages with built-up area boundaries
6. The open countryside outside the built-up area boundaries

12.3.2 Development sites are generally allocated in descending order of scale, having regard to the preferred broad strategy. However, there are exceptions.
12.3.3 Aside from Faversham (see discussion of the preferred broad strategy), Sheerness is perhaps the prime example of a settlement that has been allocated less land than its position in the settlement hierarchy (and within the Thames Gateway) would suggest should be the case. Despite being an ‘other urban centre’, Sheerness has no allocated sites due to the fact that it is surrounded by land at risk of flooding.

12.3.4 It is also notable that of the ‘rural local service centres’ only one – Teynham – has the capacity to accommodate a larger scale of growth without harm to the surrounding countryside, although all make modest contributions. Elsewhere within the rural centres at:

- Boughton, although there are some opportunities for development, its setting and the valued European habitats and landscapes around the village constrain its major expansion and limit opportunities to ‘rounding off’.

- Newington, despite its role and level of services, development opportunities are very limited due to the valued and important heritage, landscapes and habitats to the north of the village, poor pedestrian connections between north and south of the village, a restricted internal road network, poor air quality and surrounding high quality agricultural land.

- Iwade, although surrounded by lower quality agricultural land, its opportunities are limited now to those within its confines and where cumulative impacts on settlement separation with Sittingbourne or visual prominence in its exposed northern, eastern and western landscapes would not occur.

- Eastchurch, its open and elevated position within the surrounding landscape and less accessible location to the main centres of population, limit opportunities to minor ‘rounding off’ development aimed at meeting local needs.

- Leysdown, its remote location at the end of a 10km cul-de-sac off the A249 and more major services, makes development opportunities less sustainable and viable unless new development is able to demonstrate considerable investment in local services.

12.3.5 The Strategic Housing Land Availability Assessment (SHLAA) methodology has had a considerable bearing on this preferred approach. In particular, the SHLAA methodology has ensured that only the most ‘accessible’ (i.e. in terms of access to services and facilities) settlements are considered.

Choosing the best sites at locations broadly favoured for growth

12.3.6 As part of plan-making / consultation during 2012 and 2013 the Council considered alternative locations for growth around the settlements identified as potentially suitable for significant expansion:

- Informed by its evidence, in particular its Urban Extensions Landscape Capacity Study 2010, it was concluded for Sittingbourne that the NW and NE sectors of the town were the most accessible and visually contained, whilst its northern, SE and SW sectors raised concerns for landscape impact and continuing settlement separation.

- On Sheppey, the most accessible and environmentally acceptable sites were demonstrated as being at the western ‘triangle’ of settlements formed by Sheerness, Queenborough-Rushenden and Minster/Halfway. This was because of their conjunction with the strategic road/rail network and its concentrations of population, services and employment.

- At Faversham, the town was subject to its own specific options process to examine the most appropriate direction(s) for growth. This concluded (and confirmed by previous SA work) that the eastern expansion of the town was the most appropriate, whilst a specific opportunity to the north west of the town (Oare) could also be achieved sustainably, provided constraints associated with European designated habitats could be addressed.
Making best use of brownfield land and

12.3.7 The preferred approach seeks to allocate land for development which have the least environmental and amenity value, including using previously developed land. Indeed, all previously developed sites within the SHLAA determined as being achievable overall and in accordance with the settlement strategy are allocated. Specifically, some 4,210 dwellings (54%) of the total number of dwellings (inc. windfalls) are set to be delivered at brownfield sites.

12.3.8 Foremost amongst these are the two regeneration areas in central Sittingbourne and at Queenborough-Rushenden which have a close fit with the regeneration agenda of the Thames Gateway. Such areas are not without constraints, notably flood risk. However, the Environment Agency is satisfied that the ‘exceptions test’ required by Government policy can be met, whilst any remaining risk to life from flooding minimised.

Seeking to protect high quality agricultural land

12.3.9 There is insufficient previously developed land, which results in a need to allocate agricultural land. It follows that there is a need to protect high quality agricultural land as far as possible; however, given competing objectives some loss is unavoidable.

12.3.10 Any attempt to avoid loss of high quality agricultural land would likely necessitate development at locations on higher ground on the Isle of Sheppey, at Iwade and on land within the Area of Outstanding Natural Beauty (AONB). However, the allocation of sites in these locations would create a more dispersed pattern of development, with housing in locations with poorer levels of viability and/or in locations with poor access to services, sustainable transport etc. There might also be conflicts with national AONB policy. Some more specific points are as follows:

- In the case of Sheppey, it is acknowledged that some relatively accessible opportunities exist on lower quality agricultural land (SW194 Barton Hill Drive, SW/164 Land at Belgrave Road and SW133 Land East of Scoccles Road), however poor development viability challenges the deliverability of such sites at the present time. Furthermore, the Council’s urban extensions landscape evidence shows that this rolling exposed landscape has a low capacity to accommodate change given its prominence relative to the lower lying marshland areas to the south and the need to ensure settlement separation, especially when considered cumulative with other schemes.

- At Iwade, the presence and use of lower quality agricultural land presents tensions with the protection of a vulnerable and slender width area of open land separating the village with Sittingbourne (see below).

12.3.11 In light of the above discussion, the Council proposes to allocate approximately up to 134 ha of high quality agricultural land, mostly at Sittingbourne, Teynham and Faversham. Generally, sites selected are reasonably well contained by existing development or landform. Examples of this include land at NW Sittingbourne (Policy MU1), Stones Farm (Policy A8), Frognal Lane Teynham (Policy MU3) and Lady Dane Farm, Faversham (Policy MU5).

Ensuring separation between settlements

12.3.12 In making choices over site options, there were issues concerning the separation of villages from the expansion of Sittingbourne. These tensions are present both within the sites allocated for development at NW Sittingbourne and Stones Farm, in some of those identified as deliverable by the SHLAA at Iwade and in other ‘rejected’ SHLAA sites in SE and SW Sittingbourne. The Council has recognised that the weight to be attached to settlement separation issues should be less than for other designated landscapes and as such has limited its concerns to substantial impacts and not minor incremental incursions.
12.3.13 The Council has also made judgements about the cumulative impact of development – a matter not explored by the SHLAA. For example, in the case of Iwade (SW123 and SW183), the cumulative losses of settlement separation, when considered with the allocations at NW Sittingbourne, are judged to be adverse and significant. In this instance, it is the expansion of the higher order settlement at Sittingbourne which has been judged as a greater priority where development can be contained by existing development and landform and where a sustainable community can be achieved. Where inevitable adverse impacts would occur as a result of any proposed allocations, policies identify the mitigation needed to reduce the harm to acceptable levels when judged against the benefits of meeting housing needs.

Making difficult decisions around the non-allocation of sites for housing

12.3.14 Within the above context the Council considers that its choice of allocations can be fully justified. However, some specific commentary is required in respect of certain other non-allocated sites that, whilst performing well in some respects (e.g. in terms of overall accessibility and/or ability to demonstrate some compliance with the settlement strategy) are not judged as bringing the same balance of advantages and lower impacts as allocated sites:

- **SW/413 Perry Court Farm and SW/441 Land west of Brogdale Road, Faversham**: Are similarly accessible as other allocated sites at Faversham and, like Lady Dane Farm, also utilise a significant amount of high quality agricultural land. However, the options process undertaken by the Council demonstrates that its scale and location that challenges the settlement role of Faversham and its character and heritage. This potential release also has greater implications for agricultural land loss and settlement character/heritage/visual amenity in terms of cumulative impacts across other sites in the locality.

- **SW/433 Land at the A2/Western Link and SW/047 Land at London Road/Water Lane, Ospringe**: Like allocated sites, development would involve high quality agricultural land, but, more fundamentally, would be harmful to the rural approaches to the town and the heritage asset setting of Syndale Park, Ospringe and Faversham itself. Development would also challenge air quality objectives in the AQMA at Ospringe.

- **SW/164 Pond Farm, Newington**: Like other allocated sites, it involves a significant amount of high quality agricultural land, but would fundamentally challenge air quality objectives in the AQMA in the centre of the village, whilst being poorly assimilated relative to its facilities and services of the village.

- **SW/407 Land east of Newington**: Like other allocated sites, it involves a significant amount of high quality agricultural land. Whilst its wider visual impacts are reduced by landform, it would challenge air quality objectives in the AQMA in the centre of the village.

- **SW/041 Land at St. Mary’s View Newington**: Like other allocated sites, it involves a significant amount of high quality agricultural land (although it is not currently in agricultural use), but would challenge air quality objectives in the AQMA in the centre of the village, whilst being poorly assimilated relative to its facilities and services. Additionally, the site itself is a UK BAP habitat and is of considerable landscape and visual interest, as well as forming part of the setting to the conservation area and the village. Critically, its access would utilise narrow streets and a severely constrained access to the A2.

- **SW/129 Land at The Bunnybank, Eastchurch**: Although the site is well related to the existing village and its reasonable range of services, its impacts upon the local landscape and character of this part of the village are judged as significant. Eastchurch itself if less accessible to higher order services than settlements further to the west.

- **SW/080 Land east of Love Lane/south of Graveney Road**: Is less accessible than other allocated sites at Faversham due to its scale and distance from the centre of the town. Significant adverse environmental concerns are associated with its scale that include its considerable impacts on the landscape, its incompatibility with the towns small scale character and the loss of high quality agricultural land that is significantly greater than anything else at the town. This scale of growth may also trigger the need for significant and un-programmed transport enhancements to Junction 7 of the M2 with the A2.
• SW/436/437 Land in south west Sittingbourne: Like other allocated sites, it involves a significant amount of high quality agricultural land, however, its visual impacts are not as easily contained. Its scale is significant and would result in a significant erosion of settlement separation between Sittingbourne, Borden and Chestnut Street to the point of rendering that remaining as ineffective in maintaining the character and function of these villages.

• SW/050 Land at Chilton Manor Farm, south east Sittingbourne: Like other allocated sites, it involves a significant amount of high quality agricultural land, however, its visual impacts are not as easily contained. The site is part of a valley designated for its local landscape value. Due to its overall scale, visual impacts would be impossible to assimilate and significant harm to its undeveloped and tranquil valley character would result. Settlement separation with Rodmersham Green would also be significantly eroded.

The allocation of sites for employment

12.3.15 In its choice of employment sites, the Council has again been guided by its settlement strategy, but also by its 2010 Employment Land Review which used a scoring system of assessment, including sustainability criteria. Of the sites submitted to the assessment the top scoring sites have mostly been allocated, some for housing, some for mixed use as well as for stand-alone employment purposes. Some sites were also submitted for housing purposes and were not allocated for reasons already outlined – these considerations would also apply to their development for employment. Many sites were small rural sites where it was considered that general policies in the plan intended to specifically encourage rural employment could more appropriate deal with their smaller scale and more specific circumstances. Others involved the expansion of existing sites – again considered more appropriate for consideration by general Local Plan policies.

12.3.16 Despite their relative conformity with the settlement strategy, three sites – Pheasant Farm West (R3.7), Bobbing Hill (S3.7) and Bobbing Court (S3.9) were not allocated because of their reliance upon rural roads and the need for heavy traffic to move through villages.

12.3.17 The following sites were judged as being far removed from the settlement strategy of the Local Plan (due to their significant scale, remoteness from settlements and other impacts) that they were not allocated and not appraised as reasonable options. They were: Maidstone Road (R3.1), Neptune Orchard, Lower Halstow (R3.10), Hooks Hole, Chestnut Street (R3.13), Lamberhurst Farm, Waterham (R3.16), sites at Waterham (R3.19/20) and Abbey Park, Faversham (F3.7).

In conclusion

12.3.18 With reference to its settlement strategy (developed in-light of alternatives appraisal) and the consideration of site options / alternative locations, the Council strongly believes that it has allocated the most appropriate and overall sustainable sites to deliver required growth.
PART 3: WHAT ARE THE APPRAISAL FINDINGS AT THIS STAGE?
13 INTRODUCTION (TO PART 3)

The SA Report must include:
- The likely significant effects on the environment associated with the draft plan approach; and
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach.

13.1 Overview

13.1.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the Draft (‘Publication’ version) Plan. Part 3 is structured as follows:
- Chapter 16 presents an appraisal of the plan under 15 ‘sustainability topic’ headings
- Chapter 17 discusses overall conclusions and recommendations at this current stage.

13.2 Methodology

13.2.1 The appraisal is structured under 15 sustainability ‘topic’ headings. For each topic a range of sustainability objectives (as identified through scoping) are listed. Taken together, the sustainability topics and objectives provide a methodological ‘framework’ for the appraisal of likely significant effects on the baseline.

13.2.2 Within each sustainability topic chapter ‘significant effects’ of the draft plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect ‘characteristics’ are described within the appraisal as appropriate.

Limitations

13.2.3 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Added structure

13.2.4 To give the appraisal ‘added structure’, in addition to drawing conclusions on the likely effects associated with ‘the draft plan’, stand-alone consideration is given to each the following three ‘elements’ of the Local Plan:
- The spatial strategy / approach to allocations
  - N.B. Whilst some information on the merits of the proposed site allocations is provided here (i.e. within ‘Part 3’), more detail can be found in Appendix IV.
- Core policies
- Development management policies.

13.2.5 Furthermore, under each sustainability topic heading, each policy within the plan is assigned one of the following symbols to indicate broad implications –

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21 Environmental Assessment of Plans and Programmes Regulations 2004
14 APPEARAL OF THE DRAFT LOCAL PLAN

14.1 Air

Relevant sustainability objectives

- Reduce air pollution and ensure air quality continues to improve across the Borough

Appraisal of the preferred ‘strategy’ (ST) policies

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14.1.1 ST2 supports an increase in the population of Swale, which could in turn lead to an increase in vehicle movements and associated pollution. The transport evidence for the plan demonstrates that background traffic growth will affect vehicle movements and pollution.

It is also important to consider the effect of the growth strategy in terms of commuting. The overall 2011 Census context is of a Borough whose out-commuting levels have increased: commuting to Kent districts has increased, and a reliance on car commuting to these destinations is evident; and commuting to London has increased, but it remains the case that most journeys are made by public transport. There is no evidence to assume that high out-commuting will not continue for the foreseeable future, given the structure of the local economy. Indeed, employment growth planned in the sub-region outside of Swale (e.g., the Ebbsfleet and Paramount projects) could further encourage out-commuting. As such, it is appropriate to conclude that the short term effect of not building houses before jobs is positive from a commuting/traffic (and therefore air quality) perspective, but only in so far as the effect will be to prevent a worsening situation. Current out-commuters tend to be most heavily represented in the professional, R&D and office based service sectors which are underrepresented in the Swale economy. They would only be tempted to work more locally if such jobs became more available, and this is not set to happen to a significant extent through the current plan. Provision for this type of employment could happen in the future through another plan, but would involve a major structural change in the local economy. The current plan recognises that longer term economic growth opportunities exist, and does what it can to support their realisation. In terms of in-commuting, this could increase as a result of employment growth being high relative to housing growth. Whilst some employment growth is set to happen in the short term, it is unclear whether there will be a significant effect in terms of in-commuting/traffic (and therefore air pollution). Whilst shortages in labour supply are not predicted in the short term, in the long term – i.e. once all employment growth is realised – there is a significant risk that housing undersupply locally (coupled with an ageing population) could lead to a labour shortage and therefore high levels of in-commuting (resulting congestion and negative effects for air quality). However, the commitment to an early review of the plan (if it transpires that additional homes can and should be delivered locally) negates this concern to a large extent.

14.1.2 ST4 establishes a spatial strategy that involves locating development principally in and around existing larger settlements within the Borough including Sittingbourne, the Isle of Sheppey and Faversham areas. There is an emphasis on growth at the Thames Gateway towns. This is likely to ensure that the majority of new development is in close proximity to existing key services and facilities, which could lead to the reduction in the need for people to travel in the Borough and could therefore help to reduce air pollution generated from new development.

14.1.3 ST5 (Sittingbourne) expects development here (including at the village of Newington) to be consistent with local air quality action plans for Newington High Street, St. Paul's Street and East Street in Sittingbourne, which are locations of Air Quality Management Areas (AQMAs). The A2 through Ospringe is also subject to an AQMA; and this is an issue that is assigned a criteria in ST7 (Faversham).
14.1.4 **A12** (Land at the Western Link Faversham) requires developers to provide an air quality assessment. Development is expected to respond to the air quality action plan for the AQMA and achieve no detrimental air quality effect. Similarly **MU4** (Oare Gravel Workings) expects development to minimise adverse transport impacts in-light of the Ospringe AQMA.

**Appraisal of the preferred ‘core’ (CP) policies**

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14.1.5 **CP1** has potentially uncertain effects as the policy supports locating development adjacent to the strategic and primary road networks but there is no reference to ensuring sustainable modes of transport are encouraged.

14.1.6 **CP2** (Promoting sustainable transport) identifies the importance of locating new development in appropriate locations to minimise the need to travel between homes and employment, shopping, community facilities. It also emphasises the need to ensure development is located close to public transport links to encourage a modal shift from a reliance on the private car. Both these measures could contribute towards reducing the negative effects of vehicle usage upon air quality.

14.1.7 Other policies similarly seek to minimise car use. **CP4** aims to retain and create green corridors for pedestrian and cyclists to and within developments, making prudent use of landscape features, increasing biodiversity, tree cover and green infrastructure amenity to local environments.

**Appraisal of the preferred ‘development management’ (DM) policies**

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14.1.8 Development management policies are expected to help avoid negative impacts on the local air quality baseline. **DM6** (Managing Transport Demand and Impact) requires development proposals to demonstrate that development opportunities for sustainable modes of travel have been taken up and to integrate air quality management into the location and design of access. Proposals are also required to demonstrate that they do not worsen air quality to an unacceptable degree. **DM20** supports development proposals on previously developed land which incorporate renewable, decentralised and low carbon energy as integral to new commercial or residential schemes, reducing emissions while producing energy locally. **DM7** (Vehicle Parking) and **DM19** (Sustainable Design and Construction) encourage a high standard of design which will incorporate facilities to encourage sustainable modes of travel such as cycling. **DM4** and **DM14** also encourage this and improved public transport. **DM7** (Gypsy and Traveller sites) expects proposals to cause no significant harm to the health and well-being of occupants or others by impacting air quality.
Appraisal of the draft plan ‘as a whole’

14.1.9 The level of development proposed in Swale over the plan period will lead to an increase in vehicle movements, and in turn is unlikely to contribute to improved air quality. The quantum of housing growth proposed relative to employment growth also gives rise to issues, as it has a bearing on levels of commuting by car. The preferred strategy performs well (relative to the alternative approach of following a higher housing growth strategy) in that problems of increased out-commuting will be avoided; and whilst there could potentially be problems as a result of increased in-commuting in the long term, the commitment to an early plan review negates this concern to a large extent.

14.1.10 The spatial strategy directs development towards existing larger settlements, where there will be the greatest potential to walk / cycle / use public transport on a daily basis, as opposed to relying on the private car. Policies relating to allocations close to existing Air Quality Management Areas (AQMAs) expect development brought forward to demonstrate they would not increase pollution at these locations.

14.1.11 On balance, it is not anticipated that the plan will lead to significant negative effects, particularly given that there will be the potential to review the plan in the future if it transpires that there is a mismatch of housing and employment locally.
14.2 **Biodiversity**

**Relevant sustainability objectives**

- Conserve and enhance biodiversity and the natural environment

**Appraisal of the preferred ‘strategy’ policies**

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14.2.1 **ST1** (Delivering sustainable development in Swale) recognises the need to conserve and enhance the natural environment by protecting designated biodiversity and seeks to secure net biodiversity gain as part of new development.

14.2.2 **ST2** supports an increase in the population of Swale, although there is no reason to suggest that this in itself gives rise to concern from a biodiversity perspective. **ST4** establishes a spatial strategy that avoids development within internationally and nationally designated biodiversity sites; however, given the location of these sensitive sites in relation to existing settlements, there are ‘pathways’ by which growth could potentially lead to negative effects. This has been a focus of Habitats Regulations Assessment (HRA), with the final HRA Report recommending a number of enhancements to mitigation policy, and concludes that if these recommendations are taken on-board then the plan will have ‘no likely significant effect’ on internationally important wildlife sites. A particular focus of consideration within the HRA Report is the potential for effects – including as a result of **MU4** (Oare Gravel Workings site) and **MU2** (land at North East Sittingbourne) – on the Swale SPA/Ramsar and Medway Estuary SPA/Ramsar Site. Potential impact ‘pathways’ in relation to this site are: Disturbance (other than through recreation) and proximity effects; Recreational pressure; Loss of supporting habitat; Air quality; and Water quality (sewage treatment). A number of recommendations for policy enhancements are made, and the conclusion reached that: “… once the recommended amendments to the Local Plan have been made, it will be possible to conclude that an adequate policy framework is in place within the Local Plan to enable a conclusion of no likely significant effect.” Other sites that are considered within the HRA Report are: the Outer Thames Estuary SPA, for which an adequate policy framework is in place within the Local Plan to enable a conclusion of no likely significant effect; the Queendown Warren SAC; and the Blean Complex SAC. With regards to the latter two sites, since the main population centres of Swale Borough lie outside the probable core recreational catchments it is considered that no likely significant effect will arise as a result of the Swale Local Plan either alone or in combination with other projects and plans.

14.2.3 HRA considerations aside, the locations for growth proposed under **ST4** will result in the need to develop greenfield sites around settlements - including Sittingbourne, the Isle of Sheppey and Faversham – and in turn could result in negative impacts to biodiversity.

**Appraisal of the preferred ‘core’ policies**

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14.2.4 **CP2** supports the delivery of transport infrastructure in the Borough which could have negative effects on biodiversity, e.g. through use of waterways and air quality impacts resulting from traffic generation. It is however recognised that development management policies are expected to mitigate impacts upon biodiversity and secure net gains.
14.2.5 The effect of the Core Policies overall will be to conserve the Borough’s biodiversity by avoiding development that would impact on designated biodiversity areas directly, and minimising recreational impacts. Policies also seek net biodiversity gains / enhancements as part of development schemes. **CP7** (Natural environment and green infrastructure) and **CP4** (Good design) in particular, promote this proactive approach.

**Appraisal of the preferred ‘development management’ policies**

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14.2.6 A number of the development management policies support the achievement of biodiversity conservation objectives. **DM28** specifically aims to provide for net gains in biodiversity where possible. The policy sets out the weight to be given to protecting designated sites from development which is proportionate to their importance. **DM14** also aims to conserve and enhance the natural environment, whilst **DM30** supports proposals that contravene planning policies for the protection of the countryside where this can bring significant biodiversity and landscape enhancements, particularly within Biodiversity Opportunity Areas.

14.2.7 Other development management policies support the protection of valued landscapes (**DM13**), which are also valued for their biodiversity, and biodiversity habitat such as trees and hedges (**DM29**). Provision of open space and recreational facilities (**DM17** as part of new development and the protection of local green spaces (**DM18**) could also help to reduce recreational pressure on sensitive biodiversity areas close to development sites. Sustainable design (**DM19** and **DM36**) can also provide green infrastructure and biodiversity benefits. **DM20** sets out to ensure that renewable energy schemes (eg. solar PV arrays) do not foreclose opportunities to enhance biodiversity.

14.2.8 The Swale and Medway Estuary and Marshes SPA and Ramsar sites are at risk from sea level rise and coastal squeeze; hence **DM5** (Holiday parks) **DM22** (The Coast) and **DM23** (Coastal Change Management Area) are important. These policies should ensure that new development protects biodiversity in the coastal environment, and limit development within the coastal change management area.

**Appraisal of the draft plan ‘as a whole’**

14.2.9 The strategic policies set a framework for significant levels of growth in the Borough within sensitive locations, including in close proximity to internationally important sites; however the plan’s strategic, core and development management policies incorporate various measures to protect and enhance biodiversity, aiming to achieve biodiversity gain. A proactive approach is certainly in place, but it is not clear that significant positive effects on the baseline will result. Factors other than the Local Plan will have a major bearing on the biodiversity baseline, including decisions made at the planning application stages.
14.3 Climate Change

Relevant sustainability objectives

- Minimise the need for energy, increase energy efficiency and to increase the use of renewable energy;
- Encourage sustainable construction materials and methods

Appraisal of the preferred ‘strategy’ policies

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14.3.1 ST1 (Delivering sustainable development in Swale) specifically seeks to meet the challenge of climate change through design, locating development to maximise reductions in greenhouse gas emissions, integrating green infrastructure, the expansion of renewable energy and adapting to climate change by managing coastal change and flood risk.

14.3.2 ST2 supports a balance of housing / employment growth which has implications for commuting patterns. This is discussed in detail above, under the ‘Air quality’ heading, with the overall conclusion reached that negative effects will not be significant (given that a plan review would be triggered in time to prevent major issues of in-commuting in the future) and that the preferred approach performs relatively well in comparison to the alternative approach (a higher housing growth strategy, which would encourage out-commuting). From a climate change perspective, there is a need to minimise commuting by car, as this will have a major bearing on per capita carbon emissions.

14.3.3 ST4 establishes a spatial strategy that seeks to focus growth principally in and around existing larger settlements (Sittingbourne, Faversham, Queenborough and Rushenden) in close proximity to existing key services and facilities. There is an emphasis on growth at the Thames Gateway towns. In combination with other policies that encourage the use of sustainable modes of transport, the strategy is therefore expected to contribute to mitigating climate change by reducing per capita transport-related CO₂ emissions.

14.3.4 Potential improvements to public transport, measures to encourage walking and cycling and sustainable design are also proposed as part of a number of policies allocating locations for development. A1 (North West Sittingbourne) and A2 (Land at North East Sittingbourne) also encourage sustainable energy generation at these locations in accordance with the Council’s Renewable Energy Study. Regen2 (Queenborough and Rushenden) also encourages a neighbourhood combined heat and power scheme to be considered as part of mixed use development in this area.

Appraisal of the preferred ‘core’ policies

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14.3.5 CP2 (Promoting sustainable transport) identifies the importance of locating new development in appropriate locations to minimise the need to travel between homes and employment, shopping, and community facilities. It also emphasises the need to ensure development is located close to public transport links to encourage a modal shift from a reliance on the private car. Both these measures are expected to contribute positively towards reducing greenhouse emissions generated by new development. Housing and health related policies (CP3, CP4, CP5) support these principles.
14.3.6 **CP4** seeks to maximise opportunities for including sustainable design and construction techniques in development proposals, including the use of recycled and recyclable materials, sustainable drainage systems, carbon reduction and minimising waste.

14.3.7 In terms of contributing towards the achievement of climate change adaptation over the plan period, **CP7** and **CP8** focus on the importance of protecting and enhancing the green infrastructure network and areas of biodiversity and landscape value within the Borough.

Appraisal of the preferred ‘development management’ policies

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14.3.8 **DM19** (Sustainable design and construction) and **DM20** (Renewable and low carbon energy) aim to increase water and energy efficiency as part of new development and increase the amount of decentralised, low-carbon and renewable energy sources by expecting development proposals to be well designed. **DM14** is a criterion based policy for development proposals that also expects proposals to respond positively to meeting the challenge of climate change, flooding and coastal change.

14.3.9 **DM19** expects development to meet recognised design standards depending upon the type and size of development, which would incorporate a number of measures to mitigate and adapt to climate change impacts. **DM20** looks to exploit opportunities highlighted in the Borough’s Energy Opportunities map, in particular the delivery of district heating.

14.3.10 **DM21-23** seek to manage the coast and flood risk areas in accordance with national policy. These policies are expected to assist with adapting to the effects of climate change in the longer term. While **DM25** (Separation of settlements) retains strategic countryside gaps in light of development pressure to contain sprawl and further car dependence.

Appraisal of the draft plan ‘as a whole’

14.3.11 The balance of housing / employment growth has implications for commuting patterns, as discussed in detail above, under the ‘Air quality’ topic heading. From a climate change perspective, there is a need to minimise commuting by car, as this will have a major bearing on per capita carbon emissions. The headline conclusion is that negative effects will not be significant (given that a plan review would be triggered in time to prevent major issues of in-commuting in the future) and that the preferred approach performs relatively well in comparison to the alternative approach (a higher housing growth strategy, which would encourage out-commuting).

14.3.12 In terms of supporting renewable energy and ‘sustainable design and construction’, policy measures are in place; however, the spatial strategy limits the potential to recognise opportunities somewhat given viability issues associated with locations in the Thames Gateway. As such, it is not possible to conclude that the plan will result in significant positive effects in this respect.
14.4 Crime and Safety

Relevant sustainability objectives

- Reduce crime and anti-social behaviour and the fear of these

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Appraisal of the preferred ‘strategy’ policies

14.4.1 ST1 (Delivering sustainable development in Swale) and the development area based policies do promote the delivery of good design and ensuring the vitality of town centres which could deliver safer environments as part of new development. Otherwise, the spatial strategy is not expected to directly affect crime, the fear of crime or rates of anti-social behaviour.

Appraisal of the preferred ‘core’ policies

14.4.2 CP3 (Delivering a wide choice of high quality homes) expects housing development to incorporate design measures which will ensure safe and accessible environments that should help to minimise the fear of crime and crime incidents. CP5 (Promoting healthy communities) also aims to create social interaction and safe environments through mixed uses and the design and layout of development. CP4 (Requiring good design) promotes the use of design to create a safer built and natural environment, making safe connections physically and visually both to and within developments, particularly through using landscape design and open space to retain and create green corridors for pedestrians, cyclists and biodiversity.

Appraisal of the preferred ‘development management’ policies

14.4.3 Development management policies promote design and other measures which are expected to deliver safer environments including safe and secure cycle parking (DM7) and safe connections and security (DM14). Indirectly, DM1 is also expected to deliver safer environments through maintaining and enhancing the vitality of town centres.

Appraisal of the draft plan ‘as a whole’

14.4.4 A small number of policies proposed in the revised draft Local Plan are expected to have positive effects with respect to discouraging crime, anti-social behaviour and the fear of crime however these effects are not expected to be significant and overall the plan is expected to have neutral effects in terms of this sustainability objective.
14.5 Cultural heritage

Relevant sustainability objectives

- Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage

Appraisal of the preferred ‘strategy’ policies

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14.5.1 ST1 (Delivering sustainable development in Swale) aims to conserve and enhance the historic environment by applying national policy to heritage assets. It seeks to ensure the identification, assessment and positive integration of assets. The Borough has a number of historic areas, buildings and features reflecting its rich maritime history, industrial archaeology and roman and medieval legacies. Some buildings of heritage value are on local and national buildings ‘at risk’ registers.

14.5.2 ST2 supports an increase in the population of Swale, although there is no reason to suggest that this in itself gives rise to concern from a heritage perspective. ST4 steers development to locations in and adjacent to existing settlements, in particular Sittingbourne, which is relatively unconstrained. A relatively low growth approach is followed at Faversham, although the scale of growth is significant – from a heritage perspective – nonetheless.

14.5.3 ST5 (Sittingbourne), ST6 (Isle of Sheppey) and ST7 (Faversham) all expect new development to deliver effective heritage protection and enhancement measures, including in relation to the distinctive character of town and countryside. Policies allocating locations for development also incorporate, where relevant, heritage protection and enhancement measures. These include A2 (Land south of Kemsley Mill), which expects heritage asset enhancements; and MU4 (Oare Gravel Workings) which requires the numerous heritage assets on site to be further assessed and integrated. Policies allocating sites within and adjacent to existing settlements, particularly those seeking to regenerate areas of Sittingbourne and Queenborough and Rushenden, also recognise the need to identify, consider and appropriately respond to any heritage assets present.

Appraisal of the preferred ‘core’ policies

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14.5.4 Although CP1, CP2, CP3 and CP6 promote development and infrastructure needed to deliver the growth strategy which could have potential negative effects on heritage, it is recognised that a number of other plan policies seek to safeguard, protect, and enhance these assets. CP1 does identify the re-use of heritage assets at a ‘priority location’; also the promotion of tourism development under this policy has the potential to have indirect positive effects on heritage assets. Furthermore, CP3 requires new housing development to achieve sustainable and high quality design that responds to local context, which could historical context.

14.5.5 CP7 and CP8 seek to protect and enhance Swale’s historic landscape and assets through conservation, preservation, management and enhancement. In particular, CP8 identifies the importance of development proposals bringing heritage assets back into use through regeneration and town centre enhancement, especially where assets are risk. CP4 requires that all development be of a high quality design sympathetic to its surroundings / the context and the defining characteristics of the area. This policy promotes development that reinforces local distinctiveness and retains features where they contribute to the historic value of the site.
14.5.6 A number of development management policies support the conservation and enhancement of the Borough’s built and cultural heritage: These include:

- **DM3** and **DM9** require proposals for development in rural areas to result in no significant harm to the historical character of the area;
- **DM10** expects Gypsy and Traveller sites to result in no significant harm to the natural or built environment that cannot be adequately mitigated;
- **DM14** (General development criteria) expects proposals to conserve and enhance the historic environment;
- **DM19** provides protection to the historic context of sites from inappropriate construction techniques and development relating to energy efficiency and reducing waste and carbon;
- **DM20** supports the development of renewable and low carbon energy sources that avoid and mitigate harm from areas of heritage value;
- **DM22** seeks to enhance coastal heritage and provide protection, enhancement and management of the coastal landscape and seascape;
- **DM24** seeks to conserve and where appropriate enhance both designated and non-designated landscapes;
- **DM25** supports the retention of the individual character and setting of settlements through the safeguarding of important Local Countryside Gaps between Sittingbourne and its satellite villages, Upchurch and the administrative boundary with Medway Council, and settlements on Western Sheppey.
- **DM28** requires development proposals to apply national policy with regards to conserving aged or veteran trees; and ancient woodland; and
- **DM29, DM32, DM33, DM34, DM35, and DM36** provide protection to trees which make an important contribution to the historic conservation of a site or its surroundings; seek to preserve Listed Buildings except where case can be made for alteration (or demolition); expect development within Conservation Areas to preserve or enhance all features that contribute to the area’s special character or appearance; preserve Scheduled Ancient Monuments and Archaeological Sites and Historic Parks and Gardens and protect their settings; and conserve the local historic character of areas of high townscape value.

**Appraisal of the draft plan ‘as a whole’**

14.5.7 Whilst the scale of growth envisaged gives rise to the potential for negative effects on sensitive heritage assets, the decision to follow a relatively low growth strategy at Faversham is a positive. Site specific policies, core policies and development management policies together put in place a policy framework that should ensure effects are avoided and mitigated as far as possible, and opportunities realised to plan for heritage conservation alongside growth and regeneration. **Significant positive effects** are predicted.
14.6 Employment and skills

Relevant sustainability objectives

- 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

Appraisal of the preferred ‘strategy’ policies

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14.6.1 ST1 (Delivering sustainable development in Swale) expects development proposals to ensure the vitality of town centres, attract inward investment through expansion of local firms, secure growth in biosciences and technology and support the rural economy.

14.6.2 ST2 identifies a job target of 7,053 over the period which, on average, would involve 353 jobs created each year. This is set to ensure a level of employment growth above recent baseline levels, albeit still below pre-recession levels. The plan is that growth locally should lead to a situation whereby the Borough’s current employment sites are maintained, whilst new sites are delivered that increase choice and meet the needs of particular economic sectors. The draft policy also provides flexibility to deliver further employment opportunities as it includes a mechanism for the Council to review the plan should the 5 year past trend of ‘B’ class net employment completions exceed 24,000 sq m per annum.

14.6.3 The quantum of growth planned for housing is not, however, based on objectively assessed demographic or economic need identified in the Council’s SHMA, and as such may not support the increases in the local labour supply required to deliver the proposed employment growth. This could result in negative effects upon the achievement of employment objectives in the long term, particularly given an ageing population.

14.6.4 ST4 identifies the amount and distribution of new floorspace to come forward at new allocations. The policy focuses new employment allocations predominantly at Queenborough/Rushenden and Sittingbourne in accordance with the Thames Gateway growth area ambitions, as well as at Faversham and Teynham.

14.6.5 The spatial strategy in relation to housing is set to support employment objectives. The regeneration of urban areas could provide opportunities for populations in deprived areas of the Borough to acquire new skills.

14.6.6 ST5 seeks to ensure the vitality of Sittingbourne town centre, provision of key services and the development of areas such as Milton Creek which would help to improve the attractiveness of the town for future employment opportunities. Development adjacent to Sittingbourne proposed under A1 and A2 could also encourage further expansion of highly skilled jobs and help towards reducing out-commuting currently experienced in the Borough.

14.6.7 ST6 seeks to enhance Sheerness town centre, regenerate areas of Queenborough/Rushenden and also deliver expanded schools and libraries.

14.6.8 ST7 seeks to provide employment opportunities through some new sites and the neighbourhood plan at Faversham Creek as well as support appropriate economic development in rural areas.
Appraisal of the preferred ‘core’ policies

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14.6.9 **CP1** (Building a strong and competitive economy) supports high and stable levels of employment, and seeks to increase skills and educational achievement levels across the Borough. Regarding upskilling, the policy supports proposals which encourage educational facilities or an expansion of vocational learning and the development of links between educational institutions and work as well as work based learning. It seeks to deliver growth in the pharmaceutical and science sectors (i.e. high skilled sectors), as well as growth in the tourist industry which could provide new opportunities particularly on the Isle of Sheppey. In addition, the policy aims to deliver a balanced supply of employment opportunities across existing employment sites and as part of new provision at Sittingbourne, Faversham and the Isle of Sheppey and through safeguarding existing sites and allocations.

14.6.10 Other core policies, in particular **CP2** (Sustainable transport) **CP4** (Good design) and **CP6** (Community facilities and services to meet local needs) indirectly support maintaining employment levels by delivering health benefits, encouraging development with locally distinctive built and natural forms and infrastructure to support employment development.

Appraisal of the preferred ‘development management’ policies

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14.6.11 **DM3** supports the sustainable growth and expansion of business and enterprise in rural areas. This provides a steer for delivering appropriate development in rural areas and provides criteria for development brought forward in tourism and leisure and agricultural and forestry sectors, key parts of the Borough’s rural economy. This is therefore likely to support new employment opportunities within Swale’s rural economy. **DM1** and **DM2** seek to maintain and enhance the vitality and viability of town centres and encourage new retail and leisure development, which will also help to attract new investment and therefore create employment. Other policies relating to transport (**DM6**) and housing (**DM8, DM9 and DM12**) are also likely to contribute positively in terms of attracting employers.

Appraisal of the draft plan ‘as a whole’

14.6.12 A fairly ambitious employment growth strategy is set to be followed, and the decision to follow a low housing growth strategy is unlikely to constrain economic growth in the short term. In the long term there is the potential for growth to be constrained by a lack of labour supply, although the draft plan mitigates risk by establishing a mechanism for reviewing the plan should it materialise that there is the need/opportunity to allocate more land for housing. The decision to focus growth within the Thames Gateway is a positive, given the established opportunities that exist. Employment led regeneration in the Thames Gateway is expected to support an up-skilling of the population in the long-term. **Significant positive effects** are predicted.
14.7 Health

Relevant sustainability objectives

- Improve health and well-being and reduce inequalities

Appraisal of the preferred ‘strategy’ policies

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14.7.1 ST1 (Delivering sustainable development in Swale) commits to promoting healthy communities to deliver the social, recreational and cultural facilities and services needed.

14.7.2 ST2 supports an increase in the population of Swale, which could in turn place pressure on health infrastructure. CP5 (Infrastructure) and other area based policies will help towards achieving the delivery of appropriate infrastructure including health facilities to support development.

14.7.3 ST4 establishes a spatial strategy that locates new development principally in and around existing larger settlements within the Borough including Sittingbourne, the Isle of Sheppey and Faversham areas, with a focus on facilitating regeneration in the Thames Gateway. This is expected to tackle health inequality and deprivation locally, and should help to ensure that the majority of new development is in close proximity to existing key services and facilities, including health and recreational facilities.

14.7.4 ST5-ST7 include a range of requirements for new development in these areas which encourage the provision of open space and green spaces, encourage sustainable modes of transport, promote the vitality of towns, encourage regeneration and ensure local air quality is not worsened. Policies allocating locations for development are also expected to deliver benefits in combination with Core policies and Development Management policies. All of the main housing allocations highlight the need for increased capacity at local GP surgeries at Faversham, Teynham and North West Sittingbourne to accommodate new residents; and provide new public footpaths and cycle routes which will increase opportunities to exercise.

Appraisal of the preferred ‘core’ policies

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14.7.5 CP5 (Promoting healthy communities) is expected to have significant positive effects on health in the Borough. The policy protects community services and facilities and supports provision of open space, sport and recreation facilities. It also seeks to ensure design of new development delivers health benefits and ease of access to a healthy food supply. The requirement for Health Impact Assessments for certain developments, in particular within Swale’s most deprived wards, is likely to ensure that health inequalities are addressed.

14.7.6 CP2 (Promoting sustainable transport) seeks improvements to health by encouraging walking, cycling and a reduction in private car use which could help to improve local air quality. CP4 (Requiring good design) enhances the qualities of the existing environment, creating safe green infrastructure for pedestrians and cyclists. The enhancement and protection of green infrastructure through CP7 and CP8 is also likely to indirectly support improvements to health by providing further recreational facilities.
### Appraisal of the preferred ‘development management’ policies

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#### 14.7.7
Development management policies are also likely to have positive effects upon health by encouraging sustainable modes of transport, good design, protection and provision of open space, sports and recreational facilities as part of new development, promoting urban regeneration and reducing impacts of development upon local air quality. DM17 specifically seeks to protect and provide, as part of new development, open space, sports and recreational facilities in accordance with need; and DM18 aims to protect local green spaces including those of recreational value. DM6 (Transport) requires development proposals to demonstrate that opportunities for sustainable modes of travel have been taken up and to integrate air quality management considerations into decisions on location and design of access. DM7 (Vehicle Parking) and DM19 (Sustainable Design and Construction) encourage a high standard of design, and hence should encourage sustainable modes of travel such as cycling and help to reduce fuel poverty in line with DM20. Policies DM2 and DM14 encourage similar measures, whilst DM1 seeks to ensure the vitality of town centres.

#### 14.7.8
DM10 (Gypsy and Travellers sites) expects proposals to cause no significant harm to the health and well-being of occupants or others.

#### Appraisal of the draft plan ‘as a whole’

#### 14.7.9
Various components of the draft plan are set to contribute to the achievement of health objectives, either directly or indirectly. The spatial strategy is set to support regeneration in the Thames Gateway, whilst thematic and site specific policies are in place to capitalise on opportunities around access to open space and recreational facilities, encouraging cycling and walking and sustainable design. However, it is noted that issues of development viability in the Thames Gateway mean that the decision to focus growth here will result in limited funds available to spend on community infrastructure. On this basis, it is not possible to conclude significant positive effects.
14.8 Housing

- Provide affordable and decent housing adaptable to future needs of the community

Appraisal of the preferred ‘strategy’ policies

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14.8.1 ST1 (Delivering sustainable development in Swale) expects development proposals to deliver a wide choice of high quality homes in light of local demography and economic aspirations. It specifically supports the vitality of rural communities, with a focus on meeting identified housing needs in these locations in accordance with the settlement role.

14.8.2 ST2 aims to ensure employment opportunities for the Borough’s future population; however the housing target currently does not reflect objectively assessed need (but instead reflects expected deliverability in light of past trends). It is recognised that ST2 does provide a mechanism for review, with the trigger being the 5 year past trend of average net housing completions exceeding 600 dwellings per annum.

14.8.3 ST4 establishes a spatial strategy that supports development predominantly in urban areas, but also smaller scales of growth in rural areas, thereby supporting communities across the Borough. The decision to follow a relatively low growth strategy at Faversham is not thought to have negative implications from a housing perspective.

14.8.4 ST5-ST7 set out the strategy for different areas of the Borough. Along with policies allocating locations for development, ST5-ST7 provide a range of sites to encourage a good housing mix; and are also set to encourage pitch provision for the Gypsy and Traveller community on larger sites. These policies also support smaller scale growth in rural communities to assist with sustaining these communities.

Appraisal of the preferred ‘core’ policies

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14.8.5 CP3 (Delivering a wide choice of high quality homes) is a key core policy which can assist positively with delivering affordable and decent housing for the local community. The policy seeks to provide housing at locations in accordance with the preferred settlement hierarchy but particularly focussed on allocated sites, windfall sites, town centres and within deprived communities. The policy provides support to proposals which respond to the issues of local housing market areas, including rural areas. Further, the policy aims to deliver housing to meet the requirements of specific groups of the local population including families, older persons, ethnic groups including Gypsies and Travellers and the disabled. It also promotes high quality design of new homes and supports proposals which bring vacant homes back into use and up to Decent Homes standard.

14.8.6 CP4 (Requiring good design) promotes development proposals that provide a mix of uses, built forms, tenures and densities, and that have flexibility to respond to changes in lifestyle.
Appraisal of the preferred ‘development management’ policies

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14.8.7 DM8 (Affordable housing) seeks to deliver affordable housing as part of new development and provide a mix of affordable/social rented and intermediate housing. The policy expects housing to, where possible, be designed to Lifetime Standards with a proportion (to be agreed with developers) provided for wheelchair users.

14.8.8 DM9 (Rural exceptions housing) sets out criteria for development proposals in order to address rural needs. To maintain provision in the longer term the policy requires proposals to be subject to legal agreements which provide permanent control and management of this affordable housing.

14.8.9 DM10 (Gypsy and Travellers sites) aims to deliver pitches on sites allocated for housing where they are above a particular threshold. Where it can be demonstrated that the site would not be suitable for pitches developers can agree funding for pitch provision. There remains some uncertainty regarding delivery in practice, though if a 5 year land supply needs to be demonstrated then the policy states the Council will allocate and grant permission for separate sites.

14.8.10 DM20, DM14 and DM15 seek high standards of design, whilst DM19 identifies the need to provide development which is adaptable to change over the long term. DM14 and DM15 seek high standards of accessibility and inclusion so that all potential users can use development safely and easily. They also expect development to be designed so that it is flexible in responding to future changes in lifestyle.

Appraisal of the draft plan ‘as a whole’

14.8.11 The draft plan establishes a low housing growth strategy, i.e. one that will not meet objectively assessed needs. On this basis, significant negative effects are predicted. It is recognised, however, that there may not be an alternative approach that could feasibly be pursued, given viability / deliverability issues. It is also noted that a clear mechanism is in place to trigger an early review of the plan, should monitoring demonstrate the potential to increase housing supply locally. As such, it is possible to conclude that negative effects will be relatively short term.

14.8.12 Viability considerations also dictate that in some parts of the Borough the Council will be unable to require that developments deliver affordable housing alongside market housing. A mechanism will be put in place to mitigate effects – whereby some affordable housing provision can be ‘commuted’ from more viable areas to less viable areas – although significant problems of access to affordable housing will result nonetheless.
14.9 Landscape

Relevant sustainability objectives

- Protect and enhance the valued landscape and townscape of Swale

Appraisal of the preferred ‘strategy’ policies

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14.9.1 ST1 (Delivering sustainable development in Swale) seeks to manage development by steering growth to locations in accordance with the settlement strategy; and protect and enhance landscapes (in particular the Kent Downs Area of Outstanding Natural Beauty, AONB), landscape quality more generally and open space.

14.9.2 ST2 supports an increase in the population of Swale, although there is no reason to suggest that this in itself gives rise to concern from a landscape perspective. ST4 establishes a spatial strategy that involves development at settlements commensurate to their existing characteristics and the potential for negative effects on landscape. By focusing the largest scale of growth in the main town of Sittingbourne, and following a relatively low growth approach at Faversham, the spatial strategy avoids important landscape areas such as the AONB present in the south of the Borough. Rural Local Service Centres are a focus of lower scales of development, with only limited infill development and, exceptionally, appropriate modest development at the edges of the built up area boundaries, elsewhere. However, it is recognised that the strategy involves some development on greenfield land as urban and village extensions that could result in negative effects on areas identified as having low capacity for change (Swale Urban Extension Landscape Capacity Study) or identified as being locally important (notably ‘Areas of High Landscape Value’).

14.9.3 ST5 (Sittingbourne), ST6 (Isle of Sheppey) and ST7 (Faversham) all incorporate measures that highlight the importance of maintaining the separation and distinctiveness of towns and villages. Policies allocating land for development largely avoid sites designated for their landscape interest and most require the mitigation of any adverse impact on the landscape. Some of the larger allocations may improve landscape by introducing features of interest. For example, MU2 (Land at North East Sittingbourne) requires landscape enhancements given the adjacent Special Protection Area. Similarly, MU1 (North West Sittingbourne) requires a large area of open space to be provided including a continuous buffer along the A249. Whilst some policies allocate land within landscapes of low or moderate capacity for change and/or Areas of High Landscape Value, these policies do recognise constraints and make provision for mitigation including through open space provision.

Appraisal of the preferred ‘core’ policies

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14.9.4 CP1 and CP2 promote economic development and the provision of transport infrastructure which could have negative effects on landscape. However it is recognised that a number of development management policies seek to safeguard, protect, and enhance designated and non-designated landscapes and implement good design. CP3 promotes use of landscaping and habitat creation to support biodiversity and contribute to the Local Natural Assets and Green Infrastructure Strategy.

14.9.5 CP4 requires proposals to enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and responding to the landscape character, condition,
sensitivity and any limitations arising from its overall capacity for change. Guidelines set out within the Landscape Character and Biodiversity Assessment and Guidelines and Urban Extension Landscape Capacity Study are to be adhered to with development to provide hard and soft landscaping that is locally distinct and that responds positively to local character.

14.9.6 CP5 seeks to provide open space, sport and recreation opportunities in accordance with the Local Natural Assets and Green Infrastructure Strategy, whilst CP6 and CP7 seek to protect and enhance Swale’s green and historic infrastructure.

Appraisal of the preferred ‘development management’ policies

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14.9.7 Various development management policies in the plan, including DM24, DM28, DM30, DM31 and DM17, are proactive in terms of safeguarding, protecting and enhancing designated and non-designated landscapes, areas of geological and biological conservation, best and most versatile agricultural land providing open space, sports and recreation provision.

14.9.8 The plan makes provision, in certain, ‘exceptional’ circumstances for development, including residential development, in rural areas (DM9 and DM10) but expects development to ensure there are no significant adverse impacts upon settlements and the surrounding countryside. Renewable and low carbon energy (DM20) schemes may also have the potential for negative effects for landscape and townscape character if design measures produce development forms not appropriate to their setting; however as part of this policy, development would need to avoid adverse impacts that would significantly conflict with other policies of the plan such as the protection of valued landscape. Effects would also be mitigated by other development management policies including DM14, DM15 and DM33.

14.9.9 The character and distinctiveness of rural areas and the coast is recognised and addressed through DM11, DM13, DM22, DM26, and DM27. The plan also supports development which enables landscape and biodiversity enhancement in the countryside where this is needed (DM30).

14.9.10 Other policies seek to protect landscape features such as trees and hedgerows (DM27) and the landscape character of historic parks and gardens (DM35) and Areas of High Townscape Value (DM36). Policies seeking good design as part of new development and alterations to existing development (DM20 and DM16) are also likely to result in positive effects with respect to protecting local landscape and townscape.

Appraisal of the draft plan ‘as a whole’

14.9.11 Whilst the scale of growth envisaged gives rise to the potential for negative effects on landscape, the spatial strategy – both broad and at the scale of individual settlements – seeks to minimise effects as far as possible, including through avoiding locations where development would impact on designated landscapes. Site specific policies, core policies and development management policies together put in place a policy framework that should ensure effects are avoided and mitigated as far as possible. Significant negative effects are unlikely.
14.10  Local economy

Relevant sustainability objectives
- Sustain economic growth and competitiveness

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14.10.1  ST1 (Delivering sustainable development in Swale) sets out to build a strong competitive economy by delivering a range of employment sites, attracting inward investment through the expansion of local firms and also securing growth in biosciences and technology. ST1 also supports the rural economy, seeks to ensure the vitality of town centres and seeks to secure the infrastructure needed to support economic growth and competitiveness.

14.10.2  ST2 identifies a job target of 7,053 over the plan period which on average would involve 353 jobs created each year. This is a fairly ambitious economic growth strategy, as discussed above under the ‘Economy and employment’ topic, and it is not expected that the decision to follow a relatively low housing growth strategy will constrain the economy (given the commitment to an early plan review if necessary).

14.10.3  The preferred spatial distribution of housing and employment growth (ST4) will support regeneration objectives, and hence support development of a locally skilled workforce. However, loss of high grade agricultural land has negative implications. According to Experian economic forecasts only 270 people are in full time employment in the agricultural sector, but this is unlikely to include seasonal/temporary workers and the forecasts expect employment in the sector to grow.

14.10.4  ST5 and related policies allocating locations for development seek to ensure the vitality of Sittingbourne town centre, provision of key services and the development of areas such as Milton Creek, continual expansion of the existing employment sites and new supply of office space as part of mixed use development within and adjacent to Sittingbourne. Rural employment provision as part of a mixed use extension to Teynham is also supported.

14.10.5  ST6 seeks to enhance Sheerness town centre, regenerate areas of Queenborough/Rushenden and the Trinity Road area, and also support and diversify the existing tourism offer on the Isle of Sheppey.

14.10.6  ST7 seeks to safeguard, diversify and expand the tourism focus of the area and provide employment opportunities through some new sites and the neighbourhood plan at Faversham Creek. The policy also supports appropriate economic development in rural areas.

Appraisal of the preferred ‘core’ policies

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14.10.7  CP1 (Building a strong and competitive economy) is the principal policy in terms of achieving this as its primary aim is to strengthen economic development in the Borough. The policy supports proposals for office and industrial development in accordance with the spatial strategy. It promotes growth in tourism, pharmaceutical and science sectors, retail and leisure, and low carbon sectors. Growth in some of these sectors could reduce the current problem of out-commuting (understood to stand at approximately 17% of the working population). It also supports proposals which stabilise floorspace loss within manufacturing,
which has recently declined in the Borough, helping to ensure Swale’s competitive strengths are capitalised upon. The policy’s supporting text suggests manufacturing floorspace could diversity into higher value manufacturing, logistics and distribution and environmental sectors. In addition, CP1 aims to deliver a balanced supply of development sites across existing employment sites, as part of new provision at Sittingbourne, Faversham and the Isle of Sheppey and through safeguarding existing sites and allocations. The policy also supports the rural economy, through proposals which create new markets and greater resilience in the agricultural/woodland/forestry sectors, therefore helping to a diverse economy overall.

14.10.8 CP2 (Promoting sustainable transport) assists with the delivery of key infrastructure needed for economic development; whilst other core policies (e.g. CP4 - Quality design) are likely to have indirect positive effects by creating attractive and quality environments.

### Appraisal of the preferred ‘development management’ policies

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14.10.9 DM1 and DM2 seek to maintain and enhance the vitality and viability of town centres and encourage new retail and leisure development. This could have secondary positive effects by making the Borough’s town centres more attractive for businesses in other sectors wishing to make new investment, potentially service and finance sectors.

14.10.10 DM3 supports the sustainable growth and expansion of business and enterprise in rural areas. Furthermore, DM5 (Holiday parks) and DM22 (The coast) could assist managed growth in the tourism sector in coastal areas by supporting appropriate development in this area.

14.10.11 Policies relating to transport (DM6) and housing (DM8, DM9) are also likely to contribute positively by providing the necessary infrastructure to support economic development. Further, DM20 (Renewable and low carbon energy) and DM19 (Sustainable Design and Construction) could bring positive benefits through supporting the low carbon sector.

### Appraisal of the draft plan ‘as a whole’

14.10.12 A fairly ambitious employment growth strategy is set to be followed, and the decision to follow a low housing growth strategy is unlikely to constrain economic growth in the short term. In the long term there is the potential for growth to be constrained by a lack of labour supply, although the draft plan mitigates risk by establishing a mechanism for reviewing the plan should it materialise that there is the need/opportunity to allocate more land for housing. The strategy is focused on key sectors and locations, where there are identified opportunities for growth. Significant positive effects are predicted.
14.11 Population

Relevant sustainability objectives

- Meet the challenges of a growing and ageing population
- Reduce poverty and social exclusion
- Improve accessibility for all to key services and facilities

Appraisal of the preferred ‘strategy’ policies

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14.11.1 ST1 (Delivering sustainable development in Swale) expects development proposals to support a strong and competitive economy, ensure the vitality of town centres, deliver high quality homes and provide social, recreational and cultural facilities needed to support local communities. Pockets of high deprivation exist within the Borough predominantly in the main towns but also rural areas, particularly western wards on the Isle of Sheppey. With regard to the causes of deprivation, education / skills, employment and income are key factors.

14.11.2 ST2 supports employment and housing growth that will support employment opportunity and regeneration; however, the level of housing growth proposed does not reflect objectively assessed needs. It is therefore not anticipated to support the forecast population increase, household growth resulting from an ageing population or the workforce needed to deliver the proposed economic growth. The Borough’s population is expected to grow and age between 2011-2031 placing pressure on housing supply and potentially reducing the working age population in the Borough. To mitigate risks, ST2 allows for a review of the plan should the 5 year past trend indicate average net housing completions exceed 600 dwellings per annum.

14.11.3 ST4 establishes a spatial strategy that is likely to result in positive effects with respect to the delivery of regeneration, particularly in the deprived areas of Sheppey and Sittingbourne, including by prioritising the redevelopment of previously developed land and supporting improved access to services and facilities. The preferred strategy is also anticipated to assist with reducing social exclusion, including on the basis that provision is made for Gypsy and Traveller pitches within and adjacent to existing settlements and therefore co-located with key services and facilities.

14.11.4 ST5 seeks to ensure the vitality of Sittingbourne town centre, provision of key services and the development of Milton Creek. ST6 supports proposals which would enhance Sheerness town centre and regenerate the Trinity Road area, as well as areas of Queenborough/Rushenden. As such, the policy is expected to reduce poverty in the most deprived areas of the Borough. It also encourages proposals which would implement measures to reduce deprivation and deliver social and community infrastructure in Sheppey. ST7 refers to improving levels of deprivation in Davington and East Down wards of Faversham and increased capacity in infrastructure and services at these locations.

Appraisal of the preferred ‘core’ policies

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14.11.5 CP1 (Building a strong and competitive economy) supports employment and seeks to increase skills and educational achievement levels across the Borough. This policy is thus expected to assist with reducing levels of deprivation associated with education, skills and employment.
14.11.6 **CP3** (High quality homes) seeks to deliver housing to meet the requirements of specific groups of the local population including families, older persons, ethnic groups including Gypsies and Travellers and the disabled. This policy also promotes high quality design of new homes and supports proposals which bring vacant homes back into use and up to Decent Homes standard. This policy is therefore expected to reduce fuel poverty.

14.11.7 **CP5** (Healthy communities) protects community services and facilities and supports provision of open space, sport and recreation facilities as well as a number other measures to ensure design of new development delivers health benefits and provides ease of access to a healthy food supply. This policy is expected to help reduce deprivation particularly in Sittingbourne, Faversham and areas of the Isle of Sheppey.

14.11.8 To assist with the delivery of key services to support new development and improve accessibility, **CP4** (Good design) and **CP2** (Sustainable transport) seek to secure measures to facilitate access, while providing for a mix of tenures and densities that are future proofed in order to respond to future changes in use, lifestyle, and demography. The enhancement and protection of green infrastructure through **CP7** and historic green infrastructure under **CP8** are also likely to deliver improvements to health which could in turn help to reduce deprivation.

### Appraisal of the preferred ‘development management’ policies

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14.11.9 **DM3** supports rural communities by encouraging proposals which promote the rural economy; whilst **DM8** (Affordable housing) and **DM9** (Rural exceptions housing) seek to deliver affordable housing needs of the local community both in urban and rural areas and provide for the Gypsy and Traveller community. **DM10** (Provision for Gypsies and Travellers) aims to deliver pitches for this local community group as part of larger housing allocations. Co-locating housing and pitch provision is expected to reduce the social exclusion of the Gypsy and Traveller community.

14.11.10 **DM17** specifically seeks to protect and provide, as part of new development, open space, sports and recreational facilities in accordance with need and **DM18** protects local green spaces across the Borough for the local community. Further, **DM6** (Managing Transport Demand and Impact) aims to deliver improvements to access. Finally, high standards of design in development which could alleviate fuel poverty currently experienced in areas of the Borough are encouraged by **DM14, DM16 and DM19**.

### Appraisal of the draft plan ‘as a whole’

14.11.11 The spatial strategy sets out to secure regeneration at Sittingbourne and on the Isle of Sheppey, and hence should contribute to addressing existing issues of relative deprivation. Support for employment growth and town centre vitality in these locations should mean that new communities can develop that are ‘sustainable’ in the sense that there is good potential to access services, facilities and employment locally; however, it is noted that viability issues may mean that delivery of sufficient community infrastructure is a challenge. It is possible to conclude significant positive effects; however, there are uncertainties, hence careful monitoring of plan implementation will be important.
Relevant sustainability objectives

- Protect and enhance soil quality and reduce contamination

Appraisal of the preferred ‘strategy’ policies

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14.12.1 **ST1** (Delivering sustainable development in Swale) expects development proposals to apply national policy in respect of pollution, despoiled, degraded, derelict, contaminated, unstable and previously developed land. It also expects developers to prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'. ST1 also requires developments to conserve and enhance the natural environment by taking into account the benefits of the best and most versatile agricultural land by steering significant levels of development to lower quality areas where compatible with the preferred spatial strategy and in addressing flood risk, climate change and coastal change. The Borough’s geology means that it has one of the highest proportions of high quality agricultural land in the UK.

14.12.2 **ST4** establishes a spatial strategy that involves greenfield locations given that there is an insufficient supply of previously developed sites to deliver the strategy. Given the majority of the land surrounding the principal towns of Sittingbourne and Faversham is high grade agricultural land this is expected to result in the loss of some of this resource in these areas. There is limited evidence to determine the overall effect that loss of high grade agricultural land will have on the national resource.

14.12.3 Policies allocating locations for development (**A1, A2, and MU3**) include some locations on high grade agricultural land; however, the Council has identified some of these are contained by urban development and are not in agricultural use. Other policies (**MU4, A14, A13 and NP1**) do also recognise some sites are contaminated and expect new development to make these sites safe from contamination.

Appraisal of the preferred ‘core’ policies

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14.12.4 Given the need to develop greenfield land to deliver housing, economic development and infrastructure in the Borough and the presence of high grade agricultural land surrounding the principal settlements of Sittingbourne and Faversham, it is likely that policies **CP1-CP3** could lead to negative effects with regards to the loss of high quality soil. Mitigation of these effects is expected to be provided by development management policy, including **DM31 (Agricultural land)** which seeks to safeguard best and most versatile agricultural land. It is also noted that **CP3**, with regards to windfall sites, states that the Council will support development except where the site’s character, local context or environmental value determines otherwise. This suggests protection would be afforded to high grade agricultural land in these circumstances.

14.12.5 **CP7** and **CP8** conserve the Borough’s natural and historic environment and are therefore expected to also contribute positively to the achievement of protecting and enhancing soil quality, as well as reducing contamination through the regeneration of historic sites.
Appraisal of the preferred ‘development management’ policies

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14.12.6 **DM31 (Agricultural Land)** is the key development management policy with respect to protecting the Borough’s soil quality. The policy sets out that development will only be permitted on agricultural land where there is an overriding need which cannot be met on land within the built up boundaries. The policy also seeks to safeguard best and most versatile agricultural land (specifically Grades 1, 2 and 3a) unless it meets specific criteria which include ‘the site being allocated for development by the Local Plan, there being no alternative site on land of a lower grade than 3a; or the use of lower grade land would significantly and demonstrably work against the achievement of sustainable development; and the development will not result in the remainder of an agricultural holding becoming not viable’.

14.12.7 Other development management policies of the plan which could potentially protect soil quality and enhance soil quality include **DM20**, which ensures development of renewable and low carbon energy sources minimise impacts on geology, soil and flood risk; **DM28** which specifically aims to ensure development proposals will conserve, enhance and extend biodiversity, providing for net gains in biodiversity where possible; and **DM30** which supports proposals that contravene planning policies for the protection of the countryside where this can bring significant biodiversity and landscape enhancements.

14.12.8 **DM3 (Rural economy)** expects new development in rural areas to first consider reuse of existing buildings or development of other previously developed land unless they are not available or the location supports the needs of rural communities or the active and sustainable management of the countryside. This policy also protects the interests of the agricultural sector which could also have an indirect effect on protecting high grade agricultural land.

14.12.9 **DM25 (Separation of settlements)** safeguards the open and undeveloped character of areas by maintaining important local countryside gaps, preventing the encroachment and piecemeal erosion by built development to the rural open character of strategic contained settlements and open countryside.

Appraisal of the draft plan ‘as a whole’

14.12.10 The spatial strategy involves allocating substantial areas of best and most versatile agricultural land. On this basis it is appropriate to conclude **significant negative effects**. However, it is recognised that there is probably no ‘alternative’ approach that could be taken that would perform any better. Previously developed land is limited, and whilst lower quality agricultural land is available on the Isle of Sheppey the potential to allocate these sites for development is severely constrained by viability considerations and also other sustainability considerations.
14.13 Transport and accessibility

Relevant sustainability objectives

- Promote traffic reduction and encourage more sustainable alternative forms of transport

Appraisal of the preferred ‘strategy’ policies

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14.13.1 ST1 (Delivering sustainable development in Swale) highlights the importance of supporting town centre vitality, and also establishes the need for development proposals to be in-line with the Swale transport strategy.

14.13.2 ST2 supports a balance of housing / employment growth which has implications for commuting patterns. This is discussed in detail above, under the ‘Air quality’ topic heading, with the overall conclusion reached that negative effects will not be significant (given that a plan review would be triggered in time to prevent major issues of in-commuting in the future) and that the preferred approach performs relatively well in comparison to the alternative approach (a higher housing growth strategy, which would encourage out-commuting). From a ‘transport and accessibility’ perspective, there is a need to minimise commuting by car given capacity issues at major junctions.

14.13.3 ST4 establishes a spatial strategy that locates new development principally in and around existing larger settlements within the Borough including Sittingbourne and Faversham. This is likely to ensure that the majority of new development is in close proximity to existing key services and facilities, thereby reducing the need for people to travel.

14.13.4 A transport study has recently been completed that involved modelling the traffic impacts of the preferred strategy. The conclusion is reached that the current congestion issues experienced at specific locations will be exacerbated and would require some form of mitigation; however, the network as a whole will not grind to a halt.

14.13.5 ST5-ST7 promote the provision of public transport and support walking/cycling, as well as road schemes. Potential improvements to public transport and measures to encourage walking and cycling are also proposed as part of policies allocating locations for development. Policies indicating locations for development also incorporate a number of road access improvements identified as being necessary for the proposed developments.

Appraisal of the preferred ‘core’ policies

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14.13.6 CP1 has potentially uncertain effects as the policy supports locating development adjacent to the strategic and primary road networks but there is no reference to ensuring sustainable modes of transport are encouraged at these locations. This would however be addressed by CP2 and other policies.
14.13.7 **CP2** (Promoting sustainable transport) identifies the importance of locating new development in appropriate locations to minimise the need to travel between homes and employment, shopping, community. It also emphasises the need to ensure development is located close to public transport links (for example bus, rail, cycling and walking infrastructure) to encourage a modal shift from a reliance on the private car. This is expected to encourage the use of public transport and reducing the need to travel in the Borough over the plan period. Other policies (CP3, CP4 and CP5) support these principles.

14.13.8 **CP2** also supports the implementation of transport infrastructure as part of new development (both sustainable forms of transport and private car transport infrastructure); and supports the greater use of waterways for commercial traffic where this would not have an unacceptable adverse environmental impact.

**Appraisal of the preferred ‘development management’ policies**

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14.13.9 Positive effects upon the transport and accessibility sustainability objective are expected through **DM6** (Managing transport demand and impact), which would apply to new development proposals. This policy requires development proposals to demonstrate that opportunities for sustainable modes of travel have been taken up and expects environmentally acceptable improvements to the transport network to be implemented where capacity issues arise. It also expects the location, design and layout of development proposals to prioritise the needs of pedestrians and cyclists, including the disabled; integrate access to public transport; ensure existing public rights are retained / created where appropriate; and on major developments include facilities for charging plug-in and other ultra-low emission vehicles. The policy also safeguards usable wharfage or rail facilities from being lost to new development.

14.13.10 **DM7** (Vehicle parking) and **DM19** (Sustainable design and construction) encourage a high standard of design which will incorporate facilities to encourage sustainable modes of travel such as cycling. **DM2** and **DM14** also encourage this and improved public transport.

**Appraisal of the draft plan ‘as a whole’**

14.13.11 The scale of growth envisaged will involve increased traffic on the roads; however, modelling work has not indicated that major junctions will reach capacity. It is noted that the spatial strategy will limit the burden on J5 of the M2, with a view to minimising capacity issues until such time as the national roads programme can address the problems.

14.13.12 Modelling work will have taken account of the potential for the spatial strategy to support increased walking / cycling and use of public transport, but will not have assumed that all opportunities will be capitalised upon. The site specific and thematic policies within the plan are ambitious in this sense, although in practice it may transpire that viability considerations mean that investments in transport infrastructure are slow to materialise, if they materialise at all. It is also the case that there is a ‘low baseline’ of public transport usage / high car dependency, which means that a significant modal shift will be difficult to achieve. On this basis it is not possible to conclude significant positive effects.
14.14 Waste

Relevant sustainability objectives

- Achieve the sustainable management of waste

Appraisal of the preferred ‘strategy’ policies

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14.14.1 ST1 (Delivering sustainable development in Swale) does encourage good design and the use of national building standards. Other strategy policies promote development that will increase the Borough's population and economic activity locally, with the effect that construction, municipal, commercial and industrial waste arisings will increase locally; however, it is not clear that any issues will arise in terms of waste management. Planning for infrastructure to manage waste arisings is dealt with primarily by Kent County Council under a separate plan.

Appraisal of the preferred ‘core’ policies

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14.14.2 CP3 and CP5 seek to achieve high standards of sustainable construction as part house building and therefore has the potential to increase the re-use of materials while reducing waste during construction. CP6 promotes collaborative working with other organisations to identify and address any deficiencies in infrastructure. This includes discussing requirements for waste management infrastructure, the development of which, could help ensure disposal of waste material (where required) in accordance with the waste hierarchy.

Appraisal of the preferred ‘development management’ policies

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14.14.3 DM19 (Sustainable Design and Construction) expects development to use materials and techniques which reduce waste. DM19 also expects development to promote waste reduction and recycling, it is not clear how this would be implemented to help to achieve the sustainable management of waste as part of new development.

Appraisal of the draft plan ‘as a whole’

14.14.4 The plan is unlikely to create any issues in terms of the potential for waste arising to be managed sustainably. Policies encourage sustainable construction, which will reduce waste arisings from this sector; and there is also some policy encouragement for delivering waste management facilities as part of housing developments. Effects are likely to be minor.
14.15 **Water**

Relevant sustainability objectives

- Manage and reduce the risk of flooding;
- Maintain and enhance water quality (ground and surface) and make efficient use of water.

Appraisal of the preferred ‘strategy’ policies

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14.15.1 **ST1** (Delivering sustainable development in Swale) expects development in the Borough to apply policy within the Coastal Change Management Area and apply national policy with respect to flood risk on land around the estuary and from streams, drainage and groundwater. With regards to water, the policy expects development to efficiently use natural resources and apply national policy with respect to pollution and contamination which is expected to assist in protecting water supply and quality.

14.15.2 **ST2** supports an increase in the population of Swale, which could have negative implications from a water resources perspective. The Council has identified that Southern Water and South East Water’s existing Water Resource Management Plans demonstrate that although there may be stresses in the longer term supplies in the area, the expected growth and the timing of this is not expected to present impossible difficulties in terms of water supply and quality given investment already being made and long term planning.

14.15.3 **ST4** establishes a spatial strategy that steers development to the main settlements in the Borough. Areas of flood risk have been avoided wherever possible (e.g. with Sheerness allocated less land than its position in the settlement hierarchy would suggest should be the case, with growth instead directed elsewhere within The West Sheppey Triangle), although it has not been possible to avoid such areas entirely given the need to focus growth at certain areas in order to achieve wider socio-economic and environmental objectives. **ST5, ST6 and ST7** all reference the need to take into account flood risk constraints.

14.15.4 Policies allocating locations for development affected by flood risk include **MU1** (Land North West of Sittingbourne) and **MU4** (Oare Gravel workings site). Where flood risk has been identified policies expect development proposals brought forward to address this constraint through appropriate management and mitigation and some of the locations support regeneration and therefore are expected to meet the NPPF’s Exception Test requirements. The Council has also confirmed that consultation with the Environment Agency with regards to these locations has confirmed no major issues.

14.15.5 In terms of Waste Water Treatment Works capacity, there are issues at Teynham; as such **ST5 and MU3** identify the need to address this as part of new development coming forward.

Appraisal of the preferred ‘core’ policies

<table>
<thead>
<tr>
<th>Policy</th>
<th>CP1</th>
<th>CP2</th>
<th>CP3</th>
<th>CP4</th>
<th>CP5</th>
<th>CP6</th>
<th>CP7</th>
<th>CP8</th>
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<tbody>
<tr>
<td>Broad Implications</td>
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14.15.6 **CP1** which promotes economic development expects development to create resilience in existing businesses to forecast changes in flood risk, climate change and natural processes and supports development in the low carbon sectors. Similarly, **CP3** seeks to achieve high standards of sustainable design as part of house building and therefore has the potential to ensure water efficiency measures are incorporated as part of new development.
14.15.7 **CP4** maximises opportunities for the delivery of sustainable drainage systems with development proposals, which will manage and reduce the risk of localised flooding. Furthermore, **CP7** is likely to help manage the risks to those in vulnerable areas such as from surface water flooding by providing for green infrastructure.

**Appraisal of the preferred ‘development management’ policies**

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<tr>
<td><strong>Broad Implications</strong></td>
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14.15.8 **DM21** (Water, flooding and drainage) seeks to consider development in accordance with the NPPF and its supporting Technical Guidance which aims to steer development to areas at least risk of flooding and ensure site specific flood risk assessments are carried out. The policy requires these assessments to identify where necessary flood alleviation and defence measures and developers should submit details of suitable warnings and emergency plans to be provided to ensure flood risk is managed in areas at risk. The policy calls for drainage measures to be considered in the planning and design of new development and use SuDS where possible. The supporting text refers developers to the SuDS Design and Best Practice Manual and also highlights the need to consider the impact on the historic environment. This approach to drainage of new development is expected to protect and could potentially improve the quality of the Borough’s receiving water courses and groundwater which have in the past had a poor ecological status.

14.15.9 **DM21** also expects developers to seek agreement with the relevant water company to demonstrate that there will be adequate water supply and waste water connection and treatment facilities for new development before construction commences.

14.15.10 **DM22** (The Coast) and **DM23** (Coastal Change Management Area) provide a policy framework for managing the coastal zone from inappropriate development across the plan period and also relocating development out of areas at risk which supports the management of flood risk.

14.15.11 **DM19** (Sustainable Design and Construction) expects new development to incorporate water efficiency measures and protect water quality, with some new development expected to meet recognised design standards.

14.15.12 **DM1** (General development criteria) and **DM20** (Renewable and low carbon energy) expect proposals to respond positively to meeting the challenge of flood risk and coastal change.

**Appraisal of the draft plan ‘as a whole’**

14.15.13 Areas of flood risk have been avoided wherever possible, although it has not been possible to avoid such areas entirely given the need to focus growth at certain areas (the main towns) in order to achieve wider socio-economic and environmental objectives. Policy measures are in place to ensure that flood risk is mitigated through masterplanning and design measures as far as possible. Given that efforts have been made to avoid flood risk and that residual risk will be mitigated, significant negative effects are not predicted.
CONCLUSIONS AND RECOMMENDATIONS AT THIS CURRENT STAGE

15.1 Conclusions

15.1.1 The scale of growth proposed has negative implications for the achievement of environmental objectives given the sensitivities that exist locally; however, other than with respect to ‘high quality agricultural land’ (c. 134 ha of which is set to be lost, despite the plan seeking to maximise redevelopment opportunities on brownfield land as part of Thames Gateway regeneration schemes) it is not thought that effects will be ‘significant’. The spatial strategy goes some way to avoiding negative effects, given a focus on main towns and a weighting of growth towards the Thames Gateway, and a detailed policy framework is in place to guide planning applications (albeit some policy requirements, most notably around sustainable design and construction, have been softened due to ‘viability’ concerns). With regards to ‘heritage’, significant positive effects are predicted given that A) the decision has been taken to follow a relatively low growth approach at Faversham, which is particularly sensitive; and B) the policy framework in-place should ensure that historic assets are protected and enhanced as part of development schemes.

15.1.2 The potential for the plan to support reduced car dependency and longer journeys by car is obviously a key environmental issue, given the need to address poor air quality locally as well as reduce CO₂ emissions. The spatial strategy directs development towards existing larger settlements, where there will be the greatest potential to walk / cycle / use public transport, as opposed to relying on the private car, which is a positive; however, another factor is the quantum of housing growth proposed relative to quantum (and nature) of employment growth, as this has a bearing on levels of commuting by car. As a result of decision to avoid delivering housing in advance of jobs, the effect of the plan will be to avoid a worsening of the current out-commuting trend, and whilst in-commuting could potentially become a problem in the future these concerns are negated by the fact that a mechanism is in place to trigger an early plan review should it transpire that additional housing can and should be delivered to achieve a balance of labour supply and employment opportunities locally.

15.1.3 Finally, in terms of environmental considerations, it is important to consider flood risk. Areas of risk have been avoided wherever possible (e.g. with Sheerness allocated less land than its position in the settlement hierarchy would suggest should be the case, with growth instead directed elsewhere within The West Sheppey Triangle), although it has not been possible to avoid such areas entirely given the need to focus growth at certain areas in order to achieve wider socio-economic and environmental objectives. Policy measures are in place to ensure that flood risk is mitigated through masterplanning and design measures as far as possible.

15.1.4 In terms of socio-economic objectives, the first point to note is that the draft plan establishes a low housing growth strategy, i.e. one that will not meet objectively assessed needs. In addition, relatively low requirements for affordable housing delivery are set to be imposed on developers. It is recognised, however, that there may not be an alternative approach that could feasibly be pursued, given viability / deliverability issues. It is also noted that a clear mechanism is in place to trigger an early review of the plan, should monitoring demonstrate the potential to increase housing supply locally.

15.1.5 A fairly ambitious employment growth strategy is set to be followed, and it is difficult to conclude that the decision to follow a low housing growth strategy will constrain economic growth significantly, given the potential for an early plan review (which could allocate additional land for housing and hence increase the local labour supply). The decision to focus growth within the Thames Gateway is a positive, given the established opportunities that exist in key sectors. Employment led regeneration in the Thames Gateway is expected to support an up-skilling of the population in the long-term, and should also contribute to the achievement of wider health and regeneration objectives. Support for employment growth and town centre vitality in these locations should mean that new communities can develop that are ‘sustainable’ in the sense that there is good potential to access services, facilities and employment locally; however, it is noted that viability issues may mean that delivery of community infrastructure is a challenge.
15.2 Recommendations

15.2.1 No recommendations remain outstanding at this current stage, although readers will note that ‘Part 4’ (below) lists a number of monitoring indicators that will be important from an SA perspective, in-light of the appraisal findings presented above.

15.2.2 Numerous recommendations have been made in the past, i.e. as part of the appraisal of earlier, working draft versions of the plan. These recommendations are re-produced in Appendix V, along with an explanation of how they have been ‘actioned’, i.e. how they are reflected in the current version of the plan.
PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?
16 INTRODUCTION (TO PART 4)

The SA Report must include:

- Measures envisaged concerning monitoring

16.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

17 PLAN FINALISATION AND ADOPTION

17.1.1 Once the period for public representations on the ‘Publication’ version of the plan has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the Plan (and the summary of representations received) will be submitted for Examination. The Council may also submit a schedule of proposed modifications to the plan. If this is the case, then the SA Report will be updated to reflect the plan as modified. It may be appropriate to update the SA Report for submission in any case, to reflect the most up-to-date evidence base (e.g. to reflect issues raised through representations).

17.1.2 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan’s soundness or identifying the need for modifications. If the Inspector identifies that modifications to the Plan are necessary, these would be developed (possibly with SA input) before being published for consultation. An SA Report Addendum would be published alongside.

17.1.3 Once found to be ‘sound’ the Plan will be formally adopted by the Council. At the time of Adoption a ‘Statement’ must published that sets out (amongst other things) ‘the measures decided concerning monitoring’.

18 MONITORING

18.1.1 At the current stage – i.e. in the SA Report - there is a need to present ‘a description of the measures envisaged concerning monitoring’. Table 18.1 lists a short selection of monitoring indicators that are recommended given the findings of the appraisal presented above, in Part 3. These indicators could help to monitor the success of the plan, i.e. the degree to which implementation is capitalising on opportunities and minimising adverse effects.

**Table 18.1: Monitoring indicators**

<table>
<thead>
<tr>
<th>Sustainability topic / objective(s)</th>
<th>Suggested monitoring indicators</th>
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<tbody>
<tr>
<td>Air</td>
<td>• New designations of Air Quality Management Areas (AQMA)</td>
</tr>
<tr>
<td></td>
<td>• Frequency of air pollution standards violations</td>
</tr>
<tr>
<td>Biodiversity</td>
<td>• % of SSSI in favourable and unfavourable condition</td>
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<tr>
<td></td>
<td>• Locally important habitats (BAP priority habitats) created</td>
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<td></td>
<td>• Amount of new habitat created by new development</td>
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<td></td>
<td>• Functioning of the green grid (indicators to be developed with partners)</td>
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<tr>
<td>Climate change</td>
<td>• Renewable / low carbon energy installations</td>
</tr>
<tr>
<td></td>
<td>• Per capita fossil fuel consumption, and emissions of greenhouse gases</td>
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<td></td>
<td>• Development achieving sustainable design and construction standards</td>
</tr>
<tr>
<td>Crime and Safety</td>
<td>• Crime statistics</td>
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<td></td>
<td>• Fear of crime</td>
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<tr>
<td>Cultural Heritage</td>
<td>• Buildings on the national and local lists of heritage at risk</td>
</tr>
<tr>
<td>Sustainability topic / objective(s)</td>
<td>Suggested monitoring indicators</td>
</tr>
<tr>
<td>-----------------------------------</td>
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<tr>
<td>Employment and Skills</td>
<td>Employment by occupation to show stability in manufacturing, increased employment in retail, leisure, office and B1a use class activity</td>
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<tr>
<td></td>
<td>Change in Annual average wage</td>
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<td></td>
<td>Economic activity and economic inactivity</td>
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<td></td>
<td>Education qualifications to indicate improvements</td>
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<tr>
<td>Health</td>
<td>Life expectancy at birth</td>
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<td></td>
<td>Health deprivation</td>
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<td></td>
<td>Provision of new open spaces within the Borough</td>
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<tr>
<td>Housing</td>
<td>Average house price relative to average income</td>
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<tr>
<td></td>
<td>Affordable housing completions</td>
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<td></td>
<td>Change in number on the housing register</td>
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<td></td>
<td>% homes not meeting the decent home standard</td>
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<td></td>
<td>Number of homes constructed to lifetime homes standards</td>
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<tr>
<td>Landscape</td>
<td>Changes in landscape character area conditions</td>
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<td></td>
<td>Improvement/ decline in condition of the AONB as monitored by the Joint Advisory Board of the AONB</td>
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<tr>
<td>Local economy</td>
<td>Change in number of businesses (VAT registered)</td>
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<td></td>
<td>Jobs density (number of jobs filled to working age population) as indicator of greater levels of employment being achieved locally by locally living people</td>
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<td>Amount of floor space developed for employment by type</td>
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<td></td>
<td>Employment land lost to other uses</td>
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<tr>
<td></td>
<td>Economic activity/inactivity/employment/unemployment to indicate change</td>
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<tr>
<td></td>
<td>Town centre vacancy rates to show reductions</td>
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<tr>
<td>Population</td>
<td>Population profile (age structure, ethnicity etc.)</td>
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<tr>
<td></td>
<td>% of new development completed in Rural Local Service Centres</td>
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<tr>
<td>Soil</td>
<td>Percentage of completions on development on Previously Developed Land</td>
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<tr>
<td></td>
<td>Average land use densities on permitted housing sites</td>
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<tr>
<td></td>
<td>Amount of best and most versatile agricultural land (grades 1, 2, 3a) lost to significant scales of development</td>
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<tr>
<td></td>
<td>Planning permissions requiring remediation</td>
</tr>
<tr>
<td>Transport and accessibility</td>
<td>Method of travel to work, distance travelled, car ownership (where data outside Census is available)</td>
</tr>
<tr>
<td>Waste</td>
<td>N/a</td>
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<tr>
<td>Water</td>
<td>Levels of water quality</td>
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<td></td>
<td>Water consumption per capita</td>
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<td></td>
<td>Dwellings at risk of flooding and consents contrary to EA advice on flooding</td>
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<td></td>
<td>Implementation of SuDs with a focus on water quality as well as flood risk</td>
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<td></td>
<td>Waste water treatment capacity</td>
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**APPENDIX I: REGULATORY REQUIREMENTS**

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 lists the information that must be included in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below ‘interprets’ Schedule 2 requirements.

### Annex 1

#### The report must include...

1. An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.
3. The environmental characteristics of areas likely to be significantly affected.
4. Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.
6. The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.
8. An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

#### Interpretation

1. An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.
2. Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.
3. The relevant environmental protection objectives, established at international or national level.
4. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.
5. The environmental characteristics of areas likely to be significantly affected.
6. Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.
7. Key environmental problems / issues and objectives that should be a focus of appraisal.
8. The likely significant effects associated with the draft plan.
9. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan.
10. A description of the measures envisaged concerning monitoring.
APPENDIX II: CONTEXT REVIEW

Chapter 7 presents an overview of the sustainability context by listing key context messages understood from a review of the National Planning Policy Framework (NPPF). The aim of this Chapter is to present further context messages, i.e. messages understood from a review of Plans Policy Strategies and Initiatives (PPSIs) other than the NPPF. The review is structured under the sustainability ‘topic’ headings introduced in Chapter 4, above.

Air quality

Internationally established objectives

The European Union (EU) Air Quality directive 2008/50/EC22 on Ambient Air Quality and Cleaner Air for Europe came into force in 2008 replacing EU Framework Directive (96/62/EC), its associated Daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC, and the Council Decision 97/101/EC, with a single legal act. These limit values are binding on the UK and have been set with the aim of avoiding, preventing or reducing harmful effects on human health and on the environment as a whole. The UK National Air Quality Strategy was initially published in 2000, under the requirements of the Environment Act 1995. The most recent revision of the strategy sets objective values for key pollutants, as a tool to help local authorities manage local air quality improvements in accordance with the EU Air Quality Directives. Some of these objective values have subsequently been laid out within The Air Quality (England) Regulations 2000 and later amendments.

National context

The Air Quality Strategy23 sets out plans to improve and protect air quality in the UK. It considers ambient air quality only, leaving occupational exposure, in-vehicle exposure and indoor air quality to be addressed separately. The strategy sets health-based objectives for nine main air pollutants24. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.

Given the rapid development of climate change focused policy since the publication of the Air Quality Strategy, additional guidance has been published on the synergies between these two issues.25 In particular, it notes the potential for additional health benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low-carbon vehicles and renewable energy.

Biodiversity

Internationally established objectives

The EU Sustainable Development Strategy26, adopted in 2006, includes an objective to halt the loss of biodiversity by 2010. More recently at the European level, a new EU Biodiversity Strategy27 was adopted in May 2011 in order to deliver on the established Europe-wide target to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.

National context set by Government

The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was prepared as a response to the UK’s failure to halt and reverse the decline in biodiversity by 2010. It was also a response to the Natural Environment and Rural Communities Act, which stresses that biodiversity should be viewed as a core component of sustainable development, underpinning economic development and

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24 Benzene; 1,3-butadiene; carbon monoxide (CO); lead; nitrogen dioxide (NO2); ozone; particles (PM10); sulphur dioxide (SO2); and polycyclic aromatic hydrocarbons.
prosperity and offering a range of benefits across local authority service areas.\(^{28}\) The NEWP signals a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. It also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. Amongst other things, it includes commitments to enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas. The NEWP promotes green infrastructure as a way to manage environmental risks such as flooding and heat waves.\(^{29}\)

The proposals set out in the NEWP are directly linked to the research in the National Ecosystem Assessment (NEA), a major project that was able to draw conclusions on the ‘substantial’ benefits that ecosystems provide to society directly and through supporting economic prosperity. The NEA identified development as a key driver of loss and biodiversity offsetting as a possible means of increasing private sector involvement in conservation and habitat creation.\(^{30}\)

Furthermore the Biodiversity 2020: A strategy for England’s wildlife and ecosystem services builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. It builds on the successful work that has gone before, but also seeks to deliver a real step change. It was published in summer 2011 and sets out the government’s ambition to halt the overall loss of England’s biodiversity by 2020, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.\(^{31}\)

**National context set by the Wildlife Trusts**

Wildlife Trust ‘Living Landscape’ initiatives focus on conservation of biodiversity over large areas of land where habitats are fragmented. Within these areas a spatial approach to ecological restoration aims to:\(^{32}\) Protect and maximise the value of areas that are already rich in wildlife; Expand, buffer, and create connections and stepping stones between these areas; and Make the wider landscape permeable to wildlife.

Restoration should both provide a healthy environment in which wildlife can thrive and enhance those natural processes that benefit people. It complements the NPPF, which calls for ‘coherent ecological networks that are more resilient to current and future pressures’\(^{33}\). A partnership approach is called for, with local government, agencies, the private sector and voluntary bodies required to act together.

The Wildlife Trusts (with the TCPA) have also produced guidance on ‘Planning for Biodiversity’. It notes that as well as benefiting biodiversity, green infrastructure can help to ‘deliver and complement some of the services currently provided by hard engineering techniques’\(^{34}\).

**National green infrastructure specific context**

The TCPA report Creating Garden Cities and Suburbs Today calls for at least 40% of a new community’s total area to be allocated to green space. This area should ‘consist of a network of well-managed, high-quality green/open spaces linked to the wider countryside’. These spaces should be of a range of types (e.g. community forests, wetland areas and public parks) and be multifunctional; for instance as areas that can be used for walking and cycling, recreation and play, supporting of wildlife, or forming an element of an urban cooling and flood management system.\(^{35}\)

Recommendations on how to achieve the delivery of such spaces are made in the Landscape Institute Position Statement on Green Infrastructure. Recommendations include: Promote collaboration on GI across

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boundaries through the Duty to Cooperate; and Make developers aware of strategic GI goals and the potential to mitigate the environmental impacts of new development and create beautiful places.\(^\text{35}\)

**National woodlands specific context**

The final report of the Independent Panel on Forestry calls for society as a whole to value woodlands for the full range of beneficial ecosystem services that they can provide. It suggests that local authorities should look at the creative, cross boundary use of green space schemes, including trees and woodland, which make a significant difference to the landscape. It also recommends that Local Plans support sustainable wood and forestry businesses.\(^\text{36}\) The Natural Environment White Paper also includes a focus on trees and woodlands. An ambition is to create more opportunities for planting woodlands; for more trees in our towns, cities and villages; and a greater proportion of woodlands to be in active management.\(^\text{37}\) Earlier policy was established through a Forestry and Woodlands Framework for the South East.\(^\text{37}\)

- Trees and woodlands should support the development of sustainable communities.
- Health and well-being can be improved through visiting woodlands.
- Woodlands and trees, especially ancient woodlands and veteran trees, must be protected from loss.

**North Kent Bird Disturbance Report – Phase\(^\text{38}\)**

A detailed study has been undertaken which investigated disturbance of birds for which the North Kent Estuaries (including The Swale SPA/Ramsar site and Medway Estuary & Ramsar site) were designated. The study outcome and recommendations can be summarised as follows:

- There have been marked declines in the numbers of birds using the three SPAs (the third being the Thames Estuary & Marshes SPA/Ramsar site on the south bank of the River Thames). Declines are particularly apparent on the Medway and have occurred at the locations with the highest levels of access.
- Disturbance is a potential cause of the declines. The disturbance study shows birds are responding to the presence of people, and there is evidence that the busiest locations suffer worst.
- Access levels are linked to local housing, with much of the access involving frequent use by local residents. It is not possible to rule out any likely significant effects on the integrity of the European sites as a result of increased housing. A suite of mitigation measures are therefore necessary to avoid impacts.
- Development within 6km of access points to the SPAs is particularly likely to lead to increase in recreational use of the SPAs. Local greenspace use such as dog walking, cycling, jogging, walking and to some extent family outings will originate from people living within this radius. Beyond 6km from access points onto the SPA, large developments or large scale changes to housing levels will also result in increased recreational use. It would appear that visitors to the North Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne.

**Swale Biodiversity Action Plan\(^\text{39}\)**

The Swale Biodiversity Action Plan has actions relating to land-use planning as well as specific habitat actions for priority habitats and actions directed at supporting and encouraging local communities to take action for wildlife.


Climate change

Internationally established objectives

In its 2007 strategy on climate change, the European Commission assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.\(^{40}\) On energy, the Commission recommends that the EU’s energy efficiency improves by 20 % and the share of renewable energy grows to 20 % by 2020.

How local authorities can reduce emissions and manage climate risk\(^{41}\)

In this guidance document planning functions are described as being a ‘key lever’ in reducing emissions (and adapting localities to a changing climate), with it considered particularly important that local authorities use these to:\(^{42}\)

- Enforce energy efficiency standards in new buildings and extensions;
- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
- Work with developers to make renewable energy projects acceptable to local communities; and
- Plan for infrastructure such as low-carbon district heating networks.

With regards to low-carbon district heating networks, the DECC report ‘The Future of Heating’ points out that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nation’s greenhouse gas emissions. Renewable heat currently represents 1% of heat generation, but Government’s vision is of: *buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to whole communities*…\(^{43}\)

Flood and Water Management Act\(^{44}\)

The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings);
- Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Sustainable drainage systems (SuDS)

In relation to SuDS, further guidance is provided in the document Planning for SuDS.\(^{45}\) This report calls for greater recognition of the opportunities for multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’

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Climate change, justice and vulnerability

This report calls for greater recognition of the social dimensions of vulnerability to climate change when considering adaptation policy. It notes that how badly a person or group will be affected by an extreme weather event is determined not only by their exposure to the event, but also on their vulnerability. This combination of factors can be described in terms of ‘Climate Disadvantage’. This is a function of:

- the likelihood and degree of exposure to a hazard; and
- individual or group vulnerability with regards to such hazards.

Once recognised, these social dimensions of vulnerability require a widening of the scope of climate adaptation policy to take into account a broader set of concerns than has traditionally been the case. These concerns will include a number of areas of social policy which are not specifically concerned with climate change. For instance, a variety of social factors can affect the capacity of households to prepare for, and respond to and recover from flooding:

- Low-income households are less able to take measures to make their property resilient to flooding and to respond to and recover from the impacts of floods
- The ability to relocate is affected by wealth, as is the ability to take out insurance against flood damage.
- Social networks affect the ability of residents to respond to flooding. For example, by providing social support and a response network, and by improving the local knowledge base.

Climate Local

Kent County Council committed to the Climate Local initiative in September 2012, followed by Swale Borough Council. Climate Local asks councils to:

- Set out what actions they intend to undertake locally to reduce carbon emissions and respond to changes in the climate both within their own operations and services and with the local community;
- Set out their level of ambition and how they are going to monitor and demonstrate achievements; and
- Share with other councils and national partners' actions being undertaken and ambitions, progress and the learning from experiences and achievements.

Kent and Medway Green Deal Partnership

The Kent and Medway Green Deal Partnership provides overall direction for retrofit activities and to the establishment of a Green Deal for Kent and Medway. The Green Deal is a Government initiative to support energy efficiency measures in households and businesses with no up-front cost to the owner/occupier.

Growing the Garden of England: A strategy for environment and economy in Kent

The second theme of this strategy aims to tackle climate change in the County. It sets out to achieve the following aims and targets:

- Reduce carbon emissions in Kent - By 2030 Kent’s greenhouse gas emissions, measured as CO2 equivalent, will be 60% below 1990 levels.
- Help the public sector, the business community and Kent residents to manage both positive and negative impacts of climate change, including extreme weather events - By 2015 we will have tackled Kent's vulnerability to climate change and will be delivering a comprehensive action plan for adaptation. A system of monitoring and reviewing progress will be in place.

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47 http://www.kent.gov.uk/environment_and_climate_change/climate_local_kent.aspx
48 http://www.swale.gov.uk/climate-local/
49 http://www.kent.gov.uk/environment_and_climate_change
50 Ibid
Cultural heritage

The Government’s Statement on the Historic Environment for England\textsuperscript{52}

This document sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Also of note is the reference to promoting the role of the historic environment within the Government’s response to climate change and wider sustainable development agenda.

English heritage policy

Heritage at Risk\textsuperscript{53} lists every heritage asset currently considered to be at risk in the UK according to local planning authority. Heritage assets are split into a number of categories namely; buildings, places of worship, scheduled monuments, registered parks and gardens, registered battlefields, protected wreck sites and conservation areas. With regards to Swale the English Heritage study considers that there are thirteen buildings considered at risk.

Realising our ambitions for Swale – Partnership priorities for the Borough to 2031\textsuperscript{54}

Maximise Swale’s opportunities in a way which supports tourism and takes into consideration the needs and preferences of residents and visitors. Assist with the implementation of heritage activities.

Crime and safety

Influence of nature on and community well-being

The report Natural Solutions from the New Economics Foundation looks to highlight evidence from recent studies that demonstrates the important role that the natural world can play in delivering well-being and the delivery of key societal goals such as health, education, urban regeneration and crime reduction.

It points to the relationship between access to nature and positive health outcomes, with both physical and mental health benefits on offer through increased physical activity and environmental experience and contact. The natural environment is also described as potentially being a resource to help reduce crime levels and increase community cohesion by providing a neutral space in which people can meet and interact. In addition, green spaces and other outdoor locations can provide key environments for effective learning, with this particularly being the case for children not engaged in formal learning.

The Local Transport Plan for Kent 2011-2016\textsuperscript{55}

The plan aims to deliver a safety and healthier community as an outcome of its transports plans. Various ambitions include; reducing casualties on the county’s roads, reducing pollution and traffic impacts, improving accessibility to health, promoting active transport and protecting against anti-social behaviour.

Swale Community Safety Partnership Swale Safer and Stronger Communities Plan 2011-14

The priorities for 2012-13 are:

- Domestic abuse
- Crime; Acquisitive Crime, and Fraud and Forgery
- Antisocial Behaviour; Repeat/Vulnerable Victims, Victim Satisfaction, Deliberate Fires
- Address needs of vulnerable adults to reduce reoffending
- Tackling substance misuse
- Prevent young people from offending


\textsuperscript{54} http://www.swale.gov.uk/assets/Strategies-plans-and-policies/Realising-our-ambitions-for-Swale.pdf

**Realising our ambitions for Swale – Partnership priorities for the Borough to 2031**

The strategy aims is to create safer and stronger communities with reduced crime and disorder, reoffending and anti-social behaviour. Developing targeted responses to combat localised issues which deliver local solutions.

**Swale Borough Council – Shaping the future of Swale 2010-2013**

Work with partners to tackle crime, disorder, anti-social behaviour, substance misuse and reoffending.

**Employment and skills**

**Realising our ambitions for Swale – Partnership priorities for the Borough to 2031**

Priorities include increasing prosperity, improving the Borough's skills profile and securing investment in transport infrastructure. This combination should help secure business within the Borough and enhance the local resident’s job opportunities.

**Vision for Kent (2006 – 2026)**

Kent will be a county where learning is stimulated and supported for everyone – for life, for enjoyment and for employment.

**Health**

**The Marmot Review: Implications for Spatial Planning**

'Fair Society, Healthy Lives' ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health. It does so on the basis that that there is: 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'.

It highlights three main policy actions to ensure that the built environment promotes health and reduces inequalities. These should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage. Specifically these actions are to:

- ‘Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality’
- ‘Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing’
- ‘Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation’.

The increasing role that local level authorities are expected to play in producing health outcomes is well demonstrated by recent Government legislation. The Health and Social Care Act 2012 transfers' responsibility for public health from the NHS to local government, setting a duty to improve the health of local residents. This will require a more holistic approach to health across all local government functions.

**Environmental Audit Committee – Sustainable Food**

This report highlights the lack of government guidance on providing communities with better access to local and sustainable food through Local Plans. It suggests that such guidance should encourage provisions within Local Plans that take account of such access and ‘ensure that communities are provided with open spaces to grow their own produce’.

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59 Upper tier and unitary local authorities

Realising our ambitions for Swale – Partnership priorities for the Borough to 2031

This strategy aims to achieve a Borough in which people live healthier lives and have access to high quality services that meet their needs by:

- Improving outcomes in wards;
- Reducing smoking and obesity; and
- Improving access to health facilities especially in the most disadvantaged areas.

Housing

Planning policy for traveller sites (2012)

This document sets out the Government’s planning policy for traveller sites and should be used in conjunction with the NPPF. It aims to ensure travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites, using a robust evidence base and effective engagement with stakeholder groups and other local authorities. Pitch targets for gypsy and travellers, and plot targets for travelling show people should be set, with a five year supply of specific deliverable sites identified against these targets. The Government’s aims in respect of planning for travellers sites include:

- Promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites;
- Reducing the number of unauthorised development and encampments;
- Ensuring that Local Plans include, fair, realistic and inclusive policies;
- Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- Having due regard for the protection of local amenity and environment.

Chartered Institute of Housing analysis

The Housing Report identifies the need to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: ‘Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify. Issues include.

- Overcrowding: This situation is worsening.
- Homelessness: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit.
- Empty Homes: 720,000 homes are classed as empty, but the situation seems to be improving.

Joseph Rowntree Foundation recommendations

The Joseph Rowntree Foundation’s International review of land supply and planning systems reviews mechanisms used by other countries to ensure sufficient house building. A key mechanism is ‘Growth management boundaries/urban growth limits’, i.e. Green Belts. There are some examples of successful urban containment and relative price stability over time, notably Portland, Oregon, but successful management requires planners to be pro-active in monitoring and adjusting land supply. The Planning Minister has recently stated that decreasing the English Green Belt from 13% to 12% would meet all identified housing requirements and that this could be done while preserving Green Belt functions. JRF conclude that: The Green Belt has successfully prevented urban sprawl – but at a price. Evidence from other countries suggests that it should be operated more flexibly, with boundaries revisited regularly.

References:

Policy Exchange and the TCPA recommendations

Both Policy Exchange (a leading ‘think tank’) and the Town and Country Planning Association (TCPA) highlight poor perception of new development as a key barrier to addressing the housing crisis. Policy Exchange state that ‘a lot of people object to new development because they assume that the outcome will be buildings that are at best characterless, cheap in everything except price.’ The solutions suggested by the two organisations are quite different.\(^\text{65, 66}\)

Policy exchange advocates the need for 'self-build' to make a much more significant contribution. Self-build is where development involves a discrete project for a specific owner. Currently, in the UK 10% of new homes (less in England) are self-build. Councils can support self-build by using land auctions to enable self-builders to procure plot sized areas of land.

The TCPA believe that: Well planned new communities provide an opportunity to create high-quality sustainable places, allowing for the highest sustainability standards, economies of scale, and better use of infrastructure. A holistic approach... provides an opportunity to consider how homes and neighbourhoods can be made attractive places in which to live and work, in environments which are socially inclusive and resilient to climate change. In particular, TCPA advocate developing Garden Cities and Suburbs according to a series of agreed principles. Benefits of this approach include –

- A critical mass to support the necessary facilities for low-carbon lifestyles, such as rapid public transport, low-carbon energy systems, jobs located within walking distance of homes, and a range of cultural and leisure services, including a comprehensive green infrastructure network; and

Any negative impacts on the environment can be dealt with in a holistic way, with avoidance, mitigation and compensation considered from the outset.

Government guidance on planning for traveller sites

The Government’s Planning policy for traveller sites guidance has the overall aim of ensuring that travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. The governments aims include:\(^\text{67}\)

- Promoting more private traveller sites, whilst recognising that some cannot afford private sites;
- Reducing the number of unauthorised development and encampments;
- Ensuring that Local Plans include, fair, realistic and inclusive policies;
- Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- Having due regard for the protection of local amenity and environment.

Housing conditions for minority ethnic households

This report seeks to quantify the cost of poor housing among minority ethnic households to the NHS and wider society.\(^\text{68}\)

- Around 15% of the 2.2 million ethnic minority households in England are those with at least one Category 1 HHSRS hazard (classified as poor housing).
- The estimated annual treatment cost to the NHS is around £52m per year if the poor housing amongst the minority ethnic households is left unimproved.
- Wider costs to society of this poor housing are estimated at 2.5 times the NHS costs.


Research on ‘the ageing population’

The housing market is not delivering enough specialist housing. An adequate supply of suitably located, well-designed, supported housing for older people could result in an increased release onto the market of currently under-occupied family housing, expanding the supply available for younger generations.69

Swale Homelessness Strategy 2008 -2012

This strategy aims to prevent homelessness through offering realistic options and choice; and work in partnership to maximise housing options and improve the quality of life for local people.

Swale Housing Strategy 2010-2015

This strategy aims to increase housing supply, including affordable housing; Improve housing condition and local neighbourhoods; support vulnerable people; and tackle disadvantage and improve quality of life. With regards to affordable housing, the strategy promotes the effective physical and social integration of new affordable housing and new occupiers with new market housing and within existing communities

Realising our ambitions for Swale – Partnership priorities for the Borough to 203170

This strategy aims to increase housing supply to meet the local needs and improve housing condition and local neighbourhoods.

Vision for Kent (2006 – 2026)

The vision is for Kent to be a county where housing needs are met and decent, high quality homes help create attractive, safe and friendly communities

Landscape

The European Landscape Convention (2000)

The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines landscape as: ‘An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.’ It recognises that the quality of all landscapes matters – not just those designated as ‘best’ or ‘most valued’. Among other things, the ELC commits all signatories to establishing and implementing policies aimed at landscape protection, management and planning / integrating landscape into town planning, cultural, environmental, agricultural, social and economic policies.

Landscape Institute position statement on green infrastructure71

The Landscape Institute (LI) makes a distinction between:

- Elements of the landscape that can represent distinct green infrastructure (GI) ‘assets’, e.g.
- Urban area, Business Parks, Suburban Housing, Sustainable Drainage Systems, Community Centres (e.g. with sports pitches), ‘main green spines’ (e.g. waterways and major pedestrian/cycle routes, allotments, small-holdings and orchards, and country parks
- GI ‘functions’, e.g. water management, climate change adaptation and mitigation, business benefits, local distinctiveness, recreation and health, education, community cohesion, food production, and biodiversity,

Six recommendations are made, two of which are aimed at local authorities:

- Turn strategic GI thinking into reality - Ensure that GI is a core requirement in Local Plans, Infrastructure Development Plans and development briefs. Proper consideration should also be given to the potential for multifunctional GI to perform some of the roles that ‘grey’ infrastructure is used for, particularly water management and waste. Why? Not only does GI tend to be cheaper, but it also provides infrastructure that is resilient to an increasingly unpredictable climate.
- Promote collaboration on GI across boundaries - By its nature, GI often crosses administrative boundaries, so it should be addressed through the Duty to Cooperate between local authorities.


It is also notable that the position statement references Trees in the Townscape: A Guide for Decision Makers. This highlights that trees can contribute to storm-water, management, urban cooling and microclimate control, air-quality improvement, visual amenity and carbon sequestration. Where space is at a premium and the built environment is dominant, trees provide significant natural assets that can be retrofitted into streets and other available spaces with relatively little disturbance to surrounding activities.


The AONB vision is as follows:

In 2034… the qualities and distinctive features of the Kent Downs AONB, the dramatic south-facing scarp, secluded dry valleys, network of tiny lanes, isolated farmsteads, churches and oasts, orchards, dramatic cliffs, the ancient woodlands and delicate chalk grassland along with the ancient, remote and tranquil qualities, are valued, secured and strengthened. The Kent Downs has become a landscape where change supports the AONB’s distinctive features. Robust responses to development pressures and climate change have enhanced landscape character. The Kent Downs landscape is recognised and valued, enjoyed and cherished and its future conservation and enhancement is a certainty. Positive partnerships, local people and land managers act together to conserve, enhance and promote a nationally and internationally recognised and valued landscape.

Realising our ambitions for Swale – Partnership priorities for the Borough to 2031

This strategy aims to maximise the value of green spaces to help consolidate a sense of belonging among the communities.

Local economy

Internationally established objectives

In 2010, the European Union published its strategy for achieving growth up until 2020. This strategy focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient and more competitive economy; and inclusive growth, aimed at strengthening employment, and social and territorial cohesion.

The Local Growth White Paper

The Local Growth White Paper notes that Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. In some cases this means focusing investment at areas with long term growth challenges, so that these areas can undergo transition to an economy that responds to a local demand. Places that are currently successful may also wish to prioritise activity to maximise further growth by removing barriers, such as infrastructure constraints. However, the White Paper also emphasises that: 'This does not mean that every place will grow at the same rate or that everywhere will, or will want to, become an economic powerhouse. Long term economic trends make differences in economic performance inevitable and these can and do change over time'.

Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations.

Finally, the White Paper identifies that policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring all have access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete internationally

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Parades of Shops – towards an understanding of performance and prospects

Despite their local economic and social importance, shopping parades have been subject to a continued decline. In order to buck this trend, the report suggests the need for appropriate policy responses. It is suggested that:

- The diversity of neighbourhood parades is recognised through flexible policy initiatives. These responses should look to ‘reinforce local distinctiveness and community value, and develop the social function of neighbourhood parades’ with a view to underpinning ‘on-going commercial viability’.
- The role of local parades in developing local economies by ‘providing a ‘seed-bed’ function for start-up businesses’ could be enhanced through the focused support for their ‘enterprise formation and employment growth potential’.

Another important area of concern for local economic growth is rural areas. The ‘significant untapped potential’ of rural areas to contribute to economic growth and employment is the focus of the report ‘Missing Links’. It considers distance to market to be a crucial concern and calls for the improvement of transport links and the provision of adequate digital infrastructure.

South-East LEP - Our Vision

The South-East LEP sets out as its mission the creation of ‘the most enterprising economy in England. In order to achieve this aim, it sets out a number of objectives that are to be achieved over the next twenty years. Of particular relevance in this case are the following:

- Every community across the LEP will be served by super-fast (100 mbps or greater) broadband networks; and
- There will be a steady flow of public and private investment in strategic infrastructure, including creating even better connections to key global markets.

Realising our ambitions for Swale – Partnership priorities for the Borough to 2031

This strategy brings businesses together to help in the decision making process, identifying gaps and identifying the appropriate use of major employment locations.

Regional Tourism Strategy

The Thames Gateway is identified as a tourism growth area for realising the potential for growth in business, sporting, environmental and attraction based tourism as part of the wider regeneration strategy for the Gateway, adding value to the existing tourism market.

Population

Planning policy for traveller sites (2012)

This policy should be read in conjunction with the NPPF and emphasises the need to provide for travellers in Local Plans. The size and density of the traveller population should be used to decide upon the number of pitches and/or plots required within a specific area. Policies created must be fair and facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

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Additional PPSIs

Local Transport Plan for Kent 2011-16

Key priorities set out within the plan relating to population include:

- A safer and Healthier County;
- Supporting Employment;

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• Tackling a Changing Climate; and
• Enjoying Life in Kent

Living Later Life to the Full – A Policy Framework for Later Life

Key priorities set out within the plan relating to population include:
• To ensure communities are designed to be ‘age proof’, stronger, safer and sustainable;
• To improve transport and accessibility;
• To enable people to lead healthier lives and have better access to healthcare;
• To support people’s citizenship, learning and participation in community life;
• To ensure those people who need support to live independently have choice, control and good quality care;
• To encourage people to plan for a secure later life; and
• To promote a positive image of later life and dignity and respect for older people.

Kent Prospects 2007 to 2012

Relevant objectives set out within the Kent Prospects report include to:
• Support innovation, skills and enterprise
• Promote opportunities associated with the Olympics and other events
• Promote economic development and regeneration opportunities

Soil

Additional PPSIs

Further Government policy

In Safeguarding our Soils: A strategy for England, a vision is set out for the future of soils in the Country. An element of this vision is the condition of soils in urban areas, which are to be ‘sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system’. Good quality soils in urban areas are recognised as being ‘vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities’. That planning decisions take sufficient account of soil quality is a concern of the report, in particular in cases where ‘significant areas of the best and most versatile agricultural land are involved’. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the report’s vision.

In terms of future trends, the report notes that pressures on soils and competition for land is likely to increase in future as a result of population growth. As a result, the effects of these trends and the ‘changing demands on our soils’ needs to be better understood and it must be ensured that ‘appropriate consideration is given to soils in the planning process’.

Defra Soil Protection Programme

This seeks to protect the quantify diversity, quality and extent of soils to help develop strategies to eliminate threats to spoil and promote sustainable land management.

The European Soil Thematic Strategy

This strategy aims to:
• Establish common principles for the protection and sustainable use of soils
• Prevent threats to soils, and mitigate the effects of those threats
• Preserve soil functions within the context of sustainable use

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• Restore degraded and contaminated soils to approved levels of functionality

Transport and accessibility

Additional PPSIs

Understanding Walking and Cycling

This report looks to understand why sustainable and active travel is relatively uncommon in British towns when, potentially, higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related greenhouse gas emissions. It recognises that physical infrastructure alone is not sufficient, with a more holistic approach required to incentivise such journeys. Creating a safe physical environment for pedestrians and cyclists – e.g. through fully segregated cycle path; and restrictions on vehicle access – is one important measure.

Local Transport Plan for Kent 2011-2016

Key objectives set out within the Local Transport Plan for Kent include to:

• Reduce journey times for personal travel, business and freight;
• Provide transport infrastructure;
• Support the function of the County’s international gateways;
• Reduce and reverse the impact of transport on public health;
• Encourage and enable more physically active travel;
• Improve access by and integrate public transport, walking and cycling;
• Reduce traffic levels; and
• Improve carbon efficiency of current forms of transport.

Growth without Gridlock (A Transport Delivery Plan for Kent)

‘Growth Without Gridlock’ identifies the necessary transport infrastructure needed to accommodate the level of economic growth and regeneration planned for Kent, the measures required to manage the existing network and offers travel choice and better access to jobs/ Key transport priorities for Swale are identified as:

• Securing the necessary infrastructure to open up key development areas for housing and employment;
• Delivering capacity improvements on the Strategic Road Network; and
• Regeneration of Sittingbourne Town Centre.

Realising our ambitions for Swale – Partnership priorities for the Borough to 2031

This strategy strives to secure investment in transport infrastructure:

• For staged investment to secure a solution to the issues of over capacity at Junction 5 of the M2
• Formation of a Quality Bus Partnership which provides better access to major employment areas; and
• Engage in the consultation for the new Integrated Kent Franchise for rail services, seeking affordability, integration with other transport modes and support for the Sheerness to Sittingbourne branch line.

Swale Transportation Strategy 2014-2031 (Draft)

The aims of the strategy are to:

• Encourage the use of sustainable means of travel as an alternative to the private car
• Remove pinchpoints in the transport infrastructure which are barriers to development and growth.
• Reduce the need to travel to access services, including through ‘sustainable’ mixed use developments.

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87 http://services.swale.gov.uk/meetings/eListDocuments.aspx?CId=149&MId=1274&Ver=4
• Reduce the number of people killed or seriously injured on the district’s roads

With regards to sustainable means of travel, the strategy highlights that: “Across the borough there is a great deal of scope to improve the levels of walking and cycling, and in particular travel by bus. The benefits of this will be reduced congestion and increased levels of fitness. The health benefits of walking and cycling are well documented and include improving health through fitness and decreasing associated diseases, as well as decrease in pollution and commensurate increase in air quality.”

The proposal is that: “All new developments will be required to provide for sustainable transport by: ensuring that housing and employment developments are served by bus routes, with fully accessible stops within 400m...; ensuring space for secure cycle provision; ensuring that local amenities are within walking distance; and prioritising walking and cycling routes, making them direct and secure through design.”

Waste

Internationally established objectives

The EU’s Thematic Strategy on the Prevention and Recycling of Waste is long-term strategy which aims to ensure that Europe becomes a recycling society that seeks to avoid waste and which uses waste as a resource. The strategy proposes that approaches to waste management are modernised and that they promote more and better recycling.

Planning Policy Statement 10: Planning for Sustainable Waste Management

The government’s stated overall objective is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. PPS10 goes on to state that the government aims to break the link between economic growth and the environmental impact of waste by moving waste management up the waste hierarchy, involving significant investment in new waste management facilities. It sets out the following key planning objectives:

• Drive waste management up the waste hierarchy.
• Communities taking more responsibility for their own waste, involving sufficient and timely provision of new facilities.
• Implementation of the national waste strategy and supporting targets.
• The recovery of waste without endangering human health and without harming the environment and enabling waste disposal in one of the nearest appropriate installations.
• Reflecting the concerns of stakeholders in waste management.
• Protection of green belts and recognition that the particular locational needs of some waste management facilities, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.
• Ensuring sustainable waste management is built into new development.

Government Review of Waste Policy in England

This report recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. As such, it sets out a vision to move beyond our current ‘throwaway society’ to a ‘zero waste economy’. The report recognises that planning will play a critical role in delivering this ambition. In terms of planning for waste the report notes that local authorities should consider the infrastructure needs of their community from the earliest stages of developing their local policies and plans. It also states that local communities should benefit from the hosting of waste facilities.

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Joint Municipal Waste Strategy

Principal objectives in managing municipal waste management in Kent:

- Deliver high quality services to the people of Kent, including an emphasis on waste reduction, recycling and diversion from landfill
- Meet the statutory targets set for Kent, and exceed them in areas where this is a locally agreed policy

Waste Strategy

This strategy identifies the following targets:

- Recycle or compost at least 45% of household waste by 2015
- Recycle or compost at least 50% of household waste by 2020.

Reduce the amount of household waste not re-used, recycled or composted. This means reducing it from 22.3 million tonnes in 2000 to 12.2 million tonnes in 2020 (with a target of 15.9 million tonnes by 2010). This is a reduction of 45%.

Swale First Corporate Plan 2012-2015 Updated for 2013/1491

Keep litter off the streets and away from open spaces to create a cleaner and greener Borough.

Kent Minerals and Waste Local Plan 1

The Plan has recently been submitted to Government for examination. A key objective is to make provision for a variety of waste management facilities to ensure that Kent remains at the forefront of waste management, and has solutions for all major waste streams.

Water

Internationally established objectives

The Water Framework Directive (2000/60/EC) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra’s intention is to establish a ‘framework for integrated catchment management’ across England by the end of 2013. The Environment Agency is currently seeking to establish ‘Significant Water Management Issues’ within catchments with a view to presenting second River Basin Management Plans to ministers in 2015. The Plans will seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by ‘priority’ and ‘priority hazardous’ substances; and
- Ensure the progressive reduction of groundwater pollution.

The Environment Agency believes that to achieve good status in all water bodies by 2027 (the target of the Water Framework Directive) will not be possible using only current technologies. In fact, achieving 75 per cent good status will require marked changes in land use and water infrastructure.

The EU’s ‘Blueprint to Safeguard Europe’s Water Resources’ highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU’s vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.

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The EU Urban Waste Water Treatment Directive – 91/271/EEC93 aims to protect the environment and to ensure waste water treatment is of a high standard. It provides information of the various sensitive areas and the implications which may occur if waste water is not dealt with correctly.

**Further Government policy**

The Water White Paper94 sets out the Government’s vision for a more resilient water sector, where water is valued as a precious resource. It states the measures That will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

Commitments are made in the White Paper to ‘encourage and incentivise water efficiency measures’ at the demand side. Through these measures and the demand management measures set out in Water Resource Management Plan’s for water companies, the Government aspires to reduce average demand to 130 litres per head, per day by 2030.

The avoidance of pollution is also a consideration in the White Paper, leading to a Government consultation on a national strategy on urban diffuse pollution in 2012. The consultation report95 notes that pollutants affecting failing waterbodies can be broken down into a number of categories including:

- **Point Source Pollution**: Permitted discharges from factories and wastewater treatment are currently responsible for about 36% of pollution related to failing water bodies.
- **Diffuse pollution**: Unplanned pollution from urban and rural activity, arising from sources such as industry, commerce, agriculture, and civil functions is responsible for 49% of the pollution related to failing water bodies. Agricultural diffuse pollution is responsible for 33% of failures; non-agricultural for 14%. In highly urbanised areas the contribution of urban diffuse pollution is much higher.

**Further Government guidance on flood risk**

The Flood and Water Management Act96 highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting
- Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion
- **Sustainable drainage systems (SuDS)**

GP3: Groundwater Protection: Policy and Practice97 (2012) implements the requirements of the WFD and Environmental Permitting Regs, protecting and enhancing water quality in both surface water and ground water and managing the sustainable supply of water as a resource. Principles are set out to ensure wise resource use and bring benefits to land, wildlife, flood risk management and communities. The Environment Agency’s core groundwater policy is to protect and manage groundwater resources for present and future generations in ways that are appropriate for identified risks such as pollution and climate change. To achieve this the Environment Agency seek to:

- Meet the needs of the environment and people;
- Manage surface water and groundwater as an integrated whole;
- Use robust measures to prevent the pollution of groundwater; and
- Achieve the environmental objectives of the Water Framework Directive.

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Kent Design Guide\textsuperscript{98}  
This promotes water efficiency measures through new development design.  

Code for Sustainable Homes\textsuperscript{99}  
This promotes reduction in consumption of potable water in dwellings, through the use of water efficient fittings, appliances and water recycling systems. CSH Level 3 mandatory water consumption level is less than 105 litres per person per day.

Growing the Garden of England: A strategy for environment and economy in Kent\textsuperscript{100}  
This strategy promotes the importance of water as resource and the need to use it efficiently. The strategy has priorities which aim to increase the efficiency of homes and other developments in Kent to achieve higher standards and levels of sustainability.

Regional Flood Risk Assessment for the South East\textsuperscript{101}  
This identifies broad locations where significant housing coincides with high flood risk. The Thames Gateway is identified within this category.

The Catchment Abstraction Management Strategy  
The ‘resource availability status’ indicates the relative balance between committed and available resources in a particular area. The status is classified as ‘no water available’, ‘over-licenced’ or ‘over abstracted’. The strategy illustrates implications for new development in the Borough especially in terms of water efficiency.

Shoreline Management Plans for Isle of Grain to South Foreland; and the Medway Estuary and Swale  
Sustainable long-term management policies for the coastal areas of Swale. Policy recommendations are in line with those recommended by Defra:

- Hold the line – maintain or upgrade the level of protection provided by the defences,
- Advance the line – build new defences seaward of the existing defence line,
- Managed realignment – allow retreat of the shoreline, with management control or limit movement, and
- No active intervention – a decision not to invest in providing or maintaining defences.

98 http://www.kent.gov.uk/community_and_living/regeneration_and_economy/kent_design_initiative.aspx  
APPENDIX III: DEVELOPMENT STRATEGY ALTERNATIVES

This appendix presents detailed appraisal findings in relation to the broad development strategy alternatives that are a focus of discussion in Part 2 of this Report.

Appraisal methodology

For each of the options, the appraisal identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see Part 1) as a methodological framework. Red text / shading is used to indicate significant negative effects, whilst green text / shading is used to indicate significant positive effects.

Effects are predicted taking into account the criteria presented within the Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for ‘cumulative’ effects is also a consideration.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. 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 uncertainties, there is a need to make considerable assumptions regarding how options will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible 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’.

Limitations

It is important to reemphasise the high-level nature of the alternatives. The alternatives are not site specific, which means that the appraisal focuses on strategic issues, i.e. more on issues associated with particular towns than issues associated with particular sites.

It is also important to emphasise that major assumptions are made regarding infrastructure delivery. This might be thought of as assumptions being made about the benefits that development will bring, or assumptions about the future baseline. Either way, the fact is that infrastructure delivery is often inherently uncertain.
### Appraisal findings

#### (1) 540 dpa with some growth diverted away from Faversham / towards the Thames Gateway

#### (2) 740 dpa with growth distributed as per the current population split

<table>
<thead>
<tr>
<th>Topic</th>
<th>Discussion of significant effects (and relative merits in more general terms)</th>
<th>Categorisation / Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Air quality</strong></td>
<td>Commuting by car is a key issue, as it leads to traffic congestion and hence air pollution. Option 1 could, in the short term, help to prevent worsening of the current out-commuting trend; however in the longer term the ageing population may constrain the labour supply leading to in-commuting and resulting congestion / air quality problems. Option 2 may result in a worsening of out-commuting in the short term, but in the longer term would result in a better balance between households and jobs locally. Having said this, there could still be high levels of out-commuting as the types of employment opportunities locally may not be suited to those who would otherwise out-commute. In terms of the spatial distribution, Option 2 is less than ideal as a focus of housing at Faversham under this option will mean that housing does not come forward in close proximity to a high proportion of the employment opportunities. In addition, residents of Faversham are more reliant on the private car to access shops, services and facilities than is the case for residents of Sittingbourne. It is also the case that higher growth at Faversham (Option 2) and/or the wider A2 corridor could hinder the achievement of the air quality objectives that have been set through the A2 corridor Air Quality Management Plan. Once the spatial distribution of growth is taken into account, it becomes clear that Option 2 performs less well. There is insufficient evidence to predict ‘significant’ effects, however. Growth in neighbouring authorities will also be a major factor that influences the air quality baseline in the future.</td>
<td>1</td>
</tr>
<tr>
<td><strong>Biodiversity</strong></td>
<td>An important point relates to the potential for impacts to internationally designated sites. Option 1 has been the focus of Habitats Regulations Assessment (HRA), which has concluded the likelihood of ‘no significant adverse effects’. It is not possible to conclude that higher growth (Option 2) would lead to significant adverse effects, as it is not possible to define a cut-off quantum of housing above which it would never be possible to mitigate impacts; however, what is clear is that the mitigation burden on development would increase commensurately under Option 2. Higher growth at Faversham under Option 2 could lead to specific issues given that the Swale SPA/Ramsar abuts the town. Even if additional growth under Option 2 were dispersed between service villages, issues could still remain, given that the recent North Kent Bird Disturbance Report – Phase 1 (2012): “Development within 6km of access points to the SPAs is particularly likely to lead to increase in recreational use of</td>
<td>1</td>
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*Development within 6km of access points to the SPAs is particularly likely to lead to increase in recreational use of*
Discussion of significant effects
(and relative merits in more general terms)

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<tr>
<td></td>
<td>the SPAs. Local greenspace use such as dog walking, cycling, jogging, walking and to some extent family outings will originate from people living within this radius. Beyond 6km from access points onto the SPA, large developments or large scale changes to housing levels will also result in increased recreational use. It would appear that visitors to the North Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne. People living within this broad coastal strip (i.e. beyond 6km from SPA access points and north of the M2/A2) are likely to visit for more coastal specific activities. “Aside from HRA considerations, it is also important to consider that higher growth under Option 2 would lead to greater pressure on greenfield sites with ecological value.</td>
<td></td>
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<td></td>
<td>Climate change mitigation. Commuting by car is a key issue, as this has a major bearing on per capita CO\textsubscript{2} emissions. The issue of commuting (and the issue of accessing shops, services etc by car) is discussed above, under the Air Quality topic, with the conclusion reached that Option 1 performs better on balance. In terms of per capita CO\textsubscript{2} emissions from the built environment, new development under both options would have the potential to incorporate energy efficiency measures and use renewable energy and sustainable construction methods but this would depend on implementation. There is little reason to suggest that Option 2 would lead to an increase in the average size of individual development schemes (which, it were the case, would increase the potential to secure investment in low carbon / renewable energy measures). In conclusion, Option 2 performs relatively poorly, although there is insufficient evidence to predict ‘significant’ effects.</td>
<td>1</td>
</tr>
<tr>
<td>Cultural heritage</td>
<td>A key issue relates to the character, setting and urban morphology of Faversham. English Heritage is of the view that: “The compact urban form of Faversham, and its clearly defined boundary with the countryside, is something to be protected and enhanced.” Discussions with English Heritage have highlighted that the southern side of Faversham is particularly sensitive given the contribution made to the town’s setting and character. There is confidence that Option 1 could be delivered without significant adverse effects to heritage at Faversham. Under Option 2, however, significant adverse effects would be likely. Even if additional growth under Option 2 were to be dispersed between Faversham and service villages in along the A2 corridor, then issues would remain as development would likely be out of keeping with the existing form / character of settlements. Iwade (not along the A2 corridor, but rather north of Sittingbourne) could also see additional growth, leading to a risk of coalescence with</td>
<td>2</td>
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### Discussion of significant effects (and relative merits in more general terms)

<table>
<thead>
<tr>
<th>Topic</th>
<th>Categorisation / Rank of preference</th>
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</thead>
<tbody>
<tr>
<td><strong>Landscape</strong></td>
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<tr>
<td>Option 2 performs worse on the basis that rural landscapes around Faversham and the A2 corridor villages have a relatively low capacity to accept development without significant impacts to existing character. There is also the likelihood that Iwade (not along the A2 corridor, but rather north of Sittingbourne) could also see additional growth, leading to a risk of coalescence with Sittingbourne. Option 1 will lead to negative effects locally, but it is likely that significant negative effects to landscape character can be avoided / mitigated. Option 2 would lead to a high risk of significant negative effects, although there remains considerable uncertainty given the potential to avoid effects (through careful location of development) and mitigate effects.</td>
<td>1 2</td>
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<tr>
<td><strong>Soil</strong></td>
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<tr>
<td>The Borough has a large resource of best and most versatile land, which is located within the A2 corridor i.e. in areas surrounding Sittingbourne and Faversham as well as Newington and Teynham. These locations would come under additional pressure under Option 2. It is also the case that increased support for growth at Faversham risks diverting investor interest away from development at brownfield sites in need of remediation. In conclusion, whilst Option 2 performs relatively worse, it is fair to conclude that both options would lead to significant negative effects given significant loss of best and most versatile land.</td>
<td>1 2</td>
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<tr>
<td><strong>Transport and traffic</strong></td>
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<tr>
<td>The Borough has a number of transport infrastructure challenges which include junction capacity on the M2 (Junctions 5 and 7 in particular), congestion on the A2 corridor, and localised congestion in and around key settlements, particularly Sittingbourne. In order to understand the potential for growth to impact on traffic, a study was recently completed that involved modelling the traffic impacts of a 540 home scenario and a 740 home scenario. The conclusion is reached that under</td>
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<td>Topic</td>
<td>Discussion of significant effects (and relative merits in more general terms)</td>
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<td>(1) 540 dpa</td>
<td>with some growth diverted away from Faversham / towards the Thames Gateway</td>
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<tr>
<td>(2) 740 dpa</td>
<td>with growth distributed as per the current population split</td>
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<td>either scenario “the current congestion issues experienced at specific locations would be exacerbated and would require mitigation; however, the network as a whole does not grind to a halt.” 103</td>
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<td></td>
<td>This evidence therefore suggests that both options perform equally well. However, there is other evidence that points to a need to manage pressure on J5 of the A249, at least until a programme of major improvements is undertaken as part of the national roads programme. This factor leads to a conclusion that Option 1 is preferable.</td>
</tr>
<tr>
<td>Waste</td>
<td>Option 2 would place more pressure on the County’s waste management facilities, but there is no evidence to suggest that capacity at facilities locally is constrained. It is unlikely that either option would lead to issues in terms of sustainable waste management.</td>
</tr>
<tr>
<td>Water</td>
<td>A key issue relates to the fact that considerable areas of Faversham are at risk of flooding. Under Option 1 there is confidence that a ‘sequential’ approach would be taken whereby sites at risk of flooding are avoided wherever possible. It may be the case that Option 2 results in a need to develop sites that are less than ideal from a flood risk perspective, although this is uncertain. With regards to water resources, it is not possible to conclude that a higher growth approach (Option 2) performs worse, as a lower growth (Option 1) would lead to unmet housing need that would likely have to be met elsewhere in the South East where water stress is fairly ubiquitous. With regards to waste water treatment capacity (which has implications for water quality), there could be a risk of Option 2 leading to issues/impacts; however, this is uncertain given that there is often the potential to deliver capacity upgrades where funding is available.</td>
</tr>
<tr>
<td>Crime</td>
<td>The alternatives do not have notable implications in terms of crime related issues/objectives.</td>
</tr>
<tr>
<td>Health</td>
<td>A key issue relates to the fact that Sittingbourne and the Isle of Sheppey include wards within the most deprived quintile nationally, as identified by the Index of Multiple Deprivation. Option 1 is likely to have positive-indirect effects, particularly given that supporting the vitality and viability of</td>
</tr>
</tbody>
</table>

103 There are notable study limitations that must be taken into account. The model area focuses on Sittingbourne to Sheerness, and does not cover the east of the Borough. Furthermore, the study states that the analysis for the 740 home scenario is ‘only approximated’ due to “the fact that large proportions of the additional housing allocations, compared with the 540 dpa scenario, are focused on Faversham which is outside the detailed model area.”
(1) 540 dpa with some growth diverted away from Faversham / towards the Thames Gateway
(2) 740 dpa with growth distributed as per the current population split

<table>
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<tbody>
<tr>
<td><strong>Housing</strong></td>
<td>Sittingbourne Town Centre will help to ensure access to health, leisure, shops and recreational facilities. There is a possibility that Option 2 could hinder the objectives for Sittingbourne Town Centre and wider regeneration objectives in the Thames Gateway if it is the case that housing growth outpaces improvements to the town centre and generally comes forward in advance of sufficient community infrastructure (as a result of poor development viability). Other considerations relate access to housing (discussed below) and access to services/facilities. In terms of the latter issue, Option 2 could include a focus of development at larger villages where health and other community facilities may be less readily accessible. In conclusion, Option 2 performs relatively worse. There are arguments to suggest that ‘significant’ effects might be concluded; however, there is also considerable uncertainty.</td>
<td>Opt 1</td>
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| Population        | Option 2 would contribute more to meeting objectively assessed housing needs, although objectively assessed needs would still not be met in full. As such, it is appropriate to conclude that either approach would lead to significant negative effects. With regards to the spatial distribution of growth, there is no compelling evidence of housing market failure to indicate a boost of housing is necessary at Faversham (Option 2), although if Option 2 were to involve greater growth at service villages then the effect could be to meet identified rural housing needs to a greater extent. | 2         |

| Economic growth   | It is not necessarily the case that a lower housing growth strategy (Option 1) will significantly hamper delivery of economic growth objectives in the short term. The majority of the Council’s employment floorspace is already committed, i.e. is under construction or has planning permission. Therefore, delivery of employment floorspace seems reasonably well assured regardless of which housing strategy is followed. Having said this, it is recognised that in the long term a housing shortfall could have some detrimental effects on the local economy, if it is the case that an ageing population constrains labour supply. | 1         |

| Employment        | Option 1 provides for an employment-led regeneration strategy for Sittingbourne and an organic employment led strategy for Faversham. It is not clear that a higher housing growth approach at Faversham (Option 2) would lead to | 1         |
(1) 540 dpa with some growth diverted away from Faversham / towards the Thames Gateway  
(2) 740 dpa with growth distributed as per the current population split

| Topic | Discussion of significant effects  
(and relative merits in more general terms) | Categorisation / Rank of preference |
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<td>new employers being attracted to the town, and if new employers were to invest in the town there might be a risk that it is at the expense of investment in the Thames Gateway, where there are identified employment growth opportunities and stubborn regeneration areas (Neatscourt and Sittingbourne and Sheerness town centres) that are showing some signs of growth, but remain liable to faltering. The potential for Option 2 to hinder employment growth opportunities in the Gateway is an important consideration, but given uncertainties it is appropriate to rank the alternatives on a par.</td>
<td>Opt 1</td>
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</table>

**Summary**

The appraisal shows that there is the greatest potential to differentiate between the alternatives in terms of environmental issues. In particular, it is possible to conclude that Option 2 (higher growth distributed as per the current population split) would likely lead to significant negative effects in terms ‘heritage’ considerations, whilst Option 1 would not; the key issue being the sensitive nature of Faversham, and also the service villages that could also see additional growth under Option 2. Loss of best and most versatile agricultural land is another issue in terms of which Option 2 performs notably worse than Option 1, given the higher growth quantum and also the additional steer towards Faversham. It is also suggested that the spatial approach to growth under Option 2 would encourage commuting (with implications for climate change and air quality objectives) relative to Option 1, although there is also a need to take into account the influence that the total growth quantum will have on commuting patterns. This is a complex issue, which is discussed in detail at 14.1.1, above.

In terms of socio-economic issues/objectives, Option 2 clearly performs better in terms of ‘housing’ but otherwise the alternatives perform similarly. It is not necessarily the case that a lower housing growth strategy will significantly hamper delivery of economic growth objectives in the short term, although in the long term it is recognised that a housing shortfall could have a detrimental effect on the local economy if it is the case that an ageing population constrains labour supply. Either option would likely support the achievement of regeneration objectives in the Thames Gateway, although under Option 2 there could be some risks associated with bringing additional housing forward in advance of town centre improvements, employment and community infrastructure. More generally, there might be a risk that Option 2 would have the effect of ‘distracting’ from the regeneration agenda in Gateway, given more attractive greenfield development options at Faversham.
APPENDIX IV: SITE OPTIONS

Introduction

Whilst a focus of SA work has been on the consideration of broad development strategy alternatives (with a view to informing selection of a preferred strategy), SA has also fed-into the consideration of housing site options (with a view to informing the selection of sites to allocate in order to deliver on the broad strategy).

Specifically, a Strategic Housing Land Availability Assessment (SHLAA) was undertaken that ‘integrated’ SA in that the criteria used when judging the ‘suitability’ of site options reflected the sustainability objectives established through SA scoping (see Part 1, above) as best as possible (i.e. recognising data limitations).

The aim of this appendix is to explain how –

- Site options were screened with a view to identifying those that need ‘reasonably’ be a focus of detailed SHLAA / SA;
- Reasonable site options were subjected to SHLAA / appraisal; and then
- Preferred site options were selected by the Council, in light of SHLAA / SA findings, additional work and consideration of the potential to address issues through development management policy.

N.B. Employment site options were similarly appraised – as part of an Employment Land Review (2010) – against a range of criteria, including a number with clear links to sustainability objectives. The Employment Land Review is available at: http://www.swale.gov.uk/employment-land-review-final-april-201/.

Screening site options

A long list of site options was established from a variety of sources including:

- Sites submitted by landowners/developers through a ‘call for sites’
- Sites with planning permission (on the basis that planning permission could potentially lapse over the course of the plan)
- Site allocations not yet the subject of planning permission
- Planning application refusals where the principle of housing development is otherwise acceptable
- Lapsed planning permissions
- The Swale Borough Urban Capacity Study 2003
- Employment Land Reviews
- Aerial photography
- Discussions with planning officers about potential sites in the ‘pipeline’
• Open Space Assessments
• Surplus Public Sector Land
• National Land Use Data Base
• Empty Property Registers
• English House Condition Survey
• LPA vacant commercial property registers
• Commercial property data from estate agents and property agents (With a view to identifying land in non-residential use which may be suitable for re-development for housing or mixed use, such as commercial buildings or car parks; and additional housing opportunities in established residential areas, such as under-used garage blocks).

‘Unreasonable’ site options were then screened-out using the following criteria –

• Settlement scope
  – Sites not located within or immediately adjacent to the built up areas (as defined in the adopted Local Plan) of the following settlements would be screened-out: Sittingbourne, Sheerness, Faversham (inc. Ospringe), Queenborough, Minster, Eastchurch, Leysdown, Iwade, Newington, Teynham, Boughton, Upchurch and Bapchild.
  – N.B. A common sense approach to the relationship of sites with defined built-up area boundaries was used. For example, sites on the opposite site of a road (unless a major highway) were included for assessment. Similarly, sites separated by small gaps from the built up area, e.g. because of a playing field or school boundaries were accepted, as were sites adjacent to other submissions adjoining the built up area boundary.

• Environmental issues
  – Sites located within or having a potentially significant adverse impact on the following: Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest were excluded.
  – N.B. Sites at risk of flooding were not excluded, the risk being assessed on a site by site basis and a matter for the sequential and exceptions tests required by national policy as part of the preparation of the Local Plan.

• Sites with an existing use
  – Sites from the desk top survey (mostly sourced from the National Land Use Database and Urban Capacity Studies) found to be still in active use were excluded unless there was a specific known intention/aspiration to develop the site for housing from a landowner/developer/agent.

• Site size
  – Sites not considered capable of delivering five dwellings (considered to have a cut-off of at 0.15ha) were excluded.
Sites screened-out are listed in Appendix 2 of the Council’s SHLAA Report. The outcome of the screening process was the identification of ‘reasonable’ site options that should be the focus of SHLAA / SA.

Appraising reasonable site options and developing a preferred approach

The SHLAA process involved a number of steps, with SA considerations integrated into Step 1 (Policy Constraints) and Step 2 (Suitability).

- Step 1 (Policy Constraints) - was a relatively straightforward task, whereby consideration was given to whether the current usage of the site should preclude development / redevelopment.
- Step 2 (Suitability) was a more involved task. Essentially, sites were appraised in terms of the following –
  - Accessibility to facilities and services
  - Landscape and coalescence
  - Transport
  - European Wildlife Habitats
  - Flood Risk

When completing the SHLAA, sources of evidence included the following:

- A SHLAA Partnership was established in 2008/09 - comprising local (regional) developers and their agents, the Environment Agency, Housing Associations, Regeneration UK, CPRE, HCA, Homebuilders Federation, SEEDA, Kent Highways Services, and the Highways Agency – and a number of meetings were held (although in 2011/12 comments were managed through the public consultation process only).
- Wider community engagement was encouraged through the publication of successive draft SHLAA s and the Local Plan process itself.
- A number of external consultations were undertaken with other stakeholders on a case by case basis. Predominantly, these included KCC Heritage (archaeology), KCC ecological support and Sport England (Playing Fields).
- In the case landscape considerations, judgements were made via the Swale Urban Extensions Landscape Capacity Study and the Swale Landscape Character and Biodiversity Assessment Guidelines.

It is immediately apparent that the SHLAA ‘integrated SA’ to a large extent, i.e. there is a good ‘fit’ between the SHLAA methodology and the SA framework established through scoping. In order to demonstrate the SHLAA / SA links more explicitly, Table 4a lists specific issues that were taken into account as part of the SHLAA, with each issue ‘placed within the SA framework’.
**Table 4a: Issues considered as part of the SHLAA, and links to the SA framework**

<table>
<thead>
<tr>
<th>SA topic</th>
<th>Issue taken into account through the SHLAA</th>
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<tbody>
<tr>
<td>1. Air</td>
<td>• Potential for increase in emissions from road traffic generated by potential development.</td>
</tr>
<tr>
<td></td>
<td>• Location of the potential development site within an air quality management area.</td>
</tr>
<tr>
<td></td>
<td>• Introduction of new housing close to existing lawful industrial land uses currently discharging contaminants to air.</td>
</tr>
<tr>
<td>2. Biodiversity</td>
<td>• Potential effects on local wildlife sites, hedgerows, designated European wildlife sites, UK BAP habitat sites.</td>
</tr>
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<td>• Proximity and potential for effects on the Swale SPA, SSSI and Ramsar sites.</td>
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<tr>
<td></td>
<td>• Presence of trees on the potential development site subject to tree protection orders (TPOs).</td>
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<tr>
<td></td>
<td>• Potential for effects on protected species (e.g. European protected species, badgers, great crested newt etc.).</td>
</tr>
<tr>
<td>3. Climate change</td>
<td>• <strong>Not</strong> a focus of the SHLAA</td>
</tr>
<tr>
<td>4. Crime and safety</td>
<td>• <strong>Not</strong> a focus of the SHLAA</td>
</tr>
<tr>
<td>5. Cultural heritage</td>
<td>• Potential for adverse effects on listing buildings, archaeology and scheduled monuments.</td>
</tr>
<tr>
<td>6. Employment and skills</td>
<td>• Potential for employment/job creation on site in addition to housing (e.g. mixed use residential-led development).</td>
</tr>
<tr>
<td>7. Health</td>
<td>• Potential loss of existing recreation and open space (e.g. amenity greenspace, allotments, playing fields etc.).</td>
</tr>
<tr>
<td>8. Housing</td>
<td>• Potential to provide housing for specific users (e.g. retirement homes, care home and key worker accommodation). This does not cover provision for affordable housing which is provided for separately.</td>
</tr>
<tr>
<td>9. Landscape</td>
<td>• Potential effects on landscape character or quality of designated and undesignated landscapes.</td>
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<td></td>
<td>• Potential effects on conservation areas.</td>
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<tr>
<td></td>
<td>• The ability of a landscape to absorb change, principally informed by Council’s Landscape Capacity Study.</td>
</tr>
<tr>
<td>10. Local economy</td>
<td>• The potential for housing to displace existing/future employment uses to the detriment of the local economy.</td>
</tr>
<tr>
<td>11. Population</td>
<td>• <strong>Not</strong> a focus of the SHLAA</td>
</tr>
<tr>
<td>12. Soil</td>
<td>• Ground conditions (e.g. land stability) of the potential development site.</td>
</tr>
<tr>
<td></td>
<td>• The risk of ground contamination on the potential development site.</td>
</tr>
</tbody>
</table>
Transport and accessibility

- The distance of the potential development site to keys amenities (shops, educational facilities, healthcare facilities etc.).
- Accessibility of the potential development site to public transport services (e.g. the distance to and frequency of services).
- The physical accessibility of the potential development site for vehicles and pedestrians.
- The capacity of the existing highway network to handle increased traffic generated by the potential development.
- The proximity of potential development sites to existing highways and railways and the potential for adverse effects on development sites (e.g. noise).

Waste

- Not a focus of the SHLAA

Water

- Potential effects on water source protection zones.
- The vulnerability of potential development sites to flooding.
- The servicing of potential development sites for potable water and wastewater.

Readers interested in particular site options should refer to the SHLAA. The aim here is to present an ‘at a glance summary’ appraisal of all site options against the SA framework. Table 4b categorises the performance of each site option in terms of each of the sustainability topics that together comprise the ‘SA framework’. Box 4a discusses the methodological approach taken.

Box 4a: Methodological approach to site options appraisal for the purposes of this SA Report

Each site option is categorised on a Red, Amber, Green (RAG) scale, where:

- **Red** = Significant constraint reported in the SHLAA
- **Amber** = Significant constraint reported in the SHLAA, but the potential for mitigation also reported.
- **Green** = Opportunity reported within the SHLAA.
- ‘No colour’ indicates that no issues are discussed within the SHLAA

The specific appraisal criteria taken into account, when categorising the performance of each site option against each SA topic, are those listed in Table 4a, above. For example, ‘housing’ is scored solely on the basis of whether there is ‘potential to provide housing for specific users (e.g. retirement homes)’.

Given that only one colour could be applied to each topic, sometimes a judgment call was required where individual criteria within a topic had different colour codes. Generally, a conservative approach was taken where [red + amber = red] and [red + green = amber]. This **methodological limitation** is acceptable given that the aim here is only to provide an ‘at a glance summary’, i.e. given that readers can find more detailed information within the SHLAA. It is worth noting that the methodology applied here is particularly limited when it comes to concluding on the merits of site options in terms of ‘Transport and accessibility’. Numerous sites score ‘red’ because they perform poorly in terms of proximity to one service/facility, despite the fact that they are well located in relation to others. Indeed, a number of sites that score red are located within the urban boundary of higher order settlements, and so generally perform well in terms of transport and accessibility.
In light of the SHLAA / site options appraisal work (as well as understanding of the emerging preferred broad spatial strategy) the Council was able to develop a preferred approach. As part of this, further work was undertaken to understand constraints/opportunities in greater detail, and also consideration was given to the potential to mitigate negative effects / capitalise on opportunities through development management policy.

Regarding the Council’s reasons for ruling out some site options, it is not the intention to provide comprehensive information here. However, it is appropriate to brief consideration to additional issues that fed-in – see Box 4B.

**Box 4B: Additional factors that have fed-in and enabled the Council to rule-out site options**

<table>
<thead>
<tr>
<th>It is particularly the case that consideration of agricultural land quality and landscape capacity / sensitivity has fed-in.</th>
</tr>
</thead>
<tbody>
<tr>
<td>With regards to <strong>agricultural land</strong>, it is generally the case that sites at Iwade and Sheppey are located on lower grade land, whilst other sites are on high grade land.</td>
</tr>
<tr>
<td>With regards to <strong>landscape capacity / sensitivity</strong>, bespoke studies have enabled the Council to conclude on the potential for significant landscape impacts at a number of the site options identified as scoring ‘amber’ within the table below. For example:</td>
</tr>
<tr>
<td>• Further work on landscape sensitivity at Faversham has fed-in and enabled the Council to establish the potential for negative landscape impacts for a number of the sites, including:</td>
</tr>
<tr>
<td>– Preston Fields, Canterbury Road – visually harmful given attractive rural views afforded from the A2. The juxtaposition of countryside views extending into the urban area is valued.</td>
</tr>
<tr>
<td>– Land at Perry Court and Land west of Brogdale Road – raises issues in terms of the ‘morphology’ of Faversham (given the A2).</td>
</tr>
<tr>
<td>• At Bapchild an Urban Extension Landscape Capacity Study established the potential for ‘Land at Hempstead Lane’ and ‘Land rear of 37-91 The Street’ to result in significant encroachment into a traditional fruit belt landscape.</td>
</tr>
<tr>
<td>• At Minster and Sittingbourne landscape capacity work has been undertaken that now enables the Council’s to conclude that some site options actually fall within land that should be formally designated as an Important Local Countryside Gap</td>
</tr>
<tr>
<td>• Similarly at Ospringe and Iwade Village (where there is a particular issue around coalescence with Sittingbourne, given the allocation at NW Sittingbourne), the Council is able to conclude that there would be the potential for significant landscape impacts to result from development at a number of the sites listed above as scoring an ‘amber’ in the landscape column.</td>
</tr>
</tbody>
</table>
| There are also other factors besides landscape that have fed-in to the Council’s thinking (but which might not be reflected in the red/amber scoring in the table below). For example, poor access to a GP surgery is a significant issue in Bapchild, loss of mature woodland is an issue at ‘Land east of Woodside, Boughton’ and the AQMA at Ospringe is a barrier to development at ‘Land fronting London Road’ and ‘Land at London Road/Water Lane’.

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**SA REPORT: APPENDICES**
### Table 4b: Site options appraisal (N.B. More detail can be found within the SHLAA)

<table>
<thead>
<tr>
<th>SHLAA ref.</th>
<th>Site address</th>
<th>Settlement</th>
<th>Air</th>
<th>Biodiversity</th>
<th>Cultural heritage</th>
<th>Employment and skills</th>
<th>Health</th>
<th>Housing</th>
<th>Landscape</th>
<th>Local economy</th>
<th>Soil</th>
<th>Transport &amp; accessibility</th>
<th>Water</th>
<th>Is this site a proposed allocation?</th>
<th>If so, what development management measures are proposed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>SW/101</td>
<td>Land at Hempstead Lane</td>
<td>Bapchild</td>
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<td>No</td>
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<tr>
<td>SW/408</td>
<td>Land rear of 37-91 The Street</td>
<td>Bapchild</td>
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<td>No</td>
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<tr>
<td>SW/410</td>
<td>Land adj School Lane</td>
<td>Bapchild</td>
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<tr>
<td>SW/411</td>
<td>Land adj School Lane</td>
<td>Bapchild</td>
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<td>No</td>
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<tr>
<td>SW/412</td>
<td>Bapchild Fruit Stall</td>
<td>Bapchild</td>
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<td>No</td>
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<tr>
<td>SW/003</td>
<td>Land east of Woodside</td>
<td>Boughton</td>
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<tr>
<td>SW/015</td>
<td>Land east of Woodside</td>
<td>Boughton</td>
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<tr>
<td>SW/163</td>
<td>Bull Lane</td>
<td>Boughton</td>
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<td></td>
<td>Yes. Policy A14 addresses the provision of access, impacts on the setting of conservation area, integrated landscape strategy/good design to minimise visual impact.</td>
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<tr>
<td>SW/415</td>
<td>Land off Colonels Lane</td>
<td>Boughton</td>
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<td>Yes. Policy A14 addresses integrated landscape strategy/built design to create attractive views from the A2.</td>
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<tr>
<td>SW/417</td>
<td>Land south of Colonels Lane</td>
<td>Boughton</td>
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<td>Yes. Policy A14 addresses integrated landscape strategy/built design to create attractive views from the A2.</td>
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<tr>
<td>SW/434</td>
<td>Land r/o Queens Head PH, High Street</td>
<td>Boughton</td>
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<tr>
<td>SW/129</td>
<td>The Bunny Bank</td>
<td>Eastchurch</td>
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<td>No</td>
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<tr>
<td>SW/132</td>
<td>Land north of High Street</td>
<td>Eastchurch</td>
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<td></td>
<td>Yes. Policy A14 addresses the potential for archaeological remains,</td>
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<tr>
<td>SHLAA ref.</td>
<td>Site address</td>
<td>Settlement</td>
<td>Air</td>
<td>Biodiversity</td>
<td>Cultural heritage</td>
<td>Employment and skills</td>
<td>Health</td>
<td>Housing</td>
<td>Landscape</td>
<td>Local economy</td>
<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<tr>
<td>SW/197</td>
<td>Land north of Eastchurch</td>
<td>Eastchurch</td>
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<td>No</td>
<td>respond appropriately to heritage assets, biodiversity, landscaping and providing safe access.</td>
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<tr>
<td>SW/034</td>
<td>Weston Works, Brent Hill/Brent Road</td>
<td>Faversham</td>
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<td>Yes. Policy NP1 provides for restoration / enhancement of heritage assets, flooding addressed in agreement with Environment Agency (zone 3ai) and access to services.</td>
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<tr>
<td>SW/037</td>
<td>Land at Ham Farm, Ham Road</td>
<td>Faversham</td>
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<td>Yes. Policy A14 addresses integrated landscape strategy/new urban edge and the rural amenity/appearance of Ham Road.</td>
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<tr>
<td>SW/046</td>
<td>Land fronting London Road, Ospringe</td>
<td>Faversham</td>
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<tr>
<td>SW/047</td>
<td>Land at London Road/Water Lane, Ospringe</td>
<td>Faversham</td>
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<td>No</td>
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<tr>
<td>SW/080</td>
<td>Land east of Love Lane/south of Graveney Road</td>
<td>Faversham</td>
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<td>SW/081</td>
<td>Mindon, Ashford Road</td>
<td>Faversham</td>
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<tr>
<td>SW/091</td>
<td>Land adj Western Link</td>
<td>Faversham</td>
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<td></td>
<td>Yes. Policy A12 addresses impacts on air quality/AQMA, net biodiversity gain, pedestrian/cycle links and infrastructure needs. Facilities are available within reasonable walking distance.</td>
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<tr>
<td>SW/096</td>
<td>Land at Lady Dane Farm</td>
<td>Faversham</td>
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<td>Yes. Policy MU5 addresses integrated landscape strategy, connectivity for pedestrian/cycles and public transport and providing infrastructure.</td>
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<tr>
<td>SHLAA ref.</td>
<td>Site address</td>
<td>Settlement</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<tr>
<td>SW/191</td>
<td>Faversham Police Station, Church Road</td>
<td>Faversham</td>
<td>Yes. Policy A13 addresses conservation area and archaeology and also acknowledges that surface water issues require input from Environment Agency.</td>
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<tr>
<td>SW/203</td>
<td>Land at Ordnance Wharf, Flood Lane</td>
<td>Faversham</td>
<td>Yes. Policy NP1 addresses historic buildings, potential land contamination and flood risk.</td>
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<tr>
<td>SW/210</td>
<td>Preston Forge Highway Depot, Canterbury Road</td>
<td>Faversham</td>
<td>No</td>
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<tr>
<td>SW/212</td>
<td>Bysingwood Primary School</td>
<td>Faversham</td>
<td>Yes. Policy A13 addresses ecological assessment / and an integrated landscape strategy. Facilities are available within reasonable walking distance.</td>
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<td>SW/233</td>
<td>Preston Fields, Canterbury Road</td>
<td>Faversham</td>
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<td>SW/305</td>
<td>Reedland Crescent</td>
<td>Faversham</td>
<td>No</td>
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<tr>
<td>SW/334</td>
<td>Land at Graveney Road</td>
<td>Faversham</td>
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<tr>
<td>SW/353</td>
<td>Standard Quay</td>
<td>Faversham</td>
<td>Yes. Policy NP1 provides for restoration / enhancement of heritage assets, flooding addressed in agreement with Environment Agency (zone 3ai) and access to services.</td>
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<tr>
<td>SW/354</td>
<td>Fentiman’s Yard, New Creek Road</td>
<td>Faversham</td>
<td>Yes. Policy NP1 addresses access to services.</td>
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<tr>
<td>SW/355</td>
<td>Brents Industrial Estate</td>
<td>Faversham</td>
<td>No</td>
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<tr>
<td>SW/356</td>
<td>South East Coast Oil Services Ltd</td>
<td>Faversham</td>
<td>Yes. Policy NP1 addresses flooding (in agreement with Environment Agency (zone 3ai)), access to services and the remediation of contaminated land.</td>
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<tr>
<td>Site address</td>
<td>Settlement</td>
<td>Air</td>
<td>Biodiversity</td>
<td>Cultural heritage</td>
<td>Employment and skills</td>
<td>Health</td>
<td>Housing</td>
<td>Landscape</td>
<td>Local economy</td>
<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<tr>
<td>SW/357 Flood Lane</td>
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<tr>
<td>SW/359 Standard House, New Creek Road</td>
<td>Faversham</td>
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<td>Yes. Policy NP1 addresses flooding (in agreement with Environment Agency (zone 3ai)) and access to services.</td>
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<td>SW/403 Abbey School, London Road</td>
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<td>Yes. Policy MU4 addresses impacts on air quality through Ospringe, net gain in biodiversity, secure conservation of heritage assets, mitigation of contamination, access to services.</td>
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<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>Yes. Policy A13 addresses archaeology and access to services.</td>
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<td>Yes. Policy A14 addresses impacts on the Local Wildlife Site, integrated landscape strategy, mitigation of contamination / flooding and accessibility.</td>
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<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>Yes. Policy A13 addresses integrated landscape strategy and ecological assessment and archaeology.</td>
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<td>Yes. Policy A7 addresses archaeological mitigation.</td>
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<td>Yes. Policy A14 addresses biodiversity/ecological assessment, address surface water issues, accessibility.</td>
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<td>SW/124</td>
<td>Land west of Church Lane</td>
<td>Newington</td>
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<td>No</td>
<td>Yes. Policy A14 addresses safe access/proximity of primary school, accessibility.</td>
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<tr>
<td>SW/140</td>
<td>Land and buildings at Parsonage Farm</td>
<td>Newington</td>
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<td>Yes. Policy A13 addresses mitigation for contamination and flood risk.</td>
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<td>SW/164</td>
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<td>SW/407</td>
<td>Land off High Street</td>
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<td>SW/005</td>
<td>The Foundry, Rushenden Road</td>
<td>Queenborough</td>
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<td>Yes. Policy A13 addresses mitigation for contamination and flood risk.</td>
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<td>SW/025</td>
<td>Nil Desperandum, Rushenden Road</td>
<td>Queenborough</td>
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<td>Yes. Policy A14 addresses archaeology, integrated landscape strategy, ecological and flooding impacts and the need to provide access to services.</td>
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<td>SW/042</td>
<td>Land at Moat Way</td>
<td>Queenborough</td>
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<td>SW/207</td>
<td>Aesica Ltd, Whiteway Road</td>
<td>Queenborough</td>
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<td>SW/318</td>
<td>Land adj Manor Road</td>
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<td>Yes. Policy A13 addresses flood risk and accessibility to services.</td>
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<td>SW/333</td>
<td>West Street</td>
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<td>Yes. Policy PR2 addresses biodiversity interests, impacts on adjoining conservation area and an integrated landscape strategy.</td>
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<td>SW/335</td>
<td>West of Rushenden Road</td>
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<td>Yes. Policy PR2 addresses biodiversity interests and flood risk.</td>
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<td>SHLAA ref.</td>
<td>Site address</td>
<td>Settlement</td>
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<td>Cultural heritage</td>
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<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>SW/370</td>
<td>Land south of Creekside</td>
<td>Queenborough</td>
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<td>Yes. Policy PR2 addresses biodiversity interests, contamination and flooding.</td>
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<td>SW/404</td>
<td>Land at Queenborough Road</td>
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<td>SW/990</td>
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<td>Yes. Policy PR2 addresses contamination and flooding.</td>
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<td>SW/094</td>
<td>Four Gun Field, Otterham Quay</td>
<td>Rainham</td>
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<td>SW/205</td>
<td>Stoneyard Depot, Bridge Road</td>
<td>Sheerness</td>
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<td>SW/009</td>
<td>Land at Manor Farm, Key Street</td>
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<td>Yes. Policy A14 addresses archaeology, integrated landscape strategy, biodiversity.</td>
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<td>SW/022</td>
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<td>SW/040</td>
<td>Land north of Quinton Road</td>
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<td></td>
<td>Yes. Policy MU1 addresses integrated landscape strategy, flood mitigation, pedestrian / cycle access, new vehicular access, bus routes, provision of infrastructure (and provision made at Sonora Fields).</td>
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<tr>
<td>SW/050</td>
<td>Chilton Manor</td>
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<td>SW/057</td>
<td>Land north of Key Street</td>
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<td>Yes. Policy A14 addresses integrated landscape strategy, TPO effects and flood risk.</td>
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<td>Settlement</td>
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<td>Cultural heritage</td>
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<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>SW/062</td>
<td>Land fronting Milton Creek/Gas Road</td>
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<td>Yes</td>
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<td>Policy MU2 addresses integrated landscape strategy, transport effects and pedestrian/cycle links.</td>
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<td>SW/073</td>
<td>Pheasant Farm</td>
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<td>Yes</td>
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<td>Policy MU1 addresses integrated landscape strategy, new vehicular access, bus routes.</td>
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<td>SW/075</td>
<td>Great Grovehurst Farm (north)</td>
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<tr>
<td>SW/076</td>
<td>Lydbrook Close, London Road</td>
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<td>Yes (Policy 13)</td>
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<td>SW/092</td>
<td>Milton Pipes, Church Marshes</td>
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<td>SW/104</td>
<td>Land at Grovehurst Farm</td>
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<td>Yes</td>
<td></td>
<td>Policy MU1 addresses integrated landscape strategy, new vehicular access, bus routes, provision of infrastructure.</td>
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<td>SW/107</td>
<td>Land at Chilton Manor/Highsted Lane</td>
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<td>SW/111</td>
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<td>Yes</td>
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<td>Policy A10 addresses design to enhance heritage, enhance pedestrian/cycle links to town centre, addresses transport impacts and air quality.</td>
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<td>SW/112</td>
<td>St Bartholomew’s School</td>
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<td>Yes</td>
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<td>Policy A13 addresses flood risk and impacts on listed buildings.</td>
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<td>SHLAA ref.</td>
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<td>Settlement</td>
<td>Air</td>
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<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>Yes. Policy A13 addresses flood risk and archaeology.</td>
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<td>SW/135</td>
<td>Land at Grove End Farm, Tunstall</td>
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<td>SW/179</td>
<td>The Old Sale Field, Ruins Barn Road</td>
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<td>Adult Education Centre, College Road</td>
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<td>Sittingbourne Community College</td>
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<td>Yes. Policy A13 addresses flood risk and access.</td>
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<td>189 Park Road</td>
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<td>SW/309</td>
<td>Land rear of Middletune Avenue</td>
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<td>Freesia, Grovehurst Road</td>
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<td>Yes. Policy A13 addresses landscaped frontage to Parish Road, archaeology mitigation and transport impacts.</td>
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<td>SW/311</td>
<td>Land adj 40 Tonge Road</td>
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<td>Settlement</td>
<td>Air</td>
<td>Biodiversity</td>
<td>Cultural heritage</td>
<td>Employment and skills</td>
<td>Health</td>
<td>Housing</td>
<td>Landscape</td>
<td>Local economy</td>
<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>Yes. Policy A13 addresses design/prominent location, pedestrian/cycle links, air quality, and responds to undesignated heritage assets, and to achieve net biodiversity gain.</td>
<td></td>
</tr>
<tr>
<td>SW/322</td>
<td>Shortlands Road car park</td>
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<td>Yes. Policy A13 addresses heritage assets, integrated landscape strategy, retaining trees.</td>
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<td>Yes. Policy A8 addresses design, open space, pedestrian/cycle links, integrated landscape strategy.</td>
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<td>Yes. Policy A9 addresses design, land restoration, pedestrian/cycle links, transport assessment.</td>
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<tr>
<td>SW/338</td>
<td>Eurolink Way</td>
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<tr>
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<td>Yes. Policy PR1 addresses no biodiversity loss, development to respect adjoining conservation area.</td>
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<tr>
<td>SW/344</td>
<td>Sainsbury’s, Roman Square</td>
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<tr>
<td>SW/345</td>
<td>Central Avenue</td>
<td>Sittingbourne</td>
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<td></td>
<td>Yes. Policy PR1 addresses no biodiversity loss, development to respect adjoining conservation area.</td>
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<tr>
<td>SW/346</td>
<td>Albany Road car park</td>
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<tr>
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<td>Settlement</td>
<td>Air</td>
<td>Biodiversity</td>
<td>Cultural heritage</td>
<td>Employment and skills</td>
<td>Health</td>
<td>Housing</td>
<td>Landscape</td>
<td>Local economy</td>
<td>Soil</td>
<td>Transport &amp; accessibility</td>
<td>Water</td>
<td>Is this site a proposed allocation?</td>
<td>If so, what development management measures are proposed?</td>
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<td>Fountain Street</td>
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<td>Yes. Policy PR1 addresses no biodiversity loss, development to respect adjoining conservation area.</td>
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<td>SW/348</td>
<td>Cockleshell Walk, West Street</td>
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<td>No</td>
<td>No</td>
<td>Yes. Policy PR1 addresses no biodiversity loss, development to respect adjoining conservation area.</td>
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<td>Rear of 71-121 High Street</td>
<td>Sittingbourne</td>
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<td>Jct East Street/St Michael's Road</td>
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<td>Yes</td>
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<td>Yes. Policy PR1 addresses no biodiversity loss and requires development to respect adjoining conservation area.</td>
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<td>SW/374</td>
<td>Orbital, Staplehurst Road</td>
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<td>No</td>
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<td>Yes. Policy A13 addresses mitigation against effects from road and railway noise and also addresses poor access.</td>
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<td>SW/402</td>
<td>Borden Grammar School</td>
<td>Sittingbourne</td>
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<td>Land adj 60 Ruins Barn Road</td>
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<td>SW/437</td>
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<td>SW/996</td>
<td>Land adj Grovehurst Surgery, Grovehurst Road</td>
<td>Sittingbourne</td>
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<td>SHLAA ref.</td>
<td>Site address</td>
<td>Settlement</td>
<td>Air</td>
<td>Biodiversity</td>
<td>Cultural heritage</td>
<td>Employment and skills</td>
<td>Health</td>
<td>Housing</td>
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<td>Local economy</td>
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<td>Transport &amp; accessibility</td>
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<td>SW/422</td>
<td>Land at Ufton Court Farm</td>
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<td>SW/442</td>
<td>Watermark, Staplehurst Road</td>
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<td>Yes. Policy A13 addresses mitigation against effects from road and railway noise.</td>
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<td>SW/071</td>
<td>Land at Frognal Lane</td>
<td>Teynham</td>
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<td>Yes. Policy MU3 addresses integrated landscape strategy and new access to overcome existing poor access onto A2.</td>
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<tr>
<td>SW/142</td>
<td>Land at Cellar Hill</td>
<td>Teynham</td>
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<td>SW/143</td>
<td>Land at Claxfield Farm/Lynsted Lane</td>
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<td>SW/144</td>
<td>Land east of Station Road</td>
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<td>Yes. Policy A14 addresses traffic management and off-street parking, integrated landscape strategy/biodiversity.</td>
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<tr>
<td>SW/373</td>
<td>Barrow Green Farm</td>
<td>Teynham</td>
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<td>SW/420</td>
<td>Land adj Mayfield, London Road</td>
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<td>Yes. Policy A14 addresses proximity to allocation at Frognal Lane/access to services.</td>
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<tr>
<td>SW/443</td>
<td>Barrow Green Farm, Barrow Green</td>
<td>Teynham</td>
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<td>Yes. Policy A14 addresses integrated landscape strategy and safe access.</td>
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<td>SW/049</td>
<td>Chaffes Lane</td>
<td>Upchurch</td>
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<td>SW/085</td>
<td>Land at Jubilee Fields, Oak Lane</td>
<td>Upchurch</td>
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<td>SW/086</td>
<td>Land north of Jubilee Fields, Oak Lane</td>
<td>Upchurch</td>
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</table>
APPENDIX V: PAST SA RECOMMENDATIONS

Chapter 15 explains how numerous recommendations have been made in the past, i.e. as part of the appraisal of earlier, working draft versions of the plan. The aim of this appendix is to present past recommendations along with an explanation of how they have been 'actioned', i.e. reflected in the current version of the plan.

*Table 4a: Past SA recommendations and how they have been actioned*

<table>
<thead>
<tr>
<th>Sustainability objective(s)</th>
<th>Past appraisal recommendation</th>
<th>How has this been addressed in the current version of the plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce <strong>air pollution</strong> and ensure air quality continues to improve across the Borough</td>
<td>The positive impact of the ‘Delivering Sustainable Development’ policy could be further improved by adding an additional bullet point under the principles of sustainability, which emphasises the need to ensure that new development addresses the need to improve air quality within the Borough.</td>
<td>Policy ST1 (Delivering sustainable development in Swale) sets out how Swale intends to apply the presumption in favour of sustainable development required by national policy. Policy ST1 requires all parties and development proposals to commit to applying national policy with respect to pollution. The area based policy for the Sittingbourne area (ST5), where three AQMAs are currently designated, expects development to be consistent with local air quality action plans.</td>
</tr>
<tr>
<td><strong>Policy ST7</strong> (The Faversham area and Kent Downs strategy) could be further strengthened to ensure development proposals coming forward in this area do not increase the levels of pollutants at the A2 section through Ospringe which is an AQMA.</td>
<td></td>
<td>Policy ST7 now includes a criteria aimed at ensuring development proposals “Are consistent with local air quality action plans for Ospringe.”</td>
</tr>
<tr>
<td>Conserve and enhance <strong>biodiversity</strong> and the natural environment</td>
<td>Within ‘Isle of Sheppey’ policy, incorporate policy wording that emphasises the importance of protecting key biodiversity assets as part of delivering economic regeneration on the Isle of Sheppey.</td>
<td>Policy ST6 (Isle of Sheppey) includes at point 10 support for development proposals which establish Sheppey as a focus for achieving net gains in biodiversity both through the appropriate mitigation and compensation of projects within the Borough and further afield. The supporting text for this policy recognises the presence of the international, national and local biodiversity interests of designated areas of the coast and estuarine and these areas needing to be protected and enhanced. It identifies that enhancements would be through compensatory land needed as a result of development in this area.</td>
</tr>
<tr>
<td>Sustainability objective(s)</td>
<td>Past appraisal recommendation</td>
<td>How has this been addressed in the current version of the plan?</td>
</tr>
<tr>
<td>-----------------------------</td>
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</tr>
<tr>
<td>Reduce crime and anti-social behaviour and the fear of these</td>
<td>The need to reduce crime, fear of crime and anti-social behaviour is not directly addressed within the draft plan. It is recommended that the 'Delivering Sustainable Development' policy incorporates reference to 'designing out crime'.</td>
<td>Policy ST1 (Delivering sustainable development in Swale) sets out how Swale intends to apply the presumption in favour of sustainable development required by national policy. Policy ST1 expects development proposals to deliver good design and core policies CP3 (Delivering a wide choice of high quality homes) and CP5 (Promoting healthy communities) aims to create social interaction and safe environment which will minimise the fear of crime.</td>
</tr>
<tr>
<td>Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage</td>
<td>The positive impact identified for Policy CP1 (Sustainable Development) could be further enhanced by clearly identifying the need to protect areas of heritage value (including listed buildings and conservation areas) as part of delivering new development in Swale.</td>
<td>Policy CP1 (Sustainable Development) is not part of this latest version of the plan. Instead Policy ST1 (Delivering sustainable development in Swale) sets out how Swale intends to apply the presumption in favour of sustainable development required by national policy. Policy ST1 expects all parties and development proposals to conserve and enhance the historic environment by applying national policy to heritage assets, ensuring all assets are central to strategies, plans, policies and development proposals through the identification, assessment and positive integration of the importance, form and character of buildings, features, settlements and historic landscapes.</td>
</tr>
</tbody>
</table>
| Ensure high and stable levels of employment in accessible locations  
Provide affordable and decent housing adaptable to future needs of the community  
Sustain economic growth and competitiveness  
Meet the challenges of a growing and ageing population; Reduce poverty and social exclusion; and Improve accessibility for all to key services and facilities. | Consider revising the proposed housing growth target so that it can support the plan's economic growth strategy more fully; and so that it will deliver housing growth to meet identified needs. | Alternative housing growth strategies have been tested in the run-up to finalising the Publication version of the Local Plan. An explanation of why the preferred approach – which is essentially a low housing growth strategy – is justified in-light of the alternatives appraisal is given in Chapter 13, within ‘Part 2’ above. |
<table>
<thead>
<tr>
<th>Sustainability objective(s)</th>
<th>Past appraisal recommendation</th>
<th>How has this been addressed in the current version of the plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meet the challenges of a growing and ageing population; Reduce poverty and social exclusion; and Improve accessibility for all to key services and facilities.</td>
<td>Amend Policy ST7 point 9 as follows: “Improve Reduce levels of deprivation in Davington and East Downs Wards and/or facilitate as required, increased capacity in infrastructure and services in accordance with the Local Plan Implementation and Delivery Schedule.”</td>
<td>The policy now identifies the need for development proposals to: “Reduce levels of deprivation in the most deprived wards and facilitate as required, increased capacity in infrastructure and services in accordance with the Local Plan implementation and delivery schedule.</td>
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<tr>
<td>Protect and enhance the valued landscape and townscape of Swale</td>
<td>The Kent Downs AONB is located in close proximity to the M2. It is recommended that the supporting text for the ‘Sittingbourne Southern Relief Road’ policy should acknowledge the need to protect the Kent Downs AONB as part of delivering the road.</td>
<td>The concept for a Sittingbourne Southern Relief Road is now identified in the plan as a 'Longer Term Opportunity'. Its formal adoption as a strategic road project with serious prospects for delivery would lead to a Local Plan review.</td>
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<tr>
<td>Achieve the sustainable management of waste</td>
<td>Consider specifying how different types of development would promote waste reduction and recycling currently identified in Policy DM19 to assist with achieving the sustainable management of waste as part of new development.</td>
<td>Waste management is dealt with in detail within Policy CP4 (Requiring good design). This is sufficient.</td>
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<tr>
<td>Manage and reduce the risk of flooding; Maintain and enhance water quality (ground and surface) and make efficient use of water</td>
<td>Within the ‘Sittingbourne’ and ‘Isle of Sheppey’ policies incorporate policy wording that emphasises the importance of avoiding inappropriate development in areas at risk of flooding.</td>
<td>The policies state that planning permission will be granted for development proposals which are appropriate to the level of risk from climate change, flooding and coastal change.</td>
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<tr>
<td>Sustainability objective(s)</td>
<td>Past appraisal recommendation</td>
<td>How has this been addressed in the current version of the plan?</td>
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<td></td>
<td>Neither the supporting text nor the policy wording for SA1, SA2 or SA3 provide a reference to the need to improve waste water treatment facilities in Sittingbourne or Teynham as part of delivering new development. These policies would be improved by such a reference.</td>
<td>Policy MU3 (Land at Frognal Lane, Teynham) sets out that the development brief and planning applications at this site must ensure waste water connections at points that are adequate in their capacity. Policies relating to Sittingbourne sites do not provide a reference to this need for improvement. It is understood that Southern Water has not confirmed to the Council the need for improvements at Sittingbourne. Policy DM21 (Water, flood and drainage) expects proposals to demonstrate there is or will be adequate wastewater connections and treatment facilities in place before construction commences and that these details have been approved by the appropriate water company.</td>
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</tbody>
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