



Sustainability Appraisal (SA) of the Swale Local Plan



**SA Report
Non-technical Summary**

April 2015

Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	April 2015	Non-technical summary of the SA Report submitted alongside the Local Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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INTRODUCTION

URS is commissioned to undertake Sustainability Appraisal in support of the emerging Swale Local Plan. The Local Plan, once adopted, will present a spatial strategy for the District up to 2031. It will determine a broad spatial strategy and allocate land for various types of development, and will establish a policy framework that will form the basis for a wide range of planning decisions in the future.

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 the positives. SA of the Swale Local Plan is a legal requirement stemming from the EU Strategic Environmental Assessment (SEA) Directive.

This is the **non-technical summary** of the SA Report being submitted alongside the Swale Local Plan. This summary should be read alongside the main SA Report document.

Structure of the SA Report / this non-technical summary

The SA Report (and this non-technical summary) sets out to answer four questions:

1. What's the scope of the SA?
2. What has plan-making / SA involved up to this point?
3. What are the appraisal findings and recommendations at this current stage?
4. What are the next steps?

WHAT'S THE SCOPE OF THE SA?

An important first step in the SA process involves establishing the 'scope', i.e. those sustainability issues and objectives which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

- What's the sustainability 'context'?
 - Answering this question primarily involves reviewing Government's National Planning Policy Framework; however, it is also important to 'cast the net wider' and consider contextual messages established through other plans, policies, strategies and initiatives.
- What's the sustainability 'baseline'?
 - Answering this question involves reviewing available data to establish an understanding of the current and likely future state of the environment / socio-economy locally.

The following is a brief summary of some of the sustainability issues described within the SA Report. It is important to emphasise that the following list is not comprehensive.

Environmental issues

- Local air quality is poor within areas of Sittingbourne and at Ospringe and Newington with four Air Quality Management Areas (AQMA) declared between 2009 and 2013.
- Rich biodiversity habitats within the Borough especially the coastal areas require greater protection to ensure no loss of habitat or species.
- Steps are required to identify and protect a green grid structure throughout the Borough.
- Climate change is a considerable threat to the natural systems locally, particularly the coastal areas.
- Public transport connectivity is poor, creating car dependency and higher carbon emissions per capita.
- The climate change agenda requires delivery of renewable energy technologies.
- Swale has a rich heritage, which is reflected in many buildings of conservation value. A number are redundant and disused and hence on the 'at risk' register.
- 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 is an extensive resource of high quality (Grade 1) agricultural land, centred on the A2 corridor.
- The Borough is vulnerable to tidal flooding (and surface water flooding) which will be exacerbated by climate change.

Communities baseline

- Quality of life indicators such as health and crime suggest that Swale is a relatively pleasant place to live, though deprivation is an issue. Education / skills drive deprivation, as well as employment and income.
- Recreational, cultural facilities and activities and natural green and open spaces of good quality are currently limited, with improvements needed especially in urban Sittingbourne and Sheerness.
- Provision of affordable housing in the Borough is below target. The Council needs to deliver further affordable homes in both urban and rural areas, however there are issues of viability.
- An ageing population puts additional pressures on housing supply, as well as services and health care.

Economic baseline

- A significantly lower proportion of residents are employed in the finance, IT and other business sectors compared to the south east and the national average.
- Swale has a large number of people lacking qualifications and a shortage of graduate labour employment opportunities. Investment in skills and learning is regarded as critical for long term regeneration.
- Average pay is significantly lower than the south east but is just above the national average. Female workers in the Borough earn less on a weekly basis than both the national and regional average.
- High levels of out commuting to jobs particularly in the higher skilled sectors and the higher paid jobs especially using car as a main form of transport resulting in increased congestion.
- Potential constraints on the labour supply resulting from the future decline of the working age population.
- 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 SA ‘framework’

Drawing on the findings of the context / baseline review, a list of 21 ‘sustainability objectives’ was identified. These objectives – and the associated criteria - provide a methodological ‘framework’ for the SA.

The SA Framework

Topic	Sustainability objectives <i>There is a need to...</i>	Will the Policy...
Air	<ul style="list-style-type: none"> • Reduce air pollution and ensure air quality continues to improve across the Borough 	<ul style="list-style-type: none"> • Contribute to reductions in air quality monitoring pollutants at monitoring locations across the Borough?
Biodiversity	<ul style="list-style-type: none"> • Conserve and enhance biodiversity and the natural environment 	<ul style="list-style-type: none"> • Maintain and enhance relevant habitats and species? • Protect and enhance habitat corridors and linking routes? • Continue the protection of designated areas and propose appropriate enhancement? • Conserve and enhance the populations of protected and/or BAP priority species within the Borough? • Allow for the creation of new areas of BAP priority habitats?

Topic	Sustainability objectives <i>There is a need to...</i>	Will the Policy...
Climate change	<ul style="list-style-type: none"> Minimise the need for energy, increase energy efficiency and to increase the use of renewable energy; Encourage sustainable construction materials and methods 	<ul style="list-style-type: none"> Limit the emissions of greenhouse gases? Ensure the Borough is prepared for the effects of climate change? Increase the energy efficiency of the Borough's housing stock? Increase the proportion of energy generated from renewables?
Crime and Safety	<ul style="list-style-type: none"> Reduce crime and anti-social behaviour and the fear of these 	<ul style="list-style-type: none"> Help reduce the fear of crime? Incorporate designing out crime measures into new development?
Cultural Heritage	<ul style="list-style-type: none"> Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of built and cultural heritage 	<ul style="list-style-type: none"> Protect archaeological sites, historic buildings, conservation areas and other culturally important features?
Employment and Skills	<ul style="list-style-type: none"> Ensure high and stable levels of employment in accessible locations Raise the educational achievement levels across the Borough and help people to acquire the skills needed to find and remain in employment 	<ul style="list-style-type: none"> Increase the numbers of knowledge based and higher paid jobs? Create new employment opportunities to meet the needs of the residents? Contribute to increased learning opportunities across the Borough?
Health	<ul style="list-style-type: none"> Improve health and well-being and reduce inequalities in health 	<ul style="list-style-type: none"> Improve access to health services? Contribute to fuel poverty reductions? Improve access to recreation?
Housing	<ul style="list-style-type: none"> Provide affordable and decent housing adaptable to future needs of the community 	<ul style="list-style-type: none"> Deliver the appropriate mix of housing to deliver 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 failing decent homes standards? Deliver adaptable housing to meet the lifelong needs of the population?
Landscape	<ul style="list-style-type: none"> Protect and enhance the valued landscape and townscape of Swale 	<ul style="list-style-type: none"> Preserve and enhance the nationally important landscape of the AONB? Contribute positively to the Borough's established high quality landscape? Contribute to the establishment of the green grid network?
Local Economy	<ul style="list-style-type: none"> Sustain economic growth and competitiveness 	<ul style="list-style-type: none"> Contribute the development of eco-tourism industry? Provide for opportunities to attract new businesses to the Borough? Contribute to infrastructure improvements?

Topic	Sustainability objectives <i>There is a need to...</i>	Will the Policy...
Population	<ul style="list-style-type: none"> • Meet the challenges of a growing and ageing population • Reduce poverty and social exclusion • Improve accessibility for all to key services and facilities 	<ul style="list-style-type: none"> • Assist with regeneration of deprived areas in the Borough? • Improve access to key services? • Improve access to recreation, amenity and community facilities?
Soil	<ul style="list-style-type: none"> • Protect and enhance soil quality and reduce contamination 	<ul style="list-style-type: none"> • Reduce contaminated sites and increase remediation of redundant industrial land? • Maintain the resource of high quality agricultural land? • Protect an identified brownfield site with conservation value?
Transport and Accessibility	<ul style="list-style-type: none"> • Promote traffic reduction and encourage more sustainable alternative forms of transport 	<ul style="list-style-type: none"> • Provide improvements and new routes for cyclists and pedestrians? • Reduce to need to travel by car? • Lead to adverse impacts on the Strategic Road Network, particularly junction 5 and 7 of the M2?
Waste	<ul style="list-style-type: none"> • Achieve the sustainable management of waste 	<ul style="list-style-type: none"> • Reduce waste arisings? • Ensure waste management in accordance with the waste hierarchy?
Water	<ul style="list-style-type: none"> • Manage and reduce the risk of flooding • Maintain and enhance water quality (ground and surface) and make efficient use of water 	<ul style="list-style-type: none"> • Improve the quality of water within the Borough? • Reduce the demand for water (water efficiency measures)? • Ensure that development does not increase vulnerability to flooding? • Provide SuDS and other flood prevention systems and ensure integration into the wider green grid network?

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

It is a legislative requirement that every SA Report includes an explanation of how/why the preferred (i.e. draft plan) approach was selected/developed in-light of earlier appraisal of 'reasonable alternatives'. As such, an interim stage of SA (i.e. a stage prior to appraisal of the draft plan / preparation of the SA Report) must involve appraisal of reasonable alternatives.

'Part 2' of the SA Report explains how alternative spatial strategies have been appraised and consulted-on over the years so that by 2014 it was understood that there were two spatial strategy alternatives. The alternatives are presented in the **Table 1** below.

The alternatives were subjected to appraisal (see **Table 2**) and then subsequently the Council was in a position to finalise the draft plan. Section 12 of the SA Report includes a detailed explanation of the Council's reasons for selecting the preferred approach in light of alternatives appraisal.

Table 1: The reasonable alternatives (2014)

	Quantum	Distribution	
		Thames Gateway	Outside the TG (predominantly Faversham)
Option 1 - Lower growth with diversion of growth from Faversham to the Thames Gateway	540 dpa	87%	13%
Option 2 - Higher growth, distributed as per the current population split	740 dpa	76%	24%

 Table 2: Reasonable alternatives (2014): Summary appraisal findings¹

Objective		Categorisation / Rank of preference	
		Opt 1	Opt 2
Environment	Reduce air pollution and ensure air quality continues to improve across the Borough	★1	2
	Conserve and enhance biodiversity and the natural environment	★1	2
	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	★1	2
	Reinforce local distinctiveness, environmental quality and amenity through the conservation and enhancement of built and cultural heritage	★1	2
	Protect and enhance the valued landscape and townscape of Swale	★1	2
	Protect and enhance soil quality and reduce contamination	★1	2
	Promote traffic reduction and encourage more sustainable alternative forms of transport	★1	2
	Achieve the sustainable management of waste	N/a	N/a
	Manage and reduce the risk of flooding; To maintain and enhance water quality (ground and surface) and make efficient use of water	★1	★1
Communities	Reduce crime and anti-social behaviour and the fear of these	N/a	N/a
	Improve health and well-being and reduce inequalities in health	★1	2
	Provide affordable and decent housing adaptable to future needs of the community	2	★1

¹ 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.

Objective		Categorisation / Rank of preference	
		Opt 1	Opt 2
	Meet the challenges of a growing and ageing population ; Reduce poverty and social exclusion; and Improve accessibility for all to key services and facilities.	2	★1
The economy	Sustain economic growth and competitiveness	★1	★1
	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	★1	★1

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.

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

Part 3 of the SA Report answers the question 'What are appraisal findings at this current stage?' by presenting an appraisal of the Draft Plan as it currently stands. The appraisal is presented under the 15 SA topic headings established through scoping. The overall conclusions are as follows:

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.

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.

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.

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.

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.

WHAT ARE THE NEXT STEPS?

The Council has now submitted the plan to Government, alongside a summary of the issues raised through consultation, so that it might then be examined by a Government appointed Planning Inspector as part of an Examination in Public.

The Inspector will consider the Plan, the SA Report, evidence-base studies and representations received before then either reporting back on the Plan's soundness or identifying the need for modifications. Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a Statement will be published that sets out (amongst other things) 'measures decided concerning monitoring'.