

Sustainability Appraisal (SA) of the Swale Borough Local Plan

SA Report Addendum

Non-technical summary

June 2016

Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	June 2016	Non-technical summary of the SA Report Addendum published alongside the Proposed Modifications to the Swale Borough Local Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

Limitations

AECOM Infrastructure & Environment UK Limited (“AECOM”) has prepared this Report for the use of Swale Borough Council (“the Client”) in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by AECOM in providing its services are outlined in this Report. The work described in this Report was undertaken in 2016 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

AECOM disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to AECOM’s attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. AECOM specifically does not guarantee or warrant any estimate or projections contained in this Report.

Copyright

© This Report is the copyright of AECOM Infrastructure & Environment UK Limited.

AECOM Infrastructure and Environment UK Limited
 6-8 Greencoat Place
 London, SW1P 1PL
 Telephone: +44(0)20 7798 5000
 Fax: +44(0)20 7798 5001

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Borough Local Plan. Once adopted, the plan will establish a spatial strategy for growth and change over the next 15 years, allocate sites and establish a policy framework for determining planning applications.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement.

The plan is at an advanced stage of preparation, having been formally published in December 2014 ahead of being submitted to Government for examination in April 2015; and then having been the focus of Examination Hearings in November/ December 2015.

At the current time, proposed modifications to the plan are published for consultation, and an SA Report Addendum is published alongside. The SA Report Addendum aims to inform representations, and subsequent plan-making work (see the discussion of 'next steps', below). It is an 'addendum' to the SA Report published and submitted alongside the plan in 2014/15.

This is a non-technical summary (NTS) of the SA Report Addendum.

Structure of the SA Report Addendum / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
 - i.e. in the run-up to preparing proposed modifications.
2. What are the appraisal findings at this current stage?
 - i.e. in relation to proposed modifications.
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering: "What's the scope of the SA?"

What's the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability objectives and sub-objectives, which were developed subsequent to a 'scoping' process that involved review of the sustainability context and baseline, and also consultation.

Taken as a whole, the list of sustainability objectives and sub-objectives indicates the parameters of SA, and provides a methodological 'framework' for appraisal - see **Table 1**.

Table 1: Sustainability objectives (the SA framework)

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

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

PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising 'reasonable alternatives' in time to inform development of the draft plan (or proposed modifications), and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, Part 1 of the SA Report Addendum explains how work was undertaken to develop and appraise reasonable alternatives. Specifically, Part 1 of the report -

- 1) Explains the process of establishing reasonable alternatives;
- 2) Presents the appraisal of the reasonable alternatives; and
- 3) Gives the Council's response to the alternatives appraisal findings.

Establishing reasonable alternatives

When developing reasonable alternatives in early 2016 there was firstly a need to take into account considerable background. Most notably, there was a need to take into account direction provided by the Inspector tasked with examining the Local Plan, who wrote to the Council with interim findings in February and March 2016. The Inspector's interim findings led to an understanding that:

1) There is a need to allocate additional sites, such that the plan provides for Objectively Assessed Needs (OAN) for housing, which in practice means allocating sites to deliver 2,224 homes plus an appropriate buffer, which the Council has determined should mean allocating additional sites to deliver c.3,000 homes.

2) The spatial strategy reflected in the submission plan is broadly 'sound' and hence additional allocations must be in-line with that strategy. Specifically, the Inspector's interim finding was that:

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

Having considered background factors (1) and (2), there was an understanding that: the aim was to develop a single set of alternative approaches to distributing c.3,000 dwellings; and only certain distribution options need ('reasonably') be given consideration. However, even with this understanding, it was recognised that there remained a plethora of alternative approaches that might be taken, with 116 site options in contention.

As such, it was recognised that there was a need to undertake work to explore reasonable site options, with a view to narrowing down the number of distribution alternatives in contention, and ultimately establishing a set of reasonable alternatives. There are a number of different work-streams examining site options in isolation, including work presented in Appendices I - III of the SA Report Addendum.

Ultimately, having considered site options in isolation, and also thought about how site options might be delivered in combination at each settlement in order to achieve a coherent growth strategy, three reasonable alternatives emerged - see **Table 2**. Points to note are -

- There are constants across the alternatives, specifically: c.700 additional allocations at Sittingbourne, primarily through an extension to the southwest; c.800 additional allocations at West Sheppey, primarily at two sites to the west of Minster; c.800 additional allocations at Faversham, at sites that stand-out as most suitable (including two sites with planning permission, or 'resolution to grant planning permission'); c.100 additional allocations at Newington, at a site that stands-out as most suitable; and nil additional allocations at Teynham, East Sheppey, Boughton and other villages.
- Whilst there are other spatial strategy options besides those in Table 2, it is appropriate to limit the number of alternatives given explicit consideration in order to ensure 'accessibility'. Interested parties are, of course, welcome to comment on spatial strategy options other than those presented.

Table 2: Reasonable spatial strategy alternatives to inform ‘modification-making’

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

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

Summary alternatives appraisal findings

Summary alternatives appraisal findings are presented within Table 3. Within each row of the table (i.e. for each element of the SA framework - see Table 1) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using **red** / **green**) and also rank the alternatives in order of performance. Also, ‘ = ’ is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table 3: Spatial strategy alternatives appraisal findings

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

¹ N.B. The aim is to discuss the relative merits of the alternatives in terms of the SA framework - i.e. in terms of competing sustainability objectives - rather than to identifying an option that is best performing or 'most sustainable' overall.]

The Council's response / justification for the preferred approach

The Council's preferred approach is Option 1, which the appraisal finds to perform relatively well, albeit with some draw-backs. In-light of the alternatives appraisal the Council is confident that the preferred option is justified and ultimately 'sound'. The Council's response to the alternatives appraisal is as follows:

"The Council's preferred approach is Option 1, which can be summarised as follows -

- Sittingbourne is intended to remain the overall focus for growth in the Borough, in recognition that it is the largest settlement with strong opportunities for urban regeneration, employment and new services with overall good transport links. The town's position within the Thames Gateway reinforces the need for growth here. However, there are limitations to its overall growth, not least the presence of best and most versatile agricultural land (BMV) and landscape and heritage constraints to the south of the town. Thus the preferred approach represents a balance between safeguarding the town's position within Policy ST3 (of the submitted plan) and safeguarding its important environmental resources. There will though be development needed in locations where the need for growth will override local constraints; notably through the erosion of important local countryside gaps.
- Having struck a balance at Sittingbourne, there is a need for growth at other locations, principally the Isle of Sheppey where sites can be provided on lesser constrained sites, whilst maximising the use of sustainably located BMV in a way that too reflects Sheppey's overall position within the Thames Gateway. Here though, there too are limits to growth, with sites toward the centre and eastern end of Sheppey less well located and judged to have more significant environmental impact. The focus therefore is on the better connected and less harmful sites on the western side of the Island.
- Having struck a balance at Sittingbourne and Sheppey, there is the need to secure a proportionate boost at Faversham and the rural areas. In the case of Faversham, this can be achieved without significant/substantial harm to the strategy and vision for the town. In the rural areas, this boost can also be achieved with further growth at the Rural Local Service Centres, and, amongst these settlements, Iwade is considered to be the most appropriate focus for additional growth because of its strong location close to Sittingbourne and the strategic road network. Here, a limited amount of lower quality agricultural land is also available, whilst large areas of land are able to provide potentially significant environmental and green infrastructure benefits for the village and for the Swale Thames Gateway as a whole.

The Council has been able to identify this preferred approach drawing on various workstreams, namely: work examining site options in isolation; appraisal of district-wide spatial strategies; and other factors, including discussions with site promoters.

Appraisal of Borough-wide strategic alternatives finds the preferred approach (Option 1) to perform relatively well against a number of objectives, although it was noted that it performs relatively poorly in terms of biodiversity (see HRA) and soil. These and the other topic issues have been considered by the Council as follows:

- Air: The preferred approach performs equally as well as option 2, however, on balance, the Council believes that option 1 has a better relationship with the strategic road network and does not give rise to air quality concerns. Whilst option 2 would not give rise to air quality concerns on Sheppey, the longer journeys off-Island to employment and other services would be less favourable than for option 1.
- Biodiversity: Significant effects within option 1 relate to HRA issues at Iwade, but examination of the HRA and the proposed policy AX5 put in place by the Council demonstrate that the issues are capable of being addressed and that these could, potentially, lead to certain biodiversity benefits.
- Cultural Heritage: Whilst the preferred approach leads to some issues, any potential impacts arising are capable of adequate mitigation with the issues appropriately addressed in proposed policy wordings.
- Landscape: The preferred approach is, on balance, the best performing and whilst the approach is not without potential adverse impacts, these are clearly addressed through proposed policy.

- **Soil:** Whilst option 2 performs better and significant effects are highlighted against option 1, the Council considers that this is not an overriding reason for not favouring option 1, once other factors, notably transport and traffic and housing (viability) are taken into account. The Council's preferred approach seeks to avoid the use of high quality soils until such times as significant conflict with other objectives occurs. The Council believes that the balance that is required to be reached between these potentially conflicting objectives has been struck.
- **Transport and traffic:** The preferred approach performs best, even though it is acknowledged that this is not by a significant margin. This is largely due to outstanding or unknown impacts associated with further work required to assess impacts in the A249 corridor. However, the plan has in place the work required to address any issues arising.
- **Health:** Whilst the preferred approach does not stand out against other options, it does have the potential to deliver high quality infrastructure that supports health activities.
- **Housing:** Whilst the preferred approach does not perform any better than option 3, it is clearly preferable to option 2 in terms of that option's more dispersed approach and poorer viability. This is particularly relevant in terms of the balance to be struck with the protection of soil and transport and traffic issues.

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

APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report Addendum answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the proposed modifications that are currently published for consultation. The appraisal comprises a series of narratives, each examining proposed modifications in terms of one element of the SA framework (see Table 1, above). Summary findings are presented here.

Air

Proposed modifications give rise to some concerns, particularly the allocation of Land north of High Street, Newington (New Policy AX6). Policy requires innovative solutions; however, it is not clear the extent to which such solutions will result in reduced traffic through the AQMA. On balance, it is appropriate to conclude the potential for **significant negative effects**; however, there is much uncertainty.

Biodiversity

Proposed modifications give rise to some concerns, given the allocation of land for a major extension at Iwade; however, a rigid policy framework is set to be put in place to ensure that impacts are mitigated and opportunities realised. As such, it is not possible to conclude significant negative effects.

Climate change

Higher growth in Swale is arguably non-ideal from a climate change mitigation perspective; however, it is not clear that this is a significant consideration. The policy framework, in respect of low carbon infrastructure and design, might ideally be strengthened; however, it is recognised that development viability (albeit improved in recent years) is a constraining factor; and equally it is recognised that deletion of Code for Sustainable Homes requirements is in-line with Government policy.

Cultural heritage

Whilst additional allocations are in proximity to heritage assets, a robust policy framework is in place to avoid/mitigate impacts. Perhaps the greatest concern relates to the impact to Faversham's historic setting, which to a large extent cannot be mitigated.

Landscape

There will be a range of impacts to locally important landscapes as a result of additional allocations at Sittingbourne, Iwade, Faversham and Sheppey; however, detailed site specific policy will be put in place to avoid/mitigate effects as far as possible.

Soil

The spatial approach to distributing the additional allocations (Policy ST4; MM58) leads to tensions, as it is not possible to avoid the loss of best and most versatile agricultural land, including significant areas of grade 1 (i.e. highest quality nationally) agricultural land. Directing a degree of growth to West Sheppey and Iwade is a positive; however, there will still be some loss of grade 3a (i.e. lowest grade best and most versatile) agricultural land at Iwade. On the basis of this discussion, **significant negative effects** are predicted.

Transport and traffic

The growth strategy is broadly supported, from a transport/traffic perspective, on the assumption that required infrastructure upgrades (most notably upgrades to M2 J5) come forward in advance of development. Each major site is associated with specific issues, but policy is in place to ensure that these are addressed.

Waste

Proposed additional allocations do not have implications for sustainable waste management, and no proposed new or modified thematic policy deals with waste management.

Water

Proposed modifications lead to few concerns from a flood risk perspective, and there are no identified issues in terms of water resources or water quality.

Crime

Proposed additional allocations do not have implications for crime / fear of crime, and no proposed new or modified thematic policy deal with crime.

Health

Proposed modifications have minor positive implications for the achievement of health objectives, primarily as a result of supporting new green infrastructure delivery.

Housing

Proposed modifications will lead to **significant positive effects**, in terms of housing, on the basis that the effect is to provide for additional homes such that objectively assessed needs will be met in full over the plan period. The fact that housing delivery will be closely monitored, and a plan review triggered if it is apparent that necessary housing delivery is not being achieved, is also a positive. The policy of providing for additional Gypsy and Traveller pitches has been removed, but this approach is justified by the latest evidence of needs.

Population

Proposed modifications have minor positive implications for the achievement of 'population' objectives. A Local Plan Implementation and Delivery Schedule has been prepared to demonstrate how a range of new community infrastructure will be delivered; however, the aim generally is to respond to needs arising from new communities, rather than address any existing deficiencies.

Economic growth, employment and skills

Proposed modifications will help to diversify and strengthen the local economy, directing additional housing to the Thames Gateway to support employment growth, and allocating new land for offices at Faversham. The proposed new Local Plan Review 'triggers' are also of note, and will help to ensure that any future economic opportunities (as understood from monitoring of economic indicators) are realised.

Conclusions at this current stage

The appraisal of proposed modifications finds the likelihood of significant positive effects in terms of 'housing' objectives, given that additional housing site allocations are proposed such that objectively assessed needs should be met, and also minor positive effects in terms of communities ('health' and 'population') and the local economy objectives. Significant negative effects are predicted in terms of air quality (albeit with much uncertainty), given an allocation at Newington in proximity to an AQMA, and in terms of the loss of best and most versatile agricultural land. In respect of 'biodiversity', significant negative effects are not predicted, given the robust policy framework that is set to mitigate effects; however, it is clearly the case that major expansion at Iwade is not ideal in this respect. A number of other tensions are also highlighted (e.g. in respect of cultural heritage and landscape); however, again it is the case that significant negative effects are not predicted given the policy framework (particularly site specific policy) that is proposed. No formal recommendations are made at the current time, although it is generally recommended that the Council / Inspector should consider ways to address the negative effects / tension highlighted through the appraisal.

Next steps

Part 3 of the SA Report answers– *What happens next?* – by discussing plan finalisation and monitoring.

Plan finalisation

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

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

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

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

Monitoring

At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The Council has proposed a range of monitoring indicators, which is broadly supported. Key monitoring indicators are those that could trigger a plan review, as specified in policy ST2. Given appraisal findings presented above, it is suggested that there might also be a particular emphasis on: on-site habitat enhancements, air quality within the A2 AQMAs and traffic at key junctions, including on Sheppey.