

Agenda

Policy and Resources Committee Meeting

Date: Wednesday, 11 March 2026

Time 7.00 pm

Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT

Membership:

Councillors Mike Baldock, Lloyd Bowen (Vice-Chair), Charles Gibson, Tim Gibson (Chair), Alastair Gould, Angela Harrison, James Hunt, Elliott Jayes, Mark Last, Ben J Martin, Richard Palmer, Julien Speed, Ashley Wise and Dolley Wooster and one vacancy.

Quorum = 5

Pages

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building until advised to do so. Do not use the lifts.

- (d) Anyone unable to use the stairs should make themselves known during this agenda item.

2. Apologies for Absence

3. Minutes

To approve the Minutes of the Meeting held on 4 February 2026 (Minute Nos. TBA) as a correct record.

4. Declarations of Interest

Councillors should not act or take decisions in order to gain financial or other material benefits for themselves, their families or friends.

The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPis) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

5. Matters Arising

Update from the Chair on any matters from the previous meeting or upcoming agenda items relating to this Committee.

Items for Noting

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Issued on Tuesday, 3 March 2026

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**Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT**

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Policy and Resources Committee Forward Decisions Plan – 10 March 2026

Report title, background information and recommendation(s)	Date of meeting	Open or exempt	Lead Officer and report author
Risk Management Update – Q3 & Q4	TBC	Open	Lead Officer: Emma Jones? Head of Service: Kathy Woodward
Annual Risk Management Report – 2025/2026	TBC	Open	Lead Officer: Georgia Harvey Head of Service: Kathy Woodward
Award of Contract - CCTV Control Room Expansion	TBC	Open	Lead Officer: Stephanie Curtis Head of Service: Charlotte Hudson

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Policy and Resources Committee	
Meeting Date	11 th March 2026
Report Title	Houses In Multiple Occupation (HMO) Supplementary Planning Document (SPD) - Consultation Launch
EMT Lead	Emma Wiggins Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson Head of Place
Lead Officer	Ian Harrison Planning Manager (Planning Applications)
Classification	Open
Recommendations	1. That members note the new time constraints for the adoption of Supplementary Planning Documents; 2. That members note the importance of this SPD to the Council motion; 3. That members approve the draft Houses in Multiple Occupation SPD (Appendix I) for consultation purposes; and 4. That members delegate to the Head of Planning, in consultation with the Planning and Transportation Policy Working Group Chair, the making of minor amendments and corrections to the draft HMO SPD document prior to the start of the consultation period.

1 Purpose of Report and Executive Summary

- 1.1 This report sets out the background to the recommendations made by the Planning and Transportation Policy Working Group (PTPWG) during its meeting on 22nd January 2026.
- 1.2 Prior to that, at the Full Council Meeting on 1st October 2025, a motion was brought relating to the “Management and Regulation of HMOs in Swale”. At that Council meeting it was resolved to, amongst other things, refer this matter to the relevant Committee to develop a Supplementary Planning Document (SPD) addressing the four core principles that are set out below:
- *A maximum threshold for HMO’s within defined areas or individual streets to avoid over concentration*
 - *Minimum off-street parking requirements for HMO’s to reduce pressure on local roads*
 - *Proper waste and recycling storage and management for all HMO’s*
 - *Minimum room sizes and standards in line with national guidelines*

- 1.3 To address that motion, the recommendations of the report that was presented to PTPWG were:
1. *That members note the new time constraints for the adoption of Supplementary Planning Documents;*
 2. *That members note the importance of this SPD to the Council motion; and*
 3. *That members recommend to Policy and Resources Committee (P&R) that it approves a consultation draft based on the core principles of the motion and the parameters as set out in the report (without Planning and Transportation Policy Working Group (PTPWG) formally reviewing the draft).*
- 1.4 Members discussed the report at the PTPWG meeting on 22nd January 2026 and voted in favour of all recommendations.
- 1.5 An important reason for the approach that was recommended to PTPWG is that there are new, tight time constraints for the production and adoption of SPD documents as a result of the transitional arrangements that government has introduced with respect to the preparation and adoption of local plans and SPDs.
- 1.6 Consequently, and considering the usual timescales required for pre-consultation review, consultation itself, and post consultation approval by PTPWG, Policy and Resources Committee (and for the latter, also Full Council) PTPWG agreed to recommend to P&R Committee that a draft SPD, based on the Full Council motion and the parameters set out in the supporting report be approved for consultation. Removing the usual role of PTPWG in reviewing the full draft document was critical in enabling the SPD to be adopted before the opportunity to do so was removed by government.
- 1.7 A draft HMO SPD has now been prepared and is included at Appendix I.
- 1.8 The purpose of this report is to seek the approval of the draft HMO SPD for consultation purposes, thereby enabling it to be the subject of a 4 week period of public consultation.
- 1.9 It is requested that delegation be given to the Head of Service, in consultation with the PTPWG Chair, to make any minor amendments and corrections to the document prior to the start of the consultation period.

2 Background

- 2.1 The PTPWG report set out the full background to the matter, including providing a link to the applicable minutes of the Full Council meeting of 1st October 2025.

- 2.2 Along with seeking the relevant committee to make an Article 4 direction to restrict permitted development rights related to the formation of HMOs, the Council resolved at that meeting to seek the appropriate committee to develop a SPD relating to the Management and Regulation of HMOs in Swale.
- 2.3 The report to PTPWG then went on to provide a commentary of the scope of an SPD and the requirement for the SPD to build-on existing development plan policies. To reflect that, a commentary of the applicable policies within Swale's Local Plan was then provided and an indication was given of how it would be appropriate for the forthcoming SPD to provide guidance specific to HMOs in relation to the application of those policies. This had the effect of clarifying the scope of the proposed SPD, in alignment with the Full Council motion, and building upon that motion by indicating how the objectives of the motion aligned with policies of the development plan.
- 2.4 Within the PTPWG report, it was acknowledged that the evidence base relating to the existing HMO stock was limited. In the intervening period, work has been undertaken, including consultation with colleagues, to develop a full picture of the number and location of HMOs within the Borough. The evidence that has been identified at this stage is detailed within the draft HMO SPD.
- 2.5 As set out above and within the PTPWG report, the timeline for the adoption of an SPD is constrained as a result of an incoming restriction on the use of SPDs and the existence of a deadline for the adoption of SPDs. To that end, the following timetable was provided within the PTPWG report:

Stage	Date
Presentation of this report to the Planning and Transportation Policy Working Group.	22 January 2026
Circulation of Draft HMO SPD to Members of the Planning and Transportation Policy Working Group for comment.	Late February 2026
Seek approval from the Policy and Resources Committee to consult on the Draft HMO SPD.	11 March 2026
Undertake a four week consultation in respect of the Draft HMO SPD.	23 March 2026 to 20th April 2026
Extraordinary meeting of the Planning and Transportation Policy Working Group to recommend post-consultation draft for adoption.	Mid / Late May 2026
Policy and Resources Committee Meeting to recommend post-consultation draft for adoption.	Mid June 2026
Urgent Decision Committee for adoption.	Late June 2026

- 2.6 By preparing this report and presenting the matter to the P&R committee on 11th March 2026, the above programme is on course. A draft of the HMO SPD was circulated to Members of the Planning and Transportation Policy Working Group on 26th February 2026 in accordance with the above timeline.

3 Proposals

- 3.1 That members note the new time constraints for the adoption of Supplementary Planning Documents;
- 3.2 That members note the importance of this SPD to the Council motion;
- 3.3 That members approve the draft House in Multiple Occupation SPD (Appendix I) for consultation purposes; and
- 3.4 That members delegate to the Head of Planning, in consultation with the Planning and Transportation Policy Working Group Chair, the making of minor amendments and corrections to the draft HMO SPD document prior to the start of the consultation period.

4 Alternative Options Considered and Rejected

- 4.1 There are a number of alternative options to progressing the HMO SPD which have been considered. Some of these are were assessed in the Planning and Transportation Policy Working Group report of 22nd January 2026, including the following:
 - **Alternative Option 1:** Members could suggest the consultation draft is revised prior to consultation. Whilst officers consider the draft optimally reflective of the circumstances and evidence available, they can advise on the night of the applicability of suggestions and how these could be tested via consultation.
 - **Alternative Option 2:** Prepare a Draft HMO SPD with a narrower or wider scope than set out above. This has been rejected on the basis that the scope aligns with the Full Council motion and the preparation of an alternative HMO SPD would fall outside the timeline for adoption.
 - **Alternative Option 3:** Prepare a form of guidance note other than an SPD. This has been rejected on the basis that the approach would not align with the Full Council motion and the resultant guidance would not have the same status as an SPD.
 - **Alternative Option 4:** Prepare a supplementary plan under the new Local Plan system. This has been rejected on the basis that there would be a considerable time period until such a plan would be able to be adopted and so this would be ineffective in respect of any applications received in the interim period.
 - **Alternative Option 5:** Do not prepare or seek to adopt a HMO SPD. This has been rejected on the basis that the approach would not align with the Full Council motion.

- 4.2 For the same reasons as set out before, it is recommended that those options are rejected.

5 Consultation Undertaken or Proposed

- 5.1 As set out above, the draft HMO SPD has been circulated to members of the PTPWG with a small window of opportunity to comment being provided. The document has also been shared with internal colleagues, including all Heads of Service.
- 5.2 The recommendation set out above is for the draft HMO SPD be approved for consultation purposes. The consultation envisaged to take place would accord with the Council's Statement of Community Involvement, including:
- The publication of the draft HMO SPD on the Council's website.
 - The provision of paper copy at the Council Offices.
 - Emailing people on the consultation database to highlight the consultation opportunity.
 - Notification of the draft HMO SPD to Town and Parish Councils.
 - Publicity comprising the use of social media, a press release and the inclusion of details within other updates and bulletins.
 - Consultation with internal and external stakeholders including the Council's Housing and Community Service, Private Sector Housing, Parking and Environmental Services teams and the Highway Authority (Kent County Council).

6 Implications

Issue	Implications
Corporate Plan	The HMO SPD would support the delivery of all of the Corporate Plan priorities: • Community • Economy • Environment • Health and housing • Running the Council The Plan contains a specific objective to 'progress a Local Plan with local needs and capacity at its heart.'
Financial, Resource and Property	There are financial and resource implications associated with preparing the Draft HMO SPD, undertaking public consultation in relation to it and as a result of due process. This is within the base budget.
Legal, Statutory and Procurement	Preparation of an SPD is carried out under a national legislative and regulatory framework.

Crime and Disorder	There are no direct crime and disorder impacts arising from this recommendation.
Environment and Climate/Ecological Emergency	There are no environment and climate/ecological emergency impacts arising from this decision. However, an HMO SPD would be likely to address matters that affect the local environment including car parking, refuse storage and living conditions.
Health and Wellbeing	There are no direct health and wellbeing impacts arising from this decision. However, once drafted there will be guidance within the SPD that will positively affect the health and wellbeing of local residents.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.
Risk Management and Health and Safety	A risk could be that the HMO SPD goes beyond what is justified by evidence, goes beyond what can reasonably be the scope of a SPD or duplicates other legislation such that it is not found to be a sound or reasonable tool for the determination of planning applications. A further risk is that the HMO SPD is not able to be adopted before the deadline that is referred to at paragraph 2.5 above. There are no known health and safety risks.
Equality and Diversity	None at this stage.
Privacy and Data Protection	None at this stage.
Local Government Reorganisation	Local Government Reorganisation

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

4.2 Appendix I: Draft HMO SPD

8 Background Documents

8.1 Agenda item 365 - Motion - Management and Regulation of HMO's in Swale. Minutes of Full Council Meeting of 1st October 2025:

(<https://services.swale.gov.uk/meetings/mgAi.aspx?ID=20955>)

- 8.2 Item 5 - Planning and Transportation Policy Working Group 22 January 2026 - Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) – Consultation Launch:

(<https://services.swale.gov.uk/meetings/documents/s32844/HMO%20SPD%20Consultation%20Launch.pdf>)

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Supplementary Planning Document
Houses in Multiple Occupation
Draft

Images and branding to follow.

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3. Local and National Planning Policies
4. Existing HMO stock and Potential Effects of a HMO stock.
5. Guidance Topic 1 – Concentration of HMOs
6. Guidance Topic 2 – Parking
7. Guidance Topic 3 – Waste and Recycling Storage and Management
8. Guidance Topic 4 – Room Sizes
9. Other Controls, Legislation and Contacts
- Appendix A – HMO Concentration Assessment

INTRODUCTION

Swale Borough Council is actively seeking the provision of housing to meet the identified needs of the Borough's residents. As will be set out within this document, this is integral to Bearing Fruits 2031 - The Swale Borough Local Plan (Adopted July 2017) which is part of the Council's Development Plan.

Whilst there is limited definitive evidence available of a need for Houses in Multiple Occupation (HMOs), the Council's Housing Market Assessment identifies that single person households are relatively unlikely to afford market housing and the Council has declared an affordable housing emergency. In addition, there is evidence that demonstrates an increase in the supply of HMOs. In combination, it is considered that the evidenced need for accommodation that is comparatively cheaper and available to rent and the increase in the supply of HMOs suggests that HMOs are forming an increasing part of the Council's Housing stock.

The evidence base indicates that building of various types can become HMOs, albeit most appear to have resulted from the conversion of dwellings. Whilst most dwellings are or were designed for occupation by family units, HMOs are very likely to have a higher adult population and are likely to be used more intensively as a result of bedrooms being formed in place of rooms that were initially envisaged to be used for other purposes. Similarly, buildings used for other purposes previously might not have envisaged residential use at all. As a consequence, there can be instances where the differing occupation of a building and the impacts of accommodating an alternative mix of residents can have implications especially on

- the character and appearance of an area,
- parking provision within the locality, and
- the living conditions of the intended occupiers of the HMO and residents of the surrounding area.

Purpose of the HMO Supplementary Planning Document (SPD)

In light of the above, the purpose of the HMO SPD is to guide the application of the Council's existing policies in respect of applications for HMOs. This covers the following matters:

- The avoidance of the over concentration of HMOs
- The availability of adequate parking.
- The provision of storage for waste and recycling and its management.
- The provision of adequate room sizes for future residents.

Status and Scope

The SPD cannot introduce new policies but will identify matters that should be addressed by an applicant in order to demonstrate compliance with existing policies of Bearing Fruits 2031 - The Swale Borough Local Plan (Adopted July 2017) hereafter referred to as 'The Local Plan'.

Similarly the document will provide an indication of how the Council will approach applications for HMOs and how these approaches relate to the existing policies of The Local Plan.

Once adopted as an SPD, this document will be a material planning consideration for the Council when determining planning applications involving the provision of HMOs.

HMOs WITHIN THE PLANNING SYSTEM AND KEY DEFINITIONS

It is considered appropriate to provide a summary of how the planning system controls the change of use of a building to a HMO. It is anticipated that this might assist some future applicants.

Where a HMO use is introduced, experience demonstrates that it is often reported to the Council's Planning Investigations Team. An additional purpose of this specific section is, therefore, to provide a reference point for those persons who become aware of a HMO being introduced or wish to comment on an application related to a HMO, whether that be a Certificate of Lawfulness or an application for Planning Permission.

Development

Section 55 of the Town and Country Planning Act 1990 defines development and, for the purposes of this SPD, it is relevant that it includes building operations and material changes of use of land. The word 'material' is addressed further below.

From this basis, where the use of a building materially changes, it will constitute development. Section 55 of the T&CP Act 1990 highlights that this is not applicable where the new use falls within the same Use Class as the former use.

Where a material change of use occurs, to be lawful, it would either need to be permitted development or granted planning permission following the submission of a planning application.

Permitted development is development that is enabled by the Town and Country Planning (General Permitted Development) Order 2015 (The GPDO). Of specific relevant to changes of use are the Classes within Part 3 of Schedule 2 of the GPDO which mean that certain changes can occur with needing planning permission.

Definition of a HMO

As will be set out below, the planning legislation that is relevant to HMOs links to the definition that is provided by Section 254 of the Housing Act 2004. A shortened and summarised version of this definition is as follows:

Section 254 of the Housing Act 2004

A building or a part of a building is a "house in multiple occupation" if—

- (a) it meets the "the standard test" which comprises of the following criteria;
 - (1) one or more units of living accommodation that are not self-contained flats.
 - (2) the occupiers do not form a single household
 - (3) it is the accommodation is occupied by persons as their main residence.
 - (4) the occupiers residential use is their only use of the premises.
 - (5) rents are paid by at least one occupier.

- (6) two or more occupiers share one or more basic amenity or the living accommodation is lacking one or more amenity
- (b) it meets “the self-contained flat test” which is as per (2) to (6) above and it consists of a self-contained flat.
- (c) it meets the conditions in subsection (4) (“the converted building test”) which is as per (1) to (5) above and the building has been converted
- (d) an HMO declaration is in force in respect of it under section 255; or a declaration can be made where the above tests are met other than (4) but their use represents a significant use.

There is an additional sub-section (e) that relates to converted blocks of flats, but this is not relevant to Use Class C4 as will be set out below and is therefore of limited relevance to planning.

Classification of HMOs

Town and Country Planning Use Classes Order 1987 (as amended)

This legislation (hereafter referred to as the Use Classes Order) categorises uses of land. Those that fall outside those classes are deemed to be “Sui Generis” i.e. they are effectively a bespoke use of land that is not categorised and, as such, any material changes of use of that land would need planning permission.

Of relevance to this HMO SPD are the following use classes, for which shortened versions of the formal definitions have been provided:

Use Class C3 – Dwellinghouses

Use as a dwellinghouse (whether or not as a sole or main residence) by:

- (a) a single person or by people to be regarded as forming a single household;
- (b) not more than six residents living together as a single household where care is provided for residents; or
- (c) not more than six residents living together as a single household where no care is provided to residents (other than a use within Class C4).

Use Class C4 – Houses in Multiple Occupation

Use of a dwellinghouse by not more than six residents as a “house in multiple occupation”

Interpretation – “For the purposes of Class C4 a “house in multiple occupation” does not include a converted block of flats to which section 257 of the Housing Act 2004 applies but otherwise has the same meaning as in section 254 of the Housing Act 2004.”

Sui Generis – Other Uses that are outside the Use Classes

In relation to HMOs this means the use of a dwellinghouse by more than six residents as a “house in multiple occupation”

Permitted Development

The following section of the abovementioned GPDO applies to the conversion of dwellings (Use Class C3) to HMOs that fall within Use Class C4. A shortened version of the permitted development is provided.

Class L of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.

Permitted Development:

Development consisting of a change of use of a building—

- (a) from a use falling within Class C4 to a use falling within Class C3;
- (b) from a use falling within Class C3 to a use falling within Class C4.

Development is not permitted by Class L if it would result in the use—

- (a) as two or more separate dwellinghouses falling within Class C3 in relation to any building previously used as a single dwellinghouse; or
- (b) as two or more separate dwellinghouses falling within Class C4 in relation to any building previously used as a single dwellinghouse.

Guidance Related to Permitted Development

Where a development falls within the scope of permitted development, it can lawfully occur without any involvement by the Planning Service at Swale Borough Council. There is no need to apply for planning permission.

Often a person will choose to submit an application for a Certificate of Lawfulness for a Proposed Use or Development (often referred to as a CLOPUD or LAWPRO). Such an application seeks confirmation that the proposal is permitted development and the application has to be considered only in respect of whether or not the development could have lawfully occurred on the date that the application was submitted.

Alternatively, if sought after the development has occurred, a Certificate of Lawfulness for an Existing Use of Development (a CLEUD or LDCEX) can be sought.

Seeking a Certificate of Lawfulness is entirely optional. The only consideration to be made by the Planning Service for those types of applications is whether the

development is lawful. Planning merits and national and local planning policies, including this SPD, would not be relevant to such an application.

Planning Permission

Other than where a development is permitted development, planning permission is required.

In summary, changing a building to a Large HMO (Sui Generis Use) i.e. a HMO with 7 or more residents, needs planning permission.

Alterations to the number of residents within a Large HMO could represent a material change of use meaning that might also need planning permission.

The conversion of buildings in any other uses to HMOs of any size would also need planning permission.

Physical Works

In many instances, the conversion of a dwellinghouse to a HMO will involve building operations.

Such works might be able to occur under the terms of Classes A (extensions and alterations other than the roof), B (roof extensions), C (other roof alterations), E (outbuildings) of Part 1 of Schedule 2 of the GPDO. The reason for this being that buildings with a lawful use as a dwellinghouse retain their permitted development rights.

If the building operations exceed those permitted development rights, planning permission is required.

The abovementioned Permitted Development Rights relating to building operations are not applicable to flats.

Section 56 of the T&CPA highlights that internal works within a building are not development and do not require planning permission.

Listed Buildings and Conservation Areas.

Notwithstanding the above, if a building is a listed building, consent may be required for internal works under the terms of the separate regime of control that applies to listed buildings. A change of use does not require listed building consent and so, on its own, the creation of a HMO would not need listed building consent. It is the physical works to a building that may need consent.

A site being within a Conservation Area limits building operations that can occur under permitted development rights, in the same way that they are partially reduced for dwellings. However, being in a Conservation Area does not create any additional limitations with respect to the creation of HMOs in terms of change of use.

Materiality of Change of Use

Above, the term 'material' was highlighted in respect of the definition of development and the inclusion within that of the change of use of land. In this regard, it is relevant to stress that not all changes of use of land will be material. Of relevance to HMOs, is that there could be circumstances where enabling an additional person to reside at a premises might not be considered to result in a material change of use. This would be for determination in the circumstances of a specific case, as what might be material in one case, might not in another.

Restrictions on Permitted Development Rights relating to the Change of Use of Land.

At this time, there are no area-based restrictions in Swale on the ability of property owners to utilise the permitted development right set out above in respect of changes of use to create HMOs.

However, as part of the same Council motion that sought the preparation of this SPD, the Council requested that steps are taken towards making a direction under the terms of Article 4 of the GPDO which would have the effect of removing permitted development rights relating to Class L of Part 3 and the creation of HMOs.

Such a restriction on permitted development rights would materially alter the above commentary as the permitted development opportunity would not be applicable and planning permission would be required for all HMOs that fall within Use Class C4 as well as those Large HMOs that fall outside the Use Classes Order.

Breaches of Planning Control

Where development has occurred that requires planning permission and no such planning permission has been obtained, interested parties are invited to notify the Council's Planning Investigations Team. To do so, it is requested that the following webpage is used: <https://swale.gov.uk/planning-and-regeneration/planning-breaches-and-enforcement/report-a-breach-of-planning-consent#h2>

Investigations of breaches will occur in accordance with the Council's Planning Enforcement Strategy. This can be found at: <https://swale.gov.uk/your-council/strategies-and-policies/planning-enforcement-strategy>

It is hoped that interested parties may have found this document before reporting a development that has or is in the process of occurring. In such instances it is helpful that regard is had to the content of this SPD before reporting a development.

Where a development or building operations are occurring and there is a suspicion that a breach of planning control will occur, formal enforcement action will seldom be considered until a breach of planning control has definitively occurred.

LOCAL AND NATIONAL PLANNING POLICIES

The development plan in effect within the Swale Borough includes Neighbourhood Plans and the Kent Waste and Minerals Local Plan (2024 to 2039). It also includes Bearing Fruits 2031 - The Swale Borough Local Plan (Adopted July 2017) which is the primary source of planning policy relating to development throughout the Swale Borough.

As far as it is relevant to this SPD, Local Plan Policy ST1 (Delivering sustainable development in Swale) states that *“all development proposals will, as appropriate:*

7. *Deliver a wide choice of high quality homes by:*
 - a. *meeting the full, objectively assessed need for housing in the housing market area;*
 - b. *providing housing opportunity, choice and independence with types of housing for local needs; and*
 - c. *keeping vitality within rural communities with identified housing needs, proportionate to their character, scale and role;*
8. *Achieve good design through reflecting the best of an area’s defining characteristics;*
9. *Promote healthy communities through:*
 - a. *location of development to achieve safe, mixed uses and shared spaces;*
 - b. *rejuvenation of deprived communities.”*

Local Plan Policy CP3 (Delivering a wide choice of high quality homes) states that the Council and others *“shall work towards the delivery of a wide choice of high quality homes that extend opportunities for home ownership and create sustainable, inclusive and mixed communities.”* It goes on to state that *“development proposals will, as appropriate:*

- (2) tailor the purpose and objectives of housing proposals to the issues present within local housing market areas;*
- (5) achieve a mix of housing types, reflecting the findings of the current Strategic Housing Market Assessment or similar needs assessment;*
- (6) meet the housing requirements of specific groups, including families, older persons, or disabled and other vulnerable persons; and*
- (8) achieve sustainable and high quality design in accordance with Policy CP4 and Policy DM19.”*

Leading on from the above, Policy CP4 (Requiring good design) states *“that all development proposals will be of a high quality design that is appropriate to its surroundings.”* It goes on to state that *“development proposals will, as appropriate:*

1. *Create safe, accessible, comfortable, varied and attractive places;*

- 2. Enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and strengthening sense of place;*
- 5. Retain and enhance features which contribute to local character and distinctiveness;*
- 7. Achieve a mix of uses, building forms, tenure and densities;*
- 10. Use densities determined by the context and the defining characteristics of the area*
- 11. Ensure the long-term maintenance and management of buildings, spaces, features and social infrastructure;*
- 12. Be flexible in order to respond to future changes in use, lifestyle, and demography;*

Policy DM14 (General development criteria) sets out that *“All development proposals will, as appropriate:*

- 3. Accord with adopted Supplementary Planning Documents and Guidance*
- 5. Reflect the positive characteristics and features of the site and locality*
- 7. Be both well sited and of a scale, design, appearance and detail that is sympathetic and appropriate to the location;*
- 8. Cause no significant harm to amenity and other sensitive uses or areas;*
- 10. Achieve safe vehicular access, convenient routes and facilities for pedestrians and cyclists, enhanced public transport facilities and services, together with parking and servicing facilities in accordance with the County Council’s standards.”*

Finally, Policy DM7 (Vehicle Parking) states that *“when prepared, the Swale Vehicle Parking SPD will provide guidelines for:*

- 1. Car parking standards for residential development, which will*
 - a. take into account the type, size and mix of dwellings and the need for visitor parking; and*
 - b. provide design advice to ensure efficient and attractive layout of development whilst ensuring that appropriate provision for vehicle parking is integrated within it.*
- 3. Cycle parking facilities on new developments, of an appropriate design and in a convenient, safe, secure and sheltered location.”*

At the Neighbourhood Plan level, there are no specific policies within the Boughton and Dunkirk Neighbourhood Plan (2023) which address HMOs. However, policies H1, H8, T3 and E1 are considered to align with The Local Plan insofar as they address the provision of housing to meet local needs whilst minimising environmental impacts, providing adequate parking and ensuring that development respects and enhances local character, environmental quality and amenity value.

Similarly, the Faversham Neighbourhood Plan (2024) does not include any policies that specifically address HMOs. However, policies FAV3 and FAV10 are considered to align with The Local Plan insofar as they address meeting local housing need and

achieving development that compliments the existing townscape and character and represents sustainable design in various stated respects.

The abovementioned Local Plan policies are considered to be aligned with paragraphs 8, 63, 96, 109, 111, 112, 131 and 135 of the NPPF.

Moreover, although it has been published in draft and is the subject of current public consultation, it is relevant that the policies appear to align with policies, DP3, P3, TR2 and TR4 of the Consultation Draft NPPF that was published on 16th December 2025.

In this context, it is considered sound for an SPD to guide the circumstances where HMOs will be able to be supported as they will achieve the outcomes set out within these policies.

EXISTING HMO STOCK & POTENTIAL EFFECTS OF A HMO STOCK

Existing HMO Stock

Identifying the existing HMO stock with reliance solely on planning records is problematic given that, as set out above, many can be formed without needing planning permission and without recourse to the Council's Planning Service. In short, many could have been created without the Planning Service knowing, especially where there are a lower number of residents that might not attract the same amount of attention as larger HMOs. Notwithstanding this, the Council's planning application, local plan monitoring and planning enforcement records have been reviewed and this has enabled several HMOs to be identified. Other Council records have also been utilised to identify HMOs including the HMO License Register.

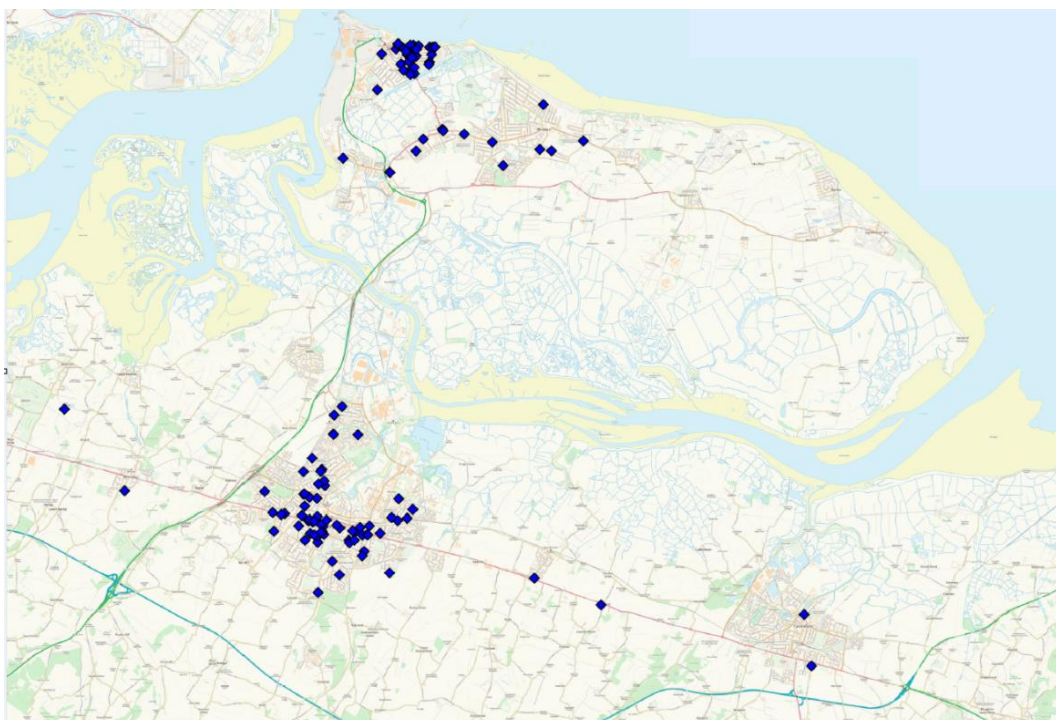
Some records will need to be reviewed further and, as this search process can only represent a snapshot in time, the stock of HMOs will evolve. It is, however, anticipated that a register of known HMOs will be able to be kept up-to-date through the collaboration of the respective teams within the Council.

This research to date indicates that there are 126 HMOs within the Swale Borough.

Evidence sourced from the Office for National Statistics (ONS) indicates that when the 2021 Census was undertaken, there were 61 Small HMOs and 14 Large HMOs in the Swale Borough. In total there were, therefore, 75 HMOs.

It therefore appears that there has been an increase of 51 HMOs in approximately 5 years, a 68% increase above the 75 HMOs that were recorded in the Census.

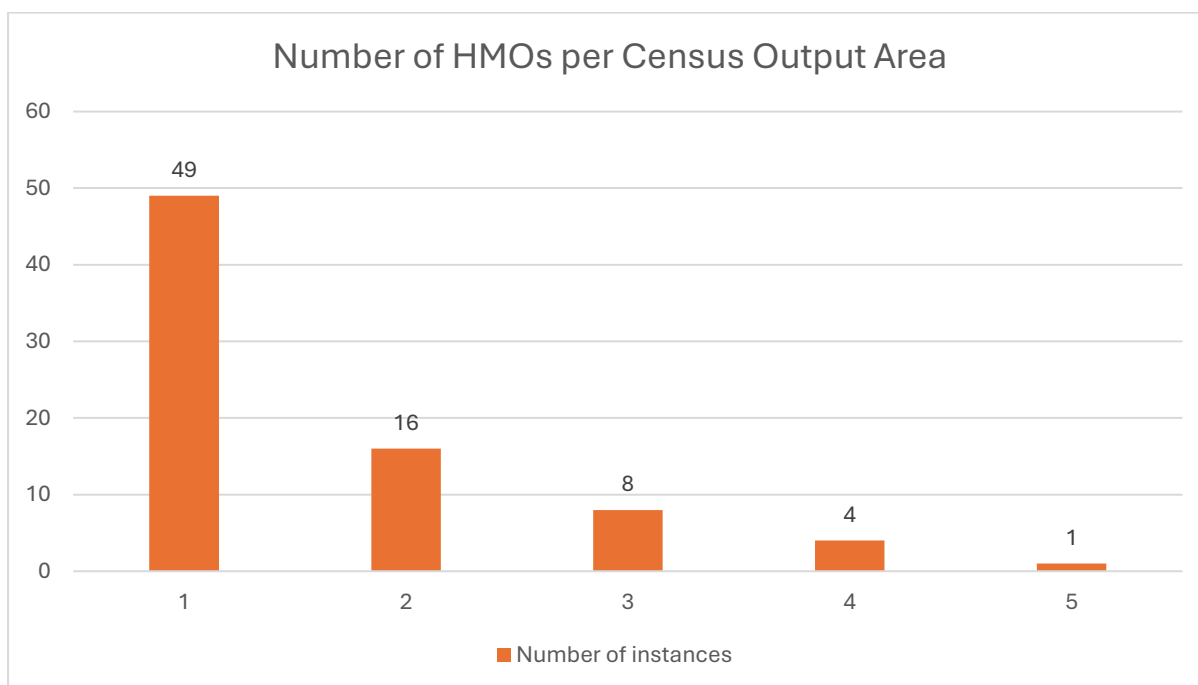
The map below shows that there is a degree of dispersion to the location of HMOs:



On a ward level, the 126 HMOs that have been identified are broken down as follows:

Abbey	1	Milton Regis	8	Sheppey Central	5
Borden and Grove Park	6	Minster Cliffs	1	Teynham and Lysted	2
Chalkwell	12	Murston	4	Watling	1
Hartlip, Newington and Upchurch	2	Queenborough & Halfway	8	Woodstock	3
Homewood	15	Roman	16		
Kemsley	3	Sheerness	39	TOTAL	126

At a more localised level, Census data can be broken down to Output Area (OA) level which are generally areas of between 40 and 250 households with resident populations of between 100 and 625 people. Through separating the 126 identified HMOs into the Output Areas, the following dispersal of HMOs has been established:



Number of HMOs per OA	1	2	3	4	5
Number of instances	49	16	8	4	1

The OA area with the most HMOs is in Sheerness, near and around the junction of Marine Parade, Broadway, and Alma Road. There are 158 households within that area and, as such, 5 HMOs amounts to 3.16% of the households being HMOs.

If combined with an adjacent OA to the west which is one of those that has 4 HMOs, there are 344 households and 9 HMOs in that area, amounting to 2.62%.

Potential Effects of a HMO Stock

The number and quality of HMOs in the borough has been cited as a matter that requires further consideration and, in this regard, the Full Council meeting on 1st

October 2025 provides a useful steer of the matters that are considered to require attention.

It is noted that the motion for Full Council and the debate of that motion identified the following potential impacts of HMOs:

- Impacts on local amenity
- Increased parking demand
- Refuse generation
- Impacts on local infrastructure and public services
- Impacts on housing balance and changes to the character of residential areas
- A reduction of the supply of properties for families and single occupiers.
- Poor living conditions for occupiers

GUIDANCE TOPIC 1 - CONCENTRATION OF HMOs

Ensuring the Concentration of HMOs respects Character and Living Conditions

This matter is considered to align with the consideration of developments in respect of Policies ST1, CP3, CP4 and DM14.

It is considered that the avoidance of an undue accumulation of HMOs within a particular area will ensure that areas with a character defined by dwellinghouses is not unduly eroded. Moreover, it is considered that this will ensure that the developments contribute to the achievement of achieving sustainable inclusive and mixed communities as required by Policy CP3.

Furthermore, noting the potential for a material increase in the number of adult residents and the activity associated with such a population, it is considered that there is scope for there to be a different level of noise and disturbance caused, that could have an impact on the living conditions of existing residents within that area.

Noting that policy DM14 seeks to ensure development causes no significant harm to amenity and other sensitive uses or areas and that paragraph 135f) of the NPPF states that development should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, it is considered appropriate to seek to ensure that a suitable living environment is retained.

As demonstrated above, there is a fairly broad dispersal of 126 HMOs over 16 wards and 8 wards without any HMOs. However, there are some distinct areas where a concentration of HMOs has been identified. Such concentrations can have many implications, including the erosion of the residential character of an area.

A methodology for assessing the acceptability of a concentration of HMOs is to identify a catchment area, calculate the number of residential properties and the number of HMOs within that area and set a threshold based on the number of HMOs that are considered to be able to be accommodated without causing the erosion of the character of the area or other strains that could be contrary to the abovementioned policies.

Appendix A sets out a step-by-step approach to undertaking a HMO Concentration Assessment.

It is considered that a 100m radius from the existing front door of a dwelling is a suitable catchment area in the context that, for many, such an area would be construed as being the area in which they live and the area around their home

Having regard to the evidence above which addresses the prevalence of HMOs within an area, it is considered that a threshold of 10% is an appropriate guideline.

If the threshold of 10% is exceeded in a predominantly residential area, it is likely that a site visit will demonstrate that there is already a noticeable presence of HMOs within the locality. It would be expected that this would not be the case where fewer

HMOs exist. Therefore, unless it can be demonstrated that an additional HMO beyond the 10% threshold can be comfortably accommodated within an area, it is probable that a proposal to introduce a further HMO will be found to cause the undue undermining of an existing residential character.

In more commercial or mixed use areas where there are less than 10 residential properties within the Assessment Area, a 30% threshold will be applied.

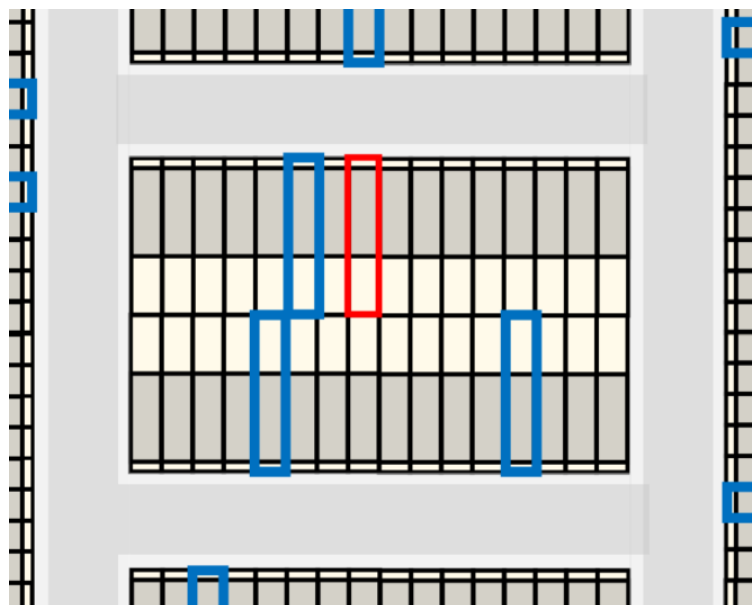
Where a building contains flats, if one of those flats is used as a HMO, the building shall be considered as a whole and that building will be counted as a HMO for the purposes of a concentration assessment.

Avoidance of Sandwiching

In the interests of providing adequate living conditions for existing residents, it is considered appropriate to avoid instances of sandwiching. Where the increased activity resulting from a HMO which has been set out above can be experienced at one side of a C3 dwellinghouse, it is unlikely to have an significantly harmful impact on the overall living conditions of those neighbouring residents.

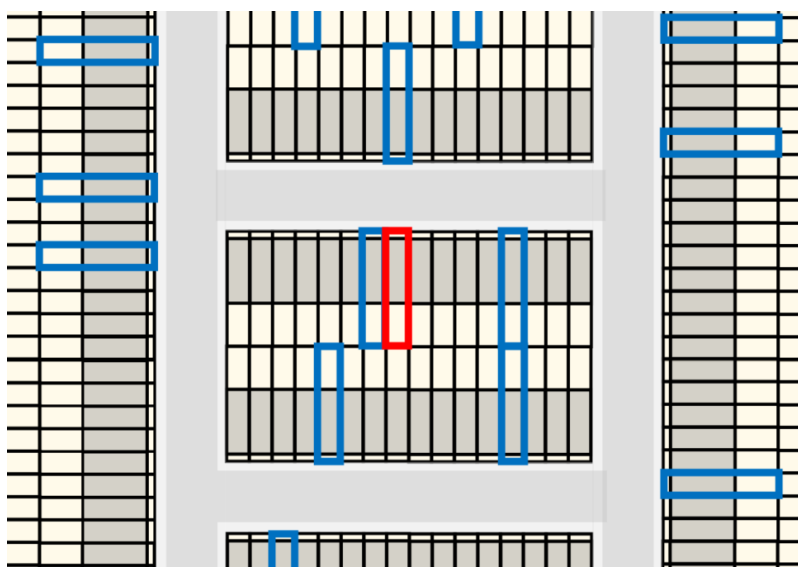
However, where a residential dwellinghouse in C3 use is neighboured by HMOs at both sides, it is likely that there will be a sense of being surrounded by HMOs which will materially change the living conditions of those residents.

Consequently, unless it can be demonstrated that significant harm will not arise, it is likely that a situation where a dwellinghouse becomes “sandwiched” between two HMOs will not be found acceptable. An example of a likely unacceptable HMO sandwich situation is demonstrated on the diagram below:



In this example above, there would be a dwellinghouse falling within Use Class C3 sitting between an existing HMO (marked in blue) and a proposed HMO (marked in red). This would not be acceptable.

However, one HMO being located next to another may be acceptable:



This will only be considered as an issue where properties are adjacent to each other in a side-by-side format. In such an arrangement, properties are usually closer to their neighbours than properties at the opposite side of a road or where there are gardens between the buildings. Moreover, where there are attached properties, there is a greater likelihood of disturbance being noticed through the adjoining structures.

Where a building contains flats, the same approach shall also apply but on a horizontal and vertical basis. No flat in C3 Use should abut (to the side, above or below) more than one HMO in the interests of providing suitable living conditions for the occupiers of flats which are likely to be more constrained as a result of their configuration.

GUIDANCE TOPIC 2 – PARKING

This objective is considered to align with the consideration of developments in respect of Policies DM7 and DM14. The Council's Parking Standards currently provide no parking standards for HMOs. By setting out how parking will be expected to be provided, it will provide clarity for all.

An assessment of the location of the existing HMOs within the Swale Borough indicates that many are located in areas where there is limited off-street parking and a reliance, by all, on on-street parking. Parking stress can be detrimental to living conditions and detract from the amenities of an area and, as such, it will be beneficial for such developments to be steered to locations where they can be accommodated or make adequate provisions.

Census data from the 2021 Census indicates that there were 11,119 private rented properties in the Swale Borough. HMOs align closest with this type of property.

Within that, 4,646 of the properties had just one usual resident aged 17 years or over. It is considered that this figure is relevant as most HMO rooms are occupied on a single adult basis and where there are more, this is likely to be balanced out with periods of under-occupancy elsewhere as not all properties are occupied at all times.

Within those properties, 1793 had no access to a car, 2571 had access to a car and 282 had access to two or more cars.

Using that data and proceeding on the basis that the two or more category would most likely be not more than two cars in the majority of cases, it can be assumed that the 4,646 persons renting privately in the Swale Borough led to car ownership amounting to approximately 3,135 cars. This amounts to a car ownership rate of 0.67 cars per person living alone.

More broadly, again based on the 2021 Census, of the 15,957 one-person households within the Swale Borough, 5871 had no access to a car, 8866 had access to one car, 961 had access to two and 259 had access to 3. That equates to a total of 11,565 cars which amounts to an average of 0.72 cars per person living alone.

At a Borough level, the 2021 Census indicates that 16.6% of households do not have a car or van. However, for those wards where HMOs were identified, the percentage of households without cars are as follows:

Abbey	24%	Milton Regis	20%	Sheppey Central	12%
Borden and Grove Park	13%	Minster Cliffs	11%	Teynham and Lysted	12%
Chalkwell	21%	Murston	21%	Watling	16%
Hartlip, Newington and Upchurch	9%	Queenborough & Halfway	17%	Woodstock	10%
Homewood	20%	Roman	27%		
Kemsley	12%	Sheerness	34%		

Moreover, using the figures for one-person households only, the percentage of households without cars are as follows:

Abbey	44%	Milton Regis	44%	Sheppey Central	26%
Borden and Grove Park	34%	Minster Cliffs	33%	Teynham and Lysted	31%
Chalkwell	41%	Murston	44%	Watling	37%
Hartlip, Newington and Upchurch	28%	Queenborough & Halfway	36%	Woodstock	31%
Homewood	44%	Roman	52%		
Kemsley	28%	Sheerness	55%		

At a more local level, using the data for the Output Areas where HMOs have been identified, 26.9% of households do not have access to a car, 41.3% of households have access to one car, 23.2% have access to 2 cars and 8.6% have access to 3 cars.

Proceeding on the basis that each room is occupied independently and is therefore tantamount to an individual household, both elements of evidence support a case that approximately 2 out of 3 occupiers would have access to a car and be located in areas where there is slightly over 1 car per household on average.

By extension, it is logical to state that car parking should be available at a rate of 0.66 car parking spaces per bedroom, rounded up to the nearest whole parking space. This would mean that a 3 bed HMO would need 2 spaces, a 4 bed HMO would need 3 spaces, 5 and 6 bed HMOs would need 4 spaces, a 7 bed HMO would need 5 spaces, 8 and 9 bed HMOs would need 6 spaces and a 10 bed HMO would need 7 spaces.

It is noted that the reality is that most HMOs are proposed where the form of the original building, the plot it sits within and the area generally, makes this level of parking provision unlikely in most cases.

To that end, on-street parking may be a requirement. In that scenario, it is recommended that any application is accompanied with evidence to demonstrate that parking spaces on-street within the vicinity of the site are likely to be available to accommodate the uplift from the existing use (based on the Council's adopted parking standards).

A Parking Survey, using a methodology such as the Lambeth Methodology, would be an appropriate way to demonstrate the adequate availability of on-street parking. Other approaches could be considered if they provide a robust assessment of parking availability.

Car Parking Permits

The Swale Parking Permit Policy is available at <https://swale.gov.uk/your-council/strategies-and-policies/parking-policy>

This restricts the provision of parking permits and, as such, reliance on parking permits within Controlled Parking Zones is unlikely to be practical for HMOs with more residents than allowed for by the parking policy.

GUIDANCE TOPIC 3 – WASTE & RECYCLING STORAGE & MANAGEMENT

This objective is considered to align with the consideration of developments in respect of Policies CP4 and DM14, particularly though ensuring that development causes no significant harm to amenity and other sensitive uses or areas and creates safe, accessible, comfortable, varied and attractive places.

Whilst the provision of refuse storage facilities will primarily be addressed by the Council's Environmental Services team, the role of the HMO SPD is to ensure that refuse storage is provided in a manner that represents high quality design, as required by the abovementioned policies. The provision of discreet and accessible refuse and recycling storage will encourage its use and avoid an expanse of containers being kept at sites and within streets in prominent, visually unfortunate or obstructive arrangements.

For a HMO that is to be converted from a dwelling, where there are no more than 5 residents, the recycling storage arrangements would be no greater than arises from the existing dwelling. As such, there would be no additional requirements to provide refuse and recycling storage. For guidance, it is highlighted that the property would be entitled to the following provisions and it is recommended that arrangements are made within proposals for their storage and them to be made available for collection and returned to their storage locations at the appropriate times:

- 1 x 180ltr refuse bin
- 1 x 240ltr recycling bin (with a 2nd provided if needed)
- 1 x 23ltr food bin (with a 2nd provided if needed)
- 1 x 5ltr food caddy

Where a HMO would have 6 or more persons, it might introduce the need for a larger 240ltr refuse bin or an additional 180ltr refuse bin to be provided. In addition, where there is more than one kitchen, additional 5ltr food caddies can be provided.

Where the alteration of the use of the building is likely to result in an uplift in the number of bins kept at a site (other than the 5ltr caddies which should be kept within kitchens), it will be expected that plans accompany any application to demonstrate how these will be stored. All such storage should be provided within the building or the plot and it will be expected that the storage will be discreet and/or visually acceptable in the context of the character and appearance of the site and the locality.

In addition, any management arrangements required to ensure that bins are presented to suitable collection locations and subsequently returned to their storage positions should be detailed within supporting submissions.

Conditions may be imposed to ensure the provision of adequate storage and management arrangements.

GUIDANCE TOPIC 4 – ROOM SIZES

This objective is considered to align with the consideration of developments in respect of Policies ST1, CP3 and CP4 by meeting the housing requirements of specific groups, creating accessible and comfortable places, being flexible in order to respond to future changes in use, lifestyle, and demography and delivering a wide choice of high quality homes.

Minimum bedroom sizes and standards for licensable HMOs are already in effect under the terms of the Housing Act 2004. However, the HMO SPD will be applicable to all planning applications for HMOs, including those that might not require a licence.

The Council will expect any planning applications submitted for HMOs to demonstrate room sizes that accord with the National Standards that are currently set out, any standards that replace those standards or any local standards adopted by the Council's Private Sector Housing team, whichever are the largest. At present, the minimum room sizes for bedrooms (taken from the Housing Act) and shared kitchens (taken from the Council's HMO standards) are:

Occupancy	Minimum Bedroom Size for HMO
One child under the age of 10	4.64 square metres
One occupant over 10 years of age	6.51 square metres
Two occupants over 10 years of age	10.22 square metres

Number of People Sharing a Kitchen	Minimum Kitchen Size
1 to 3 people	5 square metres
4 people	6 square metres
5 people	7 square metres
6 people	9 square metres
7 to 10 people	11 square metres

OTHER CONTROLS, LEGISLATION & CONTACTS

This SPD has been prepared solely from a planning perspective. HMOs and building operations are, however, also controlled by other legislation:

The Housing Act 2004 (Requirement for a Licence)

This legislative regime is wholly separate from planning. At the time of writing, the Housing Act 2004 effectively states that:

A HMO falling within the scope of requiring a license is one that —

(a) is occupied by five or more persons;

(b) is occupied by persons living in two or more separate households; and

(c) meets

(i) the standard test under section 254(2) of the Act

(<https://www.legislation.gov.uk/ukpga/2004/34/section/254>)

(ii) the self-contained flat test under section 254(3) of the Act but is not a purpose-built flat situated in a block comprising three or more self-contained flats; or

(iii) the converted building test under section 254(4) of the Act.

When granting a licence conditions can be used to control various matters including:

- Gas Safety Certificates
- Electrical Appliances and Furniture Safety Standards
- Smoke and Carbon Monoxide Alarm provision.
- The provision of Terms of Occupation to Occupiers.
- Minimum sleeping room sizes
- Anti-Social behaviour management conditions
- Repairs.
- Training of license holders

The Licence Application process involves assessing the suitability of the licence holders (fit and proper persons test) and assessing the suitability of the property (shared bathing and toilet facilities and wash hand basin in rooms, kitchen facilities and fire safety facilities and equipment).

Full details of the approach to HMO Licensing at Swale Borough Council can be found at <https://swale.gov.uk/business-licensing-and-procurement/licences-permits-and-consents/houses-in-multiple-occupation>.

The Building Act 1984 and The Building Regulations 2010

Extensions, alterations and works within a building might require approval under the terms of the Building Regulations.

This is an entirely separate legislative function and the Planning Service at Swale Borough Council operates under a Memorandum of Understanding with the South Thames Gateway Building Control Body (details of which can be found at <https://www.stgbc.org.uk>).

Where works are considered to conflict with Building Regulations, they can be brought to the attention of the Building Control Body at the abovementioned website.

As set out in an earlier section of this SPD, internal works do not require planning permission and so any requirements resulting from the Building Regulations do not affect the assessment of a development from a planning perspective.

Party Wall Act / Civil Matters

Under the terms of the Party Wall Act 1996, neighbouring landowners are afforded certain protection in some respects. Details of which can be found at <https://www.gov.uk/government/publications/preventing-and-resolving-disputes-in-relation-to-party-walls/the-party-wall-etc-act-1996-explanatory-booklet>.

Damage, encroachment or any other comparable unauthorised use of a persons land without their consent is a matter for the respective landowners to address between themselves. Swale Borough Council has no remit to enforce property boundaries, resolve disputes or address any disagreements in these respects.

Ventilation

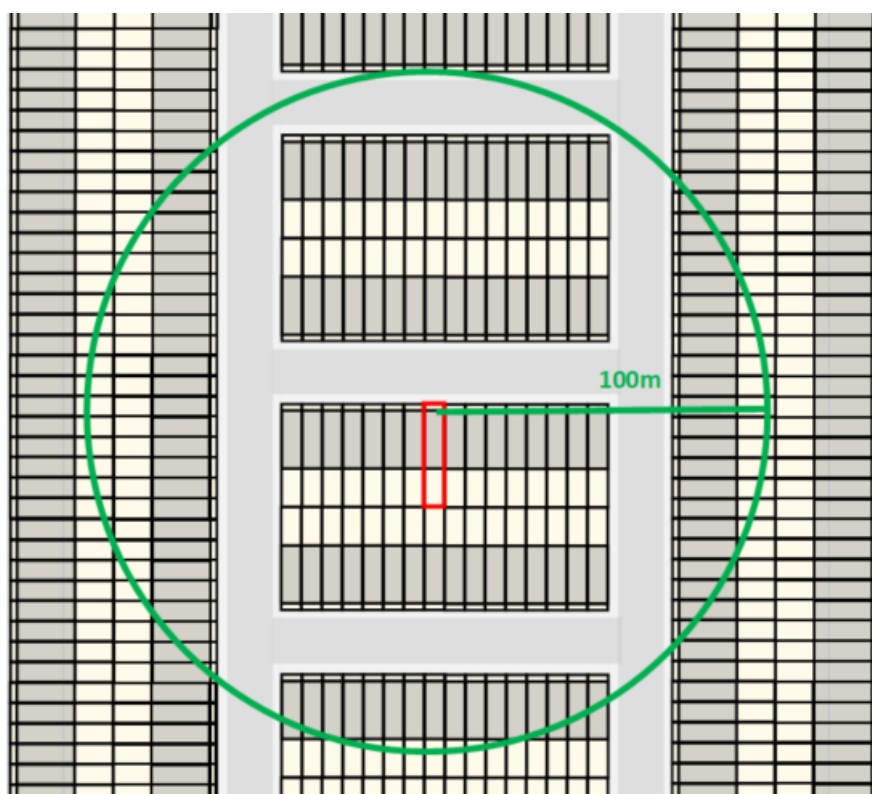
The ventilation of buildings is addressed through the Building Regulations, in particular Approved Document F.

It is acknowledged that, in the event of there being inadequate ventilation, there could be consequences with respect to the formation of damp and mould. Should that be the case, it is hereby highlighted that the Council's website (<https://swale.gov.uk/housing-council-tax-and-benefits/housing/damp-and-mould/tackling-damp-and-mould-advice-for-tenants>) provides assistance and guidance that may be of use to occupiers of such properties within these conditions

APPENDIX A – HMO CONCENTRATION ASSESSMENT

Step 1 – Establish Assessment Area

Identify the location of the proposed HMO and the position of its front door and the spread of a 100m Assessment Area from that center point.



Step 2 – Count the number of dwellinghouses within that Assessment Area

This includes all dwellings and parts of the planning unit of those dwellings (gardens) that fall within the 100m Assessment Area.

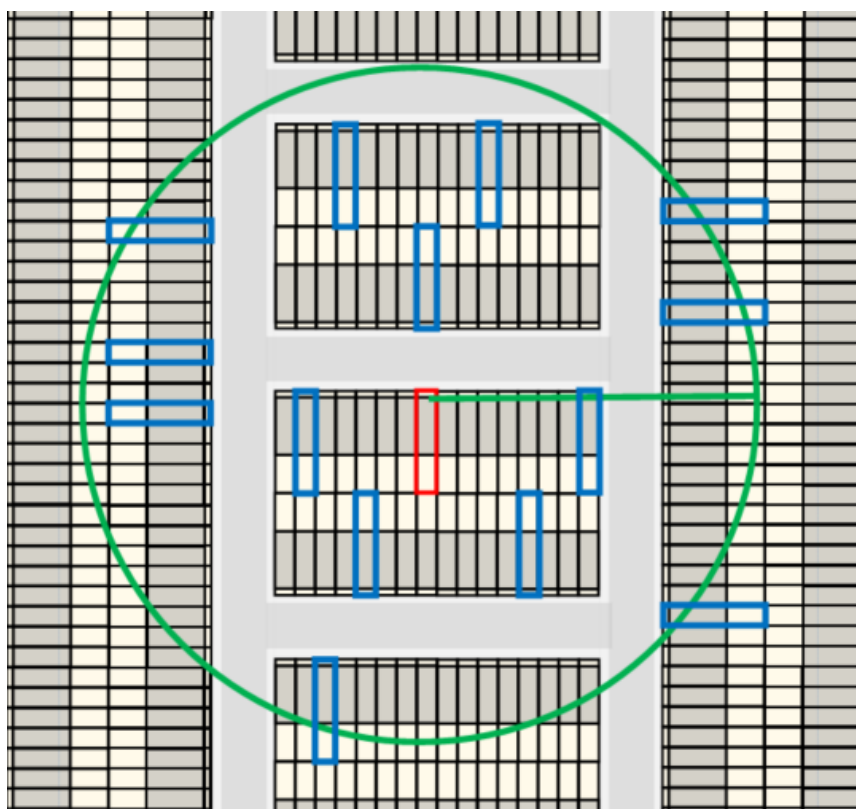
All buildings other than dwellings and flats are discounted.

As a working example, there are 146 dwellings in the Assessment Area shown above.

Step 3 – Establish the location of other HMOs within that Assessment Area

To do so, the Council will use all records and evidence available to Officers and the compiled evidence referred to in this SPD.

(These have been demarked in blue on the following diagram. There are 14 currently present in the Assessment Area shown below)



Step 4 – Undertake Assessment

Calculate whether the existing or resultant situation would result in the threshold of 10% of residential properties (or 30% in an area of mixed use or commercial properties with less than 10 residential properties).

Using the working example above, where there are 146 dwellings within the Assessment Area and 14 HMOs, the addition of an additional HMO would bring the total to 15 and so the number of HMOs would exceed the 10% threshold.

Policy and Resources Meeting	
Meeting Date	11 March 2026
Report Title	Housing Payments Policy
EMT Lead	Lisa Fillery, Director of Resources
Head of Service	Zoe Kent, Head of Revenues and Benefits
Lead Officer	Zoe Kent, Head of Revenues and Benefits
Classification	Open
Recommendations	1. To adopt the Housing Payments Policy

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to approve the draft Housing Payments policy.
- 1.2 Discretionary Housing Payments have been provided by local authorities since 2001. The purpose of the payments is to help those on the lowest of incomes to top up a shortfall between the Housing Benefit payment and the rent amount.
- 1.3 The borough has been required to have a policy in place to ensure the needs of those requiring help are met. The policy has evolved since 2001 to link in with economic downturns and national policies.
- 1.4 From 1 April 2026 the Government is changing the discretionary support that is provided towards housing costs. This report provides details of the changes and a background to the policy.

2 Background and proposals

- 2.1 From 1 April 2026 Discretionary Housing Payments (DHP) and the Household Support Fund (HSF) will end, and a new fund named the Crisis and Resilience Fund (CRF) will commence.
- 2.2 When the CRF was first announced, the previous DHP funding was merged with what was the HSF funding. The total funding was to be paid to county councils. District authorities raised concerns that the HP was a duty for district authorities, and the funds should not be merged. The Department for Work and Pensions (DWP) changed the allocation of funding for 2026/27 and 2027/28 to ensure the HP funding is paid directly to district authorities. The funding will be the same as received by authorities in 2025/26, for Swale this is £260,758.
- 2.3 Since 2008 Housing Benefit (HB) payments for private tenants (those living in a property with a private landlord rather than a Registered Social Landlord) have

been assessed using Local Housing Allowances (LHA). LHA rates are based on areas. Swale covers three rental market areas Swale and Medway (Sittingbourne and the Isle of Sheppey), Canterbury (Faversham) and Maidstone (villages on the North Downs). The rates are set at around 60% of the market rent.

- 2.4 As buying properties has become more unaffordable and more people either stay at home or rent properties rather than buying, this has made renting properties harder for those claiming welfare benefits. DHPs previously and HPs going forward can be awarded towards the shortfall between the Housing Benefit (HB) or Universal Credit Housing Costs (UCHC).
- 2.5 Prior to April 2013, DHPs had only been paid to claimants who had a shortfall between their HB and rent, for reasons such as a higher-than-average rent, working so not receiving full HB or living in larger than necessary accommodation due to a claimant being pregnant.
- 2.6 Since the implementation of the welfare reform changes in 2013 the DHP grant increased due to the reduction in the Local Housing Allowance (LHA) rates which had restricted the amount the Council can pay in Housing Benefit, the spare room subsidy reductions and the benefit cap. In 2015 Local Authorities also started awarding DHPs to claimants claiming Universal Credit Housing Costs.
- 2.7 The use of the DHP budget over the last 12 years has gradually changed. It was thought that the Benefit Cap and the spare room subsidy rules would use a large proportion of the DHP budget. This has not been the case. A large proportion of the budget now goes towards, paying towards rent arrears, deposits and rent in advance. These awards are made in conjunction with the Housing team to ensure that claimants are living in properties that are affordable and sustainable in the future.

Table 1: *DHP expenditure 2024/25*

DHP Expenditure 2024/25 DHP Grant - £262k	Number of awards	£
Benefit Cap	7	10,126
Removal of spare room subsidy	29	21,274
LHA Restriction	26	44,176
Combination of reforms	1	196
No welfare reform impact i.e. awarded under previous rules	164	188,819
Total	227	£233,999
Purpose of DHP		Number of awards
To help secure and move to alternative accommodation e.g. rent deposit		56
To help with short-term rental costs while the claimant secures and moves to alternative accommodation		2

To help with short-term rental costs whilst the claimant seeks employment	4
To help with on-going rental costs for a disabled person in adapted accommodation	1
To help with on-going rental costs for any other reasons	164
Total	227

Table 2: *DHP expenditure 2025/26 – to 10/02/2026*

DHP Expenditure 2024/25 DHP Grant - £262k	Number of awards	£
Benefit Cap	4	2,401
Removal of spare room subsidy	20	20,819
LHA Restriction	49	44,299
Combination of reforms	0	0
No welfare reform impact i.e. awarded under previous rules	150	188,819
Total	223	£233,999
Purpose of DHP		Number of awards
To help secure and move to alternative accommodation e.g. rent deposit		50
To help with short-term rental costs while the claimant secures and moves to alternative accommodation		7
To help with short-term rental costs whilst the claimant seeks employment		17
To help with on-going rental costs for a disabled person in adapted accommodation		4
To help with on-going rental costs for any other reasons		145
Total		223

- 2.8 The policy has been written to ensure that the limited funds are used to help those most in need. This will include insuring that properties that are taken on are affordable as any award should be short-term and cannot be guaranteed for future years.
- 2.9 The Government's intention when bringing in the CRF was to ensure that those people needing help would receive support if needed from both strands of the scheme to ensure people can manage their finances and manage a home effectively. The guidance states that the CRF funding can be used to help with HP if needed. To ensure the funding is used appropriately the Revenues and Benefits officers who review HP applications will work in partnership with the Housing and Welfare officers. It may for example be possible to give help towards fuel costs to ensure a person can make payments towards their rent.

2.10 The primary objectives of the policy are:

- Prevent homelessness;
- Enabling people to secure new affordable tenancies;
- Safeguard residents of the borough in their homes;
- Provide support in a time of crisis;
- Help alleviate poverty; and
- Encourage employment.

2.11 The policy will be reviewed again within the next 12 months to ensure it is helping the right people appropriately.

3 Proposals

3.1 It is proposed that the Housing Payments policy is adopted by the Policy and Resources Committee.

4 Alternative Options Considered and Rejected

4.1 To not adopt a policy, to instead use the Government guidance that has been issued.

4.2 This is not recommended. The guidance is a long document also covering the CRF, whilst the HP funding is a separate pot of funding, it is preferable to have a policy. This enables officers, claimants and stakeholders to have clear guidance on the local scheme.

5 Consultation Undertaken or Proposed

5.1 A consultation has not been carried out because of the short timescales between the guidance being issued and a policy having to be in place. A consultation will be carried out in the next 12 months and results from it can be fed into the policy for April 2027.

5.2 An equality impact assessment has been carried out.

6 Implications

Issue	Implications
Corporate Plan	The objectives and priorities in the corporate plan. To aspire to be a borough where everyone has access to

	a decent home and improved health and wellbeing.
Financial, Resource and Property	The Housing Payment grant for 2026/27 is £260,758. Financial analysis will continue to be undertaken throughout the year to ensure the funding goes to those most in need.
Legal, Statutory and Procurement	Authorities are required to have a scheme under Section 1 of the Localism Act 2001.
Crime and Disorder	Not directly applicable.
Environment and Climate/Ecological Emergency	Helping residents to live in appropriate housing can lead to better environmental conditions.
Health and Wellbeing	Residents who have difficulty in paying their rent are signposted to Housing Payments and the Housing team. Providing this support can indirectly help their health and well-being.
Safeguarding of Children, Young People and Vulnerable Adults	The policy will look to protect the most vulnerable and those households on the lowest incomes.
Risk Management and Health and Safety	Having a policy in place reduces the risks on families presenting as homeless.
Equality and Diversity	An EQA has been completed
Privacy and Data Protection	All requirements have been adhered to.
Local Government Reorganisation	A new policy will be required for any new authority. The policy will therefore be reviewed during 2027/28.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Draft Housing Payments policy
- Appendix: II: Equality Impact Assessment

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Swale Borough Council Housing Payments Policy

(a strand of the Crisis and Resilience Fund)

Mid Kent Revenues & Benefits Service

2026-27 and 2027-28

Contents

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1.0	Introduction
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11.0	Repeat Applications
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14.0	Disputes and Appeals
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17.0 Equalities Statement

18.0 Policy Review

Appendices

Appendix A - Housing Costs Excluded by Legislation from the Housing Payment scheme

Appendix B – Housing Payment Funding

Appendix C - Matters for Consideration

1. Introduction

Housing Payments (HP) form a strand of the Crisis and Resilience Fund (CRF) that enables all Local Authorities discretion to provide additional support for people who are entitled to a qualifying benefit. The legislation governing the scheme can be found at Section 1 of the Localism Act 2011.

The Department for Work and Pensions (DWP) has produced guidance for the administration of the CRF. This policy takes note of that guidance.

The main features of the scheme are that:

- The scheme is purely discretionary, a claimant does not have a statutory right to a payment;
- The expectation from government is that for 2026-27 and 2027-28 (years 1 and 2 of the CRF scheme) each council will allocate to HP a sum equivalent to that which the council received in the final year of the Discretionary Housing Payment (DHP) scheme, in 2025-26. For years 1 and 2 of the CRF scheme each council receives, from government, an allocation of CRF to be spent on HP. Each council has the option to pay over and above this amount, but the funding must be made from the council's own finances. There is no limit to how much a council may top-up the HP allocation by.
- The administration of the scheme is for the council to determine with a few specific exceptions which are detailed in Appendix A.
- A HP is not a payment of Housing Benefit (HB) or the Housing Cost Element of UC; however, there must be entitlement to one of these benefits in the week a Housing Payment is awarded for.

Appendix B sets out the funding arrangements for the current financial year.

There is a range of financial, and welfare support available to meet a variety of different circumstances and needs for low-income households. The HP fund is designed to provide support to secure affordable accommodation and provide short-term support for exceptional and unforeseen pressures affecting a claimant's ability to meet their rent liability.

The short-term nature of the fund is to provide capacity in terms of time for the household to seek further advice and make changes to their circumstances which will achieve longer-term sustainability of their current home or find alternative accommodation which is affordable within the context of the HB and UC schemes.

2. Objectives of the Scheme

The intention of the policy is that the HP budget is targeted to provide support to those who are most in need. Each case will be treated strictly on its own merits, and all customers will be treated equally and fairly when the scheme is administered. The council is committed to

working with the local voluntary sector, social landlords and other interested parties in the local area to maximise entitlement to all available state benefits and this will be reflected in the administration of the HP scheme.

The primary objectives of the scheme are:

- Prevent homelessness;
- Enabling people to secure new affordable tenancies;
- Safeguard residents of the borough in their homes;
- Provide support in a time of crisis;
- Help alleviate poverty and
- Encourage employment.

The HP scheme should be seen as a short-term emergency fund. It is not and should not be considered as a way around any current or future entitlement restrictions set out within HB or UC legislation.

Applications for HP should only be made as a last resort. Awards will be made where the household demonstrates exceptional circumstances which can only be alleviated by additional financial support from the fund where no other alternatives exist.

It is recommended that all claimants seek independent advice from Citizens Advice or another similar agency to assist with improving their personal circumstances and maximising their income.

The budget will be carefully monitored throughout the year to ensure the funding is used in the most effective way. Qualifying criteria for HP payments may be altered in line with profiled budget expenditure during the year.

3. Making a Claim

A claim for HP must be made on the prescribed form available on the council's website or a paper alternative available directly from the customer service team at the council. The form is designed specifically to gather all relevant information to enable an officer to make a decision. The form will incorporate a standard income and expenditure sheet and questions designed to provide a consistency of detail to support decision making.

In some cases, additional information or evidence may be requested. Any requests for further details will be made using the most effective method; telephone, email or in writing, shortly after the claim has been made. Where a request for further information is made this must be supplied within two weeks of the request or the claim will be considered as lapsed and no further action will be taken.

4. Eligible Groups

Claiming for HP will be considered from all households experiencing financial hardship and finding it difficult to meet their rent liability. Under the HP scheme Registered Social Landlord tenants and tenants living in privately rented accommodation are eligible to apply for assistance.

It is an aim of this policy to ensure that all claimants are able to access this fund if they need to. Appendix C sets out matters for consideration in the decision-making process and circumstances where support is more likely to be provided. In addition, in order for any HP payments to be made, there must be entitlement to HB or UC (housing costs element) for the period the HP is requested for.

Applicants intending to move into the area who are already in receipt of HB or UC will be expected to make an application for HP to the authority from which they are moving if they are seeking assistance with rent in advance or deposit.

5. Rent in Advance/Deposits

Rent in advance and deposit payments are a significant cost to those moving home.

Assistance may be provided by HP where it will assist the applicant secure long- term affordable accommodation where there is a significant risk of homelessness or ongoing financial hardship.

Under the Renters Rights Act 2025 which comes into effect from 1 May 2026 accepting rent in advance prior to signing a tenancy will be a prohibited payment. A landlord can only accept a rent in advance payment after the tenancy has been signed by the landlord/agent and tenant, but before the tenancy commences (the pre-tenancy period). The rules of the pre-tenancy period do not apply to social and supported housing or when the tenancy was agreed by a local council to meet a homelessness duty.

The council must be satisfied there is a genuine need to move and there are no other means available to pay the required rent in advance or deposit to secure the tenancy. It is expected that applicants would usually be engaged and supported by the council's Housing Options team in order to access support under this part of the scheme.

Because of the high monetary value of rent in advance and deposit awards it is recognised that this will place a high level of pressure on the HP fund. Awards will be limited to households identified as in priority need and where rents are in line with the maximum rent which can be paid under HB and UC schemes for the particular circumstances of the households and is affordable.

The intention is that by supporting tenants to find suitable and affordable accommodation they will not require additional ongoing support from HP which will reduce future costs of administration.

Single payments for rent in advance or deposit cannot be made more than once in any 12 month period to an individual tenant or to a landlord for the same property.

Single payments for rent in advance will not exceed one month's rent. Deposits will not exceed an amount equivalent to 5 week's rent equivalent.

6. Making an Award

Decisions on awards to help meet ongoing rent liability will be made by officers within the council's Benefit Service.

An officer of the council's Housing Options team may make a recommendation in relation to HP claims relating to rent in advance or deposit.

7. Relevant Time for Claiming

Applications for HP should be made as soon as possible where the household falls into difficulty and is unable to manage to meet its rent liability.

Awards of HP will normally be made from the date of the application. It is possible to pay HP for past periods however this is at the discretion of the officer who makes the decision.

Applications for rent in advance or deposits must be made prior to the commencement of the tenancy. A HP cannot be awarded for any period the customer has no entitlement to HB or UC (housing costs element). An award cannot be considered until a copy of the signed tenancy is provided with the application form. No award will be made towards rent in advance, unless a signed tenancy agreement is provided.

8. Period of Payment

Each case will be decided on its own merits and there is no minimum period an award will be made for. However, it is unlikely an award will continue past 31 March in any given year, as the HP fund is a grant from DWP that is made annually and may vary each year. The period of the award is at the discretion of the officer making the decision based on the individual circumstances of the case.

HP awards are designed primarily to meet short-term requirements and provide time for customers to make necessary changes to their circumstances to ensure they are able to live within their means in the longer-term. The fund is not an appropriate mechanism to support circumstances which are not time-limited.

In order to meet the objectives of the scheme and the way in which the scheme is funded all awards will have an end date attached to them. This will form part of the award notification sent to claimants along with information of activity which is likely to improve individual circumstances. In some cases, it is appropriate to share information with the council's Housing Options Service in order to provide proactive advice to prevent further rent arrears developing and prevent homelessness.

9. Maximum award of a HP Award

The maximum amount of HP payable on an ongoing basis is set out within the government guidance on CRF;

- For a person in receipt of HB the maximum amount of HP is limited to the difference between the HB award and the eligible contractual rent after deduction of any ineligible service charges as defined in Appendix A. This is known as the “shortfall”.
- For a person in receipt of the housing cost element of UC the maximum award is equal to the level of the housing cost element allowed in the UC assessment for each calendar month assessment period
- Single payments for rent in advance will not exceed one month’s rent. Deposits will not exceed an amount equivalent to 5 weeks’ rent equivalent.

10. Change in Circumstances

Awards of HP are to provide short-term relief and should not be relied upon as an ongoing source of income. Every decision will provide advice on actions the household should consider to improve their circumstances which will enable them to afford their rent in the future without relying on an award of HP.

Repeat awards of HP will not be considered unless the claimant is able to demonstrate highly exceptional circumstances and show they have tried to take steps to improve their circumstances.

11. Repeat Applications

Awards of HP are to provide short-term relief and should not be relied upon as an ongoing source of income. Every decision will provide advice on actions the household should consider to improve their circumstances which will enable them to afford their rent in the future without relying on an award of HP.

Repeat awards of HP will not be considered unless the claimant is able to demonstrate highly exceptional circumstances and show they have tried to take steps to improve their circumstances.

12. Method of Payment

The method of payment will be selected based on the individual circumstances of the case with payment made to the most appropriate person in the best interests of the person claiming.

Payments of HP are usually made where there is a risk of someone being evicted or to help secure a new tenancy by way of rent in advance or deposit and therefore usually the landlord or their agent will be the person whom HP is paid to.

Payment would only normally be made to the claimant or their nominated appointee where there is evidence the rent has already paid or paying the landlord could threaten the tenancy.

The method of payment will usually be by BACs transfer or crediting the rent account where this is possible.

The frequency of payment will normally be made in line with how the HB or UC is paid.

13. Notification

The outcome of the application will be notified within 21 days of receipt of all required supporting evidence. Where an application is unsuccessful, the reasons why this decision was made will be set out and explain the right of review.

Where the application is successful, the award notification will set out:

- the weekly or total amount of HP awarded;
- the period of the award;
- how, when and to whom the payment will be made;
- the requirement to report a change in circumstances.

In all cases the decision notice will provide recommended actions the applicant should consider which would help to improve the household circumstances. It is expected that this advice is followed before any future award is made.

14. Disputes and Appeals

A HP is not a payment of HB or UC and therefore it is not subject to the statutory appeals mechanism. If there is a disagreement with the decision this must be notified within one calendar month of the date of the decision letter. This must be made in writing and clearly set out the reasons for the disagreement and provide any additional information which needs to be considered.

Any appeal will be considered by a different officer from within the service who made the original decision. The outcome of the appeal will be notified in writing providing details as set out in section 12. If they remain unhappy with the decision made the final stage of review is to the Head of Revenues and Benefits. The Head of Revenues and Benefits will review the decision and will write to confirm the outcome within 21 days. No further right of internal appeal should the revised decision be disagreed with.

The only further redress against a decision to refuse an award is by way of Judicial Review in the High Court. The independent Tribunal Service cannot hear appeals relating to HP.

15. Fraud

It is acknowledged that most applications for HP are genuine, however some applications may be made with the deliberate intention to obtain money to which the applicant is not entitled.

The application for HP should be a true representation of the applicant's circumstances. It is an offence to misrepresent or fail to disclose relevant information in an application for HP.

Where facts are misrepresented or where there is a failure to disclose relevant information in support of their application, this may constitute an offence under the Theft Act 1968 or the Fraud Act 2006. Where it is suspected that such a fraud may have occurred, the matter will be investigated as appropriate and this may lead to legal action being taken against the person who made the claim.

16. Overpayments and Recovery of HP

The council will seek to recover any HP found to be overpaid or paid under the rent in advance or deposit scheme to be returned at the end of a tenancy. Normally this will involve issuing an invoice to the claimant or the person to whom the award was paid. If this is not paid further recovery action will be taken.

Careful consideration will be given on recovery of any overpayment, and it may be decided not to recover an overpayment where extenuating circumstances exist. The appeals process set out in section 13 will also apply to decisions on recovery.

17. Equalities Statement

The council is committed to delivering a service that is accessible and fair to all of the communities that it serves and ensuring that all people are treated with respect and dignity. The Equality Act 2010 sets out an "Equality Duty" to:

1. eliminate discrimination, harassment and victimisation;
2. promote equality of opportunity between different groups in the community; and
3. foster good relations within the local community.

The council gives careful consideration to equality issues in new and existing policies, strategies, and services to see what effect they will have on different groups within its communities, including those with protected characteristics.

The protected characteristics covered by the Equality Duty are:

- age;
- disability;
- marriage and civil partnership (but only in respect of eliminating unlawful discrimination);
- pregnancy and maternity;
- gender reassignment;
- race – this includes ethnic or national origins, colour or nationality;
- religion or belief – this includes lack of belief;
- sex (gender);
- sexual orientation

The council also recognises that socio-economic status can be a significant barrier to equality of opportunity.

18. Policy Review

This policy will be reviewed on an annual basis or in line with any major changes to the HB, UC or other regulations to ensure it remains valid, relevant and effective in achieving the policy objectives.

The Council will use the information provided within the application and any supporting evidence for the purpose of verifying benefit entitlement and making a decision on the claim. In addition, it may share information with other departments within the Council and with partner organisations for the purpose of the planning and/or delivery of services or fraud prevention.

Appendix A

Housing Costs Excluded by Legislation from the Housing Payments (HP) Scheme

The following elements are specifically excluded by legislation from eligibility for support by the HP scheme:

1. Ineligible charges: service charges that are not eligible for HB or UC as specified by legislation cannot be covered by a HP.
2. Increases in rent due to outstanding rent arrears: A rental liability may be increased as a mechanism to recover arrears of rent however this increase does not form part of the rental liability that can be considered eligible for a HP award.
3. Sanctions and reductions in any welfare benefit: HPs cannot meet these because to do so would undermine the effectiveness of the sanctions or reduction in benefit.
4. Benefit suspensions: HB or UC can be suspended either because there is a general doubt about entitlement or because a customer has failed to supply information pertinent to their claim. In such cases, it would not be permissible to pay HPs instead. One of the intentions of the suspension provisions is to act as a lever to ensure that the customer takes the necessary steps to provide the authority with the necessary information/evidence - paying HPs could reduce the effectiveness of this lever.
5. Shortfalls caused by benefit overpayment recovery: when recovery of an overpayment is taking place, such shortfalls should not be considered for a HP.

Appendix B

Housing Payments Funding

The Housing Payments funding and maximum expenditure allowed as determined by the Secretary of State for each council for the financial years 2026/27 and 2027/28 is:

Local Authority	Amount Funded by the Government	Maximum Allowable Expenditure
Swale	£260,758	£unlimited

The authority reserves the right for geographic distribution of the scheme to be uneven across the borough in recognition of areas where there is a higher proportion of people in receipt of HB or UC and to support other council objectives.

Appendix C

Matters for Consideration

The funding of HP only represents a small percentage of the money paid in respect of housing costs paid by HB and UC. Even when a person is affected in any of the circumstances identified below or by any of the welfare reforms it will not guarantee that a payment will be made.

Where an award of HP is made it is likely to be for a short period to ensure the scheme remains flexible. All decisions are subject to the level of funds being available. The fund will be managed to ensure that support can be provided throughout the year.

In all cases the claimant, partner and household members must demonstrate they have insufficient resources, through their income and capital, to meet their ongoing rent liability or pay the required rent in advance or deposit to secure a tenancy which is suitable for their housing needs.

Other factors that may be taken into account are;

- If the inability to meet the rent liability is due to a change in the award of HB or UC due to legislative changes in welfare benefits. In exceptional cases an award of HP may be made in the short term to help the household adjust;
- The extent of the shortfall and any steps taken by the claimant to reduce their rental liability;
- The likelihood of an imminent change of circumstances that will increase the level of the HB or UC award for example, pregnancy where the addition of a child to the household would change the calculation of HB or UC or a single person whose 35th birthday is imminent;
- If there is a real risk of homelessness due to eviction because of the shortfall. Priority will be given to applicants who are being supported by the council's Housing Options Team or other agency providing similar support;
- The impact of disability needs within the household on the accommodation requirements for which the benefit calculation does not make specific allowances;
- The medical circumstances of the household affecting their ability to move to cheaper alternative accommodation;
- If there has been a recent change of circumstances, which has negatively impacted on the ability to meet rent liability that was previously affordable;

- If the property has been specifically adapted to meet the needs of a disabled member of the household or an additional bedroom is required as a result of health needs and this is supported by the award of Personal Independence Payment or Attendance Allowance
- Where a household has been affected by a restriction under the social sector size criteria it is expected that they are engaging with their housing provider in order to move to appropriately sized accommodation;
- The level of indebtedness of the claimant and their family. HPs will not to be paid in order to finance other debts;
- The exceptional nature of the claimant and their family's circumstances;
- The length of time the HP is being asked to support. HP is not and should not be considered as a long term way around any current or future entitlement restrictions set out under legislation.
- The steps the applicant plans to take should their application be successful to alleviate their position in preparation for when the payment ends which may include;
 - applying to the council's housing register and are making bids on suitable homes;
 - making changes to the household budget in order to prioritise their rent payment
 - ensuring they are on the cheapest available tariff for their utility bills in order to increase the level of income which can be used to pay their rent liability
 - engaging with the Department for Work and Pensions (DWP) with support to find work where it is appropriate to do so.

This above list is not exhaustive or intended to be restrictive, it is intended to provide some guidance on the types of exceptional circumstances where an application is likely to have a greater prospect of success.

Additional matters for consideration in relation to rent in advance and deposits

Awards of rent in advance or deposits will only be made under this where the following criteria are met:

- There must be entitlement to HB or the Housing Cost Element of UC at the beginning of the tenancy;
- The applicant must show they do not have the ability through their own means to pay the required rent deposit;
- A signed tenancy is provided before rent in advance can be paid;
- A deposit can only be paid up to 5 weeks rent equivalent;
- Rent in advance can only be paid up to one month's rent.

- The ongoing rent must be affordable without reliance on additional support outside of HB or UC or will become affordable within 3 months due to an imminent change of circumstance which will increase the maximum level of housing costs which can be made by HB or UC;
- Applicants must have a bank, building society, post office or other account capable of making direct debit or standing order payments. If no such account is in place an undertaking must be made to open a relevant account.

Document Control			
Version	Author	Date	Comments
Version 1	Zoe Kent	26/01/2026	Based on CRF guidance
Version 2			

Swale Borough Council

Equality Impact Assessment

Part 1: Background and information

Title of Proposal (strategy, policy, plan, project, contract, service change)
Housing Payment Policy 2026/27
Brief description of proposal (objective & purpose)
Swale BC has had a Discretionary Housing Payment policy in place since 2001. The support provided will be coming under the Crisis and Resilience Fund from April 2026. The Housing Payment strand of the scheme will remain under Housing Benefits for 2026/27 and 2027/28. This policy provides information on the awards of Housing Payments from April 2026.
Is this Proposal new/a review of an existing provision/a change/deletion of existing provision
This is a review of an existing provision currently called Discretionary Housing Payments.
Who will be affected by this proposal? (Residents, Staff, Visitors, Businesses?)
Residents
Weblink to full details (if applicable)
https://www.gov.uk/government/publications/crisis-and-resilience-fund-guidance-for-local-authorities-in-england-1-april-2026-to-31-march-2029
Lead Director/HoS/Manager
Lisa Fillery/Zoe Kent
EqIA lead officer
Zoe Kent
EqIA contributors (other services involved in proposal)
Housing
Date of EqIA
05 February 2026

The Equality Act (2010) places a general duty on all public sector organisations to have 'due regard' to its three main aims.

How does the proposal meet the general duty of the act's aims as listed below? (Please see the guidance document for further detail on what is meant by 'due regard' and types of discrimination).

General duty	Please Explain
Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010	The proposal aims to help those on a low income who may need additional help towards sustaining a tenancy or taking up a tenancy.
Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.	The policy looks to support those persons who need the most support to finding housing. It positively impacts age and disability.
Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Not applicable

Part 2: Impact Assessment and Supporting evidence

Identify the positive and / or negative impact of the proposal change on any of the protected characteristics. Please consider the impact as an employer (staff), a service provider and a community leader (residents, businesses etc).

Protected characteristic	Positive impact	Negative impact	No impact
Age	X		
Disability	X		
Race (including ethnicity and nationality)			X
Religion or Belief			X
Sex			X
Sexual Orientation			X
Gender Reassignment			X
Pregnancy and Maternity			X
Marriage or Civil Partnership			X

Please also consider the impact of the proposal in relation to:

Local characteristic	Positive impact	Negative impact	No impact
Poverty (in relation to groups with protected characteristics and those without)	X		
Armed Forces Community (Serving/Veterans)	X		

Summary of Impact and Supporting Evidence

Please list below any data/evidence you have used to draw your conclusions. This could include national or local data sets, results from consultation and engagement activities or meetings etc. (see guidance document for internal support offer).

Supporting data/evidence	Source
Housing Benefit and Council Tax Support caseload data	Academy reports
DHP data	Academy reports

Having considered the impact of the proposal on the general duties of the Equality Act and the impact on groups with protected characteristics, please provide a summary of the overall impact your proposal (with reference to supporting evidence):

The policy looks to provide support to those with the highest need for support from the Housing team. Age – support may need to be provided to all ages, but particularly those just over 18 or the elderly.

The policy will support those who are disabled who may need to stay in housing that is more expensive, or who may need to move to accommodation that is adapted.

Do you have any gaps in data or evidence to assess or understand impact?

Yes/No (please delete as appropriate and if 'yes' provide details below))

Gaps in data/evidence	Planned action to address evidence gaps
Up to date information	Consultation to be carried out in 2026/27.

Do you have any plans to reduce the impact on the groups identified?

Proposed Action/Plan	Purpose	Impact Groups	Timescale

To be completed by Equalities Officer
(with Lead Officer)

Part 3: Recommendations and Sign Off

Recommendations should be based on evidence available at the time and aim to mitigate negative impacts or enhance positive impacts on any or all of the protected characteristics.

Recommendation	Lead Officer	Timescale

Policy and Resources Committee	
Meeting Date	11 th March 2026
Report Title	Local Plan Review - Growth Strategy and Sites for Allocation
EMT Lead	Emma Wiggins Director of Regeneration and Neighbourhoods
SMT Lead	Joanne Johnson Head of Place
Lead Officer	Stuart Watson Project Manager, Planning Policy
Classification	Open
Recommendations	• To recommend to Full Council a preferred growth strategy for the drafting of the Regulation 19 Local Plan consultation. • To recommend to Full Council the non-strategic sites set out in appendices I to VI for the drafting of the Regulation 19 submission version of the Local Plan including: ○ Non-strategic housing allocations. ○ Gypsy and Traveller sites. ○ Employment land allocations.

1. Introduction and Executive Summary

- 1.1 This report sets out the background to the recommendations made by Planning and Transportation Policy Working Group (PTPWG) during its meeting on 22nd January 2026 with regard to the growth strategy and selection of non-strategic sites for allocation in the draft Local Plan.
- 1.2 The purpose of the [PTPWG report](#) was to set out previous discussions on housing and employment need and the approach to meeting that need through selecting a growth strategy for the borough and non-strategic sites for allocation in the Local Plan. The report also set out the approach to drafting the Local Plan agreed in the Council's [Local Development Scheme July 2025](#) and the challenging program and timetable for the Local Plan (Appendix VII) to complete the work.

2. Background

- 2.1 The PTPWG report sets out in detail a summary of all the reports that had informed the discussions on Swale's development needs through Plan making and how the growth strategy options had been developed and considered. The report also set

out the Housing Economic Land Availability Assessment (HELAA) evidence base of sites and from the HELAA what sites were potentially suitable for consideration in drafting the Local Plan.

- 2.2 The PTPWG report set out the previously discussed growth strategy options, what housing delivery could indicatively be delivered against each option after known existing supply had been considered and what the balance of housing need would be on non-strategic sites for allocation. The report also set out a number of live planning applications for strategic sites, their proposed development, potential planning committee dates and how they would align with the growth options. The report within its appendices set out the non-strategic sites members could consider for the Local Plan. Those non-strategic sites were taken from the HELAA and the findings of this assessment were set out within the PTPWG report and its appendices.
- 2.3 Members of PTPWG discussed in depth the growth strategy options (Table 1 below) that included the residual housing need from non strategic sites. Members voted to recommend to Policy and Resource Committee to recommend to Full Council option 6, a “very large strategic site in the east of borough/settlement hierarchy hybrid”.

Table 1. Growth options – strategic and non-strategic housing contributions

	Growth option	Strategic contribution (potential dwellings)	Potential strategic site options	Residual required from non strategic sites
1	Continue Bearing Fruits Local Plan approach	0	N/A	8,068
2	Strategic site in west of Borough/settlement hierarchy hybrid	2,500	22/503654 Land to the west of Bobbing (2,500 dwellings)	5,568
3	Strategic site in east of Borough/settlement hierarchy hybrid	2,500	23/505533 South East Faversham (2,500 dwellings)	5,568
4	Strategic sites in east and west of Borough/settlement hierarchy hybrid	5,000	23/505533 South East Faversham (2,500 dwellings) 22/503654 Land to the west of Bobbing (2,500 dwellings)	3,068

5	Strategic scale new settlement/settlement hierarchy hybrid	2,500	21/503914 Highsted (south 750 dwellings) 21/503906 highsted (north 1,250 dwellings)	5,568
6	Very large strategic site in east of Borough/settlement hierarchy hybrid	4,000	23/505533 South East Faversham (2,500 dwellings) +one or two major sites totalling 1,500 dwellings	4,068

- 2.4 Members of PTPWG then discussed recommending non strategic sites. Members agreed to include the two Highsted Planning applications sites currently with the Secretary of State (SoS) for determination. The discussion on these sites included the practicalities and implications on the Council meeting its development needs should the applications be granted. The focus of the discussion included what could be delivered from the sites during a 15 year Local Plan period due to the detailed infrastructure and mitigation constraints and what contribution the sites could make to a 5 years housing land supply.
- 2.5 Members then discussed the national planning policy objectives of using brownfield land first that includes making as much use as possible of previously-developed or 'brownfield' land (National Planning Policy Framework paragraph 124). Following this discussion members unanimously agreed to recommend all the non-strategic brownfield sites en bloc.
- 2.6 Then the non-strategic greenfield sites that had been previously informally discussed with members were discussed in turn together with additional information where available. The process was then repeated for new greenfield sites that members had not previously discussed.
- 2.7 Finally, members delegated to the Head of Place in consultation with the Chair of PTPWG to compile the allocations agreed and to present these to the Policy & Resources Committee in a manner which differentiated those sites which would contribute to the five-year housing land supply position. Delegation was also given regarding any further allocations required to make up any shortfall and Gypsy and Travellers and employment land allocations. The lists of non-strategic sites and their site maps for housing, gypsy and travellers and employment are set out at appendices I to VI. The sites can also be viewed on the [HELAA 2025 interactive mapping layer](#).

- 2.8 At this stage of Plan drafting any five years supply expectation from a site can only be a high level indication of possibility and will need to be confirmed and demonstrated through evidence as the Local Plan progresses to examination. That said it is appropriate to make this high level review of possibilities now, as demonstrating a five years housing land supply is a key test of a Local Plan being found sound at examination. Sites that might contribute to a five years housing land supply are set out in the housing sites allocation list at Appendix I.
- 2.9 Officers have determined that from the housing sites agreed by PTPWG there are enough non-strategic sites to meet the residual housing need identified. With regards to employment sites the Council at its [Full Council meeting 4th December 2024](#) agreed enough sites to meet its employment need. To add resilience to the supply of employment sites officers have added new sites submitted through the call for sites 2024 that are identified as suitable in the HELAA. One existing site not chosen previously has also been added to the employment sites as it would align with the recommended strategic growth option. For the Gypsy and Traveller need all sites found to be potentially suitable for allocation in the HELAA have been proposed. Officers agreed the lists of housing, gypsy and traveller and employment sites with the chair of PTPWG and subsequently then informed members of the group for their comments. The lists of sites and site maps are contained in appendices I to VI.
- 2.10 It should be noted that there is a shortfall of Gypsy and Traveller (G&T) sites when measured against the identified need in the Councils [Gypsy and Traveller Accommodation Assessment 2023](#) (GTAA). Whilst the Council has sought G&T sites through its call for sites exercises only 1 site has been submitted in the last two exercises in 2022 and 2024. That site was found unsuitable for plan making amongst other matters due to the scale of potential development in context to surrounding uses and it being isolated in the countryside. Resultantly this has made identifying sites for Gypsy and Traveller use challenging with those proposed for allocation identified through site interviews carried out by consultants as part of the GTAA. Whilst some of the G&T shortfall against the need could be addressed through windfall planning permissions the Council may in the future wish to consider undertaking a standalone development plan document for this matter.
- 2.11 Should further new sites become available, either through the recently closed Regulation 18 consultation or other sources, that are potentially suitable for the Local Plan drafting, then these will be reported to members for their consideration.

3. Recommendations

- 3.1 Members of P&R are asked to recommend to Full Council a preferred growth strategy for the drafting of the Regulation 19 Local Plan consultation.

3.2 Members of P&R are asked to recommend to Full Council non-strategic sites set out in appendices I to VI for the drafting of the Regulation 19 submission version of the Local Plan including:

- Non-strategic housing allocations.
- Gypsy and Traveller sites.
- Employment land allocations.

4. Alternative Options Considered and Rejected

4.1 Members could choose to recommend a different growth option and different allocations to those recommended by PTPWG. This is not recommended as PTPWG is the group with the mandate to review all the information regarding preparing the Councils Local Plan and make informed recommendations.

4.2 Members could choose to not forward a growth option recommendation and/or not enough non strategic sites for allocation to Full Council. However, this would likely result in a Local Plan being unachievable in the time remaining to complete under the existing plan making system that has a deadline of December 2026. Members rejected the option of not submitting a Local Plan under the current plan making system as part of agreeing the Councils Local Development Scheme July 2025. Further any Local Plan developed under the new plan making system will likely be after local government reorganisation and subsequently Swale Borough Council would no longer be the decision maker.

5. Consultation Undertaken or Proposed

5.1 The Local Plan Regulation 19 consultation documents will be subject to scrutiny with members when they are considered by the Planning and Transportation Policy Working Group this summer, then further at Policy and Resources Committee and subsequently by Full Council where the decision will be made regarding the launch of the Local Plans public consultation. As part of the consultation members of the public, other stakeholders and key infrastructure providers will be given the opportunity to comment on the Local Plan.

6. Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action: • A Local Plan with local needs and capacity at its heart.

Financial, Resource and Property	The Local Plan work program is fully funded across a combination of base budget, committed reserves and a contribution from the Government's Local Plans Delivery Fund.
Legal, Statutory and Procurement	The timetable for the consultation is set out in the Council's Local Development Scheme (LDS) that was adopted in July 2025. The LDS is a legal requirement of Council and must be kept up to date. It notifies key stakeholders, interested parties and members of the public the Council's intentions toward Local Plan making. Not providing a growth and sites steer at this time will make completing the documentation for Summer consultation unlikely and this would require an update to the Council's LDS. Should revisions to the LDS set out that there is not enough time to submit a Local Plan for examination under the transitional window of the existing Plan making system, the Council would need to commence Plan making under the Governments new system. Swale Borough Council would not exist under the local government reorganisation proposals and subsequently would not be the decision making authority on any detailed drafting or adoption of a Local Plan under the new system.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	No implications identified at this stage.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.
Local Government Reorganisation	The timetable for the Local Plan sets out that Local Plan will be examined in public by the government's Planning Inspectorate before implementation of the local government reorganisation.

7. Appendices

Appendix I: Housing sites allocations list

Appendix II: Housing site allocation maps

Appendix III: Gypsy and Traveller site allocations list

Appendix IV: Gypsy and Traveller site allocation maps

Appendix V: Employment site allocations list

Appendix VI: Employment allocation maps

Appendix VII: Local Plan Review high level timetable to December 2026

8. Background Documents

8.1 [PTPWG report Housing Economic Land Availability Assessment 2025 findings , Local Plan growth strategy and sites for allocation discussion](#)

8.2 [Planning and Transportation Policy Working Group minutes 22 January 2026](#)

8.3 [Local Development Scheme July 2025.pdf](#)

8.4 [Gypsy and Traveller Accommodation Assessment 2023](#)

8.5 [Full Council meeting 4th December 2024](#)

8.6 [Full Council meeting 30th July 2025](#)

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Appendix I: Housing sites allocations list

SHELAA ID	Site_address	Ward	Parish	Location type	Settlement hierarchy proposed 2020	BF/GF	Site size	Confirmed site area (ha)	Final capacity (dwellings)	Mixed use	5 years HLS? possible contribution	ELR identified employment land	Employment land loss (ha)
SHELAA/258	Bell House, Bell Road	Homewood	Sittingbourne	Urban	Sittingbourne - tier 1 Principal Town	Brownfield	1 hectare or less	0.8	120			Y	0.8
SHELAA/262	Former Bus Depot, East Street	Roman	Sittingbourne	Urban	Sittingbourne - tier 1 Principal Town	Brownfield	1 hectare or less	0.37	22			Y	0.37
SHELAA/351	The Classic Cinema, High Street, Sittingbourne, ME10 4PE	Chalkwell	Sittingbourne	Urban	Sittingbourne - tier 1 Principal Town	Brownfield	1 hectare or less	0.11	50			N	
SHELAA/332	10-14 High Street, Sittingbourne, ME10 1PD	Chalkwell	Sittingbourne	Urban/Urban fringe/ Rural	Sittingbourne - tier 1 Principal Town	Brownfield	1 hectare or less	0.07	3		100%	N	
SHELAA/270	Land at Tonge Road	Murston	Sittingbourne	Urban	Sittingbourne - tier 1 Principal Town	Greenfield	1 hectare or less	0.49	19		100%	N	
SHELAA/396	St Michaels House and Langs Bar, St Michaels Road, Sittingbourne	Chalkwell	Sittingbourne	Urban	Sittingbourne - tier 1 Principal Town	Brownfield	1 hectare or less	0.15	9		100%	Y	0.15
SHELAA/267	ISP, Church Street	Chalkwell	Sittingbourne	Urban	Sittingbourne - tier 1 Principal Town	Brownfield	1 hectare or less	0.25	15			Y	0.25
SHELAA/233	Land between A2 Bapchild and existing Northern Relief Road (Highsted north)	Teynham and Lynsted Ward (82.35%) / West Downs Ward (16.94%) / Murston Ward (0.7%)	Tonge CP (82.35%) / Bapchild CP (16.94%) / Unparished (0.7%)	Urban fringe	Bapchild - tier 5 small villages	Greenfield	Major site	91.68	1250	Y Employment 0.416 (ha) Primary school 0.25 (ha) Sports and Community Facilities 0.09 (ha)	10%	N	
SHELAA/225	South East Sittingbourne (Highsted South)	West Downs / Teynham and Lynsted / Woodstock / Roman / Murston	Rodmersham/Tonge/Bapchild/Tunstall/Teynham/Milstead/Bredgar	Urban fringe	Sittingbourne - tier 1 Main borough urban centre	Greenfield	Strategic site	800.69	750	Y Other uses in Plan period to be confirmed	5%	Y	
SHELAA/081	Lady Dane Farm Buildings, Love Lane		Faversham	Urban	Faversham - tier 2 Secondary towns	Greenfield	1 hectare or less	0.64	25		50%	N	
SHELAA/111	Land at Graveney Road, East of Faversham (Site A)		Faversham/Graveney with Goodnestone	Urban fringe	Faversham - tier 2 Secondary towns	Greenfield	Major site	8.41	177		50%	Y	8.41
SHELAA/393	Land at Lion Field	Watling	Faversham	Urban fringe	Faversham - tier 2 Secondary towns	Greenfield	Major Site	2.25	68		50%	N	
SHELAA/381	Syndale Park, London Road, Faversham, Kent, ME13 0RH	East Downs	Ospringe	Rural	Faversham - tier 2 Secondary towns	Greenfield	1 hectare or less	0.72	9		100%	N	
SHELAA/418	Land at West Minster off of Brielle Way, Sheerness	Sheerness	Sheerness	Urban	Sheerness - Tier 2 Secondary Town	Greenfield	Major Site	1.9	76		50%	Y	1.9
SHELAA/421	Land Brielle Way, Sheerness	Sheerness	Sheerness	Urban	Sheerness - Tier 2 Secondary Town	Greenfield	Major Site	2.16	76		50%	Y	2.16

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SHELAA/244	Halfway Houses Primary School, Southdown Rd	Queenborough & Halfway	non parished	Urban	Minster and Halfway - tier 3 Urban Service Centre	Mixed	Major site	1.51	60		50%	N	
SHELAA/402	Hollybush Farm Caravan Park, Oak Lane, Minster-on- Sea, ME12 3QR	Minster Cliffs	Minster	Rural	Minster and Halfway - tier 3 Urban Service Centre	Brownfield	Major Site	3.87	124		50%	N	
SHELAA/408	Estuary View, Bell Farm Lane, Minster-on-Sea, ME12 4JA	Sheppey East	Minster	Rural	Minster and Halfway - tier 3 Urban Service Centre	Brownfield	1 hectare or less	0.38	15		100%	N	
SHELAA/412	Golden Leas Holiday Park, Bell Farm Lane, Minster-on-Sea, ME12 4JA	Sheppey East	Minster	Urban fringe	Minster and Halfway - tier 3 Urban Service Centre	Brownfield	Major Site	8.29	232		30%	N	
SHELAA/216	Land at West Street	Queenborough & Halfway	Queenborough	Urban	Queenborough & Rushenden - Tier 3 Urban Service Centre	Brownfield	Major site	1.45	80			N	
SHELAA/217	South of Queenborough Creek	Queenborough & Halfway	Queenborough	Urban	Queenborough & Rushenden - Tier 3 Urban Service Centre	Brownfield	Major site	7.03	380	Y Employment 1 (ha)		N	
SHELAA/218	Former Istil site Rushenden Road/Thomsett Way with yield of 240 residential units	Queenborough & Halfway	Queenborough	Urban	Queenborough & Rushenden - Tier 3 Urban Service Centre	Brownfield	Major site	4	240			N	
SHELAA/220	West of Rushenden Road, Queenborough	Queenborough & Halfway	Queenborough	Urban	Queenborough & Rushenden - Tier 3 Urban Service Centre	Brownfield	Major site	10.52	278			N	
SHELAA/223	The Foundary, Rushenden Road	Queenborough & Halfway	Queenborough	Urban	Queenborough & Rushenden - Tier 3 Urban Service Centre	Brownfield	1 hectare or less	0.37	37			N	
SHELAA/344	Land adjacent to Leysdown Road, Eastchurch, ME12 4BN	Sheppey East	Eastchurch	Urban Fringe	Eastchurch- tier 4 Village Service Centre	Greenfield	Major Site	3.7	62		50%	N	
SHELAA/143	Land south of Little Groves, Leysdown Road	Sheppey East	Leysdown	Rural	Leysdown - tier 4 Village Service Centre	Mixed	Major site	2.58	53		50%	N	
SHELAA/323	Sheppey Beach Villas, Manor Way, ME12 4QQ	Sheppey East	Leysdown	Urban Fringe	Leysdown - tier 4 Village Service Centre	Brownfield	Major Site	3.8	133			N	
SHELAA/415	Land at Church Lane, Newington	Hartlip, Newington & Upchurch	Newington	Urban fringe	Newington - tier 4 Village Service Centre	Greenfield	Major Site	4.88	90		100%	N	
SHELAA/346	Digswell, Lower Hartlip Road, Hartlip, ME9 7SX	Hartlip, Newington and Upchurch	Hartlip/Newington	Rural	Newington - tier 4 Village Service Centre	Predominantly Brownfield	1 hectare or less	0.36	11			N	

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SHELAA ID	Site_address	Ward	Parish	Location type	Settlement hierarchy proposed 2020	BF/GF	Site size	Confirmed site area (ha)	Final capacity (dwellings)	Mixed use	5 years HLS? possible contribution	ELR identified employment land	Employment land loss (ha)
SHELAA/368	Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY	Hartlip, Newington and Upchurch	Newington	Rural	Newington - tier 4 Village Service Centre	Greenfield	Major Site	4.9	52			N	
SHELAA/277	Barrow Green Farm, Barrow Green	Teynham & Lynsted	Teynham	Urban	Teynham - tier 4 Village Service Centre	Greenfield	Major site	1.09	30		30%	N	
SHELAA/286	Land Adjoining Mayfield, London Road	Teynham and Lynsted	Teynham	Urban	Teynham - tier 4 Village Service Centre	Greenfield	1 hectare or less	0.33	13		80%	N	
SHELAA/153	Land at Claxfield Road	Teynham and Lynsted	Lynsted with Kingsdown	Urban fringe	Teynham - tier 4 Village Service Centre	Greenfield	Major site	6.04	127		50%	N	
SHELAA/154	Land at Claxfield Road (Site 2)	Teynham and Lynsted	Lynsted with Kingsdown	Urban fringe	Teynham - tier 4 Village Service Centre	Greenfield	1 hectare or less	0.52	12		100%	N	
SHELAA/037	Land off Colonels Lane	Boughton & Courtenay	Boughton-under-Blean	Urban	Boughton - tier 4 village Service Centre	Greenfield	1 hectare or less	0.75	15		100%	N	
SHELAA/044	The Former Garden Hotel (no 169), The Street		Boughton-under-Blean	Urban	Boughton - tier 4 village Service Centre	Mixed	1 hectare or less	0.73	10		100%	N	
SHELAA/246	Land at Norton Ash Garden Centre	Teynham and Lynsted	Norton	Rural	Lewson Street - tier 5 Small Villages	Greenfield	Major site	9.06	100		50%	N	
SHELAA/022	Land at Street Farm, Pond Farm Road (Site B)	Borden and Grove Park	Borden	Rural	Borden- tier 5 small villages	Greenfield	1 hectare or less	0.63	15		100%	N	
SHELAA/119	Land west of Lower Hartlip Road/Munn's Lane	Hartlip, Newington & Upchurch	Hartlip	Urban fringe	Hartlip - tier 5 small villages	Greenfield	Major site	5.59	26		100%	N	
SHELAA/324	Home Farm, Breach Lane, Lower Halstow, ME9 7DB	Bobbing, Iwade and Lower Halstow	Lower Halstow	Rural	Lower Halstow - tier 5 Small Villages	Greenfield	1 hectare or less	0.5	16		100%	N	
SHELAA/306	Land at Forge Lane, Upchurch	Hartlip, Newington & Upchurch	Upchurch	Urban fringe	Upchurch - tier 5 Small Villages	Greenfield	1 hectare or less	0.85	20		80%	N	
SHELAA/308	Land south of Forge Lane and Holywell Primary School and East of Chaffes Lane	Hartlip, Newington & Upchurch	Upchurch	Urban fringe	Upchurch - tier 5 Small Villages	Greenfield	Major site	3.98	84		50%	N	
SHELAA/310	Land adjacent to Oak Lane - Chaffes Lane (Site B)	Hartlip, Newington & Upchurch	Upchurch	Urban fringe	Upchurch - tier 5 Small Villages	Mixed	Major site	1.66	40		50%	N	
SHELAA/312	Land off Chaffes Lane	Hartlip, Newington & Upchurch	Upchurch	Urban fringe	Upchurch - tier 5 Small Villages	Greenfield	1 hectare or less	0.57	14		100%	N	

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SHELAA ID	Site_address	Ward	Parish	Location type	Settlement hierarchy proposed 2020	BF/GF	Site size	Confirmed site area (ha)	Final capacity (dwellings)	Mixed use	5 years HLS? possible contribution	ELR identified employment land	Emplyment land loss (ha)
SHELAA/319	Land at Long Field, Chaffes Lane	Hartlip, Newington & Upchurch	Upchurch	Urban fringe	Upchurch - tier 5 Small Villages	Greenfield	Major site	2.38	50		50%	N	
SHELAA/321	Land west of Warden	Sheppey East	Warden	Urban fringe	Warden - tier 5 Small Village	Greenfield	Major site	6.62	139		30%	N	

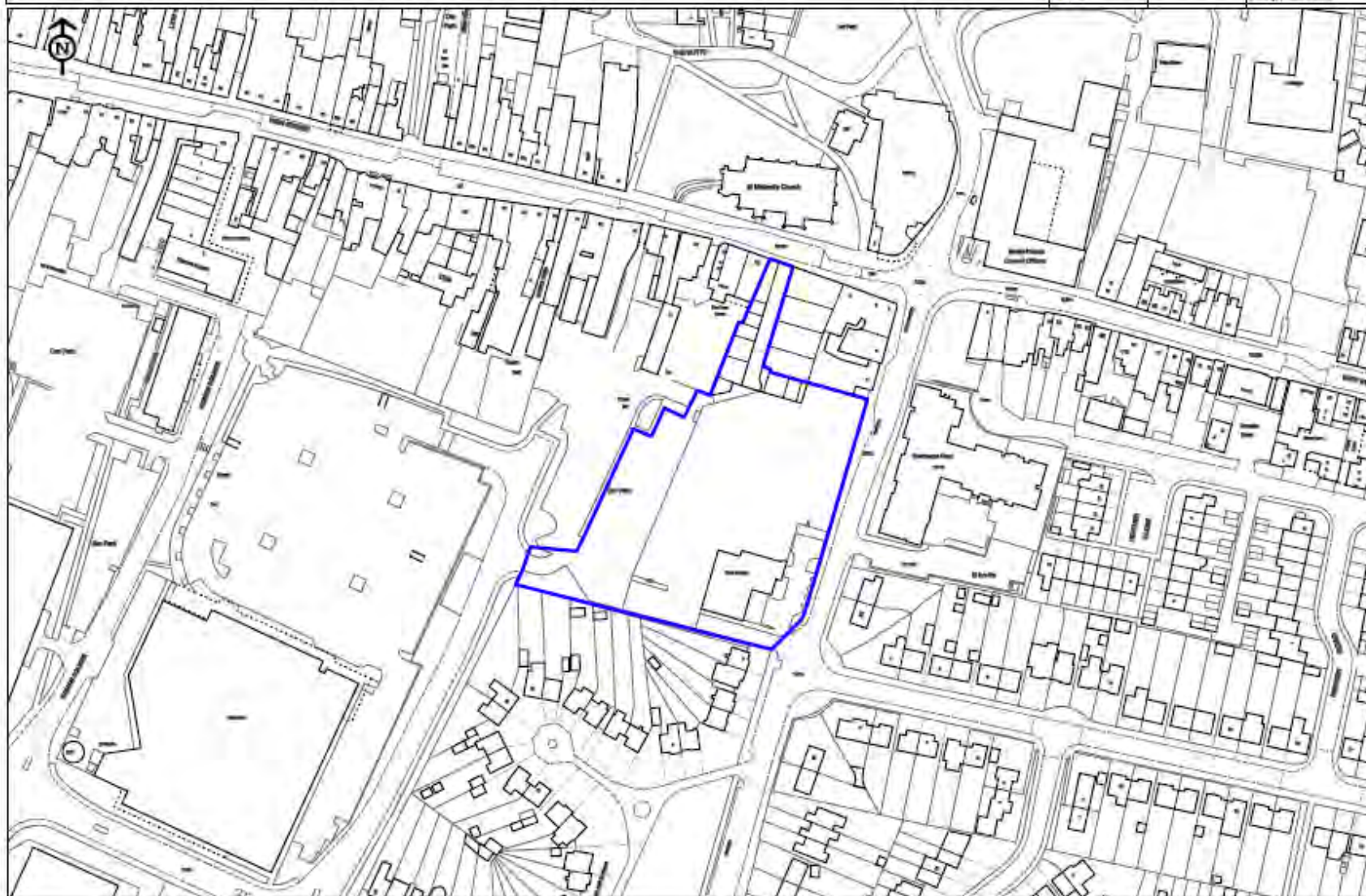
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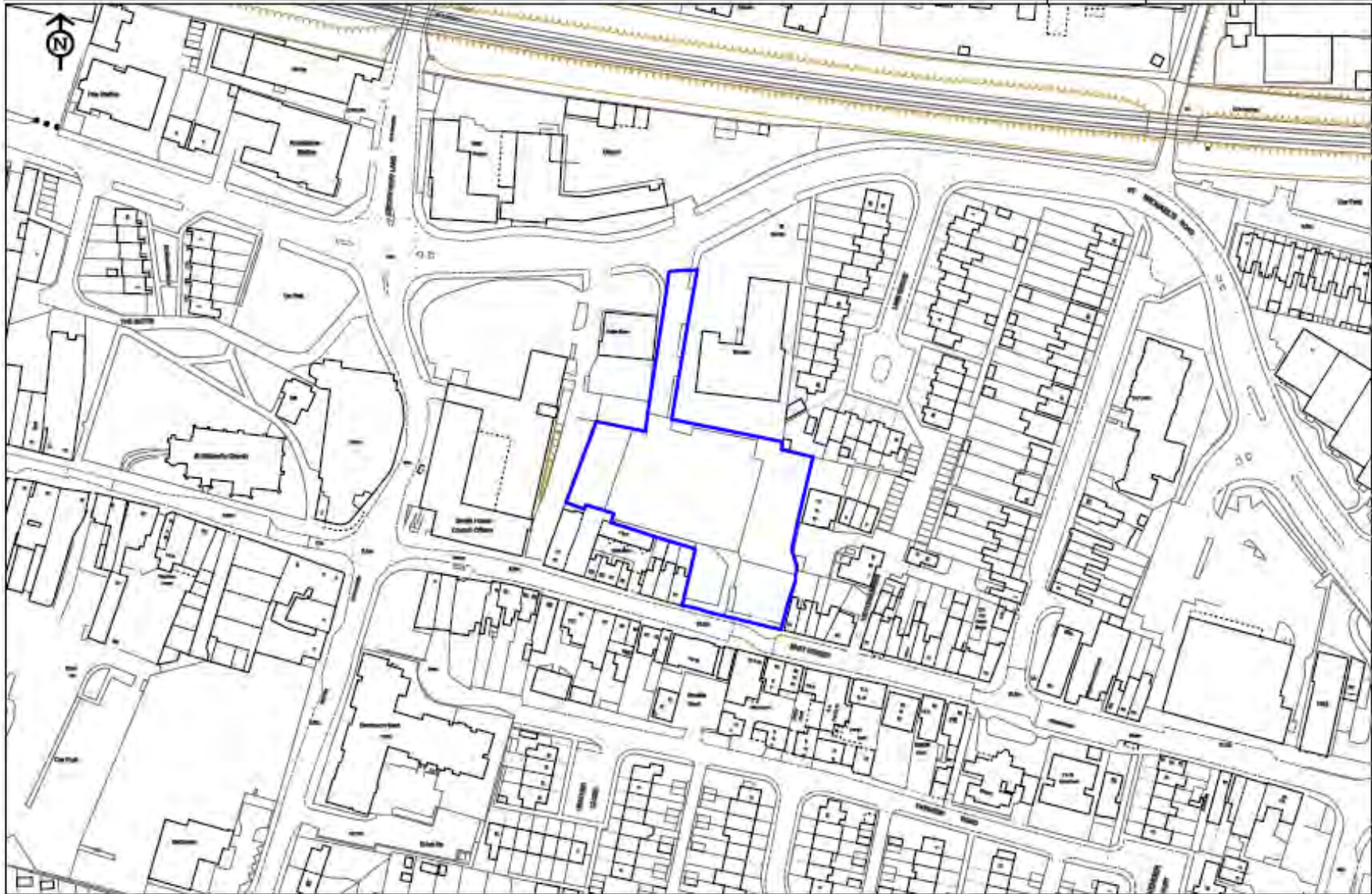
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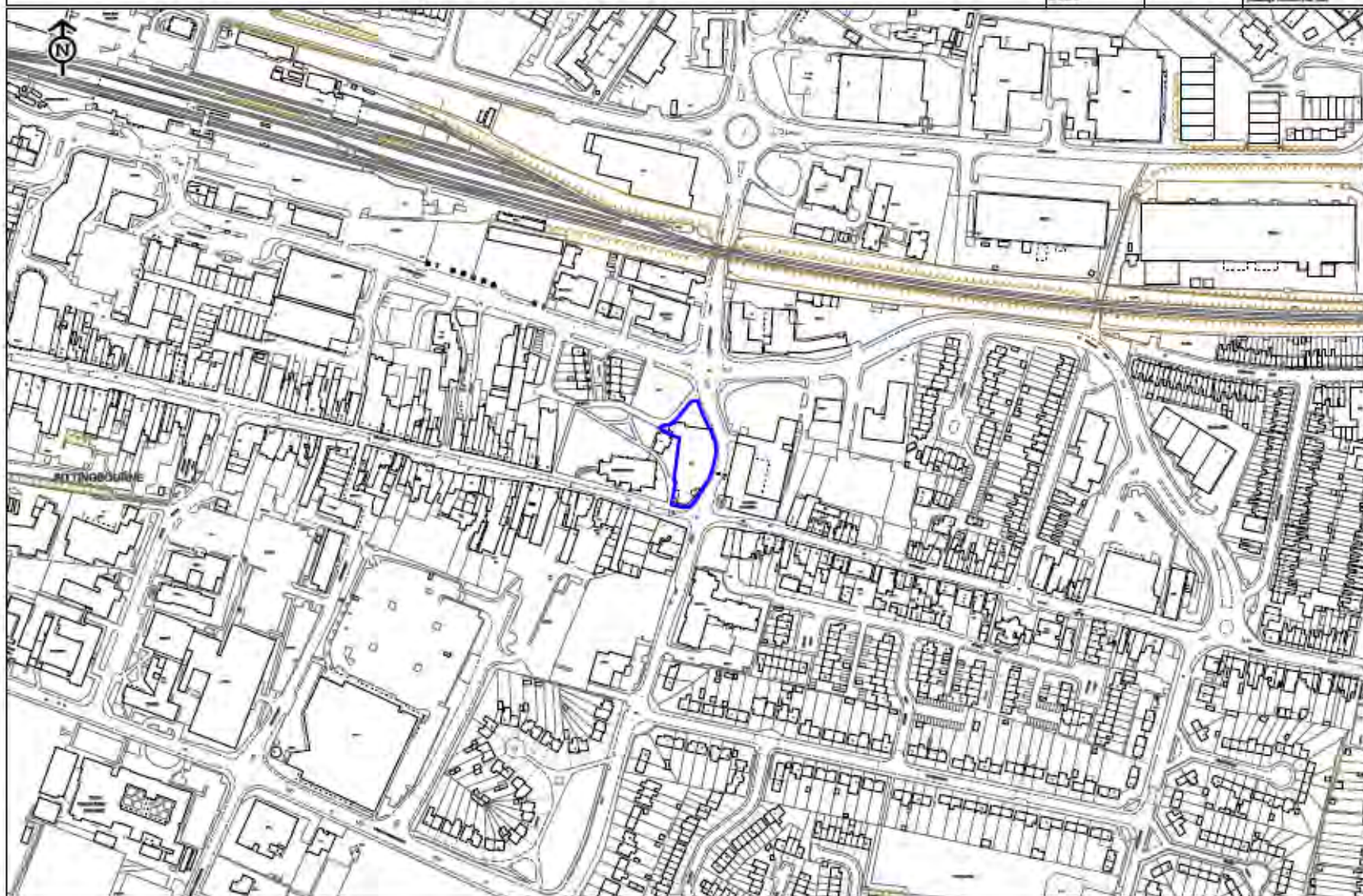
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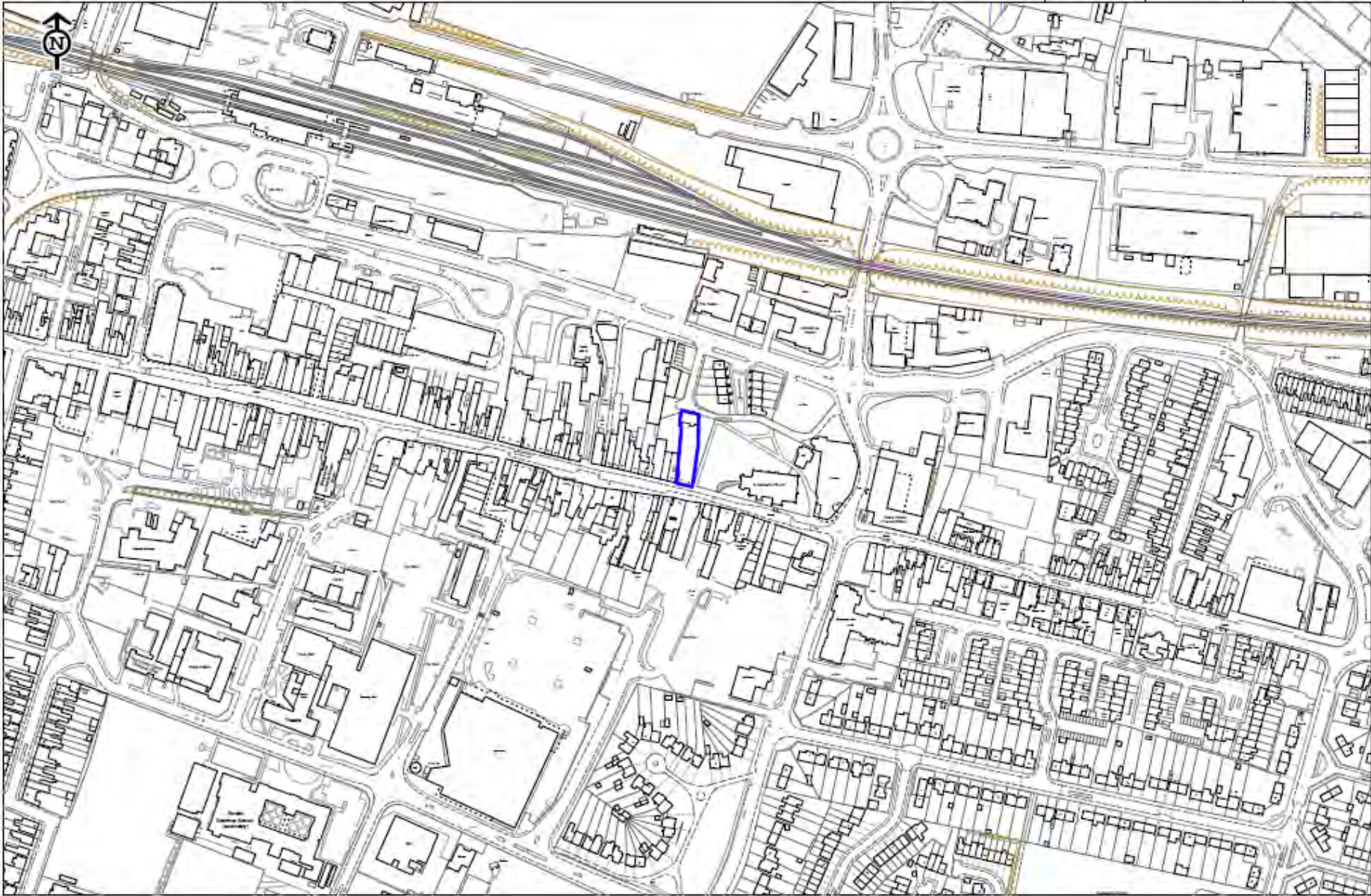
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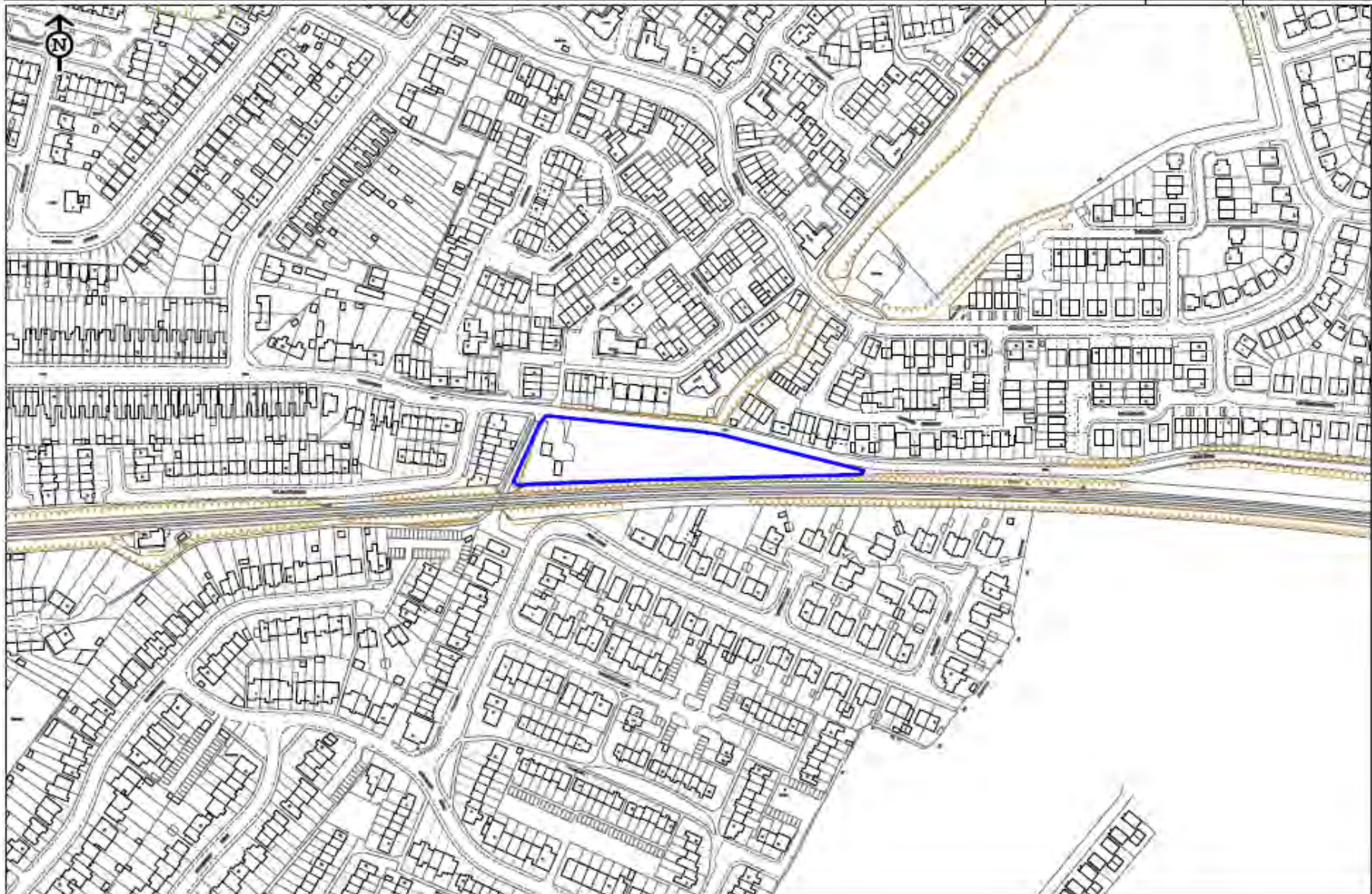
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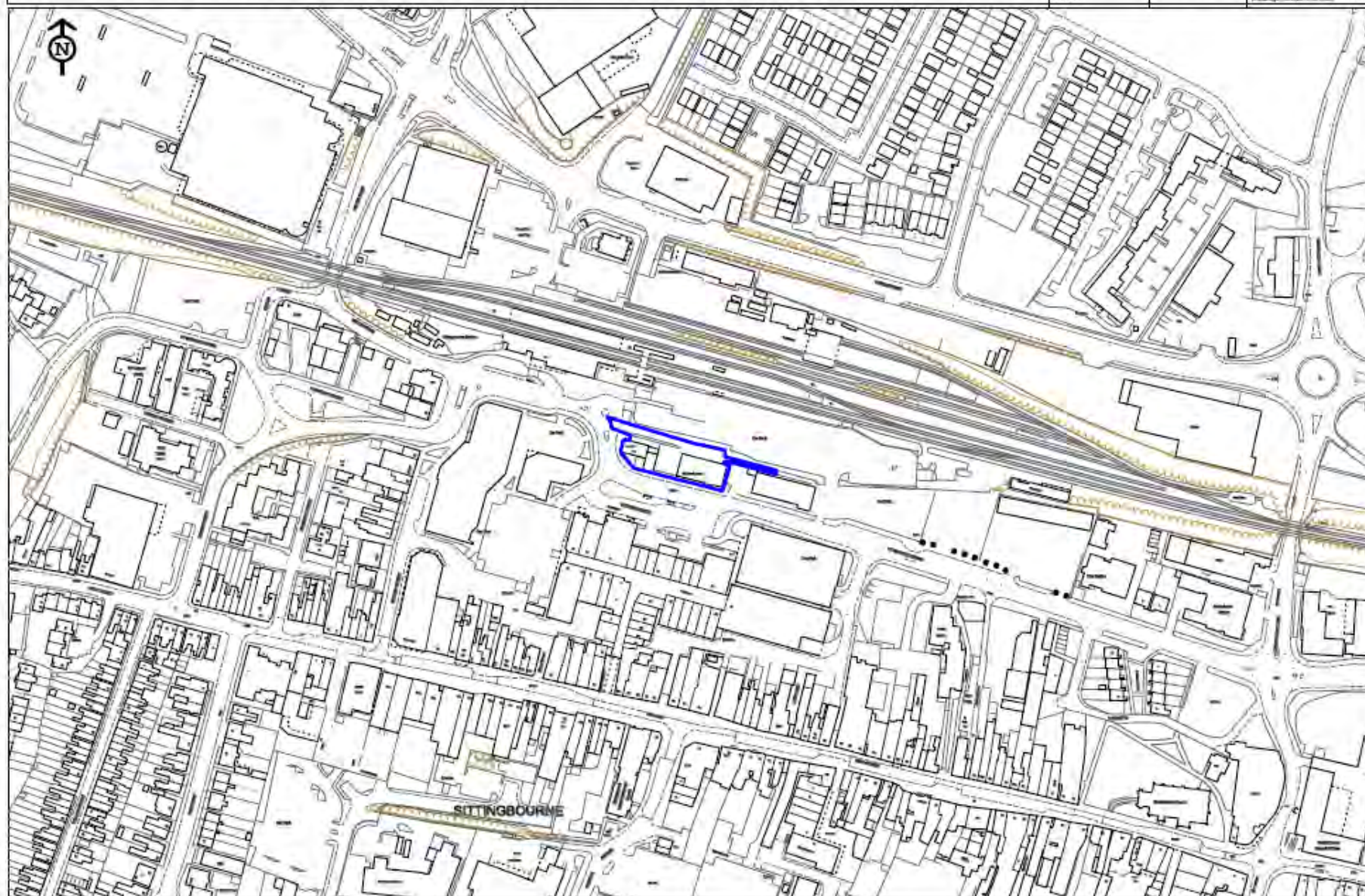


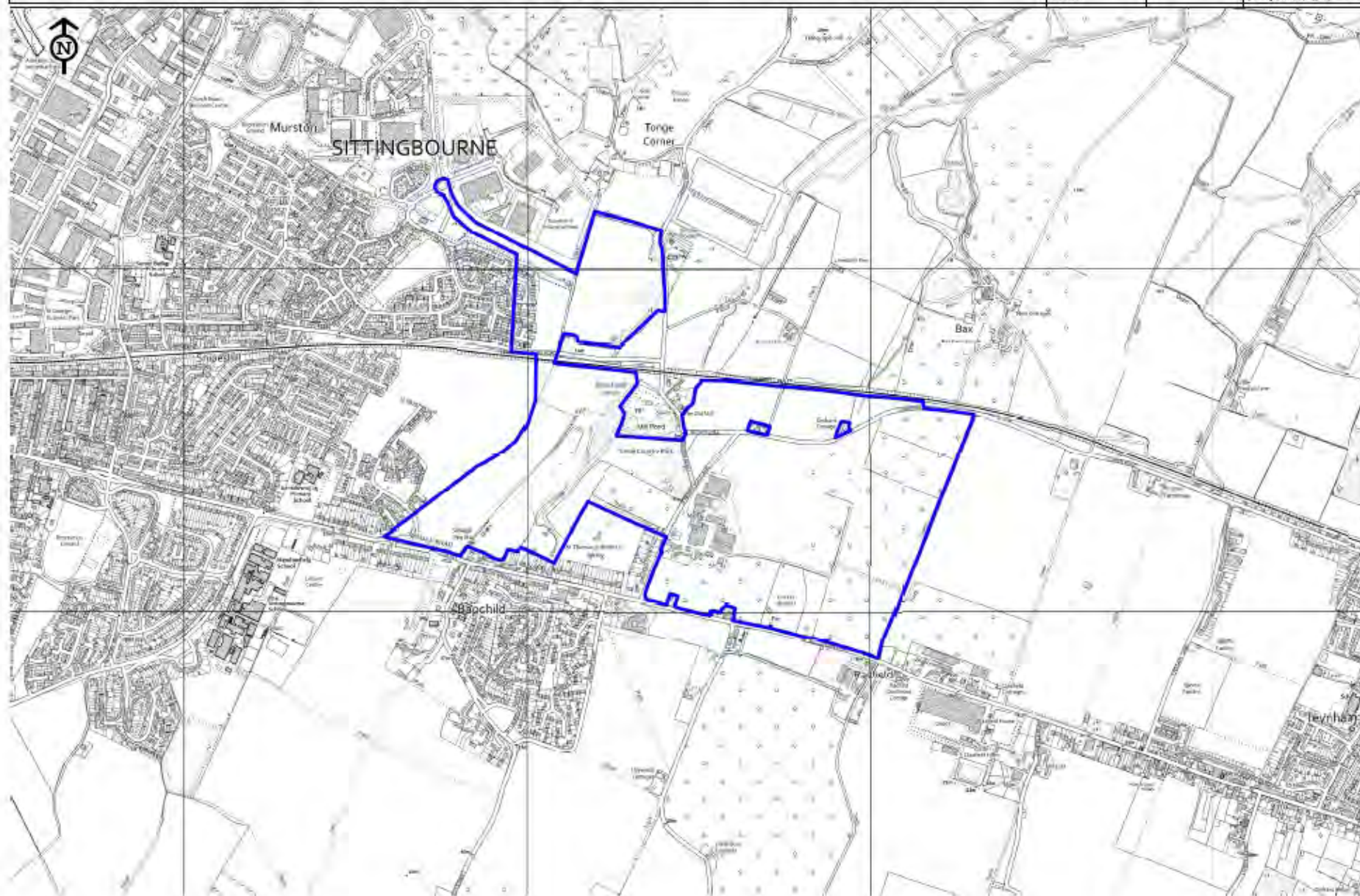


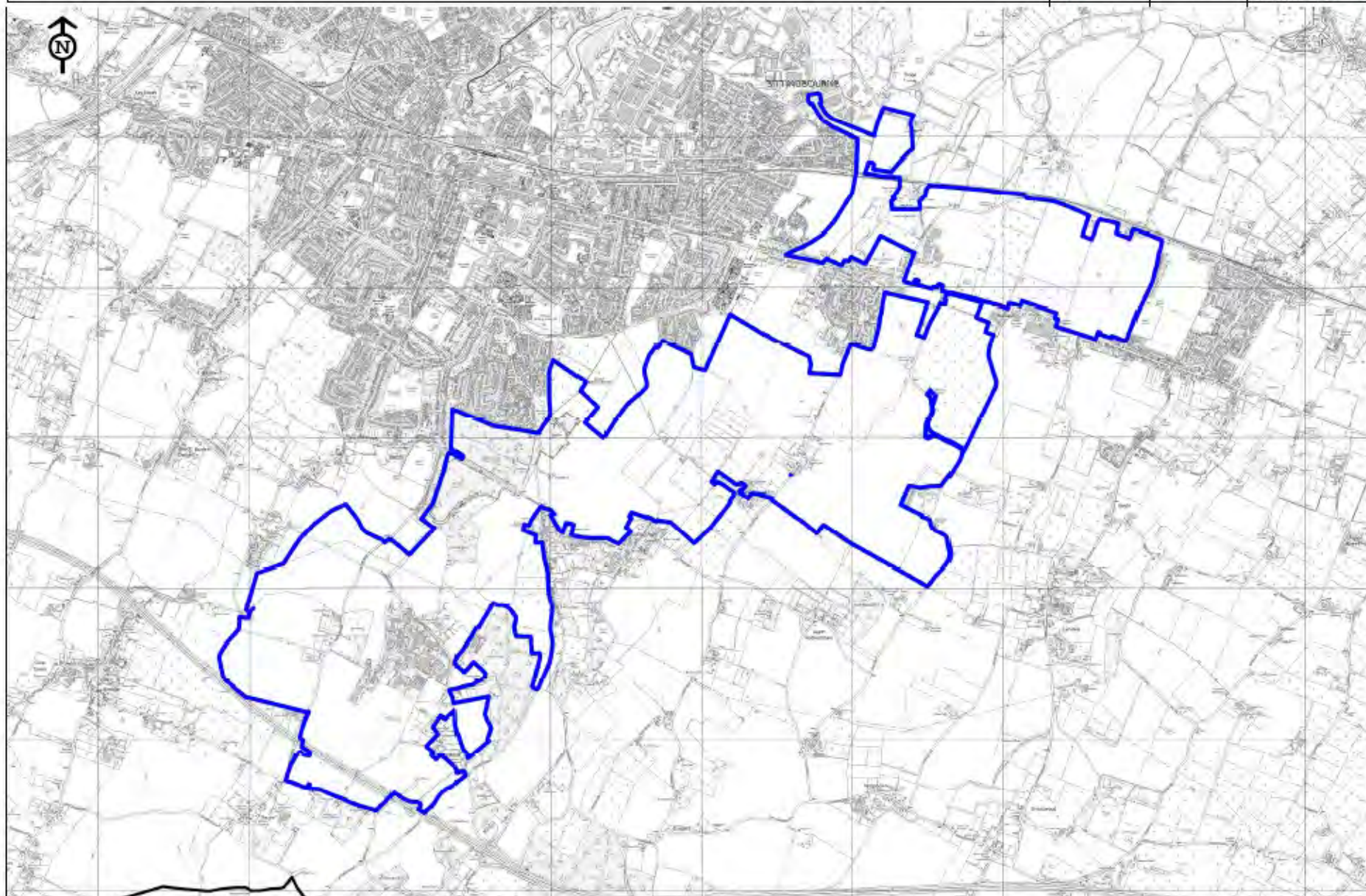


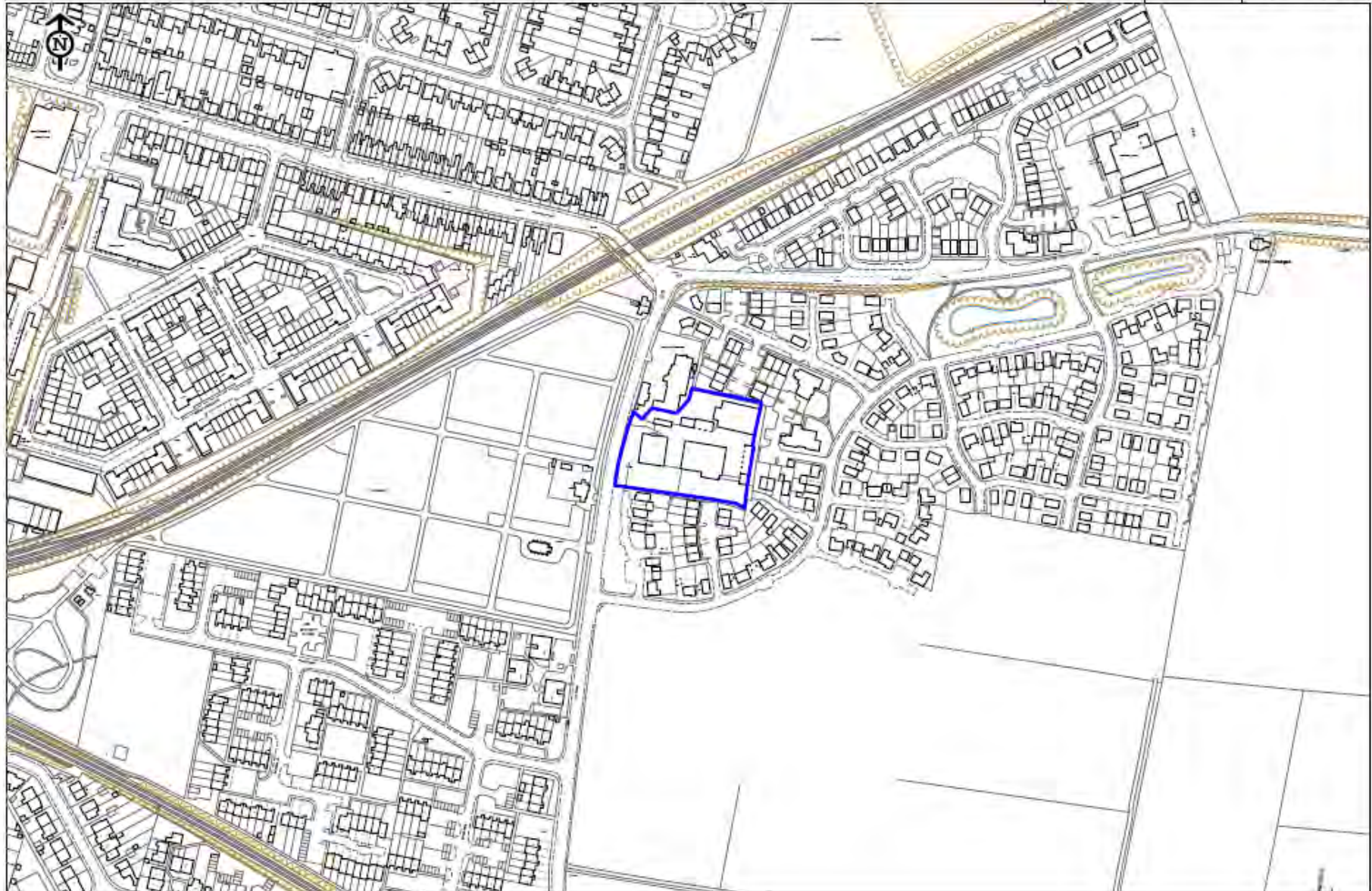


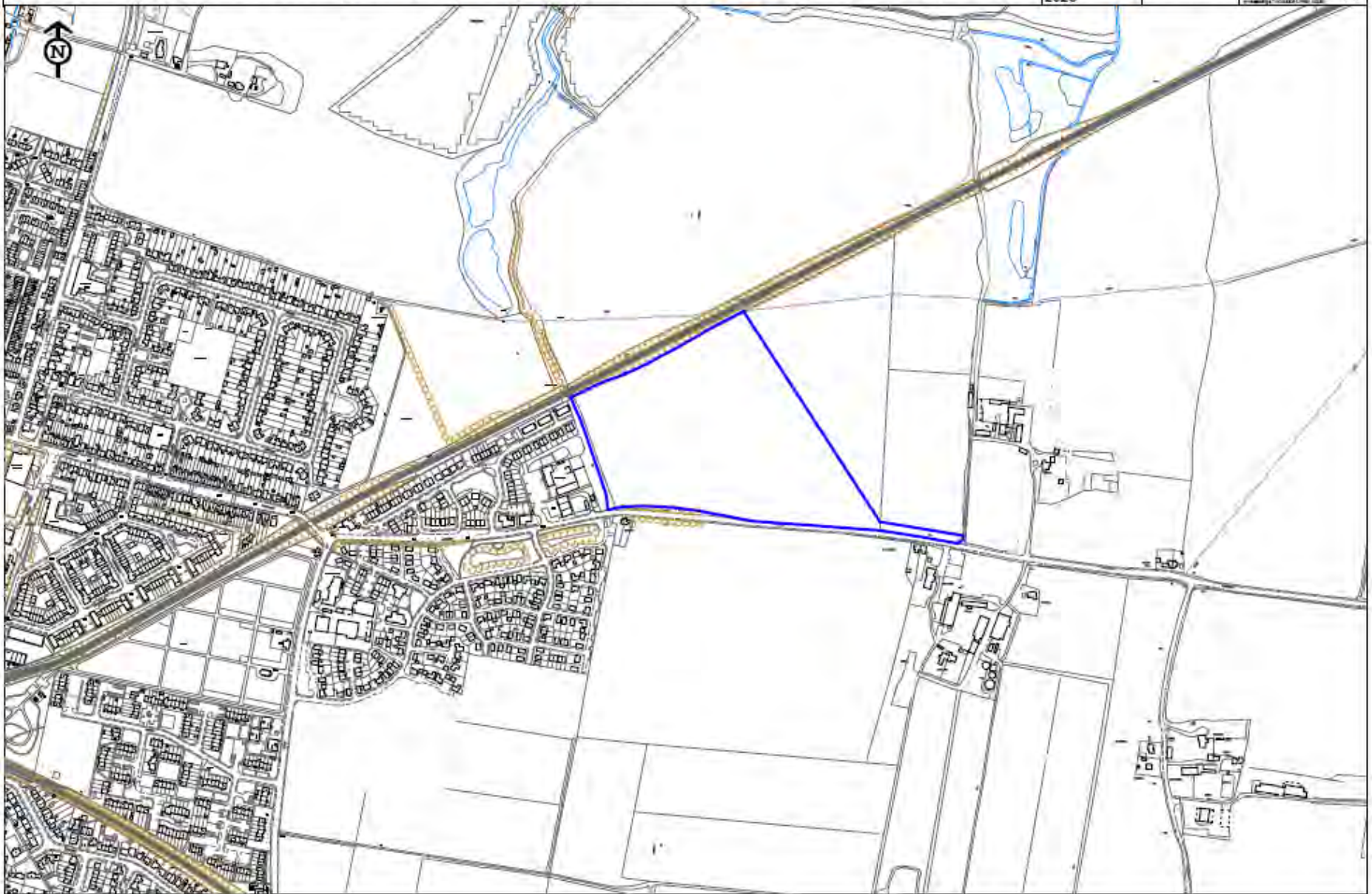


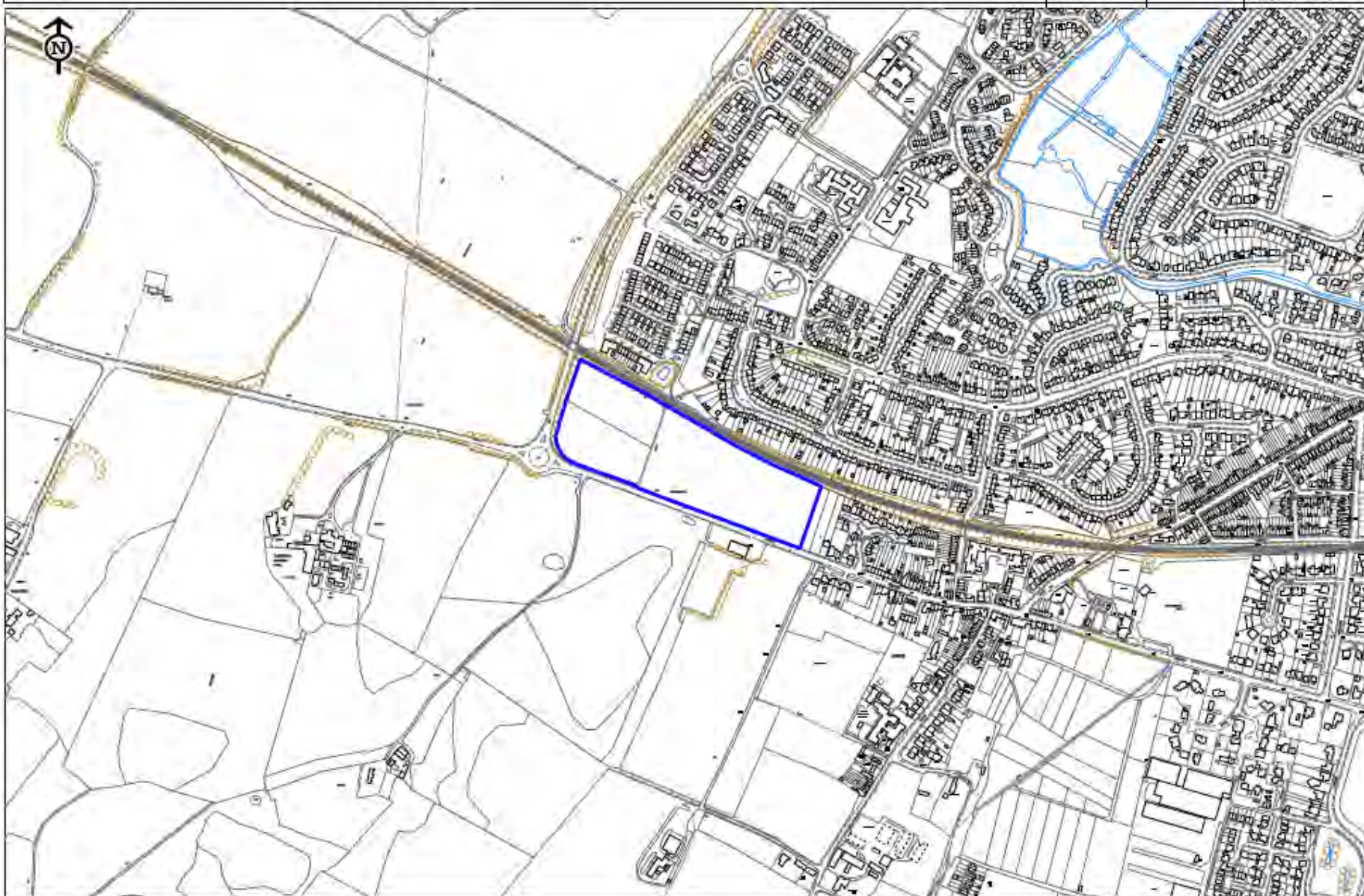


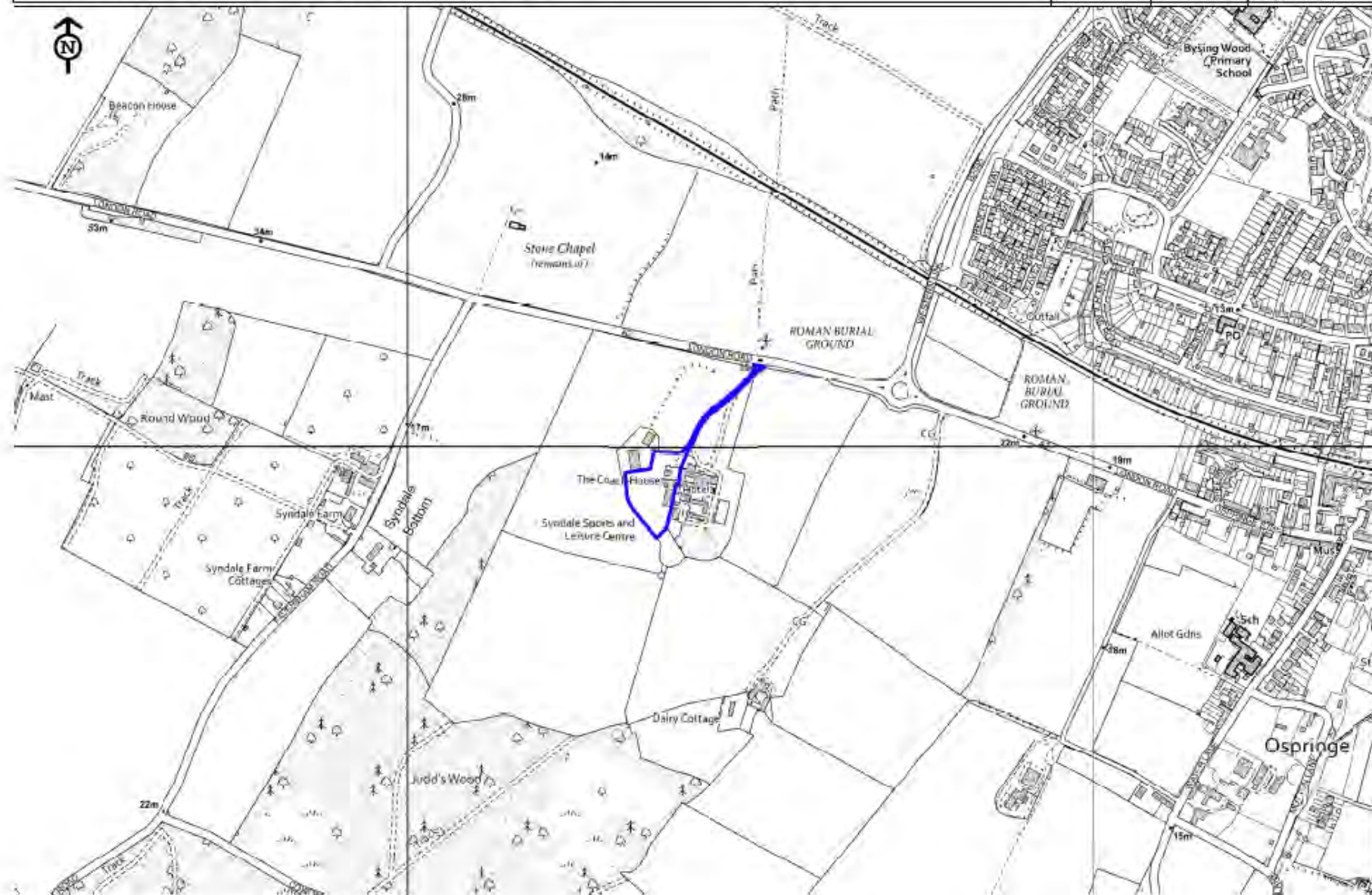




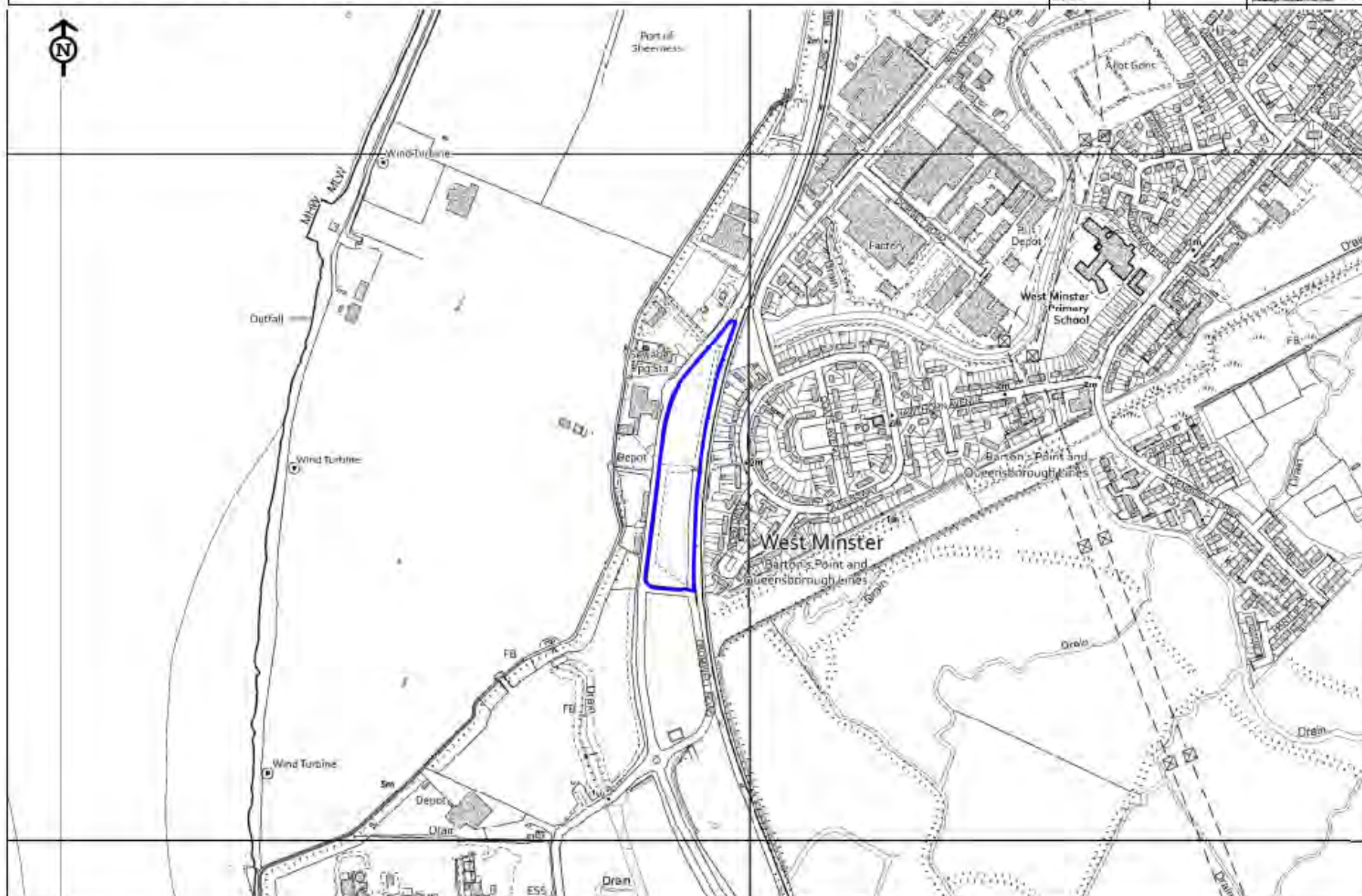


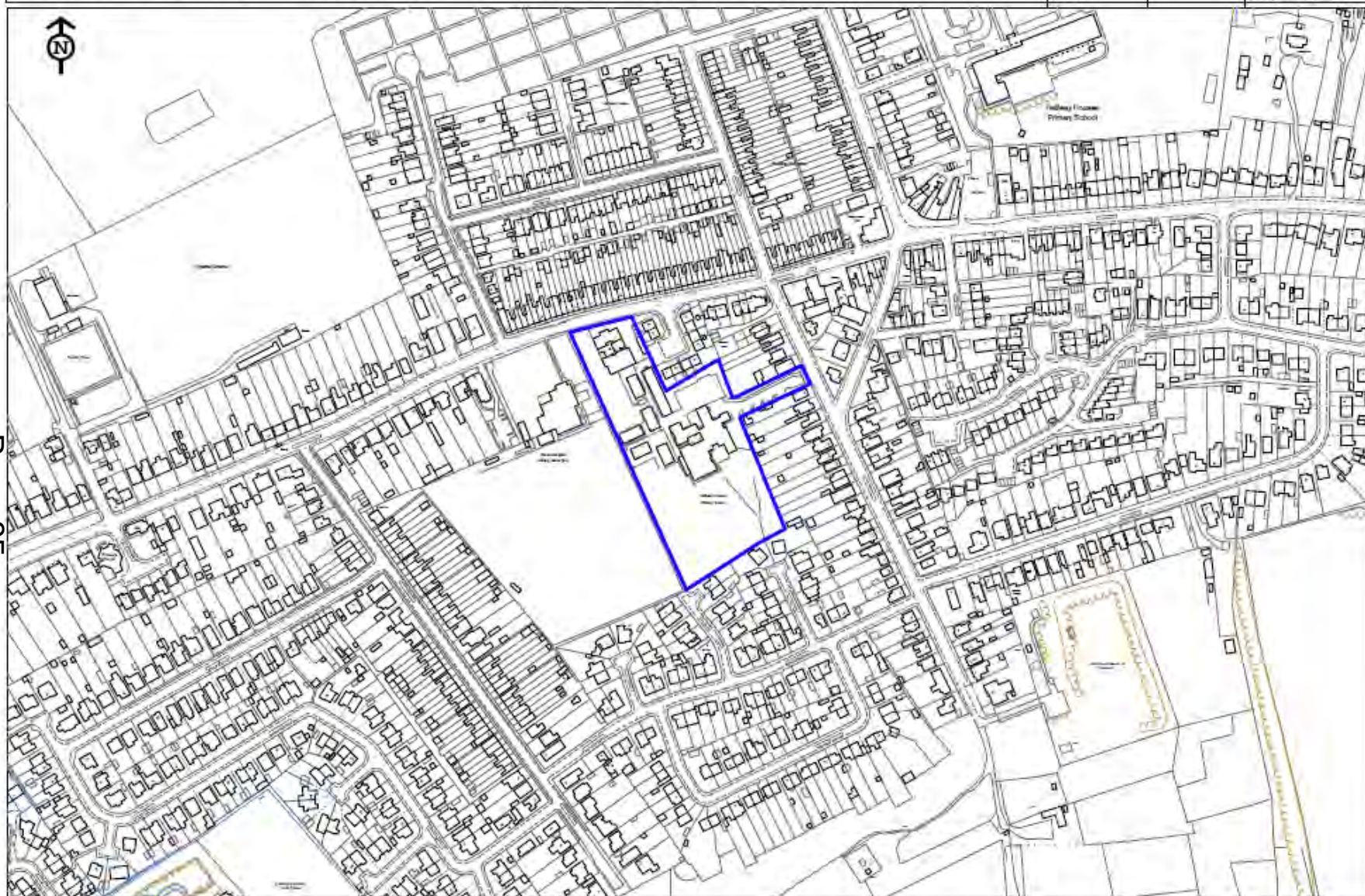


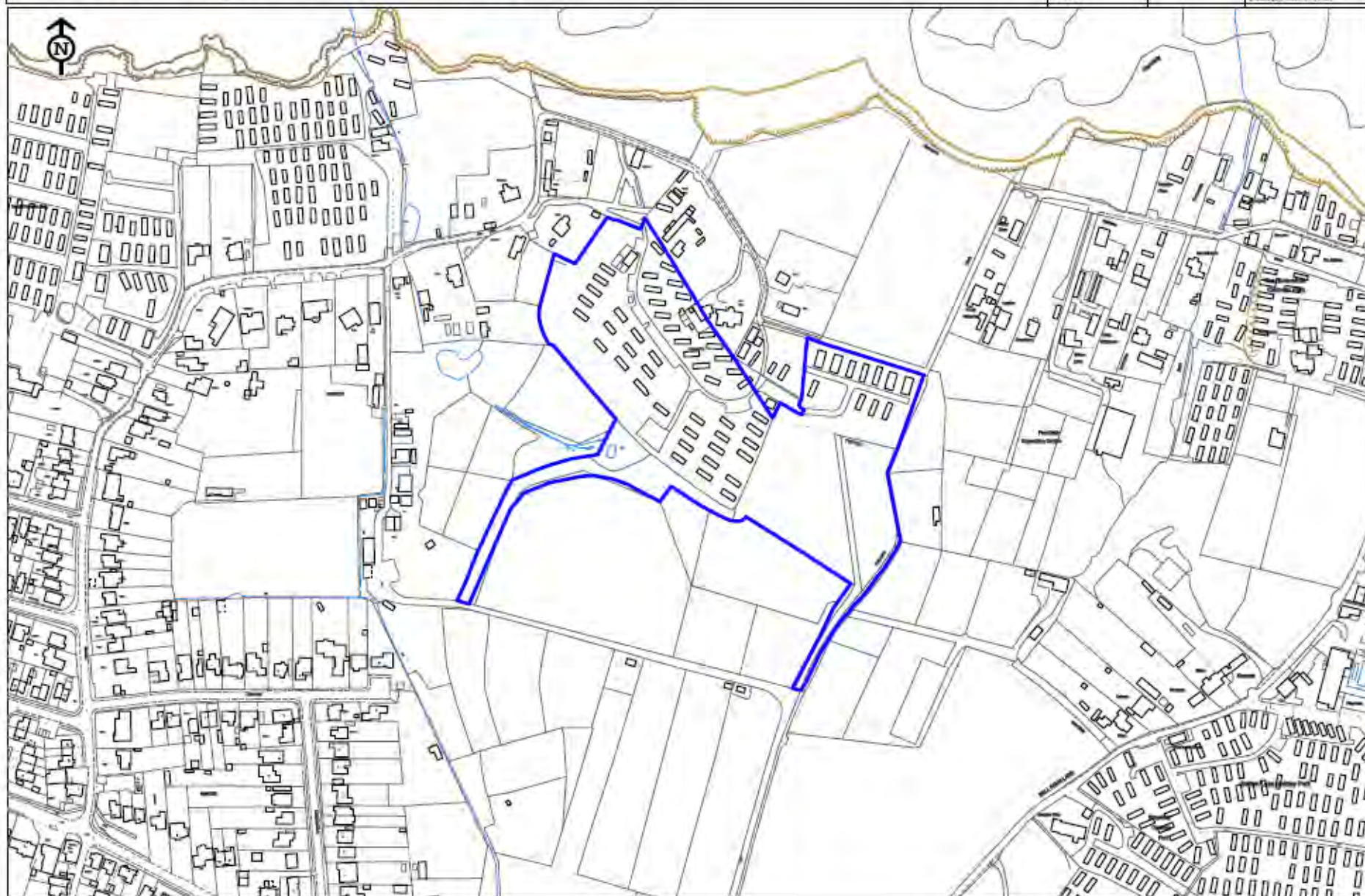


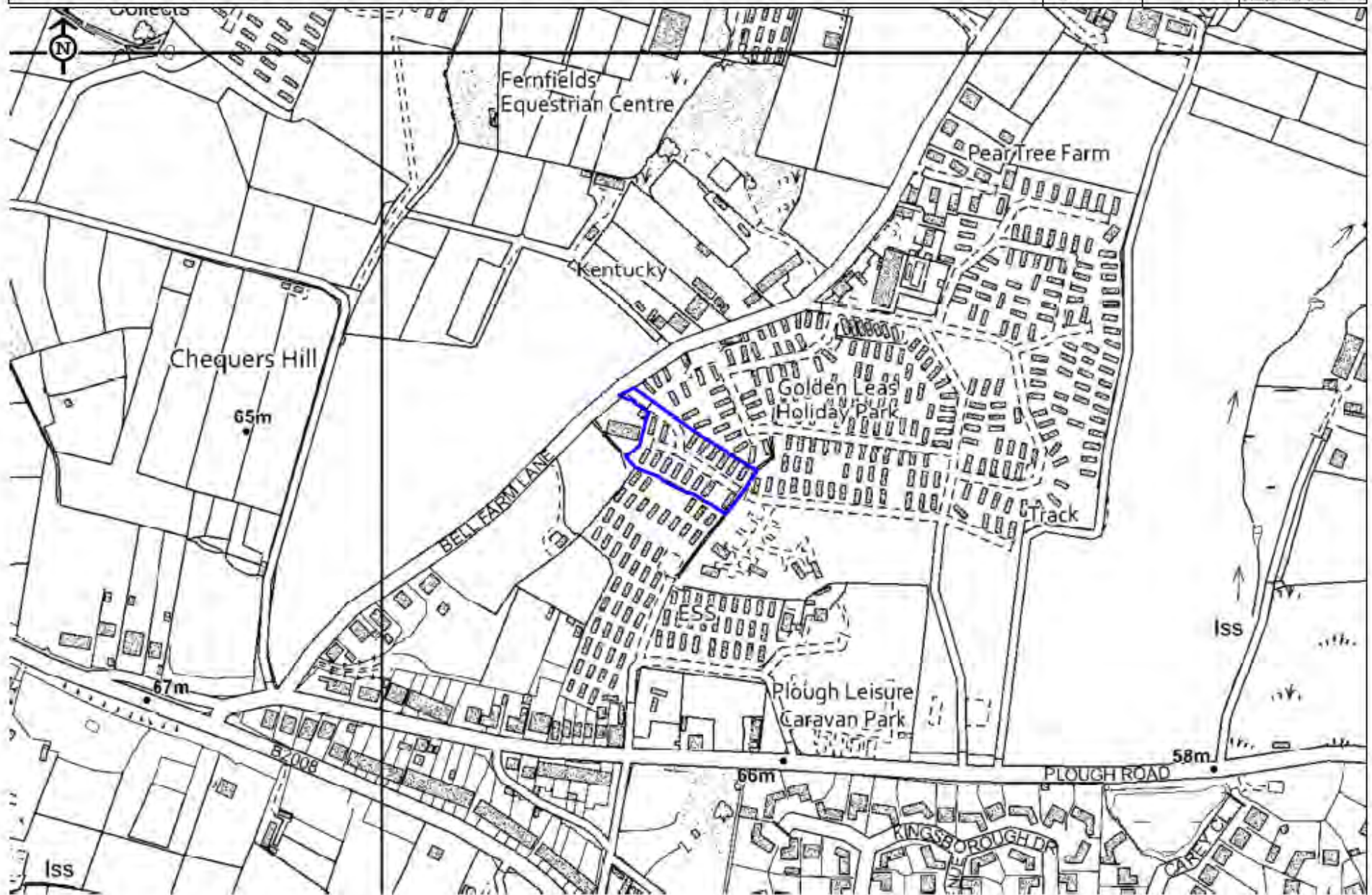


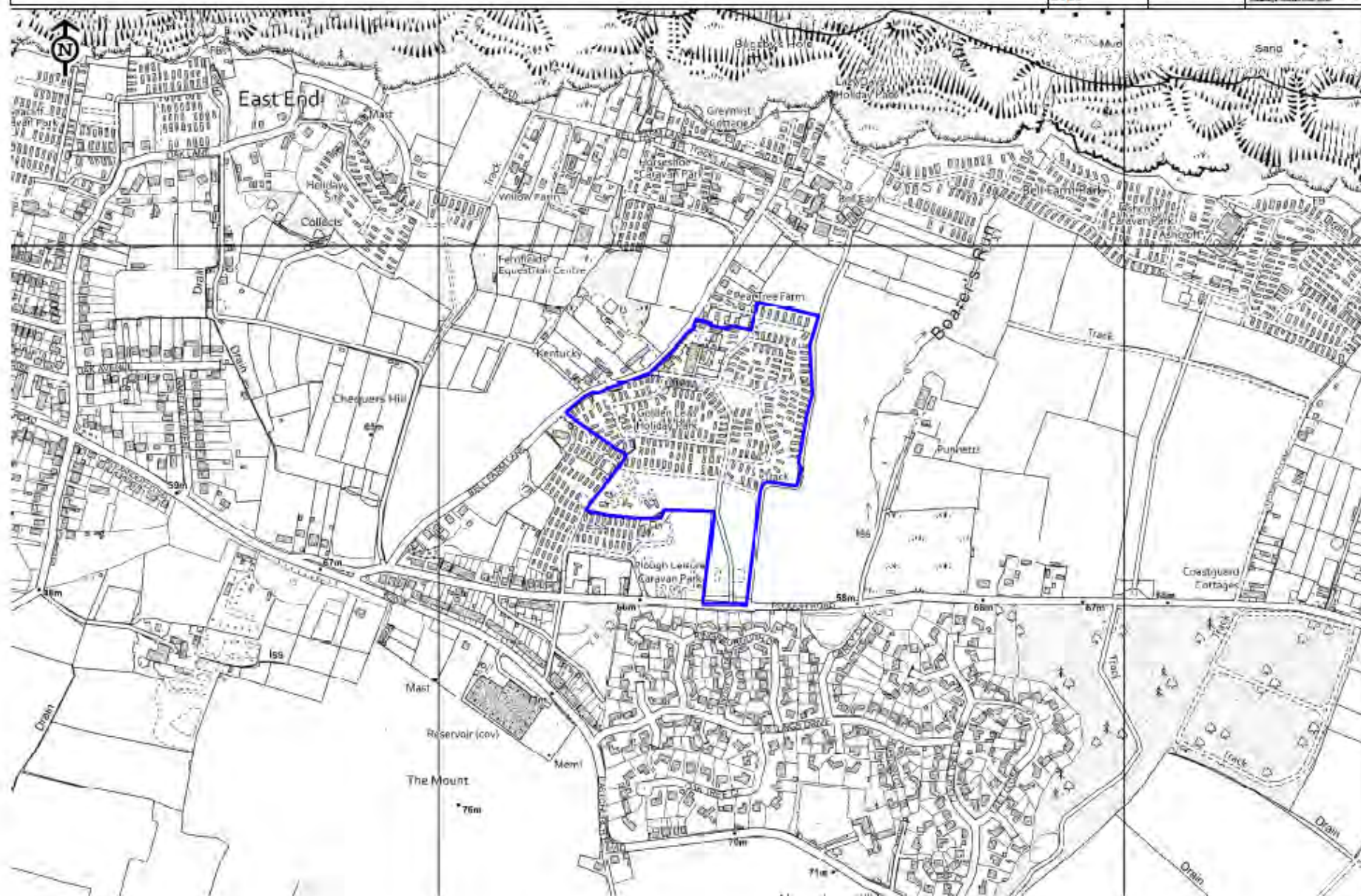




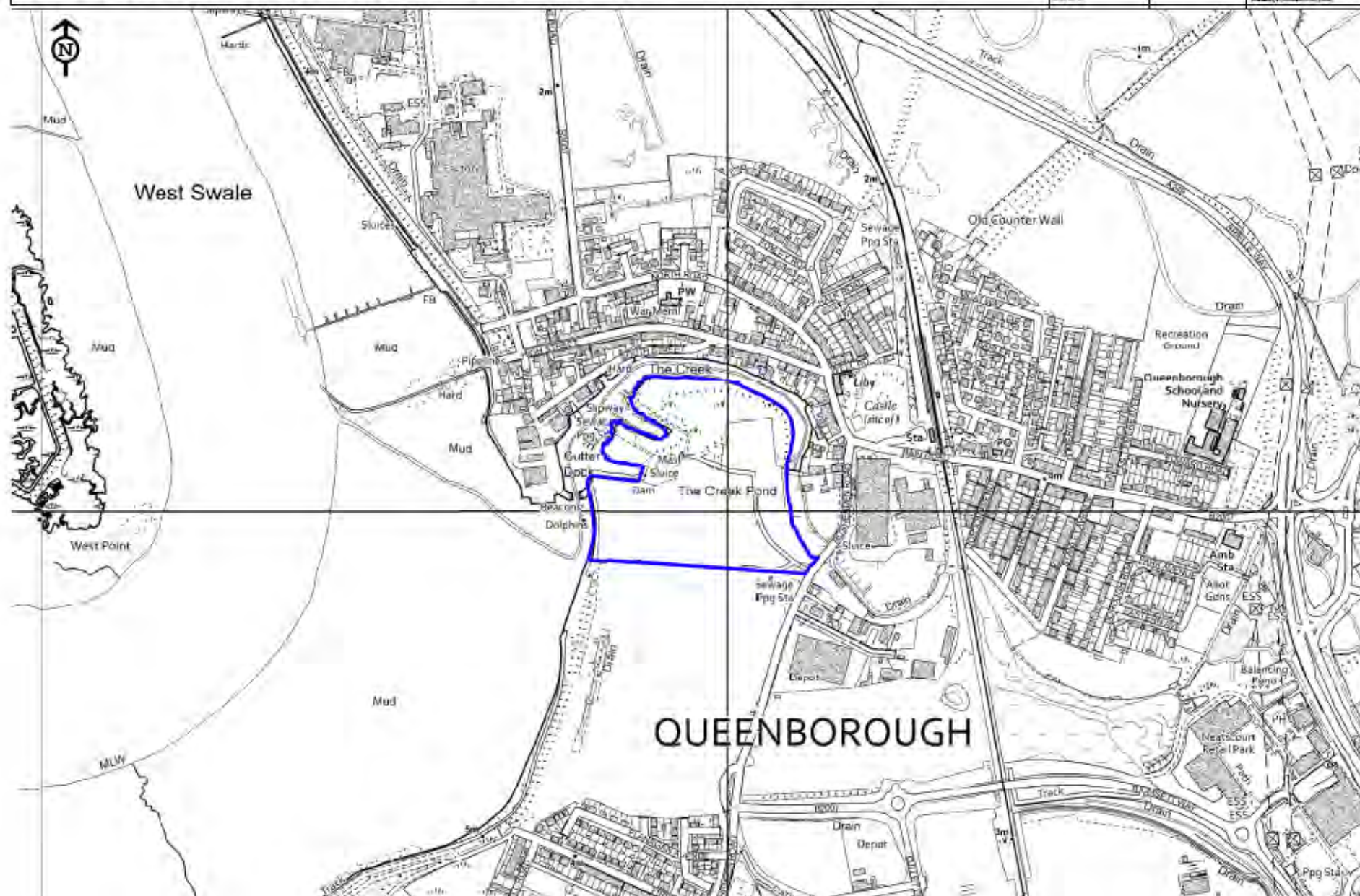












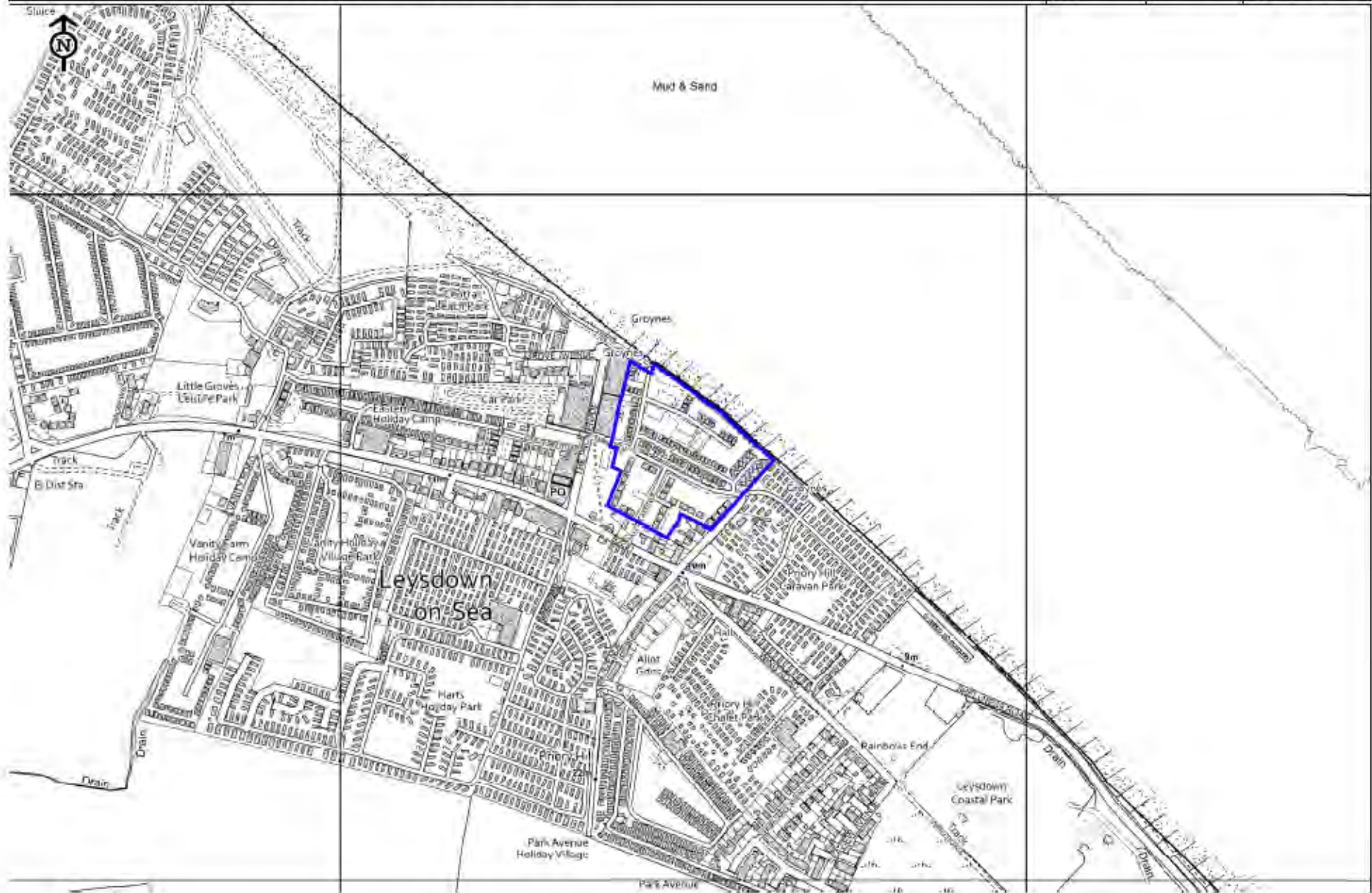










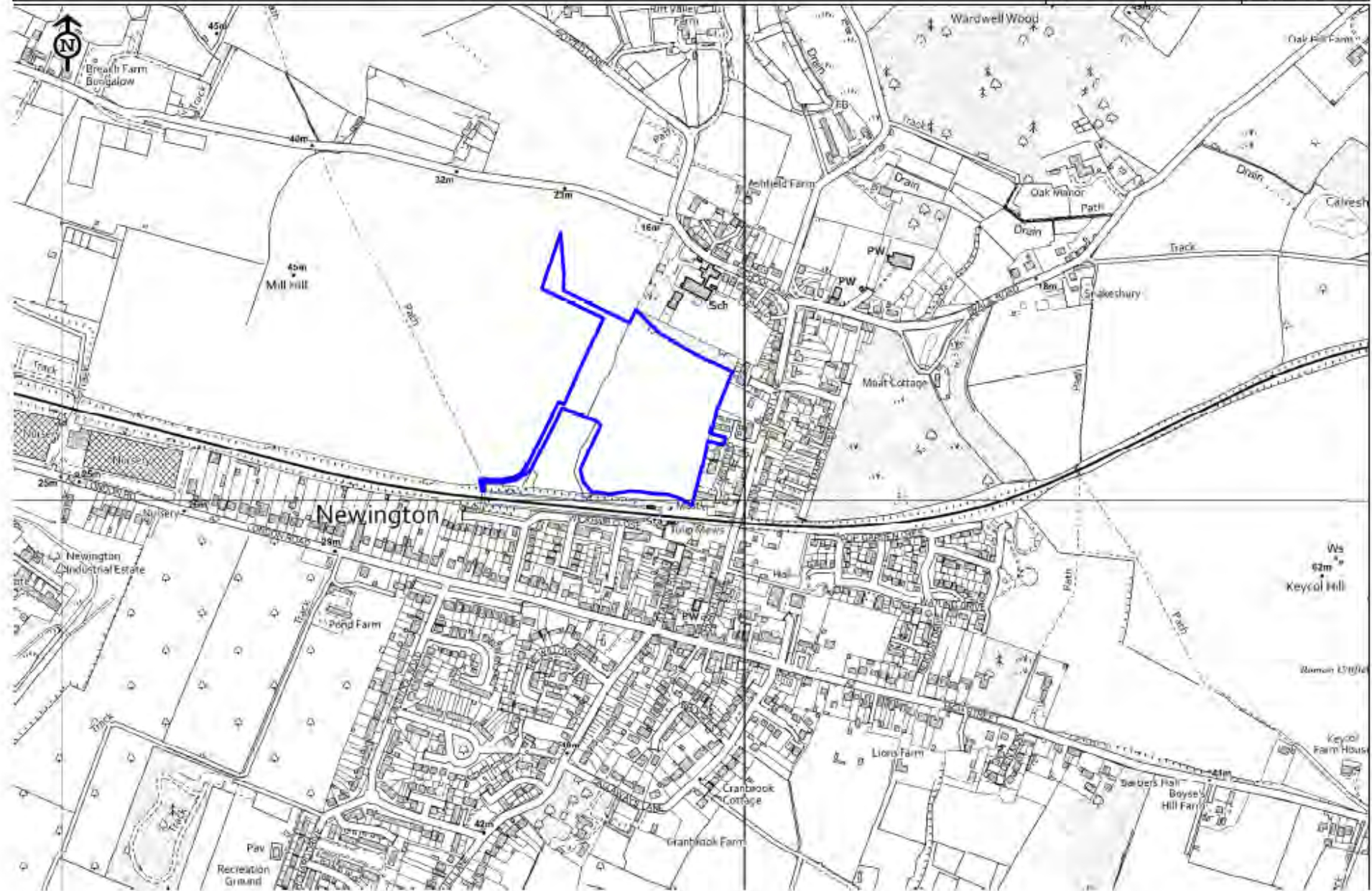


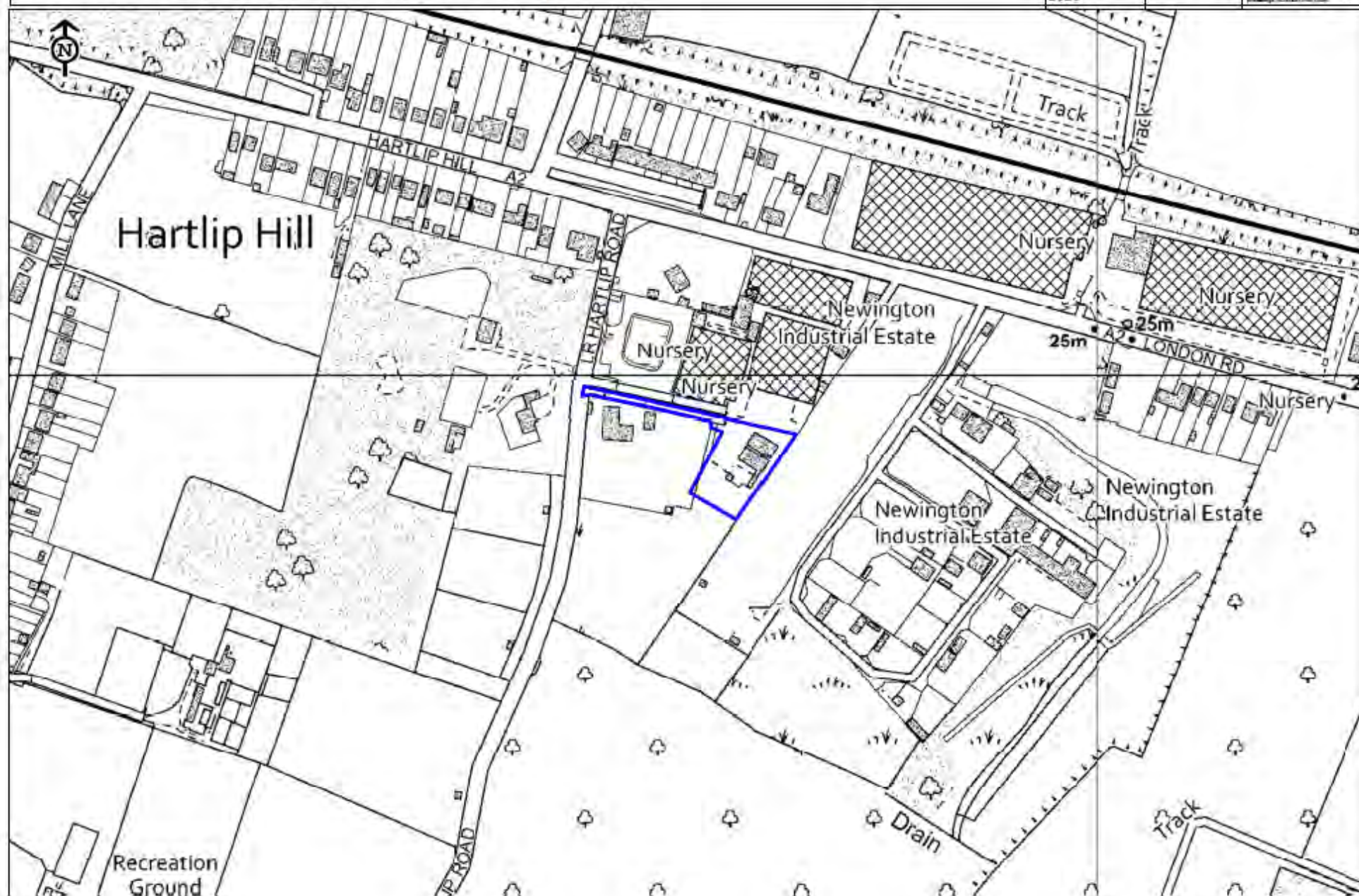
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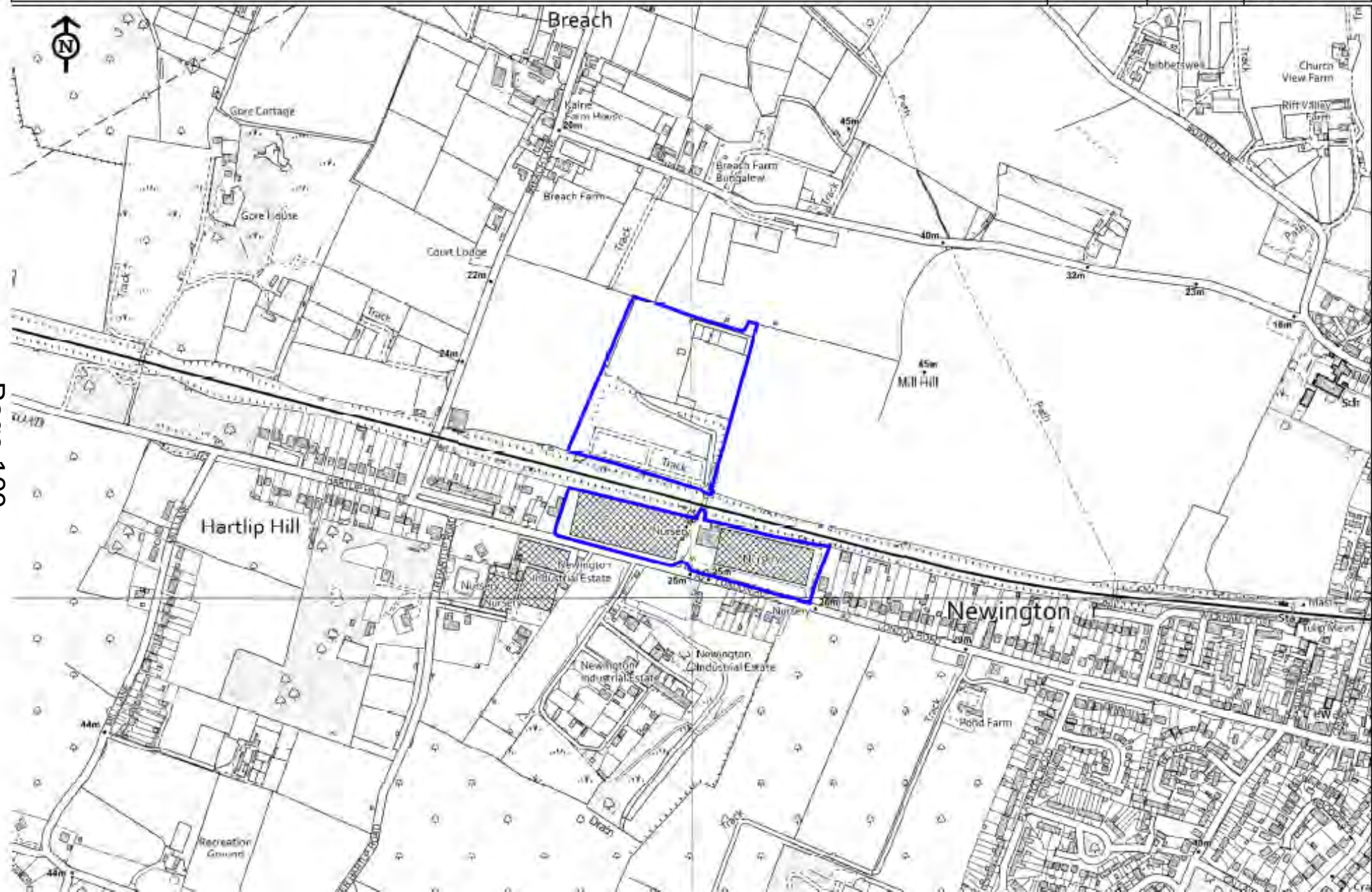
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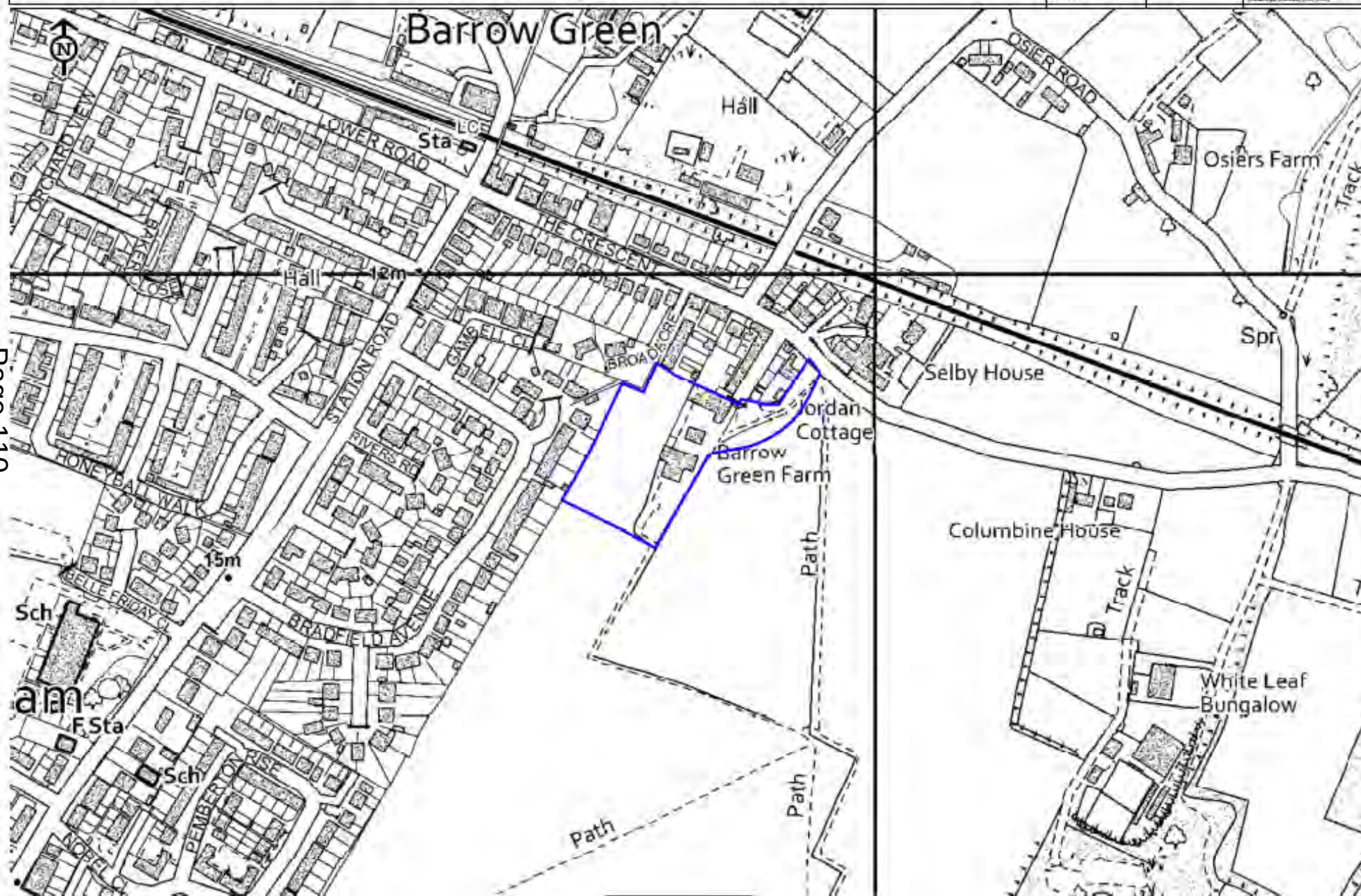
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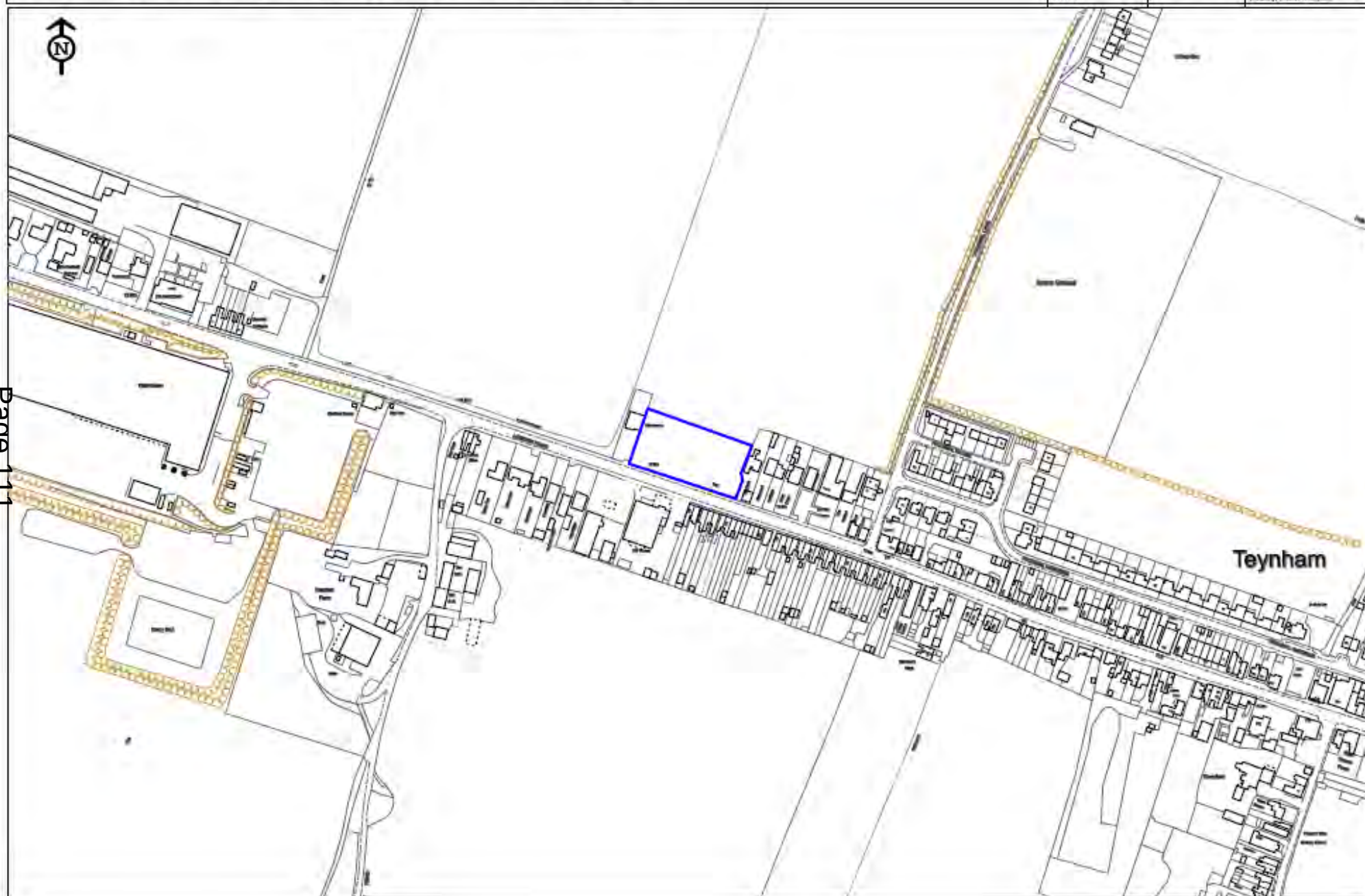
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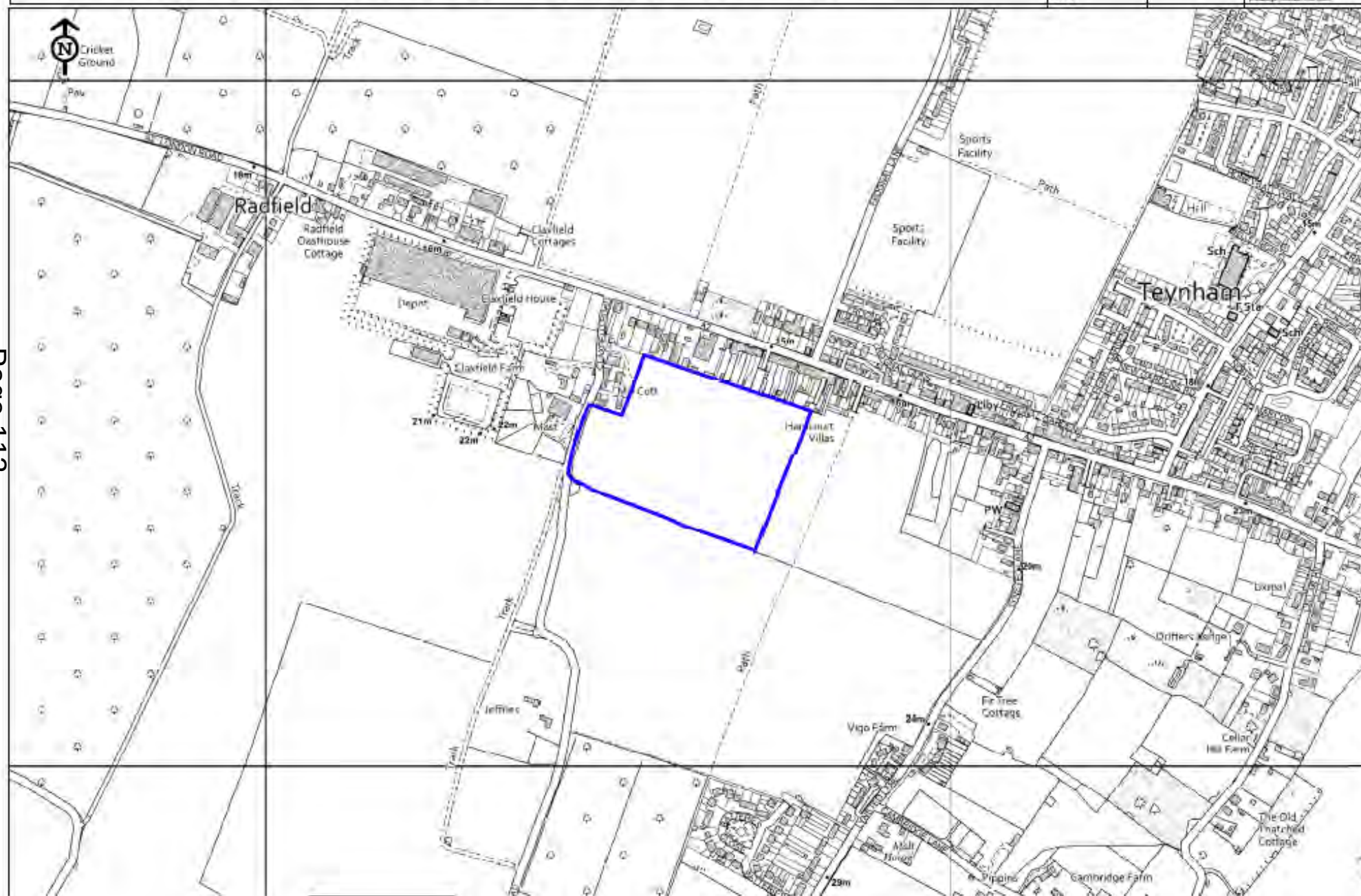


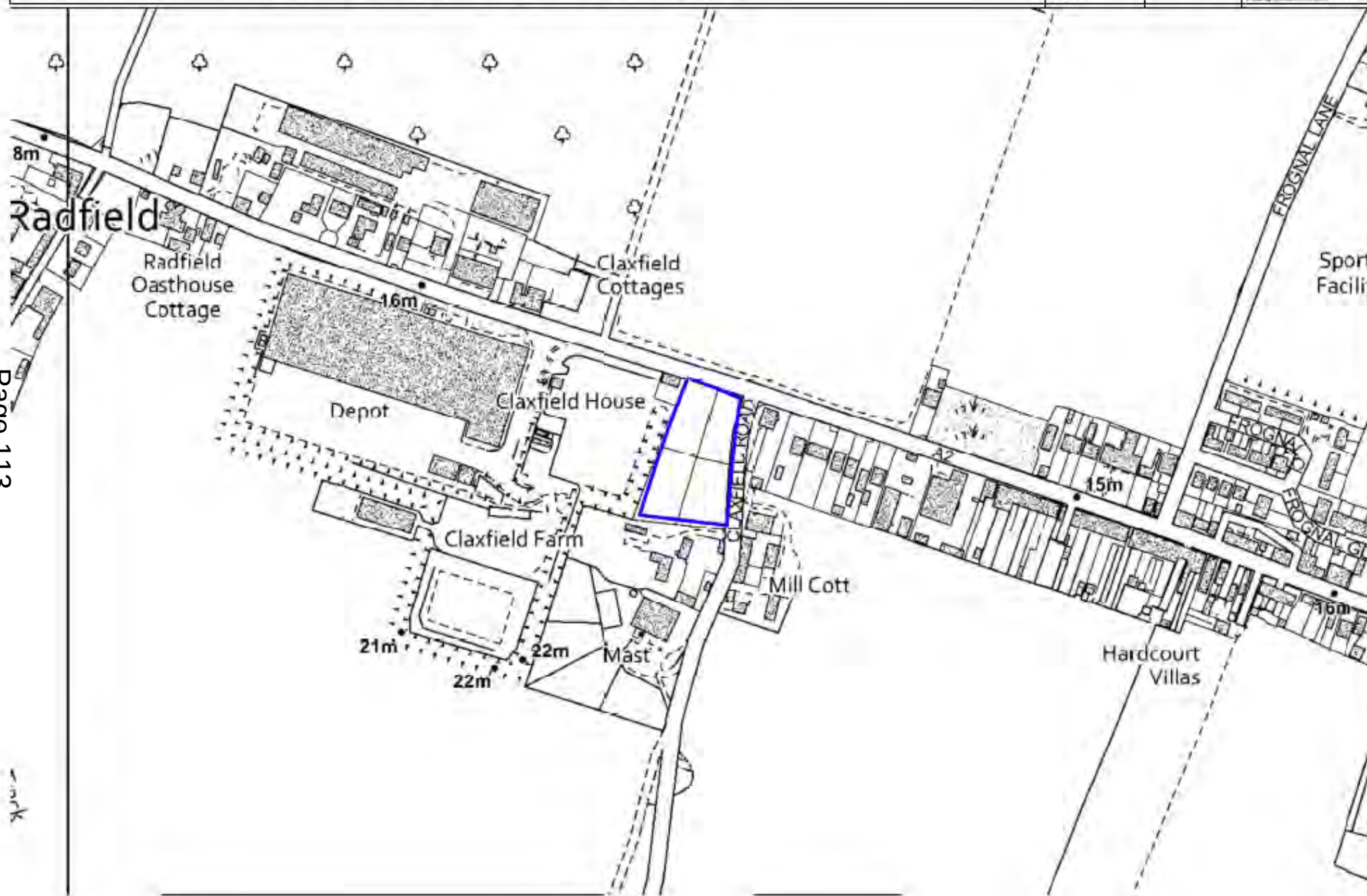


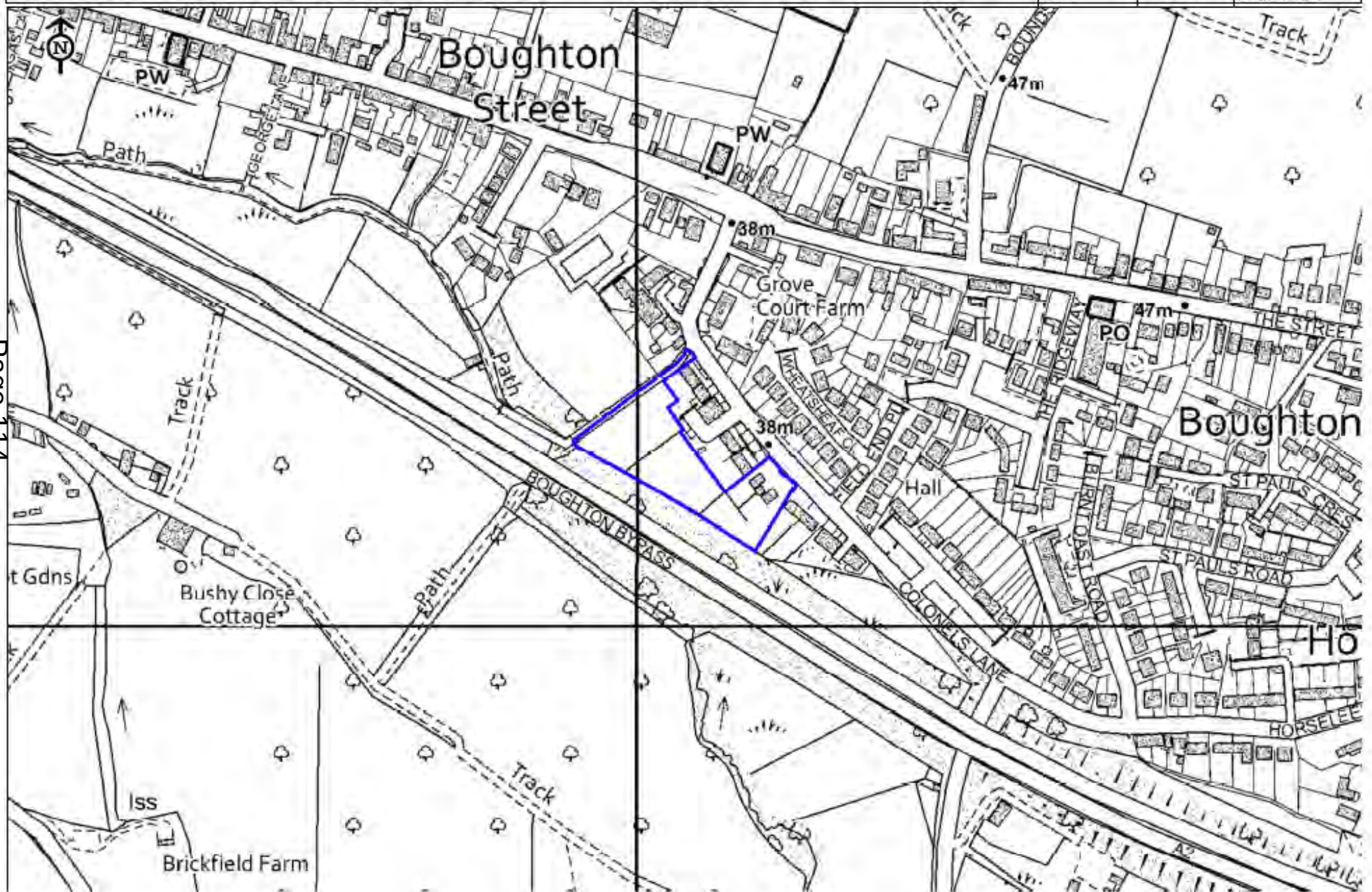


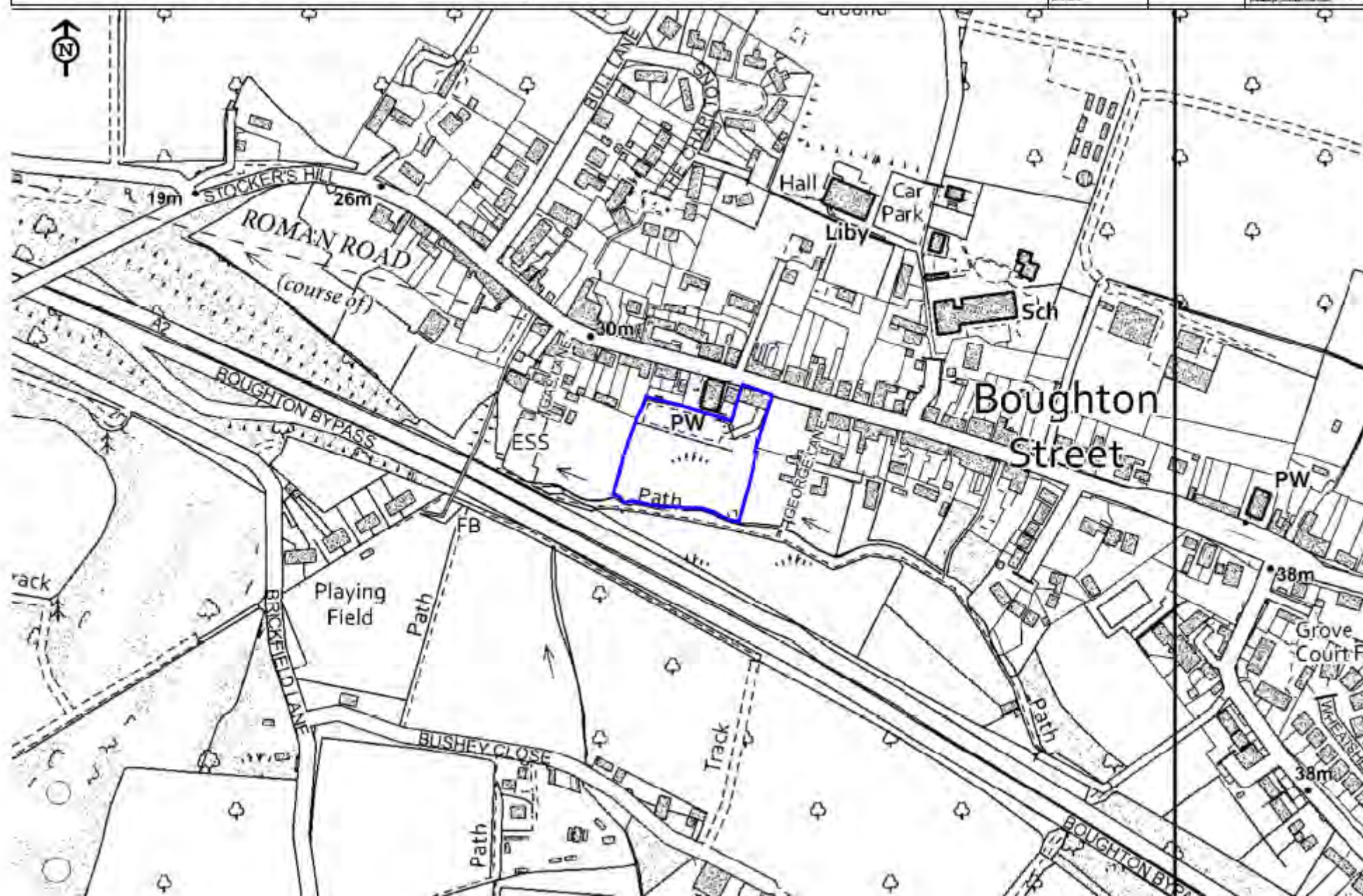


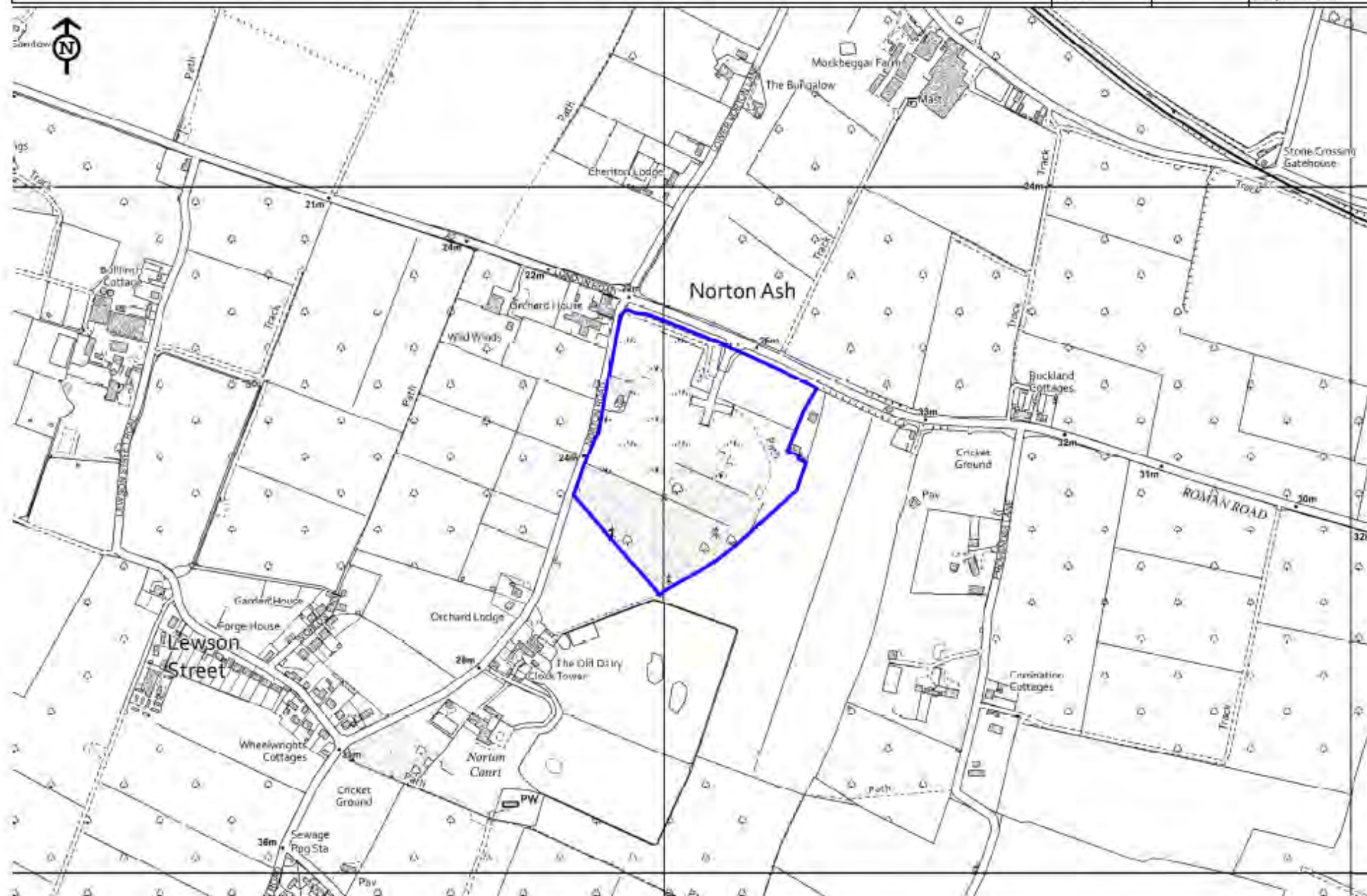


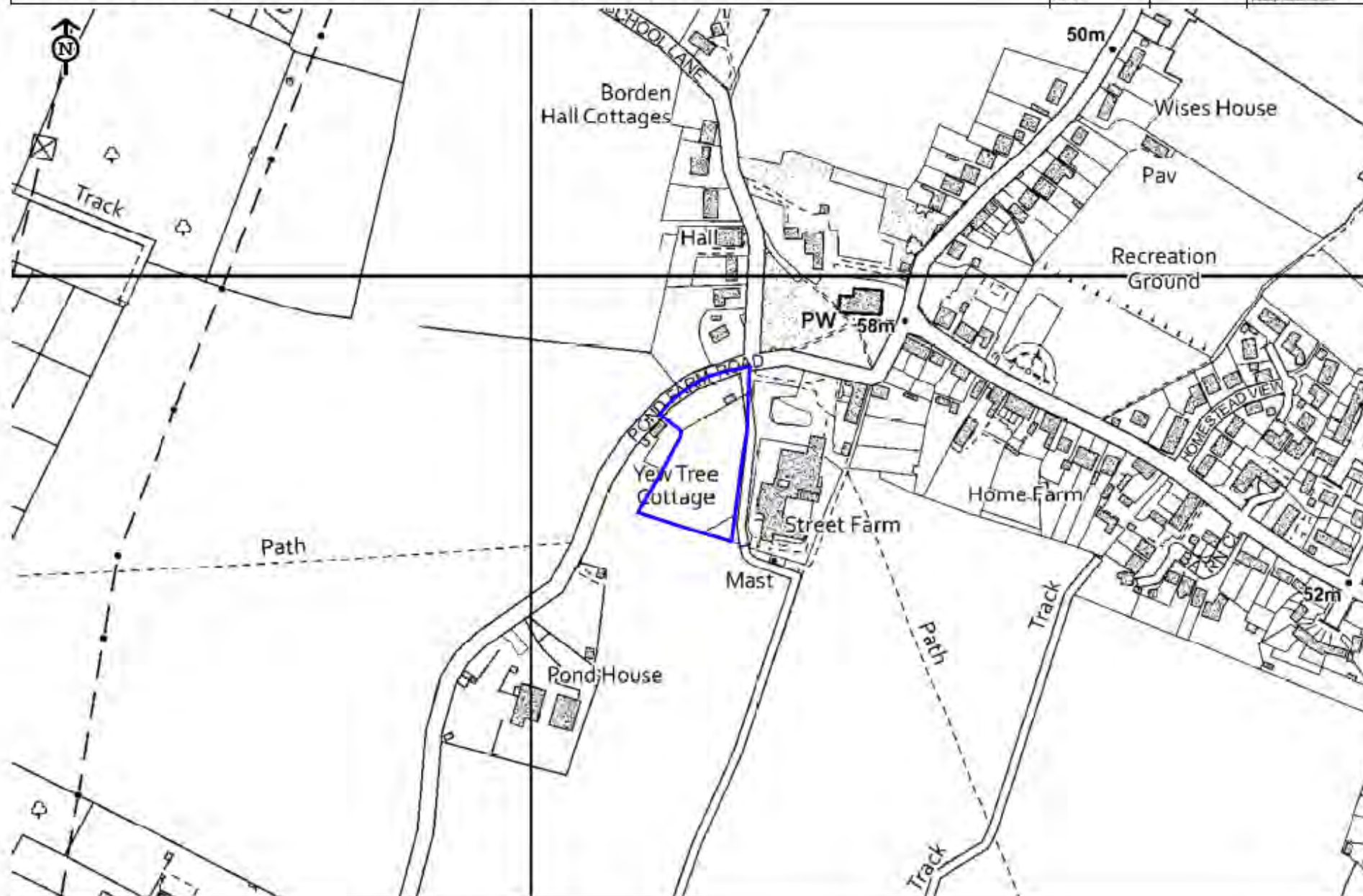


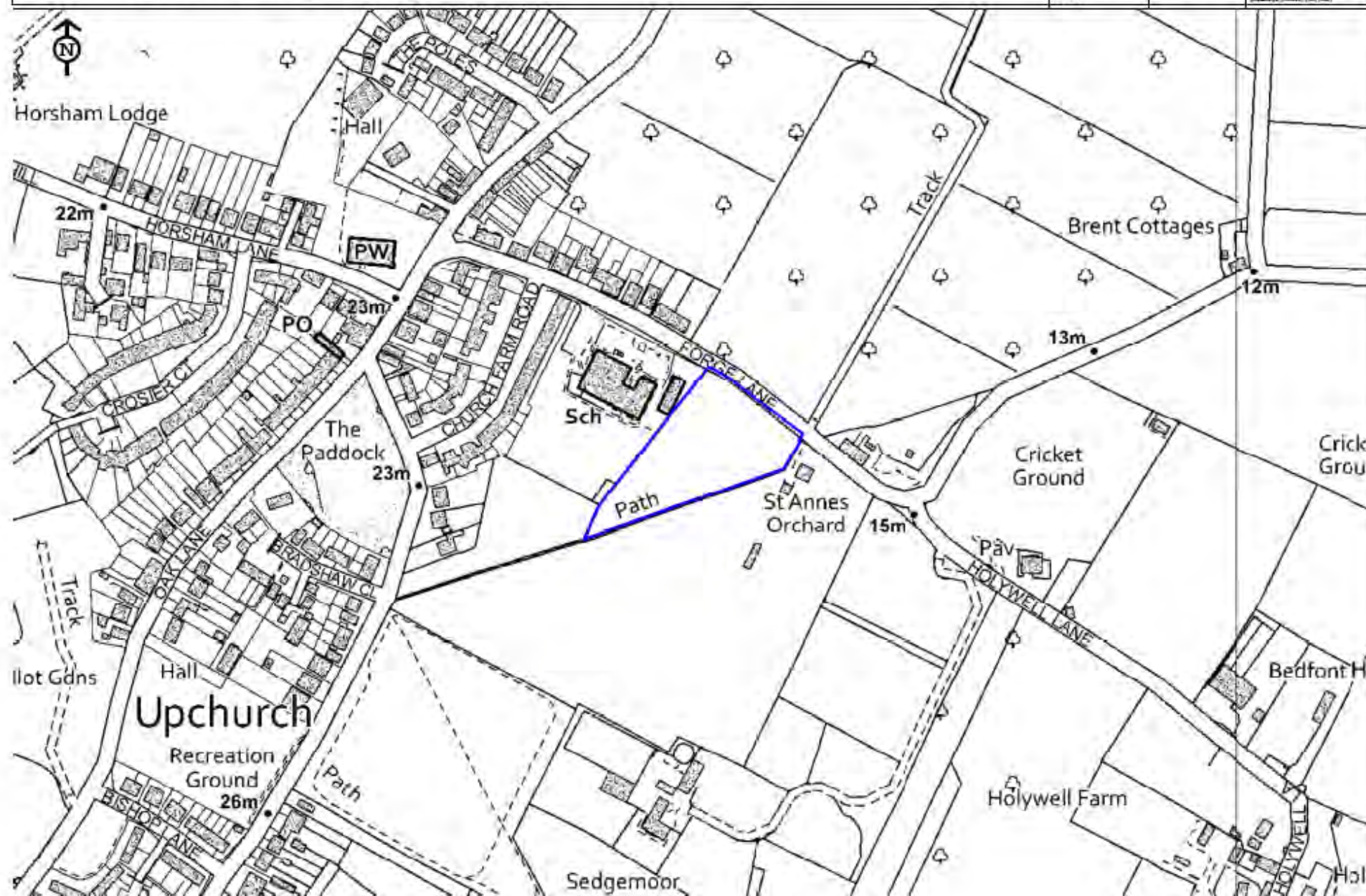


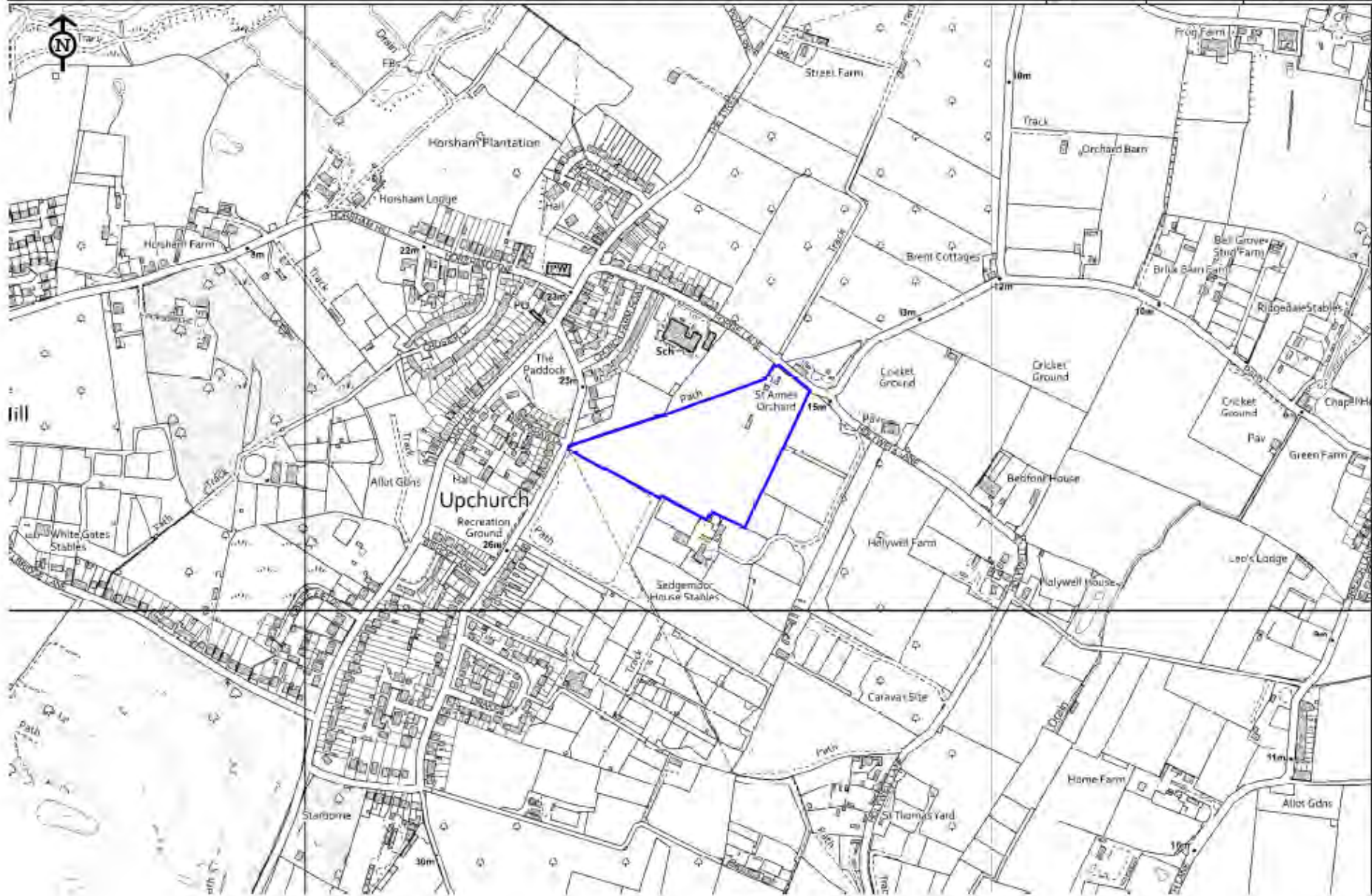




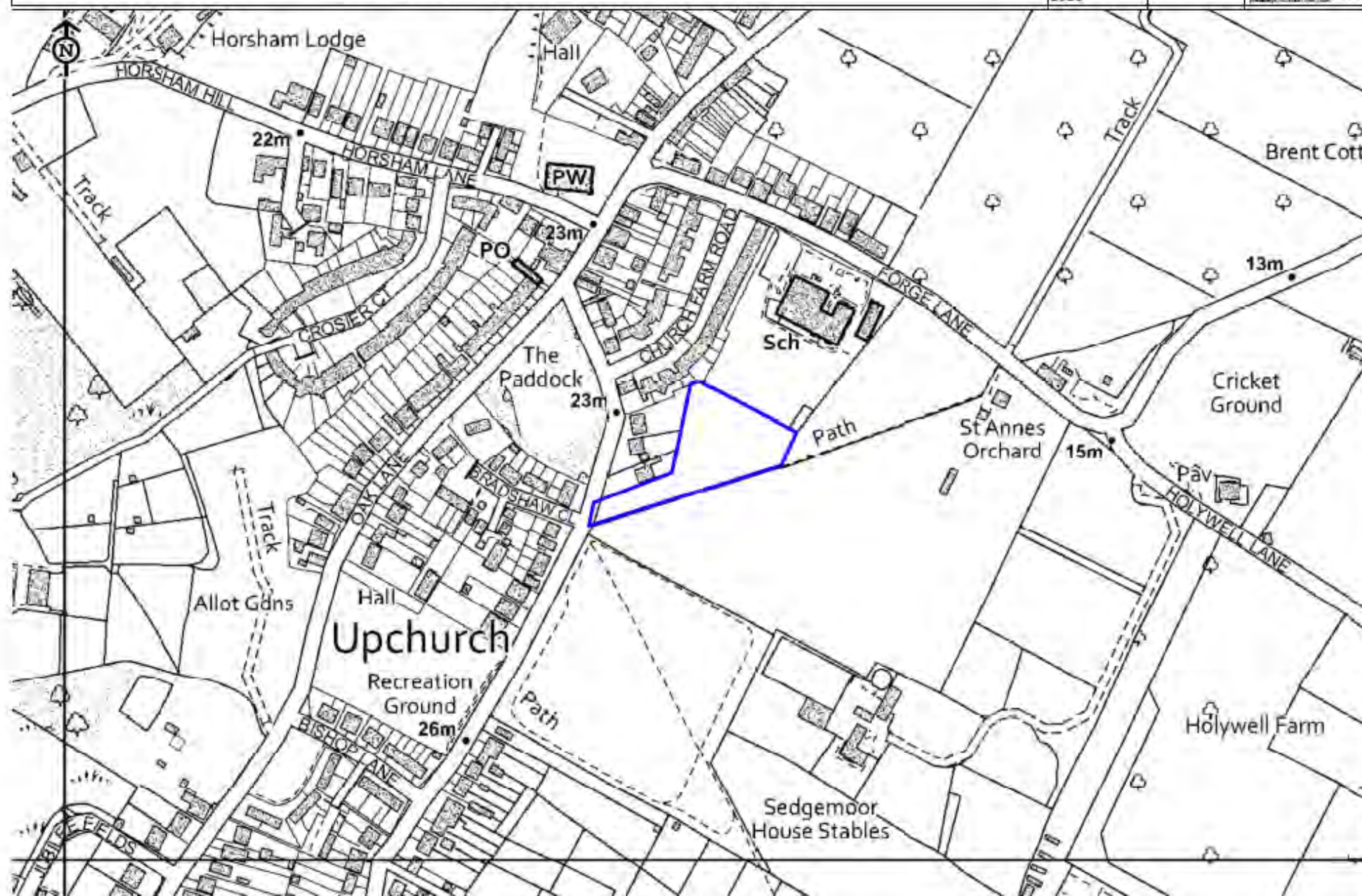




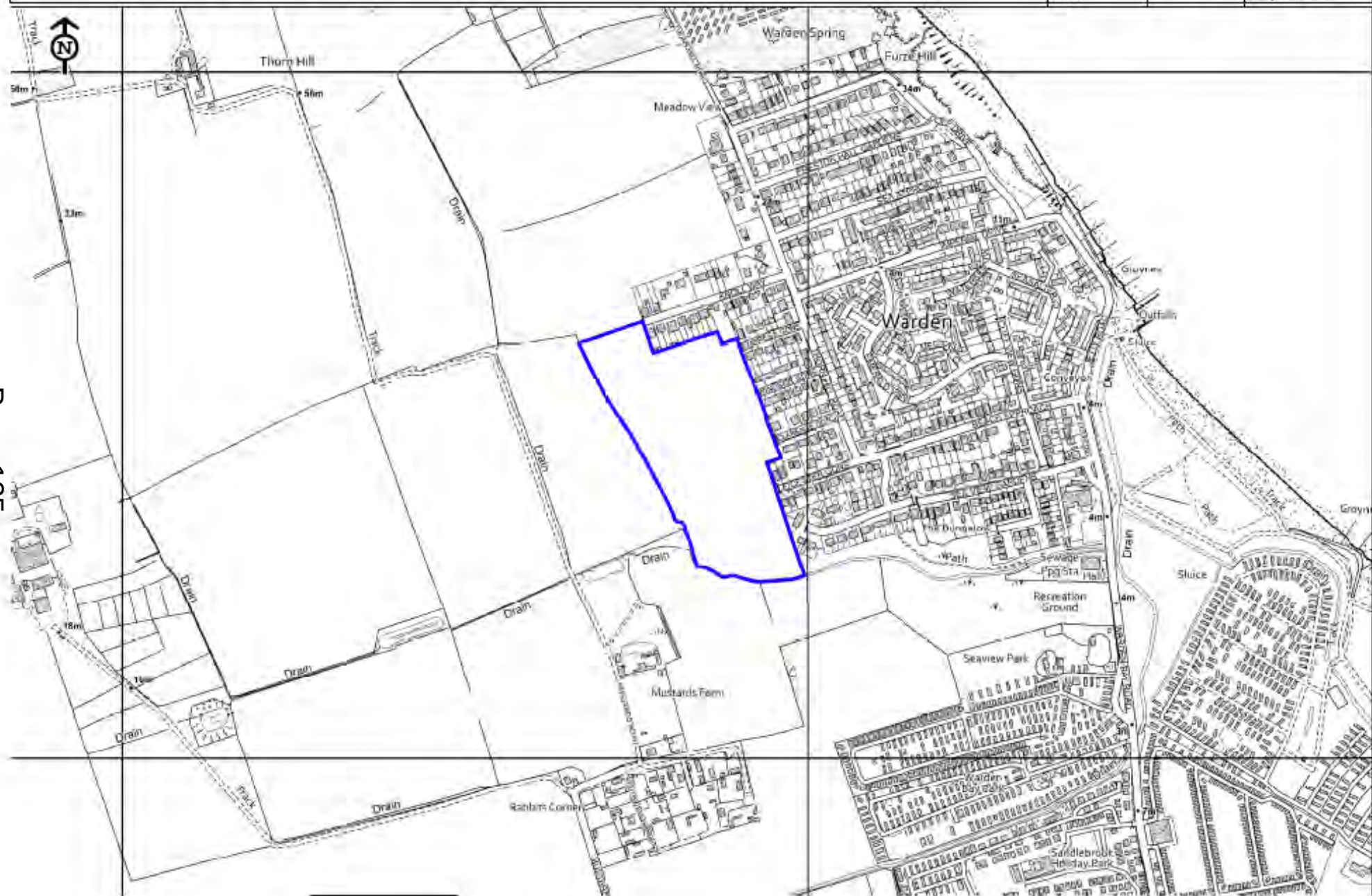












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Appendix III: Gypsy and Traveller site allocations list

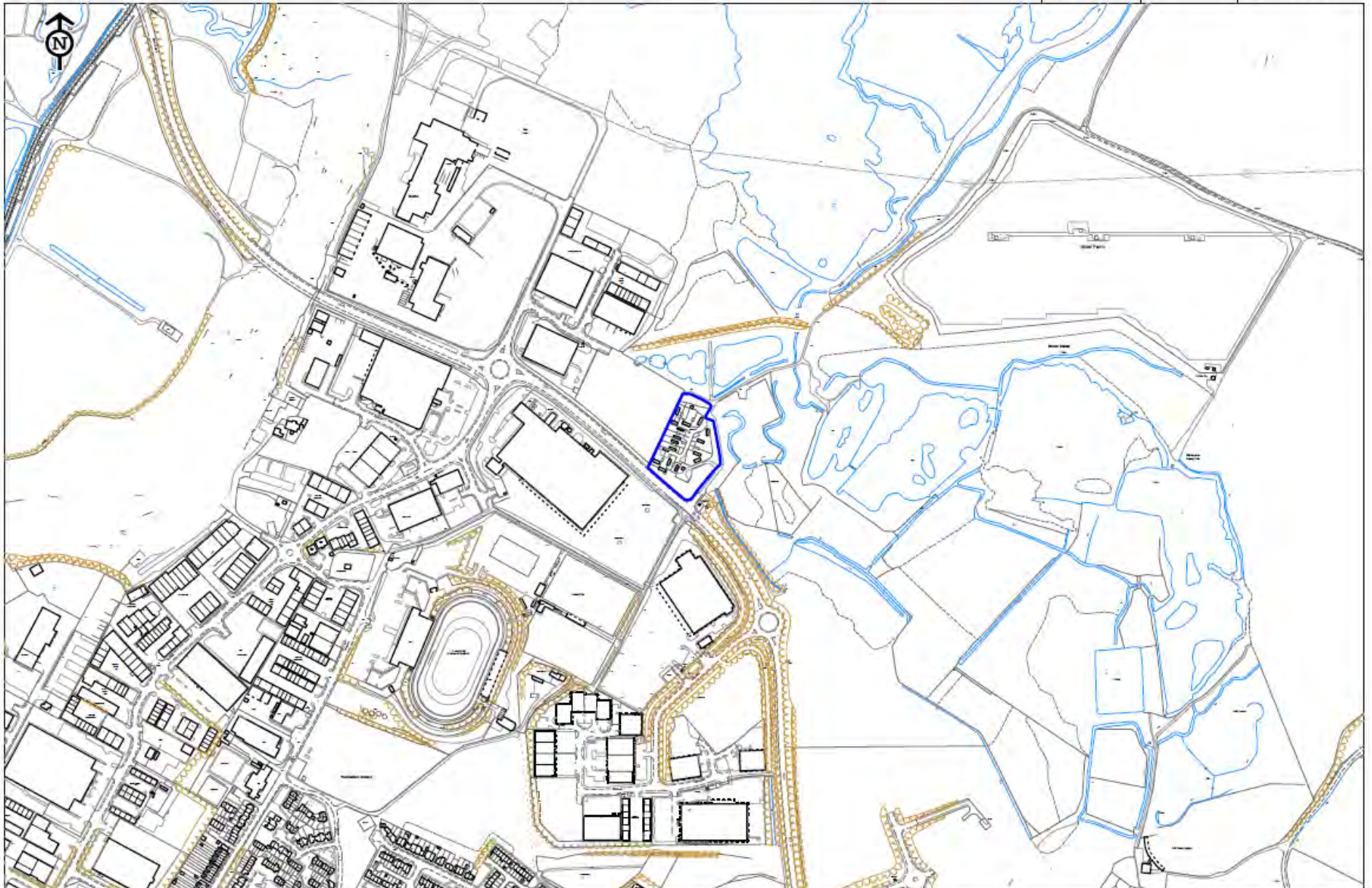
SHELAA ID	Site_address	Settlement hierarchy proposed 2020	BF/GF	Site size	Confirmed site area (ha)	Final capacity (pitches)
HELAA/435	Three Lakes Park, Church Road, ME10 3NL	Sittingbourne	BF	Major	0.99	4
HELAA/424	Bakers Place, Lomas road, ME9 8BB	Sittingbourne	BF	Minor	0.1	2
HELAA/434	Emley Road, ME12 3SS	Minster rural	BF	Minor	0.08	1
HELAA/432	The Peartree, Greyhound Road, ME 12	Minster rural	BF	Minor	0.28	1
HELAA/436	15 The Laurels, Bell Farm Lane, ME12 4JA	Minster rural	BF	Minor	0.06	3
HELAA/431	Land At Warden Road / Rear Of Orchard Cottage (Mary's Place) ME12 4GJ	Eastchurch	BF	Minor	0.42	2
HELAA/427	Keycol Farm, Keycol Hill, ME9 8NA	Newington rural	BF	Minor	0.34	2
HELAA/426	Breach Farm Paddocks, Breach Lane	Newington - tier 4 Village Service Centres	BF	Minor	0.13	1
HELAA/428	Mattsfield, Boxted Lane, ME9 7BX	Newington - tier 4 Village Service Centres	BF	Minor	0.46	4
HELAA/429	Halstow Cross, ME9 7ER	Lower Halstow	BF	Major	1.17	3
HELAA/433	Jack Russell Place, ME9 7AB	Lower Halstow	BF	Minor	0.42	3
HELAA/430	Windmill Farm, ME9 7XF	Rural	BF	Minor	0.25	3

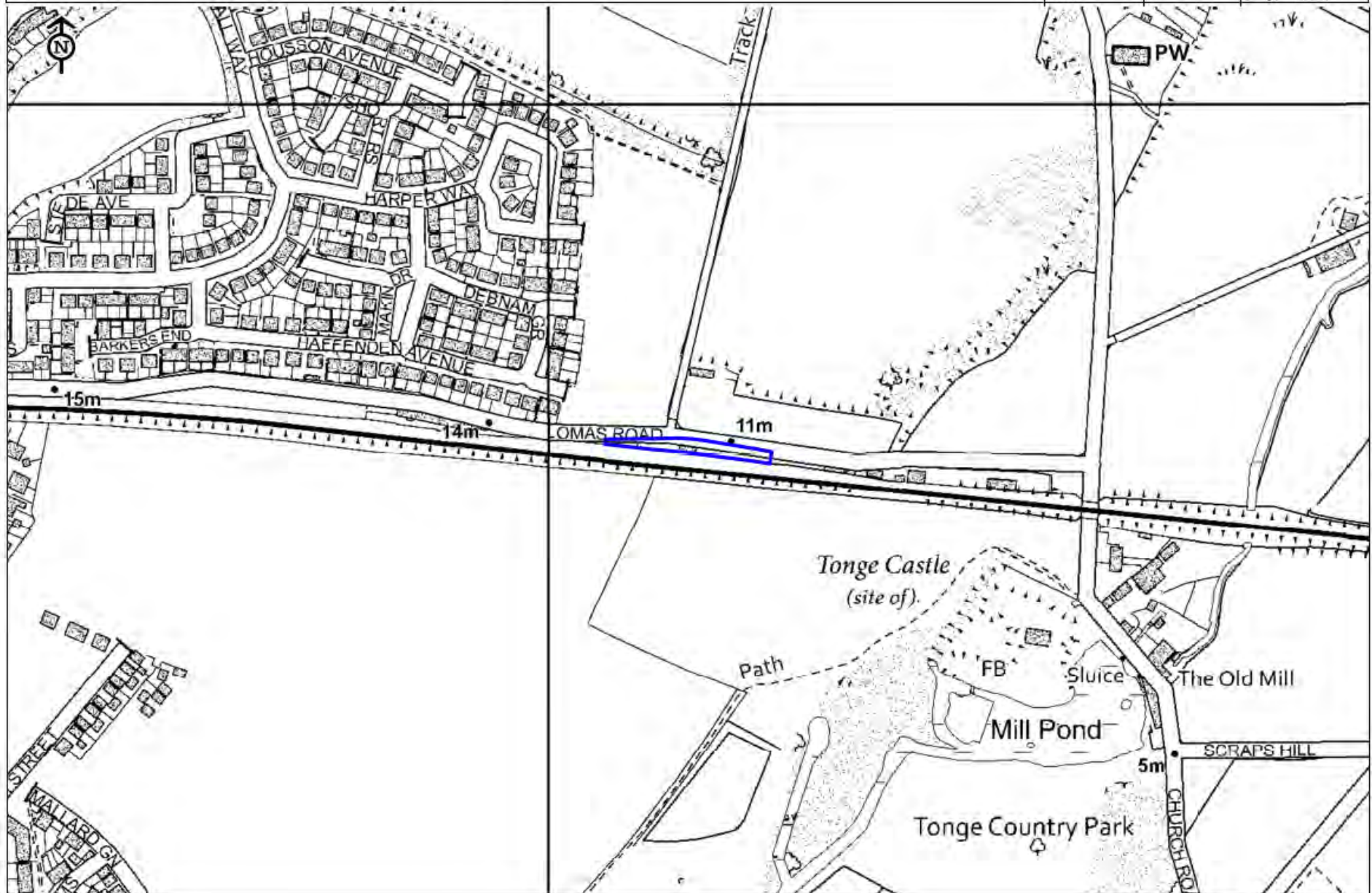
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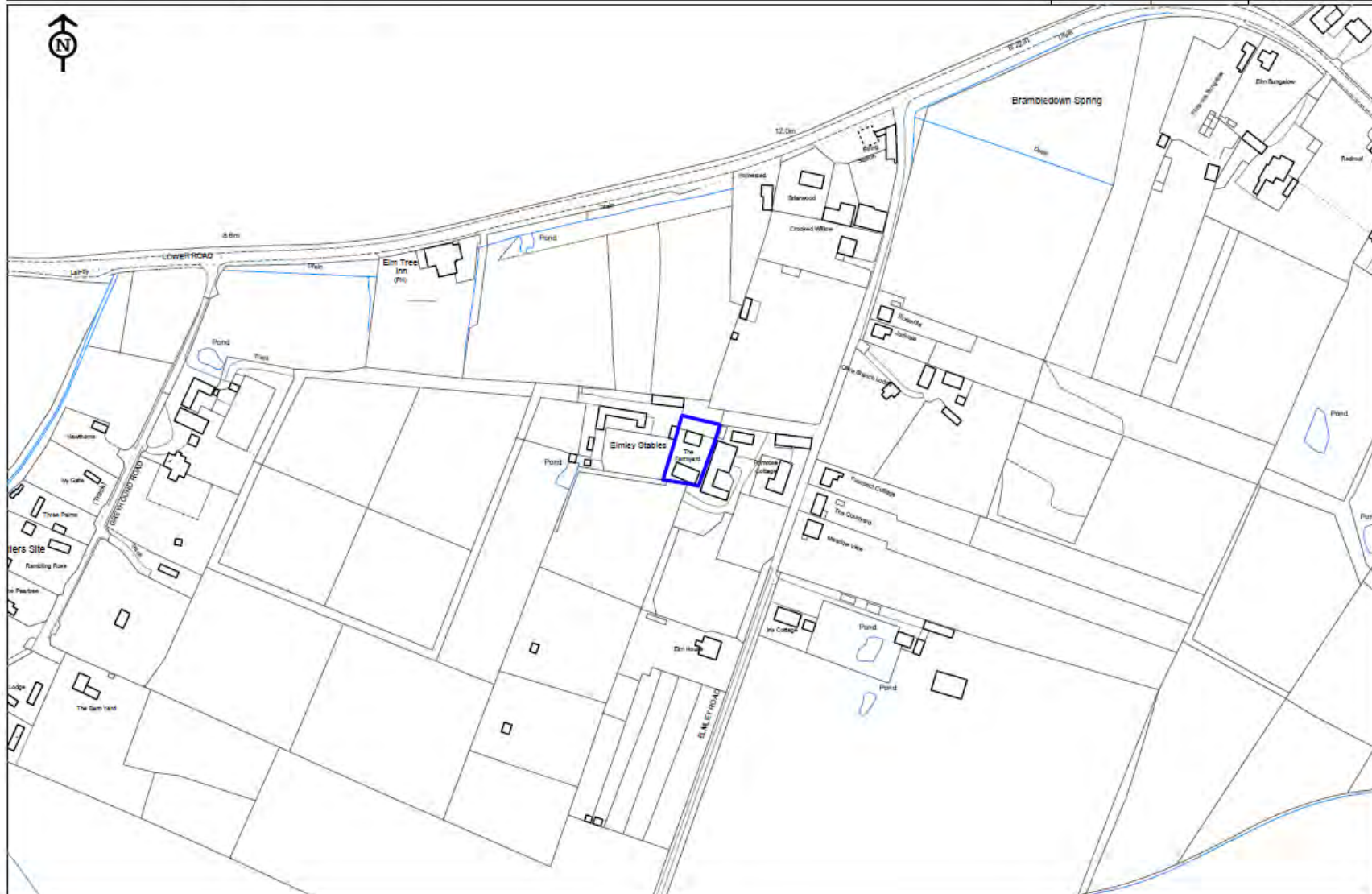
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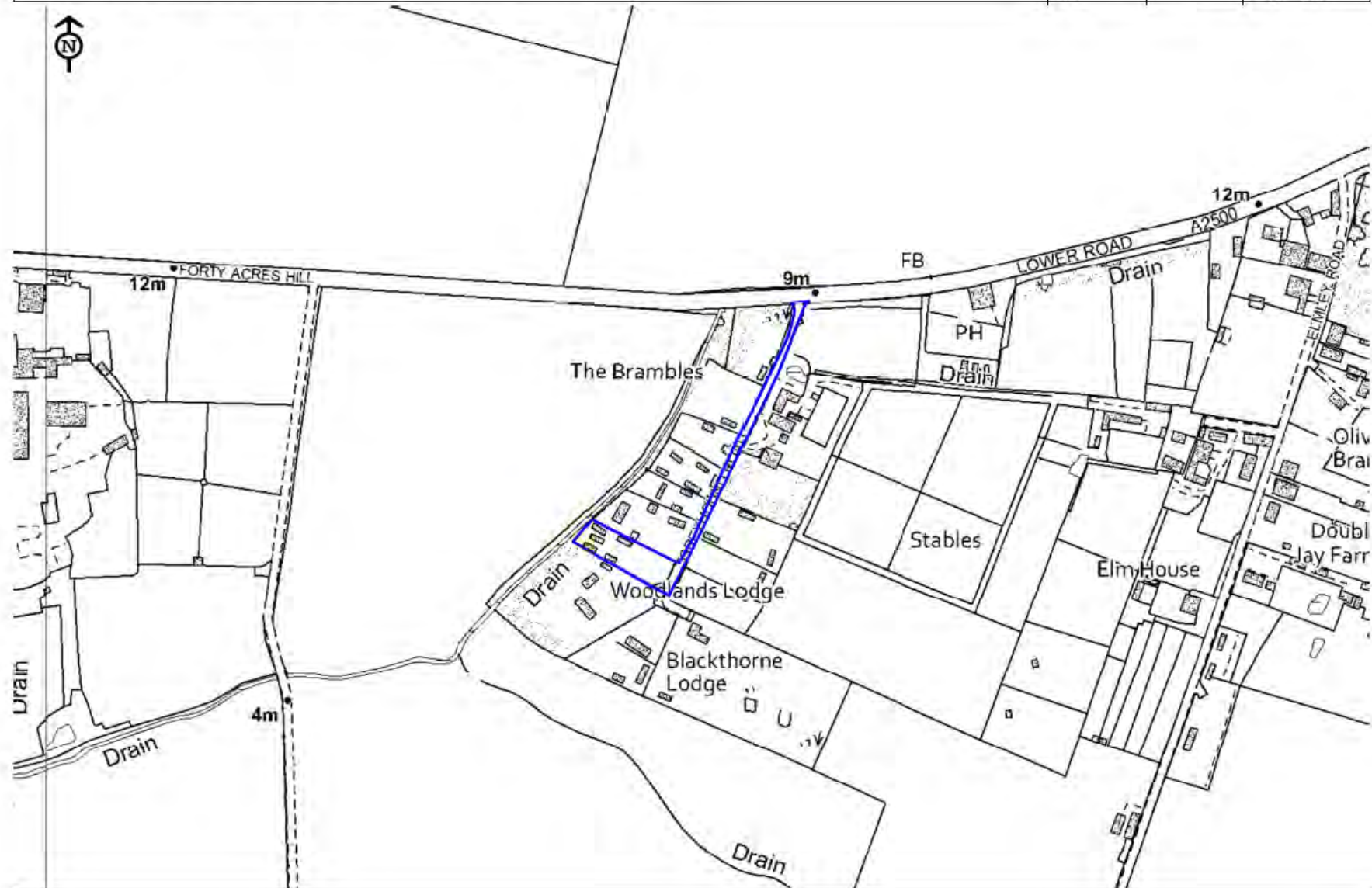
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Gypsy and Traveller sites recommended to P&R for allocation

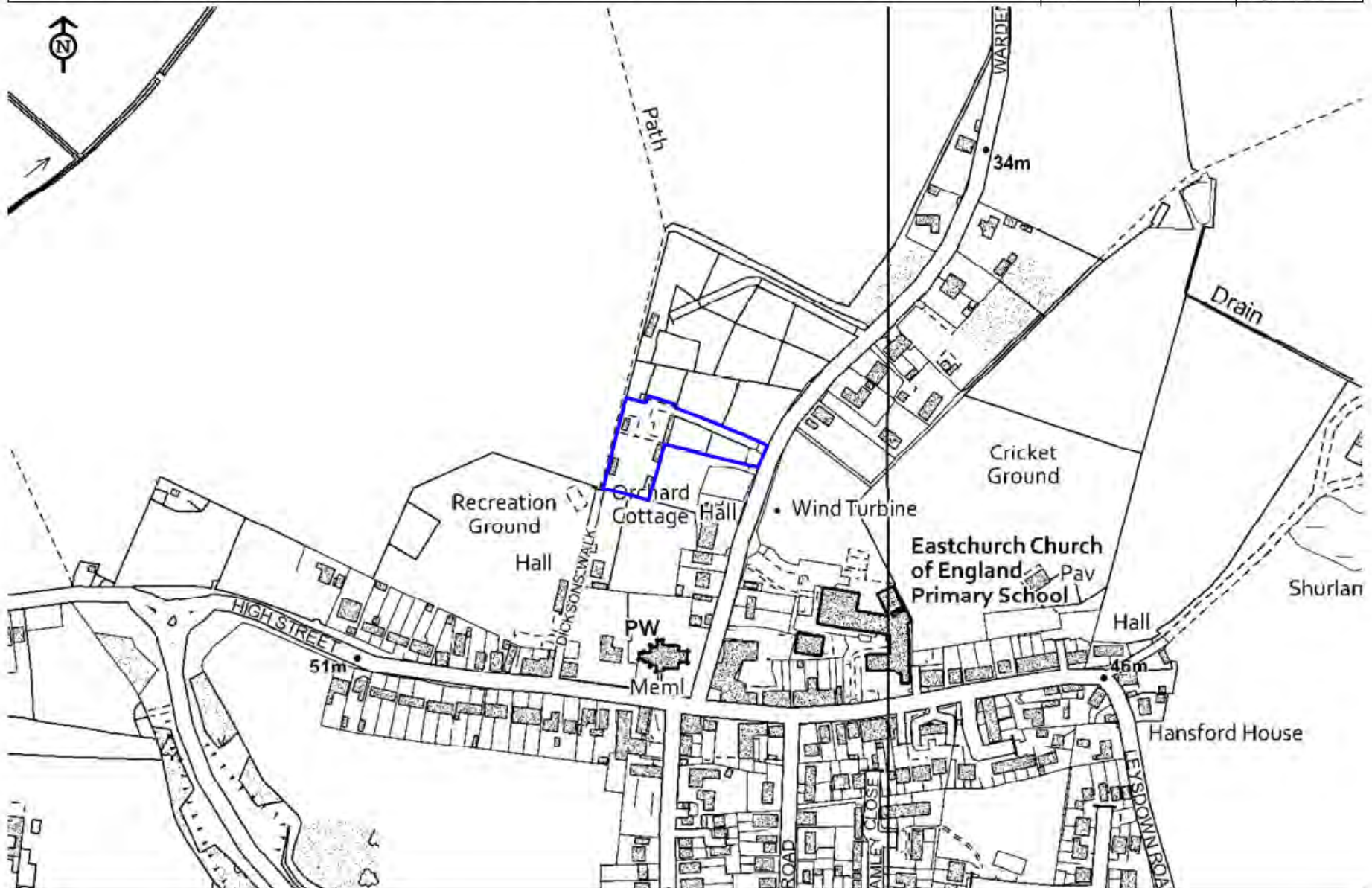










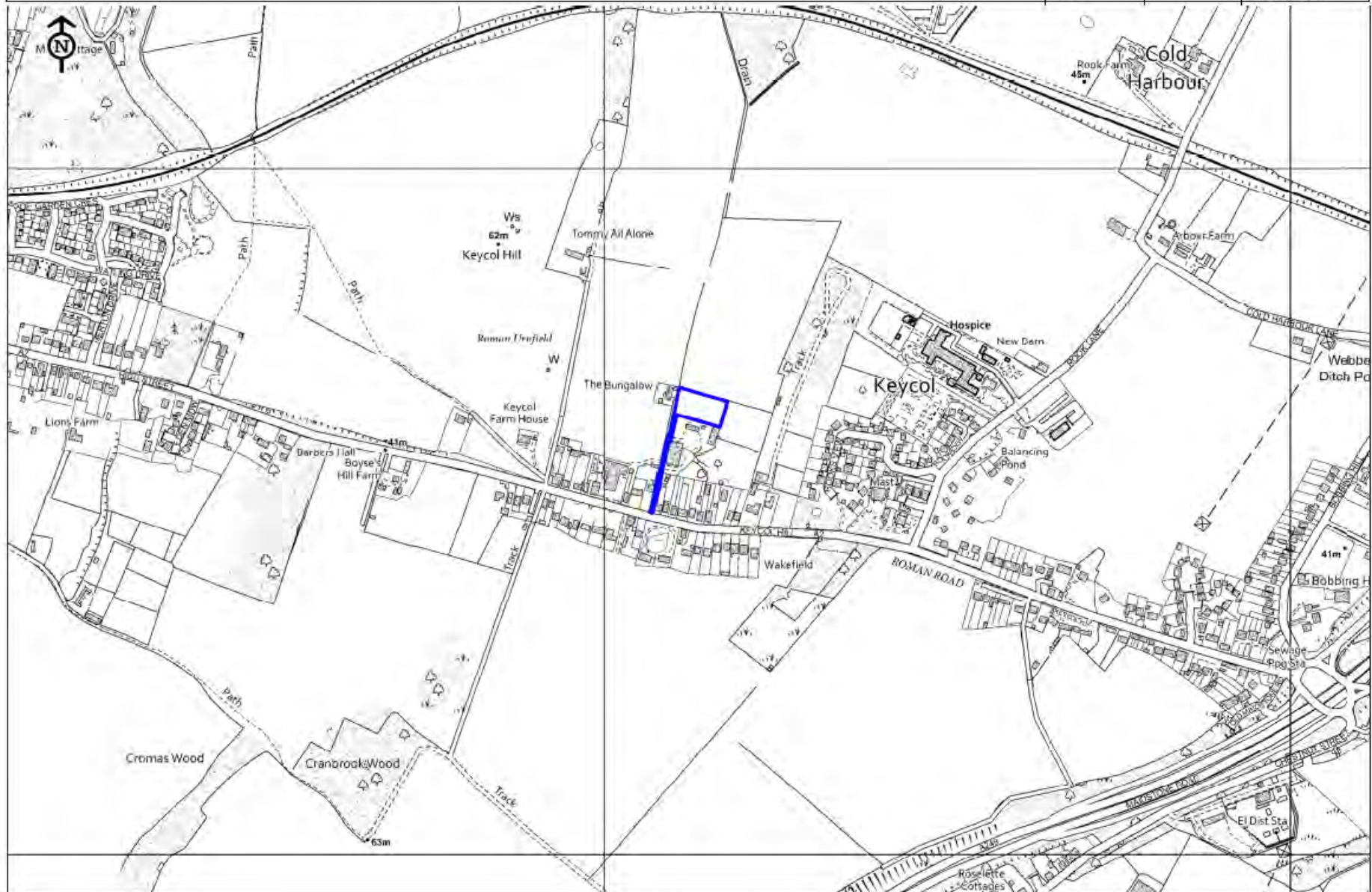


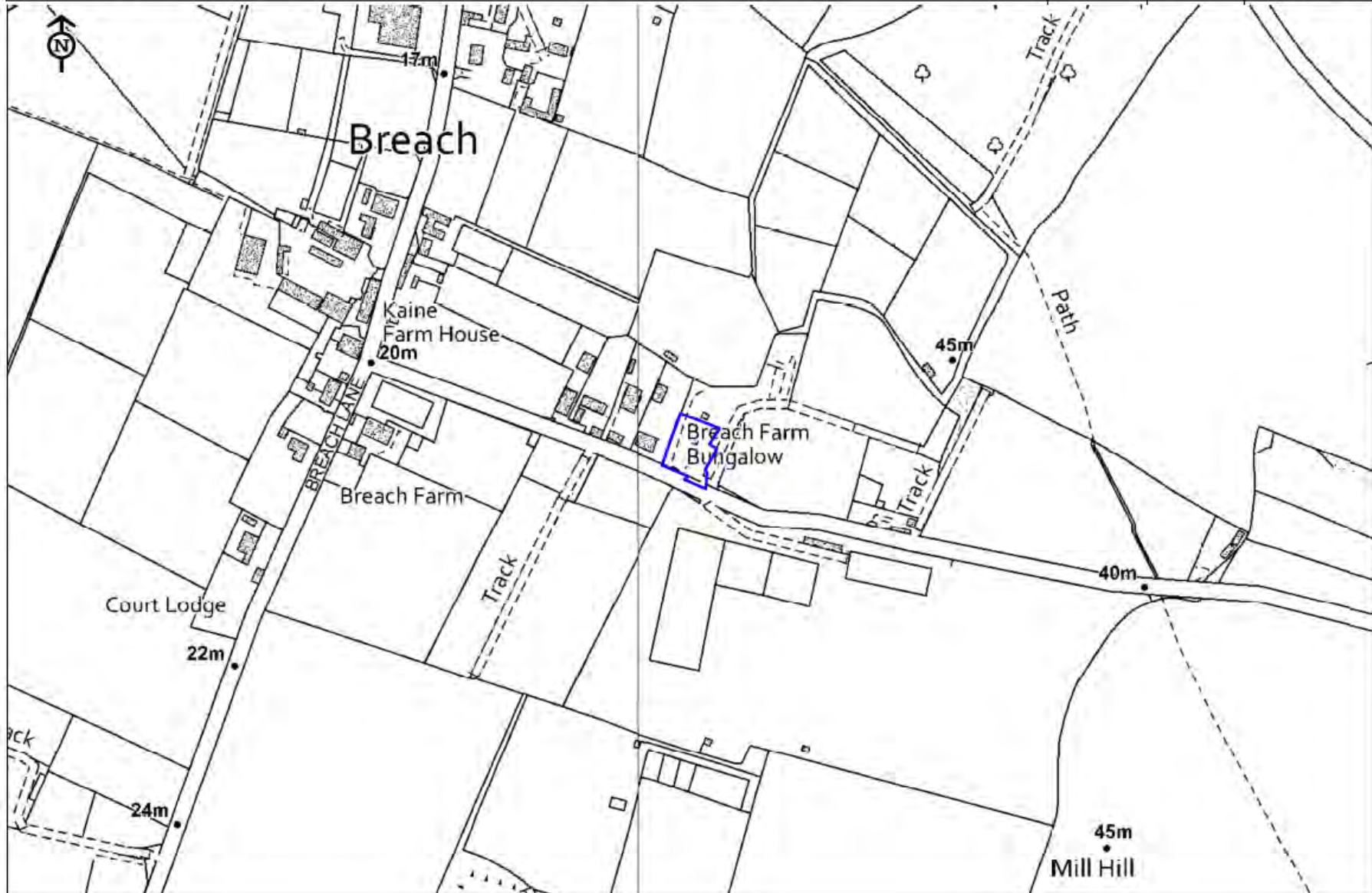
SHELAA/427 - Keycol Farm, Keycol Hill, Newington

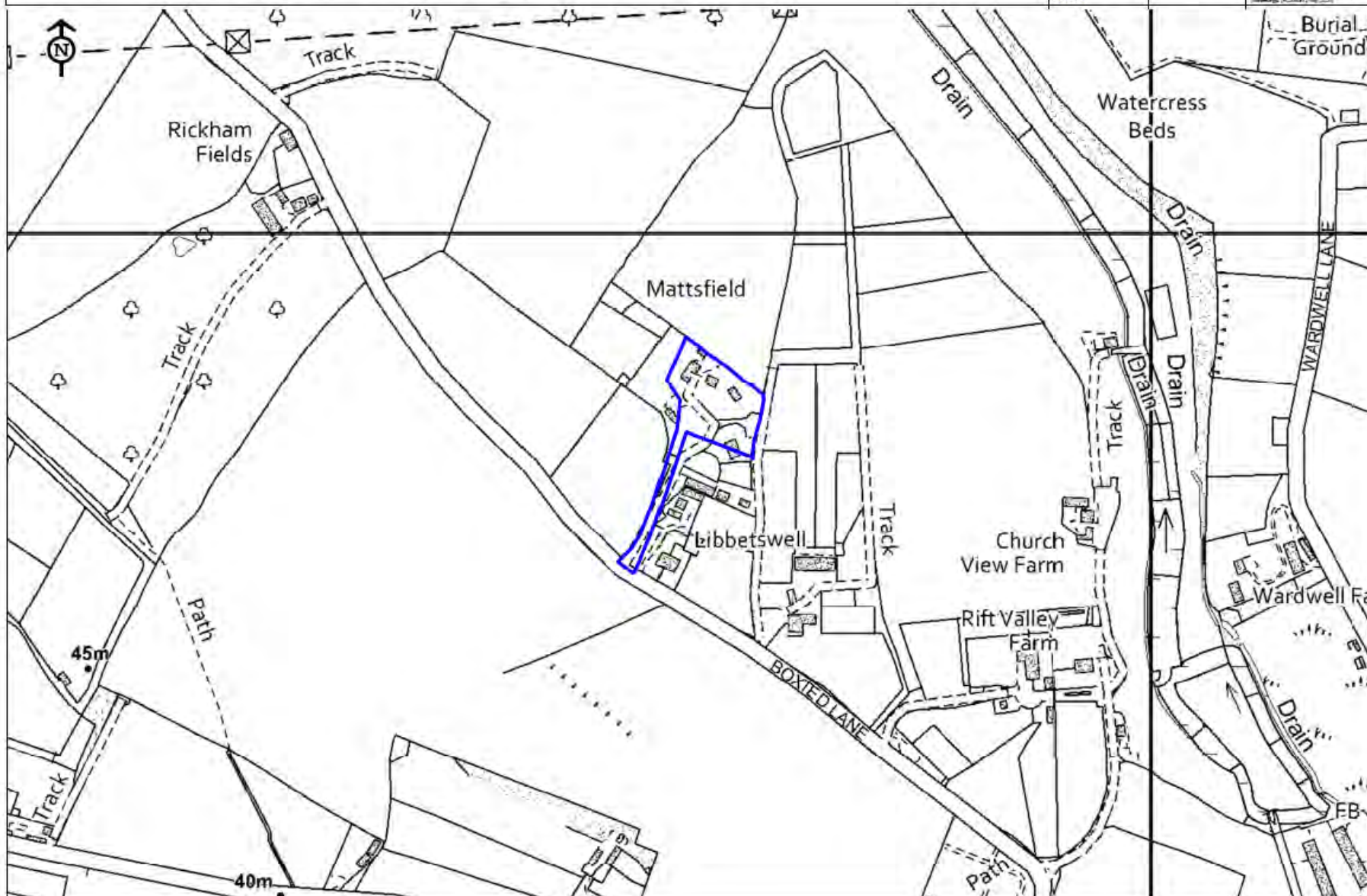
Date: May
2025

Scale: NTS

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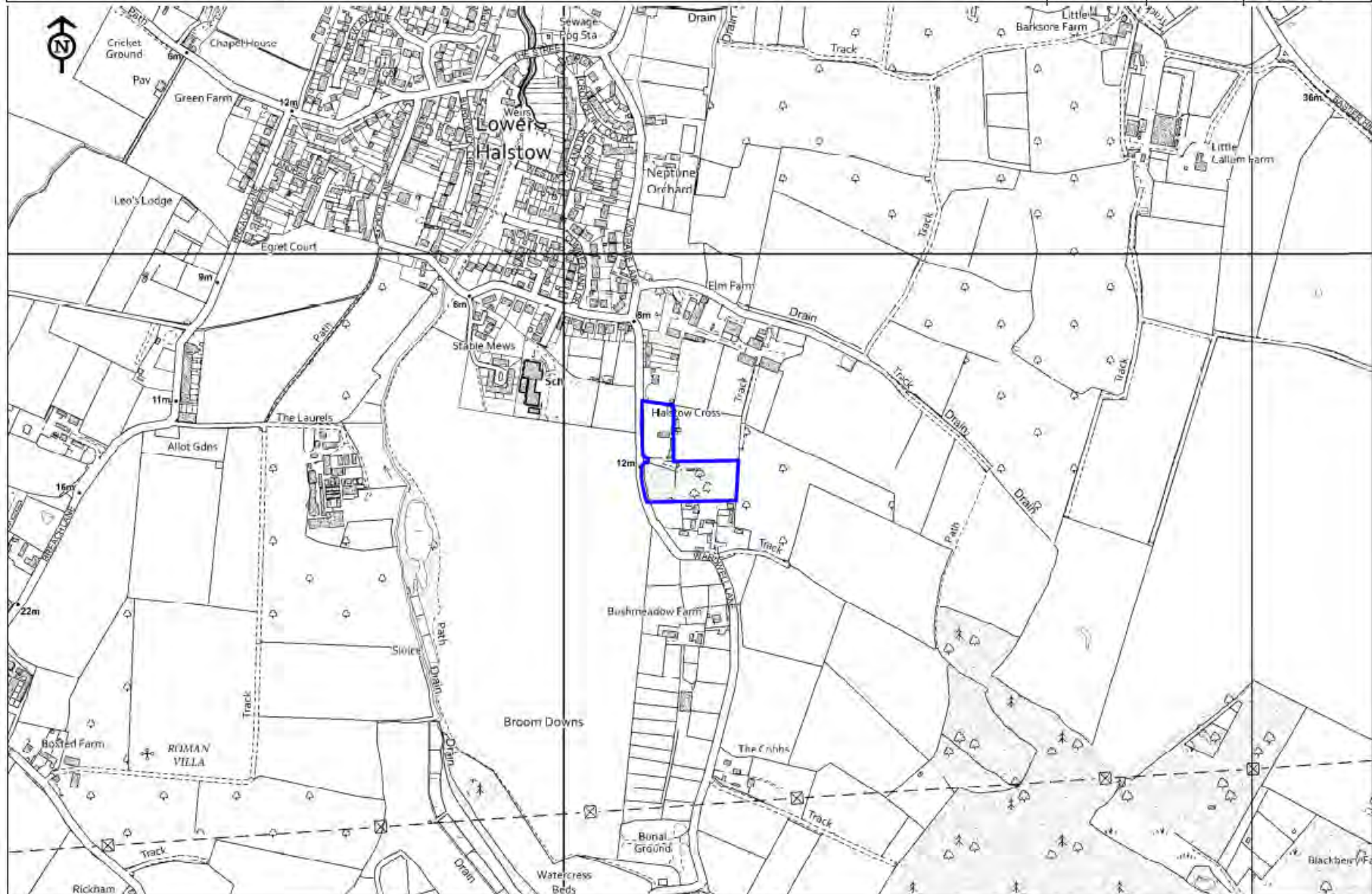


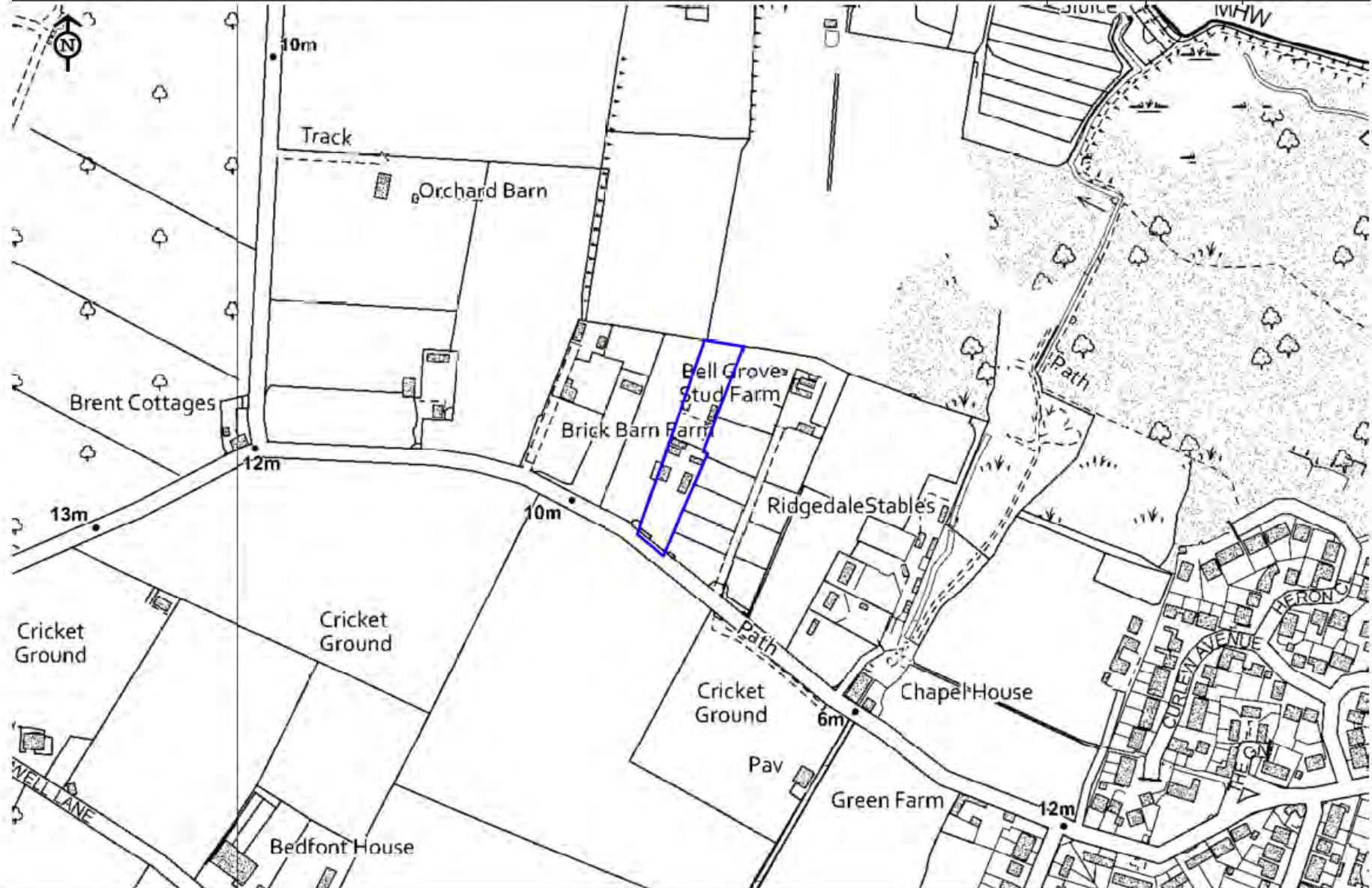
SHELAA/429 - Halstow Cross, Lower Halstow

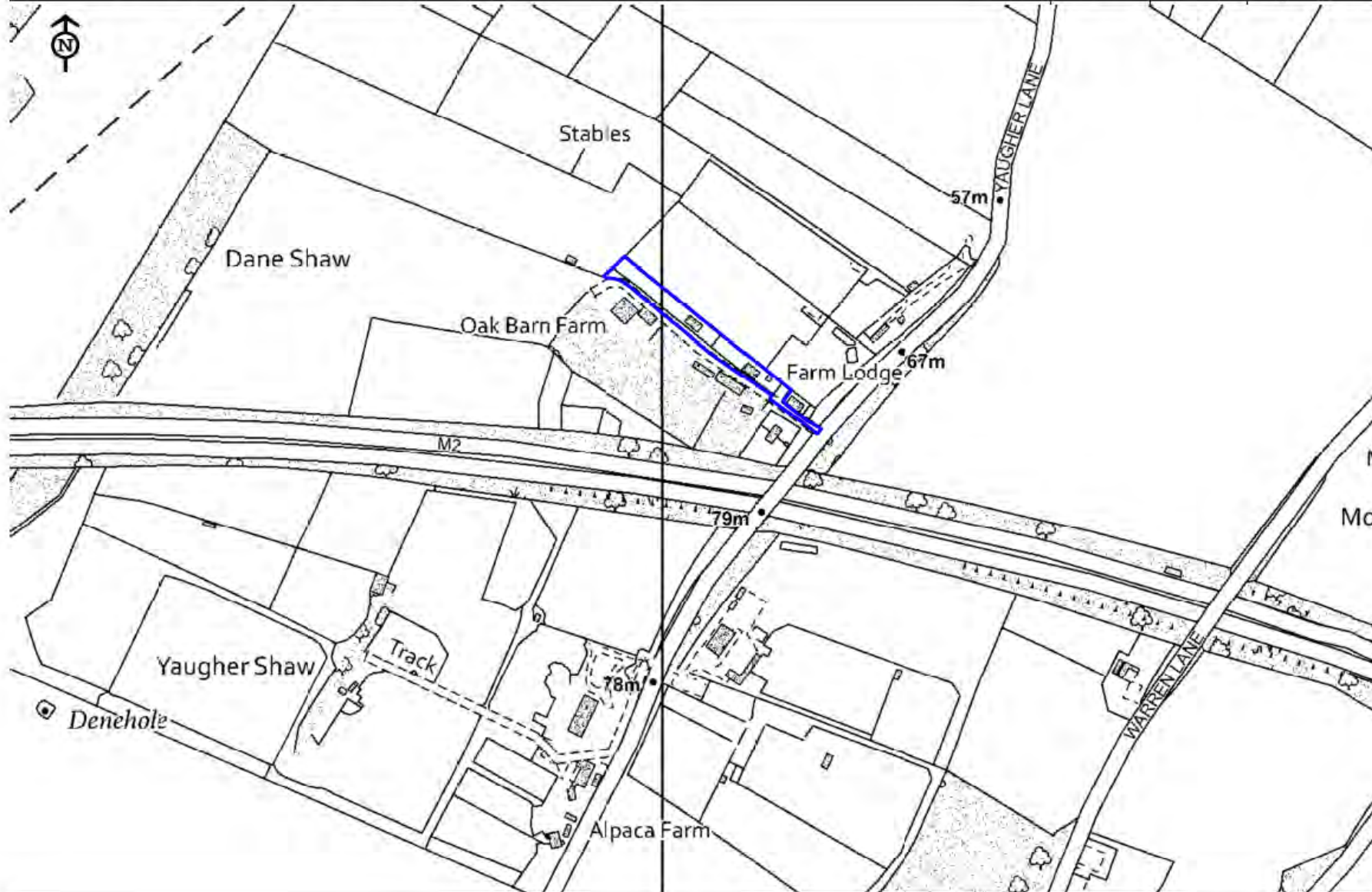
Date: May
2025

Scale: NTS

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Appendix V: Employment site allocations list

Site Identifier	Existing site reference	New or existing site	Name	Settlement hierarchy proposed 2020	Is the site previously developed land?	Potential employment area (Ha)	Mixed use
4	CFS24 (and R1)	Existing	Ridham Dock - redevelopment	Sittingbourne - tier 1 Principal Town	Yes	25	
6	SBC17/005	Existing	Land at Pheasant Farm (west), Howt Green, Sittingbourne	Sittingbourne - tier 1 Principal Town	No	1.6	
8	SBC17/ 008	Existing	Land fronting east side Bobbing Hill, Sittingbourne	Sittingbourne - tier 1 Principal Town	No	1	
11	CFS34	Existing	Land adj. Kemsley Substation, ME10 2FE	Sittingbourne - tier 1 Principal Town	No	5	
54	CFS2024/129	New	Smeed Dean Works, Eurolink Industrial Estate, Castle Road	Sittingbourne - tier 1 Principal Town	Yes	4.3	
60	CFS2024/188	New	Land north of Keycol Hill (Yellow/Blue parcel)	Sittingbourne - tier 1 Principal Town	No	2.96	
12	CFS50	Existing	Land East of Faversham expansion	Faversham - tier 2 Secondary towns	No	21	
13	SBC17/ 094	Existing	Land adj to A2 at Love Lane and west of Salter's Lane to Brenley Corner (the Duchy site)	Faversham - tier 2 Secondary towns	No	20	Y 2500 dwellings
24	REG31 97	Existing	Land at Marshlands Farm, Lower Road, Minster	Minster and Halfway - tier 3 Urban Service Centre	No	5.6	
42	SLA18/207	New	South of Queenborough Creek	Queenborough & Rushenden - Tier 3 Urban Service Centre	Yes	1	Y 380 dwellings
23	REG30 44 (R10)	Existing	Newington Industrial Estate - southern expansion	Newington - tier 4 Village Service Centre	No	2	
55	CFS2024/142	New	Land to the west and east of Newington Industrial Estate, Newington, ME9 7NU	Newington - tier 4 Village Service Centre	No	3.14	
31	SBC17/ 025	Existing	Land at Radfield Farm, London Road, Bapchild	Bapchild - tier 5 small villages	Yes	3	
27	SBC17/ 095	Existing	Hartlip Industrial Estate, Hartlip (extension to)	Hartlip - tier 5 small villages	No	5.9	
58	CFS2024/177	New	Grove Farm	Bobbing - tier 6 the open countryside	No	5.1	
33	LPR247 0 (R15)	Existing	Lamberhurst Farm, Yorklets - proposed southern expansion	Dargate - tier 6 small villages	No	3.2	
34	CFS5 (R8)	Existing	Waterham Industrial Estate - expansion east	Rural countryside	No	0.5	

Totals

110.3

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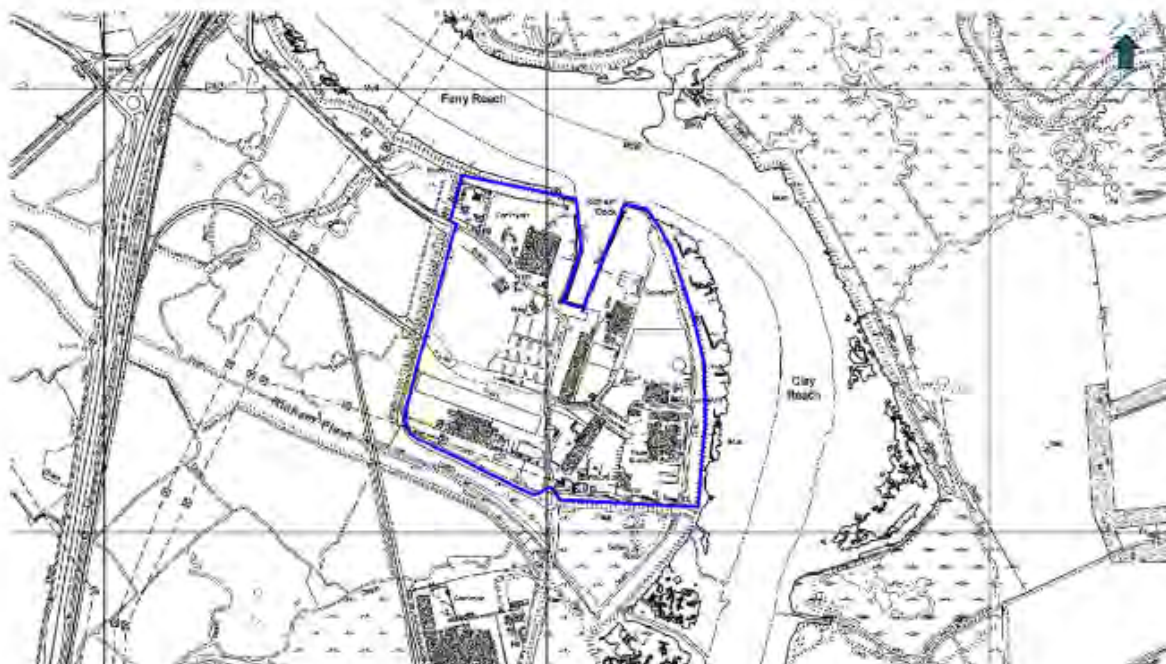
Employment sites recommended to P&R for allocation

KEY

- Existing Employment Sites
- Yes Employment Sites
- Possible Employment Sites
- No Employment Sites
- North Point

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ELR/004 Ridham Dock – redevelopment



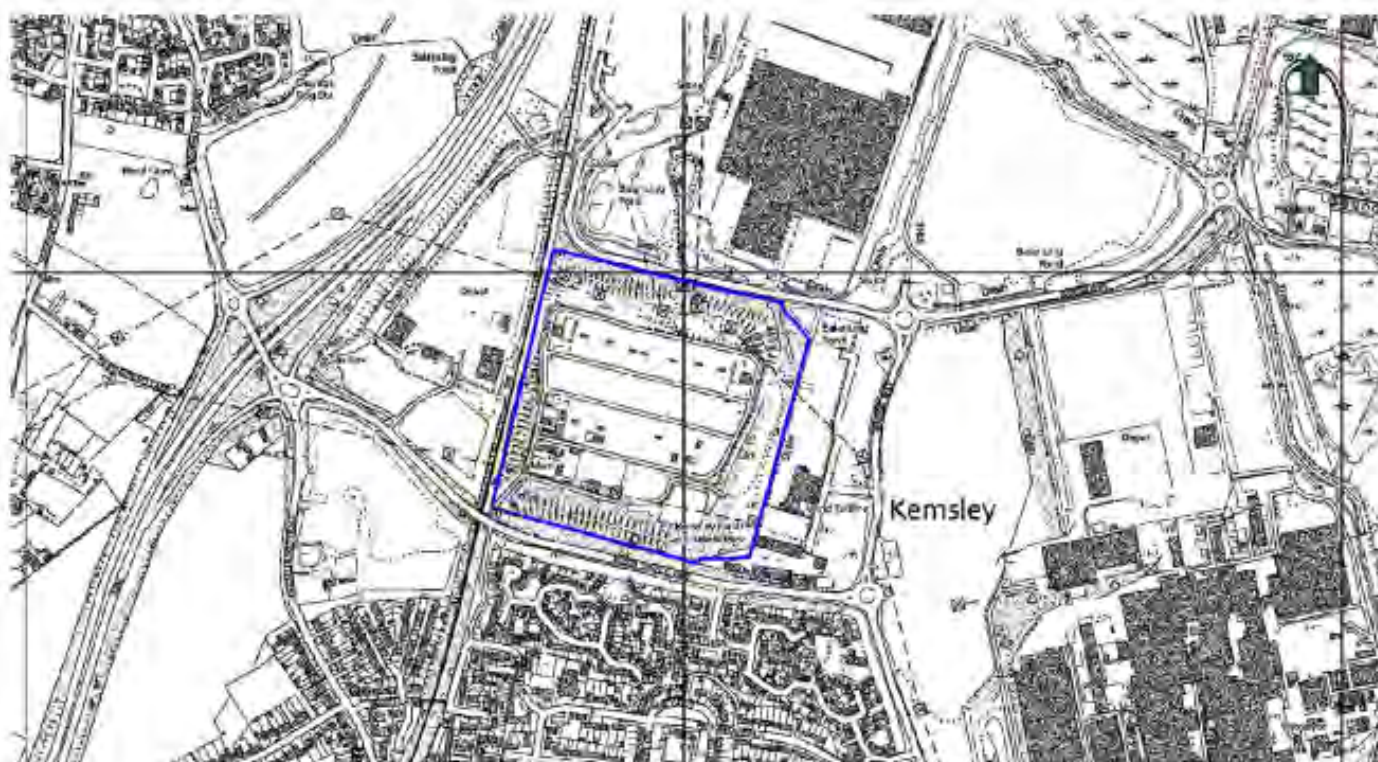
ELR/006 Land at Pheasant Farm (west), Howt Green, Sittingbourne



ELR/008 Land fronting east side Bobbing Hill, Sittingbourne

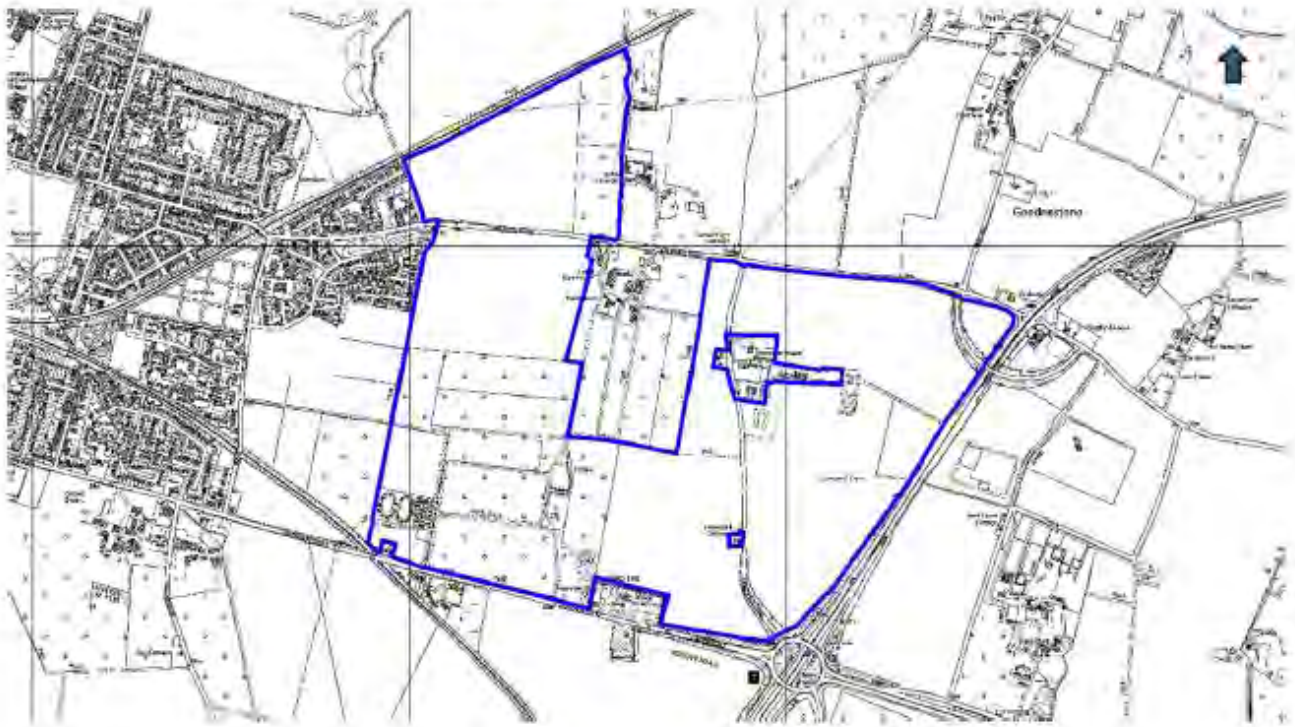


ELR/011 Land adj. Kemsley Substation

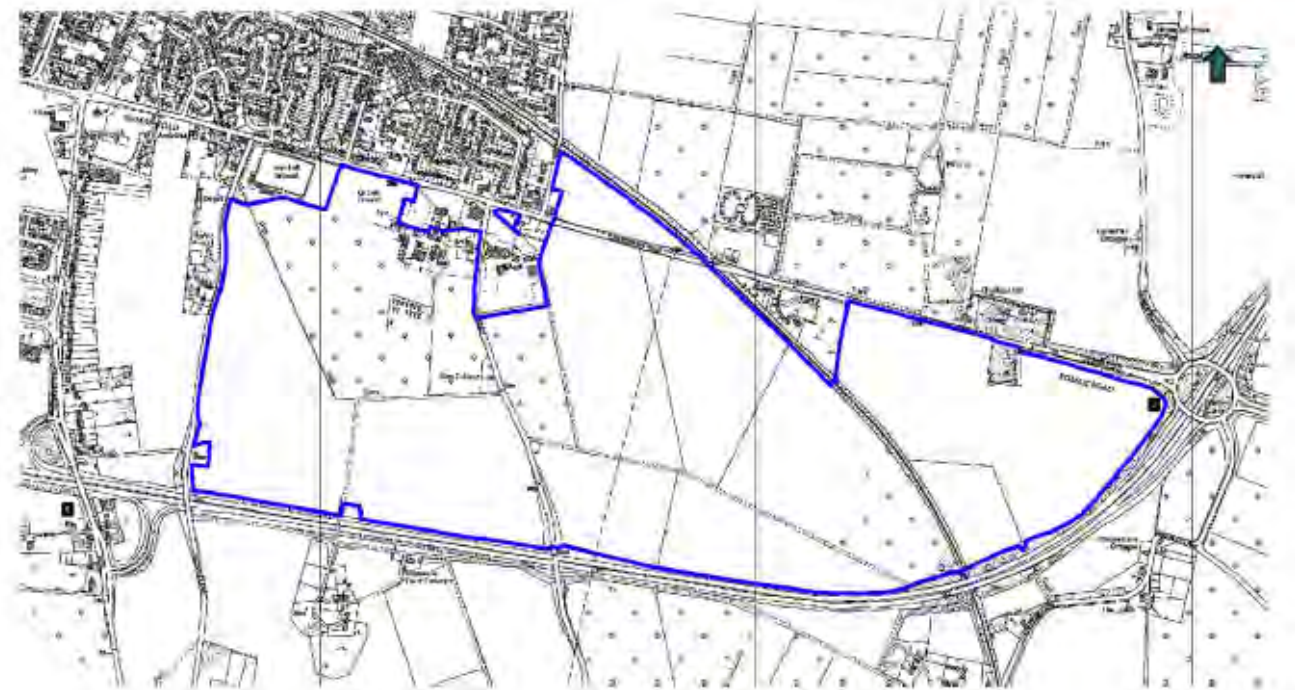


The map shows the Keycol area in Kent, with the Roman Road highlighted in yellow. The road runs from the northwest towards the southeast, passing through the Keycol area. Key landmarks include Keycol, Webber Ditch Pond, Key Street, and various landmarks like The Burglaid, The Catch House, and The Green House. A blue arrow points to the location of the Roman Road.

ELR/012 Land East of Faversham expansion



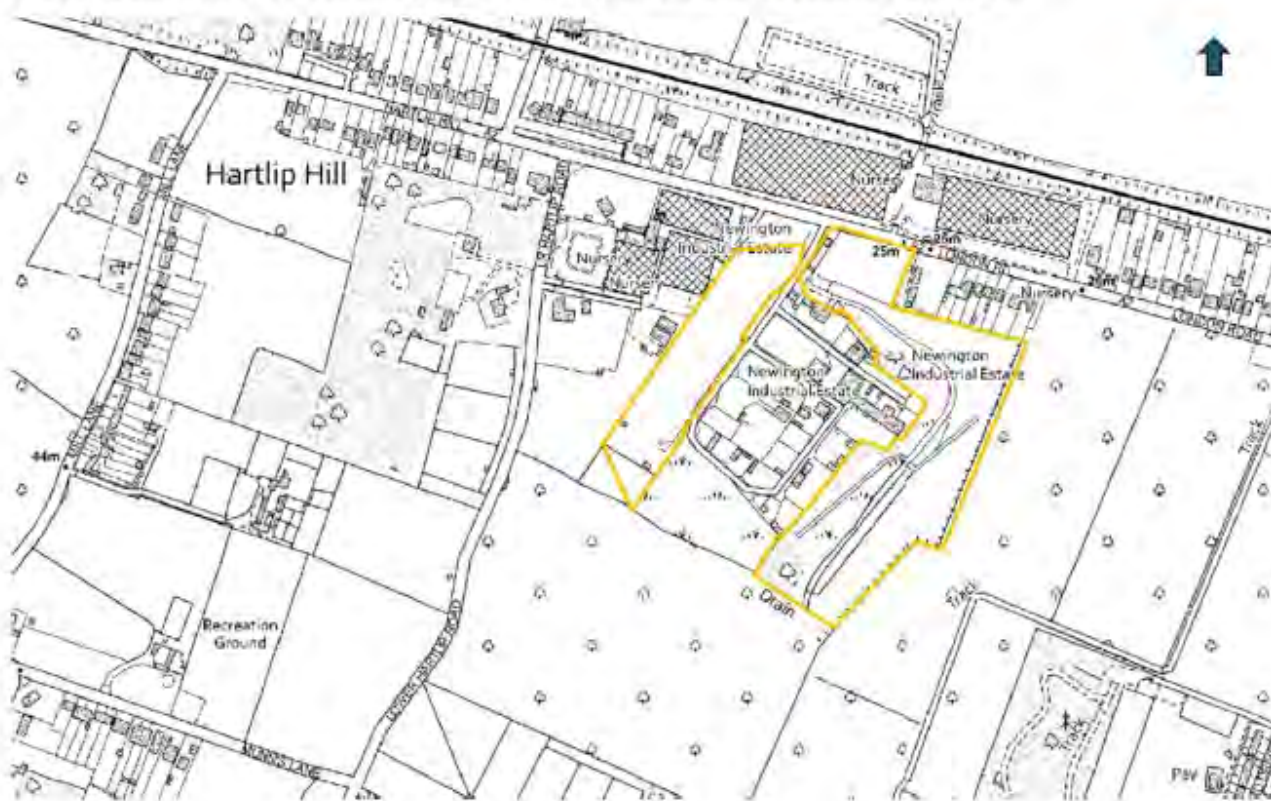
ELR/013 Land adj to A2 at Love Lane and west of Salter's Lane to Brenley Corner (the Duchy site)



ELR/023 Newington Industrial Estate – southern expansion



ELR/055 Land to the west and east of Newington Industrial Estate, Newington



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Appendix VII: Local Plan Review high level timetable to December 2026

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POLICY AND RESOURCES	
Meeting Date	Wednesday 11 th March 2026
Report Title	Swale Community Governance Review – Second Stage Consultation Proposals
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Larissa Reed – Chief Executive
Lead Officer	Stephanie Curtis, Strategic Policy and Communities Manager
Classification	Open
Recommendations	1. That Policy and Resources Committee agree and recommend to Council that the following proposals are included within the second stage CGR consultation a) To change the name of Warden Parish Council to Warden Bay Parish Council b) To create a Halfway Parish Council for the currently unparished area of Halfway (Map 1 in appendix 2) with transfer of identified land with Minster-On Sea Parish Council (Map 2 and 3), Queenborough Town Council (Map 3 and 5) and Sheerness Town Council (map 4) c) To expand the boundary of Queenborough Town Council to include the currently unparished area of Halfway (Map 6) with transfer of identified land with Minster on Sea Parish Council and Sheerness Town Council. d) To move Lucas Close from Sheerness Town Council area to Queenborough Town Council (Map 7). e) To increase the number of councillors representing Watling Ward (Faversham Town Council Ward) from 4 to 6 (3 per ward if split occurs) f) To increase the number of councillors representing Priory Ward (Faversham Town Council ward) from 2 to 3. g) To split the existing Watling Ward (Faversham Town Council ward) into two (Map 8) h) To extend the Watling Ward (Faversham Town Council ward) to encompass Perry Court (Faversham Town Council owned land) from Ospringe parish council Map 9). i) To extend Watling Ward (Faversham Town Council ward) to cover area shown in Map 10 currently within Ospringe Parish area.

	j) To extend the boundary of Watling Ward (Faversham Town Council ward) to cover land within Boughton Under Blean Parish Council and Selling Parish Council (map 11) k) To transfer land from Faversham Town Council to Sheldwich Parish Council (Map 12) l) To extend Watling Ward (Faversham Town Council ward) to transfer School Farm along Graveney Road, Graveney Road from Graveney with Goodnestone Parish Council (Map 13) m) To amend the Iwade Parish Boundary, including that with Bobbing Parish Council (Map 14). n) To create a Murston Parish Council (Map 15) o) To create a Great Easthall Parish Council (Map 16) moving land from Tonge Parish Council. p) To merge the currently unparished area of Great Easthall with Tonge parish council (map 17) q) To create a Kemsley Parish Council (Map 18) r) To create a Milton Regis Parish Council (Map 19) s) To create a Meads Parish Council (Map 20) moving land from Bobbing Parish Council t) To extend Bobbing Parish Council to encompass all of the unparished area of the Meads (Map 21) u) To extend Bobbing Parish Council to encompass all of Grove Park (Map 22) v) To create an Urban Sittingbourne Town Council (Map 23) taking merging some land from Tunstall and the remainder of unparished areas. w) To create an Urban Sittingbourne Town Council including Grove Park (Map 24). 2. That Policy and Resources Committee agree and recommend to Council the adoption of the updated Terms of Reference for the CGR, as shown in appendix 3.
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1 Purpose of Report and Executive Summary

- 1.1 This report summarises the results of the recent Stage 1 consultation for the Swale Community Governance Review (CGR) and puts forward a series of recommendations for the Stage 2 consultation, for agreement by Policy and Resources Committee before approval by Council.

2 Background

- 2.1 The Local Government and Public Involvement in Health Act 2007 (Chapter 3 of Part 4 of the 2007 Act) devolves the power to local authorities to take decisions

about matters such as the creation of parishes and their electoral arrangements to local government and local communities in England. Before a Parish or Town Council can be created the Council is required to undertake Community Governance Review (CGR)

- 2.2 Community governance reviews provide the opportunity for principal councils (SBC is the principal council) to review and make changes to community governance within their areas. This may include creating, merging, altering or abolishing parishes/town councils; their naming; their electoral arrangements; or grouping.
- 2.3 Council agreed on the 30 July 2025 to undertake a CGR and to establish a cross-party Member Steering Group to lead this piece of work. Council agreed the Terms of Reference for the Swale CGR on the 19 November 2025.
- 2.4 A CGR must follow a two-stage consultation process. The first stage can include a series of informal options to gauge the feelings of local residents. The second stage consultation would ask for views on a series of refined, formal options. It is from this second stage consultation that the Principal Council can then formulate its final recommendations as the conclusion of the CGR.
- 2.5 The Member Steering Group met during November and December 2025 to agree the key areas of focus for the review that would be included within the Stage 1 Consultation. These were also informed by proposals from existing town and parish councils, for whom were directly invited to put forward their suggestions.
- 2.6 The proposals agreed to be considered as part of the first stage consultation were:

Isle of Sheppey:

- Name change for Warden Parish Council to Warden Bay Parish Council
- To create a new parish council for the currently unparished area of Halfway; or for it to join with an existing neighbouring town or parish council.
- Establishing a parish council for whole of the Isle of Sheppey

Sittingbourne

- Review of the existing Iwade Parish Boundary
- To create a new parish/town council to cover the whole of the existing unparished Sittingbourne area or creating smaller parishes within this area.

Faversham

- To split the existing Watling Ward (Faversham Town Council ward) into two and review the number of councillors
- To extend the boundary of Watling Ward (Faversham Town Council ward) to cover land within Ospringle Parish Council

- To extend the boundary of Watling Ward (Faversham Town Council ward) to cover land within Boughton Under Blean Parish Council and Sheldwich Parish Council.
 - To increase the number of councillors representing Priory Ward (Faversham Town Council ward)
 - To amend a boundary of Faversham Town Council to transfer land to Sheldwich Parish Council.
- 2.7 Faversham Town Council also submitted a proposal for a boundary change that would see land at Perry Court, now owned by Faversham Town Council, to be transferred into Faversham Town Councils Boundary. As this area didn't include any residential properties, the Member Steering Group previously agreed that this would only need to be included in the Stage 2 consultation.
- 2.8 The first stage consultation ran from 18 December 2025 to 9 February 2026 (7.5 weeks). A total of 644 responses were received which included the completion of the online/paper questionnaire and a number of written responses from existing town/parish councils. The full details of these responses were shared with the Member Steering Group.
- 2.9 Appendix 1 details the activities that took place and the engagement rate; along with a summary of the results from the consultation both from the survey and direct discussions with existing town and parish councils.
- 2.10 Questions in relation to the Sittingbourne area, included asking residents where they felt they had the strongest local connection. This information was requested to support Members in considering the boundaries of local parish/town councils for this area, if this was the preferred option from residents over a whole Sittingbourne Town Council.
- 2.11 The Member Steering Group met on the 10th and 19th February 2026 to review the results of the first stage consultation and to agree which proposals should progress to stage 2 consultation. This included detailed review of all consultation responses alongside internal legal advice.
- 2.12 In addition to the formal questions asked, residents were also asked to put forward any other suggestions for the CGR that they would like Members to consider. From the free text comments, Members considered and agreed to take forward a number of these proposals for the second stage consultation. The details of these are also summarised in Appendix 1 and the terms of reference for the review have been updated to include these additional areas (appendix 3).
- 2.13 Unfortunately, within the final days of the consultation, it was brought to the Councils attention of an administrative error on the wording of one of the proposals on the consultation form in relation to a Faversham boundary change that would affect a small number of properties. The Member Steering Group agreed to discount the stage 1 responses, but to include at stage 2 with the corrected wording. The consultation approach for stage 2 for this proposal will factor in this in its communication to residents.

- 2.14 In a previous CGR undertaken in 2022, it was agreed by Council to transfer Lucas Close from Sheerness Town Council to Queenborough Town Council as part of a boundary review. It has been identified as part of the research into previous CGR approaches by the Council, that the Order for this transfer was not laid before Parliament. Legal advice has been sought and although the Decision remains sound and the Order could be placed, given the length of time that has passed and that some of the properties have changed hands, the CGR Member Steering Group felt it appropriate to include this proposal within the current second stage consultation before a decision is revisited.
- 2.15 Following the completion of Stage 1 consultation, internal legal advice was sought to ensure that the recommendations being taken forward for Stage 2 were compliant with our legal duties for the completion of CGR. It was recommended by Legal Services that the Terms of Reference for the CGR be formally updated and republished to show the new scope of the review, so that all new proposals are clearly identified. The amended Terms of Reference for the CGR are shown in Appendix 3. The amends made include:
- Revisions to section 5 of the terms of reference to include all areas under review and provide further information on parish boundaries and proposed changes;
 - Update to timetable within section 8 to increase the length of time for stage 2 consultation to 9 weeks.

3.0 Proposals

- 3.1 The proposals that are put forward for the Stage 2 Consultation have been identified by the Member Steering Group, based upon the Stage 1 consultation responses. The Maps that notate each proposal are shown in appendix 2.
- 3.2 Recommendation 1: That Policy and Resources Committee agree and recommend to Council that the following proposals are included within the second stage CGR consultation.
- a) To change the name of Warden Parish Council to Warden Bay Parish Council
 - b) To create a Halfway Parish Council for the currently unparished area of Halfway (Map 1 in appendix 2) with transfer of identified land with Minster-On Sea Parish Council (Map 2 and 3), Queenborough Town Council (Map 3 and 5) and Sheerness Town Council (map 4)
 - c) To expand the boundary of Queenborough Town Council to include the currently unparished area of Halfway (Map 6) with transfer of identified land with Minster on Sea Parish Council and Sheerness Town Council.
 - d) To move Lucas Close from Sheerness Town Council area to Queenborough Town Council (Map 7).
 - e) To increase the number of councillors representing Watling Ward (Faversham Town Council Ward) from 4 to 6 (3 per ward if split occurs)

- f) To increase the number of councillors representing Priory Ward (Faversham Town Council ward) from 2 to 3.
- g) To split the existing Watling Ward (Faversham Town Council ward) into two (Map 8)
- h) To extend the Watling Ward (Faversham Town Council ward) to encompass Perry Court (Faversham Town Council owned land) from Ospringe parish council (Map 9).
- i) To extend Watling Ward (Faversham Town Council ward) to cover area shown in Map 10 currently within Ospringe Parish area.
- j) To extend the boundary of Watling Ward (Faversham Town Council ward) to cover land within Boughton Under Blean Parish Council and Selling Parish Council (map 11)
- k) To transfer land from Faversham Town Council to Sheldwich Parish Council (Map 12)
- l) To extend Watling Ward (Faversham Town Council ward) to transfer School Farm along Graveney Road, Graveney Road from Graveney with Goodnestone Parish Council (Map 13)
- m) To amend the Iwade Parish Boundary, including that with Bobbing Parish Council (Map 14).
- n) To create a Murston Parish Council (Map 15)
- o) To create a Great Easthall Parish Council (Map 16) moving land from Tonge Parish Council.
- p) To merge the currently unparished area of Great Easthall with Tonge parish council (map 17)
- q) To create a Kemsley Parish Council (Map 18)
- r) To create a Milton Regis Parish Council (Map 19)
- s) To create a Meads Parish Council (Map 20) moving land from Bobbing Parish Council
- t) To extend Bobbing Parish Council to encompass all of the unparished area of the Meads (Map 21)
- u) To extend Bobbing Parish Council to encompass all of Grove Park (Map 22)
- v) To create an Urban Sittingbourne Town Council (Map 23) taking merging some land from Tunstall and the remainder of unparished areas.
- w) To create an Urban Sittingbourne Town Council including Grove Park (Map 24).

3.3 Recommendation 2: That Policy and Resources Committee agree and recommend to Council the adoption of the updated Terms of Reference for the CGR, as shown in appendix 3.

4.0 Alternative Options Considered and Rejected

- 4.1 To pause the Community Governance Review: It would be possible to pause any Community Governance Review, however having completed the Stage 1 consultation with a good level of engagement from communities on a number of the proposals, it would not be recommended to pause.
- 4.2 To reduce the number of proposals for the CGR second stage consultation: It would be possible to reduce/amend the number of proposals being recommended

to progress to stage 2 consultation. However, those that have been put forward have been developed by the cross-party Member steering group following extensive review of all consultation responses for Stage 1; and are felt by the Member Steering Group to best reflect the needs of the local community that responded. Appendix 1 details the number of responses to the individual proposals included at Stage 1 – some of these did not necessarily show a clear intent from the community and it was therefore felt by the Member Steering Group that these proposals should be asked again for clarity.

5.0 Consultation Undertaken or Proposed

- 5.1 Section 93 of the 2007 Act allows principal councils to decide how to undertake a community governance review, provided that they comply with the duties in that Act which apply to councils undertaking reviews. Swale Borough Council as the principal council will need to consult local people and take account of any representations received in connection with the review. When undertaking the review we must have regard to the need to secure that community governance reflects the identities and interests of the community in the area under review, and the need to secure that community governance in that area is effective and convenient.
- 5.2 Under the 2007 Act the council is required to consult local government electors in any area under review, and others who may have an interest in the review. Other bodies might include local businesses, local public and voluntary organisations - such as schools or health bodies. There is legal requirement on what constitutes a stage 2 consultation, but the consultation must be fair, proportionate and transparent.
- 5.3 The Plan for the Stage 2 consultation would be to follow similar activities as Stage 1 (as shown in appendix 1), but with increased focus on localised events/activities. The full consultation plan will be developed and signed off by the Member Steering Group. It will also ensure that the precept implications of any options chosen is clear for residents.
- 5.4 If approved, the Stage 2 consultation will run for a minimum of 8 weeks. It has been recommended by Legal Services that due to the complexity of the proposals and to ensure the process is fair and transparent that the consultation should run for 8-12 weeks. In order to meet the timescales required to run elections in 2027, any agreed recommendations from Council would need to be submitted to Government by summer recess to allow time for them to consider the proposals. This needs to be factored into the timetable when planning the second stage consultation dates.
- 5.5 All proposals, if agreed to be taken forward to second stage consultation, will include the option of 'no change' for residents. This will be made clear in the question wording so that residents do not feel that they are being made to make a choice that would see a new parish/town council put into place.

- 5.6 The consultation questions will include clear maps and reasoning for each proposal being put forward, along with any financial implications for residents.

6.0 Implications

Issue	Implications
Corporate Plan	The work required to carry out Corporate Governance Reviews is in the Corporate Plan
Financial, Resource and Property	The cost of undertaking the CGR has been met through existing officer resources – the officer working on Local Government Reorganisation has led this piece of work
Legal, Statutory and Procurement	The Local Government and Public Involvement in Health Act 2007 (Chapter 3 of Part 4 of the 2007 Act) devolves the power to local authorities to take decisions about matters such as the creation of parishes and their electoral arrangements to local government and local communities in England Following the completion of the stage 1 consultation and discussions in forming the proposals for stage 2 consultation, further advice was sought from internal Legal Services. To ensure procedural fairness, they have recommended that the terms of reference for the review are updated (as discussed in section 3 of this report). Any consultation documents must also be very clear if it was not included in the stage 1 consultation and how it arose from stage 1 representations. It was also confirmed that there is no prohibition on relying on stage 1 responses in addition to those received from stage 2 if they are asking identical questions with no material change. It was also advised that although there is no statute or fixed guidance on the consultation length for stage 2, the legal requirement is that it is fair, proportionate and transparent. It has been suggested that the preferred length for a stage 2 consultation runs for 8-12 weeks where proposals are numerous, complex or potentially contentious.
Crime and Disorder	There are no direct crime and disorder implications for these proposals.
Environment and Climate/Ecological Emergency	There are no direct Environmental Emergency implications for these proposals.
Health and Wellbeing	Although there is not direct Health and Wellbeing impact for these proposals, Town and Parish Councils are able to undertake work to improve Health and Wellbeing
Safeguarding of Children, Young	There are no direct safeguarding implications for these proposals

People and Vulnerable Adults	
Risk Management and Health and Safety	There are no direct health and safety implications for these proposals
Equality and Diversity	There are no direct Equality and Diversity implications for these proposals, however an equality impact assessment will be completed following the second stage consultation to accompany the final recommendations.
Privacy and Data Protection	There are no direct privacy or data protection implications for these proposals
Local Government Reorganisation (LGR)	The undertaking of a CGR ensures that all levels of governance within the borough have been reviewed ahead of LGR. This ensures that local government best meets the needs of local communities.

7 Appendices

Appendix 1: Swale Stage 1 CGR Consultation Summary

Appendix 2: Maps of proposed boundaries

Appendix 3: Revised Terms of Reference for Swale Community Governance Review.

8 Background Papers

CGR Full Council Decision 30 July 2025 – Agreement for Review - <https://services.swale.gov.uk/meetings/documents/g4329/Printed%20minutes%20Wednesday%2030-Jul-2025%2019.00%20Council.pdf?T=1>

CGR Full Council Decision 19 November 2025 – Terms of Reference Agreement <https://services.swale.gov.uk/meetings/documents/g4331/Printed%20minutes%20Wednesday%2019-Nov-2025%2019.00%20Council.pdf?T=1>

Lucas Close CGR Full Council Decision 2022 - (Public Pack) [Agenda Document for Council, 27/07/2022 19:00](#)

Ordnance Survey Election Maps – [Election Maps](#)

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Appendix 1: Swale Community Governance Review-Stage One Consultation Summary

The Stage One consultation launched on 18 December 2025 and closed on 9 February 2026, equating to a 7.5-week consultation period. The consultation consisted of one form split into three areas to ensure residents felt it was relevant to them but not time-consuming to complete. The areas under review and responses are as follows:

Isle of Sheppey –3 questions were asked

Should Warden Parish Council change it's name to Warden Bay Parish Council?	
Yes-change the name	14
No-keep it as it is	1
TOTAL	15
Should the unparished area of Halfway have its own parish council or merge with an existing?	
New parish	18
Merge with an existing	20
No change	4
TOTAL	42
Should the Isle of Sheppey have its own whole Island Council?	
Yes-whole island council	43
No-keep it as it is	81
Other	10
TOTAL	134

Sittingbourne-2 Questions asked

Should the currently unparished areas of Sittingbourne have it's own town council or a local parish council?	
Yes-whole town council	55
No-a local council	70
No-keep it as is	20
Other	19
TOTAL	184
Should Iwade boundary be changed?	
Yes-move the boundary	37
No-keep it as is	20
Not resident of the area	125
TOTAL	182

Faversham-4 questions asked

Should Watling Ward be split and increase the councillor numbers?	
Yes-split and increase	25
No-keep as it	12
TOTAL	37

Should Watling Ward boundary be extended to include part of Ospringle PC	
Yes-extend the boundary	17
No-keep as it	17
Not resident	27
TOTAL	61
Should Watling Ward boundary be extended to Brenley Corner area	
Yes-extend the boundary	22
No-keep as it	25
Not resident	14
TOTAL	61
Should the number of Councillors be increased in Priory Ward	
Yes-increase the number	23
No-keep as it	13
Not resident	25
TOTAL	61

Consultation engagement

Following agreement of a robust engagement plan to ensure the consultation was promoted widely across the borough, promotion began before the consultation formally opened. This included press releases, social media updates, and attendance at meetings such as area committees and local community networking groups.

The table below details the engagement reach during the consultation period:

Engagement-in person	Numbers
Warden Parish council meeting	10
Island forum meeting	58
One Swale Roadshow-Gateway	4
The Forum public engagement	15
Iwade parish council meeting	11
Queenborough town council meeting	15
Engagement-online	
Online meeting for Sittingbourne review	3
Email to stakeholder list	85
Email to KCC and SBC members	54
Email to parish/town councils	38
Social media posts	Facebook 5 posts 59,664 views Instagram 4 posts 970 views
CGR video views	5373
CGR webpage clicks	3249 views News item 233 views

2 x newsletter emails	5400
Inside Swale	All of Swale

Other promotional activity included posters in high-footfall areas across the borough, leaflet distribution, and door-knocking by individual members, parish/town councils, or community groups — particularly the Milton Regis Society, who distributed a significant number of leaflets and consultation forms and radio broadcasts.

Consultation responses breakdown

The consultation has received 644 responses:

Isle of Sheppey 300

Sittingbourne and surrounding 257

Faversham and surrounding 79

Breakdown of responses:

52 paper consultations

584 online submissions

4 email responses

4 written responses

Summary of written responses	
Borden Parish Council response	Swale Borough Council is best placed to cascade official Community Governance Review updates and information/ communications are issued directly by Swale Borough Council and distributed through appropriate channels, and not just by social media, to ensure residents receive clear, consistent, and authoritative information.
Bredgar Parish Council	We do not request any changes to the Bredgar parish boundary as part of this review. Should any changes be proposed to neighbouring parishes that may impact Bredgar, we request that BPC is consulted and given the opportunity to comment. We believe that Sittingbourne should have its own town council to represent all currently unparished areas.
Selling Parish Council	Selling Parish Council wishes to object to 'To extend the Watling ward (town council ward) boundary to the M2 and A2 London Road at Brenley Corner (map 1).' If this proposal were approved it would see a portion of land currently within the parish transferred to Faversham TC. Should the planning application from the Duchy of Cornwall go ahead, this would change. As such, we feel this is an attempt to maximise potential electors and s106 funding.
Dunkirk Parish Council	Dunkirk Parish Council agreed to support the Boughton and Dunkirk Neighbourhood Plan comments on the Community Governance Review. The Parish Council does not wish to see the Neighbourhood Plan, a legally made document being undermined by a change in the boundary for Boughton-Under-Blean.

Faversham Town Council	Faversham TC request the steering group consider a boundary change so that the entirety of Perry Court land in the TC's ownership falls within FTC's boundary.
Ospringle Parish Council	Ospringle PC considered parts of the review that both directly and indirectly impact the PC. Ospringle PC refer in detail to the potential detrimental impacts of the proposals to the council, including detailing out financial implications through loss of precept. Ospringle note concerns from residents, and advise there is an overwhelming wish for boundaries not to be moved.
Boughton and Dunkirk Neighbourhood Plan	Response includes detail on the consultation process, the terms of reference and the proposals being consulted on. They note some proposals are based on not yet determined planning applications, and with no reasonable justification for the proposals.

Residents comments for new proposals in stage 2

There were two proposals put forward by residents within the stage 1 consultation questions that hadn't previously been considered. These are for the two areas shown below.

Extension of Watling Ward to include School Farm:

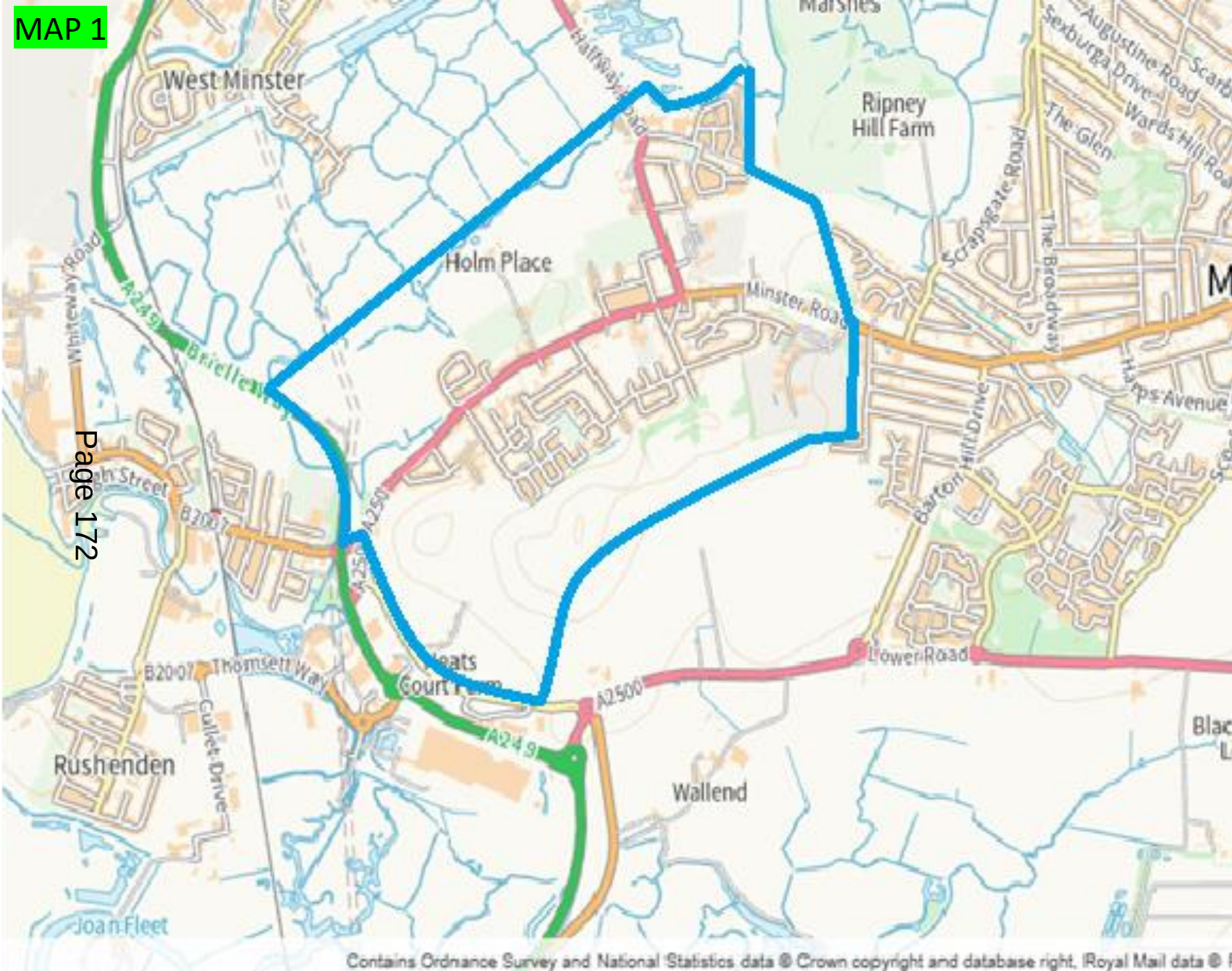
- I both live and have my scientific instrumentation business Cairn Research Ltd at School Farm on the Graveney Road. We all feel very much part of Faversham rather than Graveney, so I think it would make very good sense to extend the eastern boundary of the town so as to include us the town
- Faversham should also expand to include School Farm which was historically part of Faversham Abbey. When splitting the ward the boundary should be looked at to ensure whole areas are grouped together, currently 12 houses on Tettenhall way are in watling east while the rest of Perry court is in watling west.

Proposal for Great Easthall Parish:

- Personally think Sittingbourne Town Council should include the Meads and Grove Park, and go up to Snipeshill, and include Murston South polling district. Murston North and Great East Hall should have their own parish. Kemsley should have its own parish. Chalkwell Ward north of the railway line (except Regent Quay which should be in Sittingbourne) should join Milton in their own parish council.
- Great Easthall is a unique estate, whilst you can walk from it to Murston, you can't drive. It has its own entry and exit road via Swale Way making it effectively its own entity. We have our own unique challenges and often feel forgotten with no shops or amenities of any kind within a sensible walking distance.

Additionally, it was identified by one of the Members of the Member Steering Group that as part of the map drawn for the proposal to split Watling Ward (Faversham Town Council ward), this would actually split Tettenhall Way. It has been proposed that the map for this proposal be slightly re-drawn.

Isle of Sheppey maps

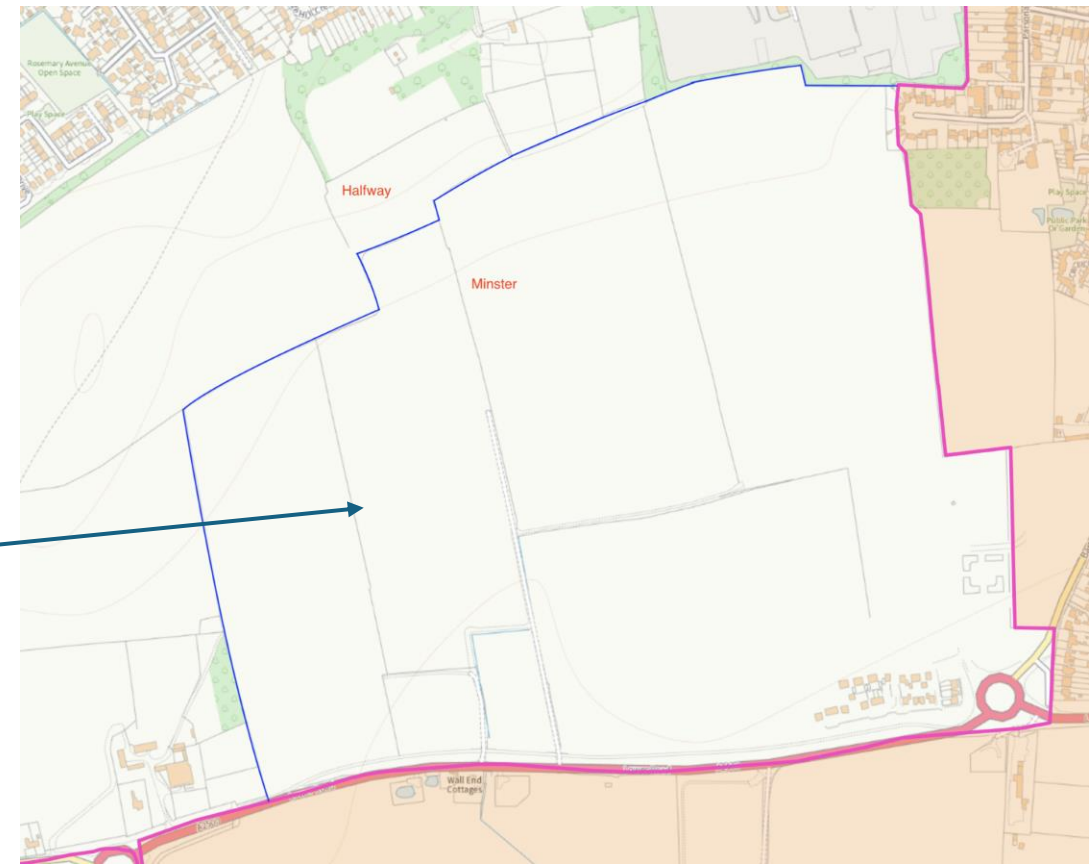


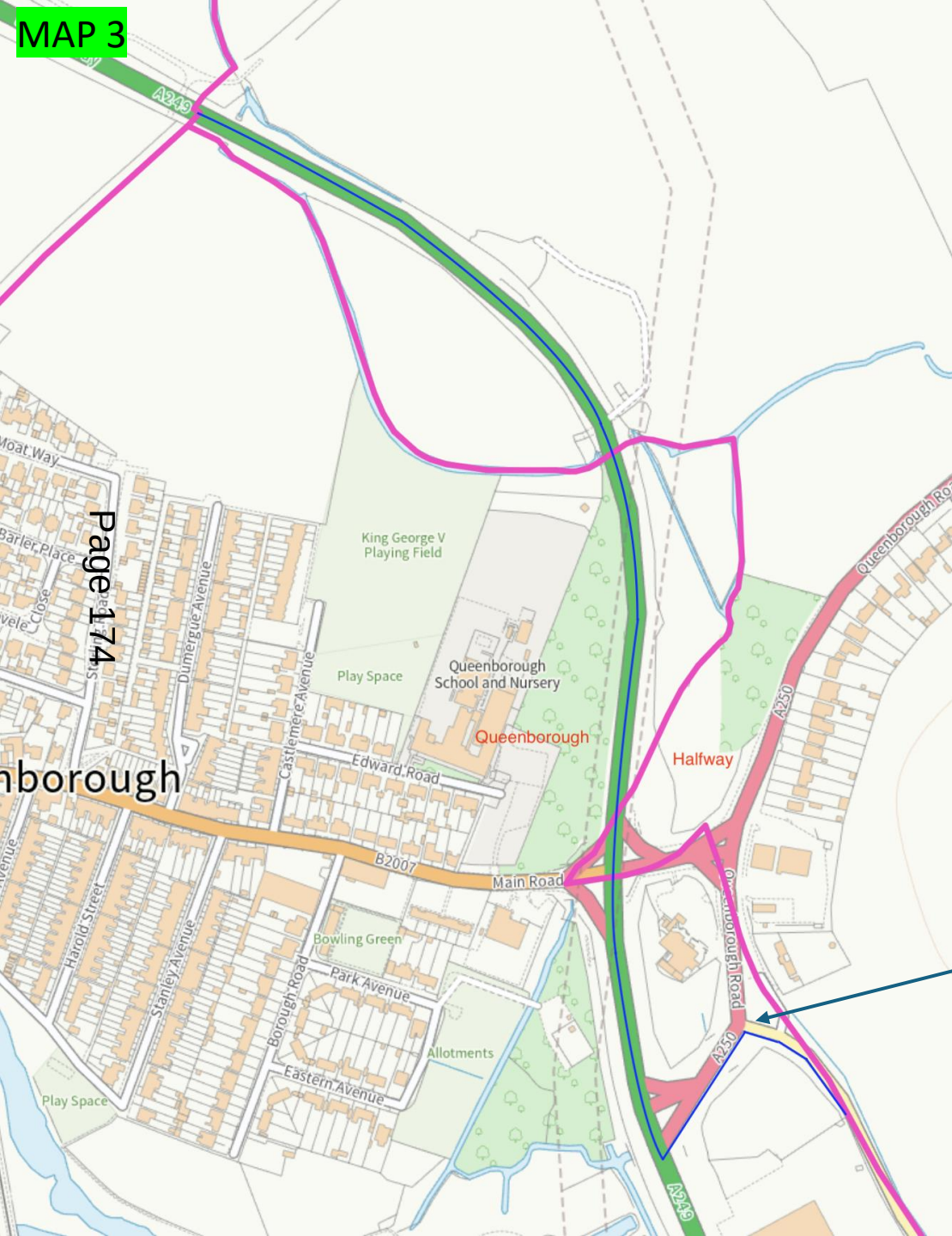
Indicative proposed Halfway Parish Council boundary –maps 2, 3 and 4 provide detail on boundary lines.



Proposal to move housing north of Power Station Road from Minster on Sea PC to Halfway. Blue line indicates proposed new boundary. Pink line indicates existing.

Proposal to move the new housing estate around Cowsted Farm and Parsonage Farm, north of the Lower Rd, to Minster on Sea PC. 650 new homes will access from the Barton Hill Drive roundabout, are currently being built on this land.

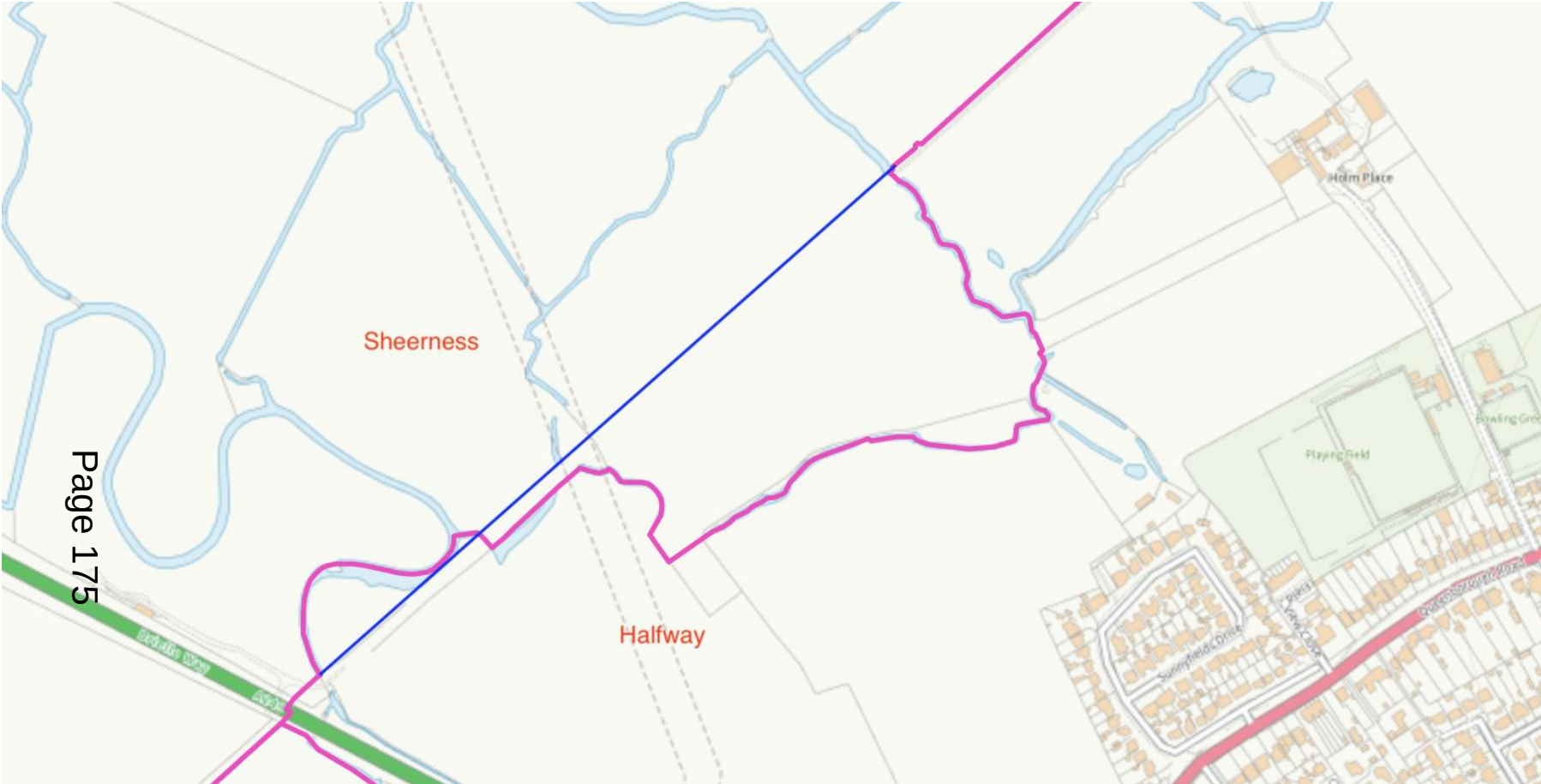




Proposed boundary to change to move remainder of the Appleford Rd estate from Halfway to Minster on Sea PC.

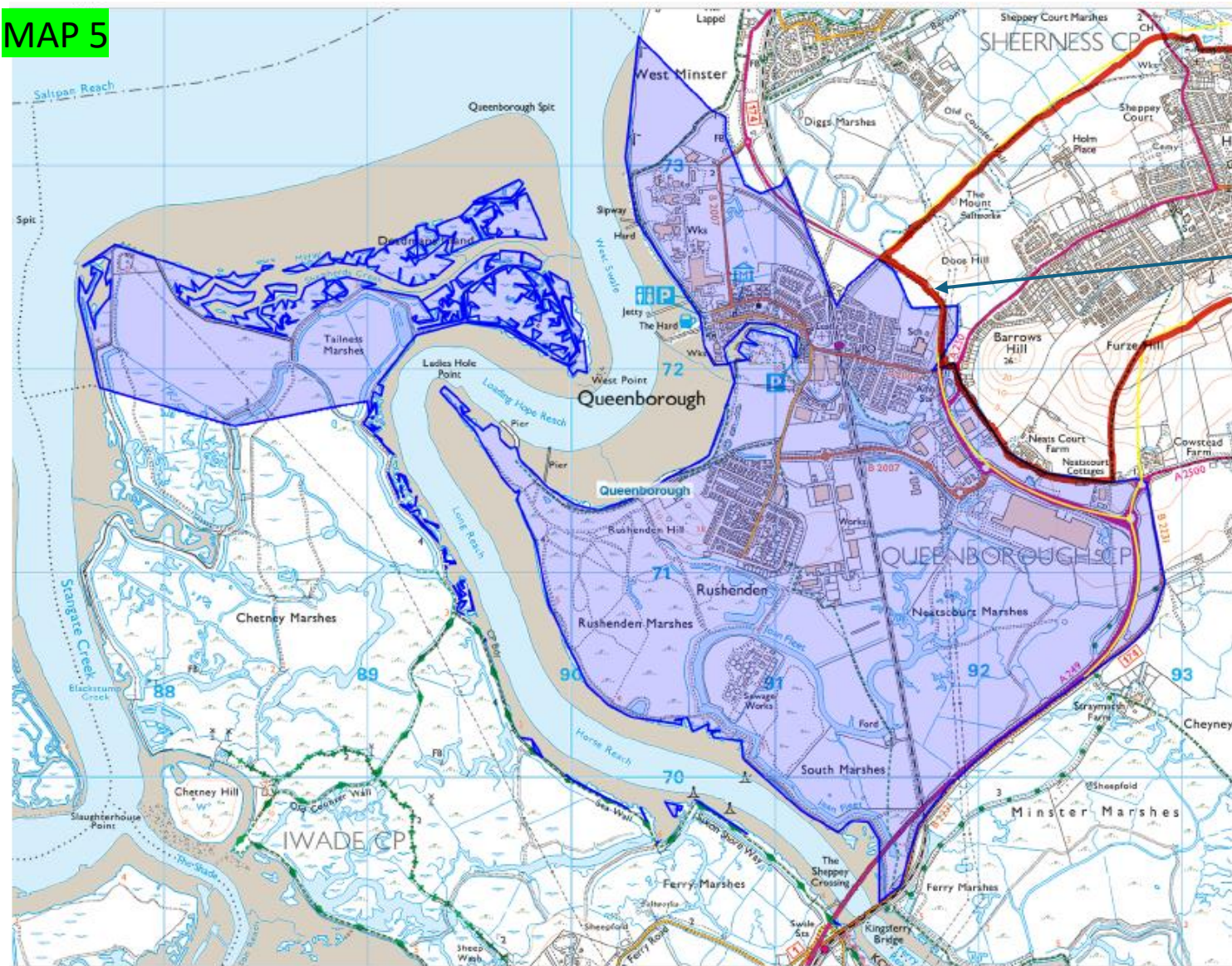
Proposal to amend existing boundary line between Halfway and Queenborough TC to follow A249.





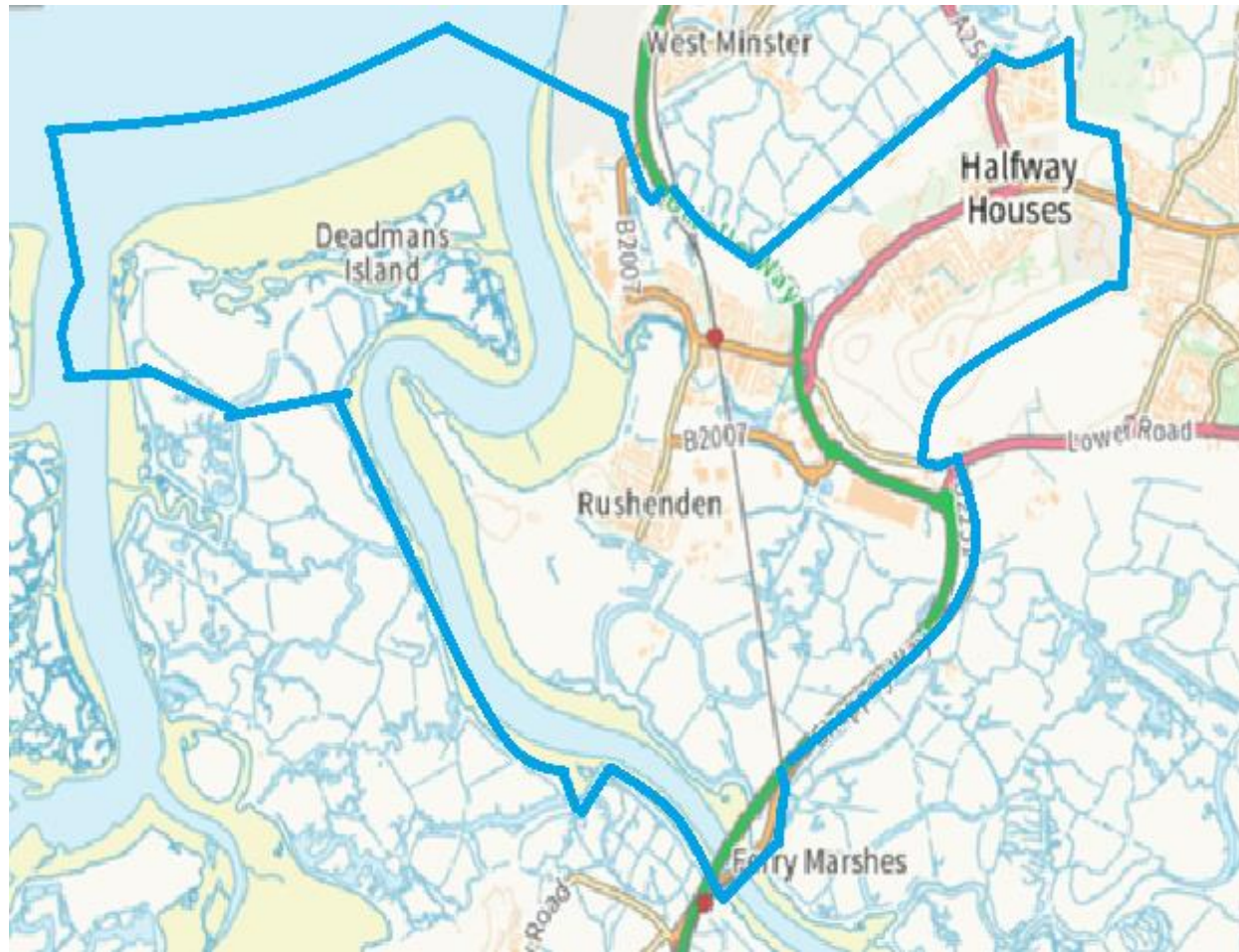
Proposed boundary change between Sheerness Town Council and Halfway, the blue line indicates with proposed change, pink is the existing.

MAP 5

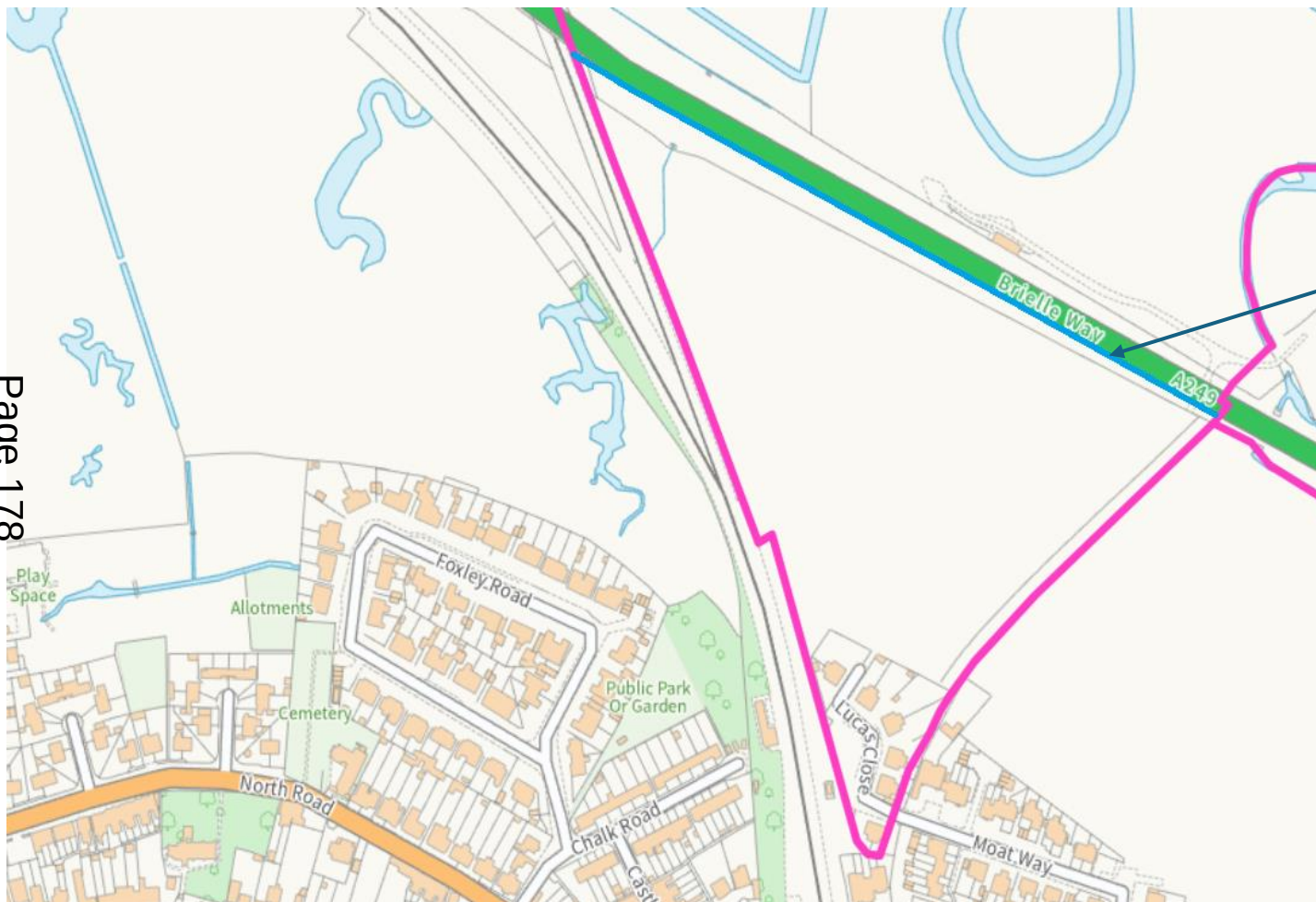


The border with Queenborough TC, shown in blue, would be unchanged except for where it runs between Queenborough Road and the old Light Railway. Here, it would run along the centre of the A249 Brielle Way, taking a small piece from QTC and giving a small piece back to QTC. No houses are affected by this change.

MAPS 6



Extension of Queenborough Town Council to include the currently unparished area of Halfway, using boundaries as per Map 2



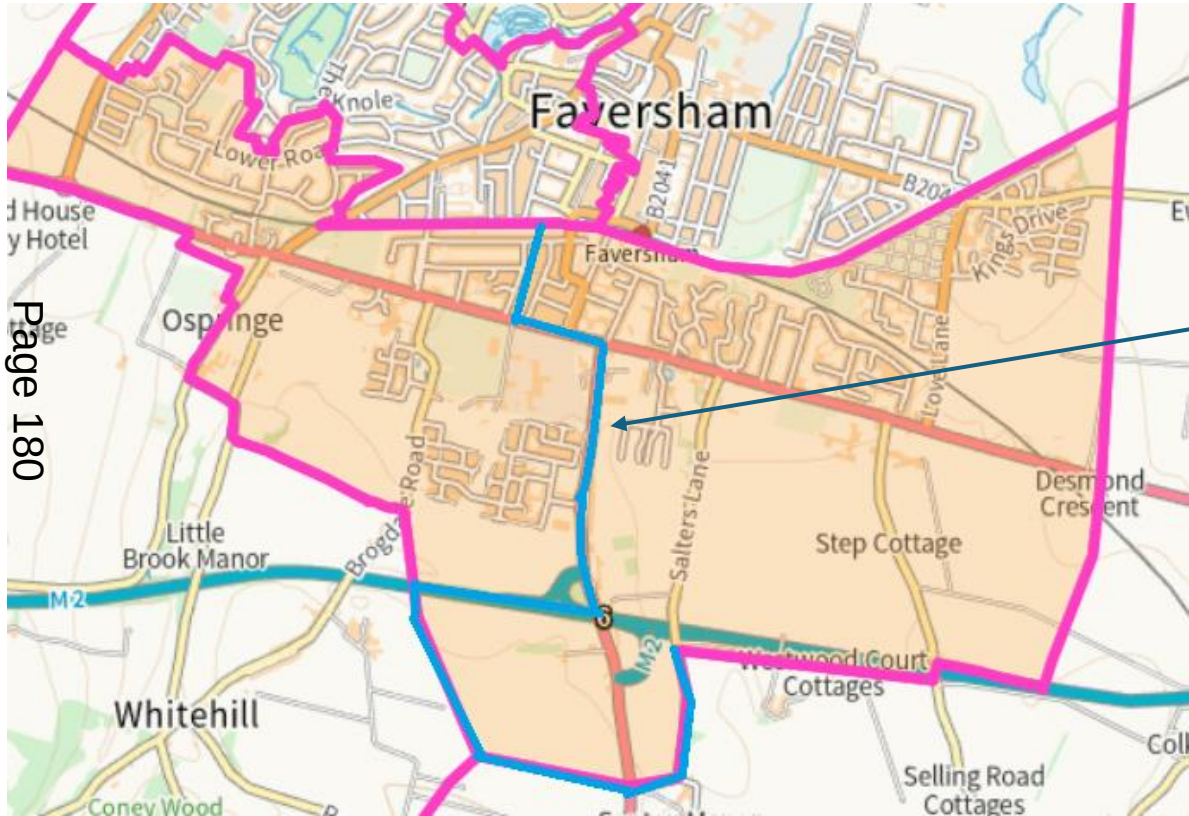
Lucas Close boundary change

Blue line indicates where the boundary will be moved to

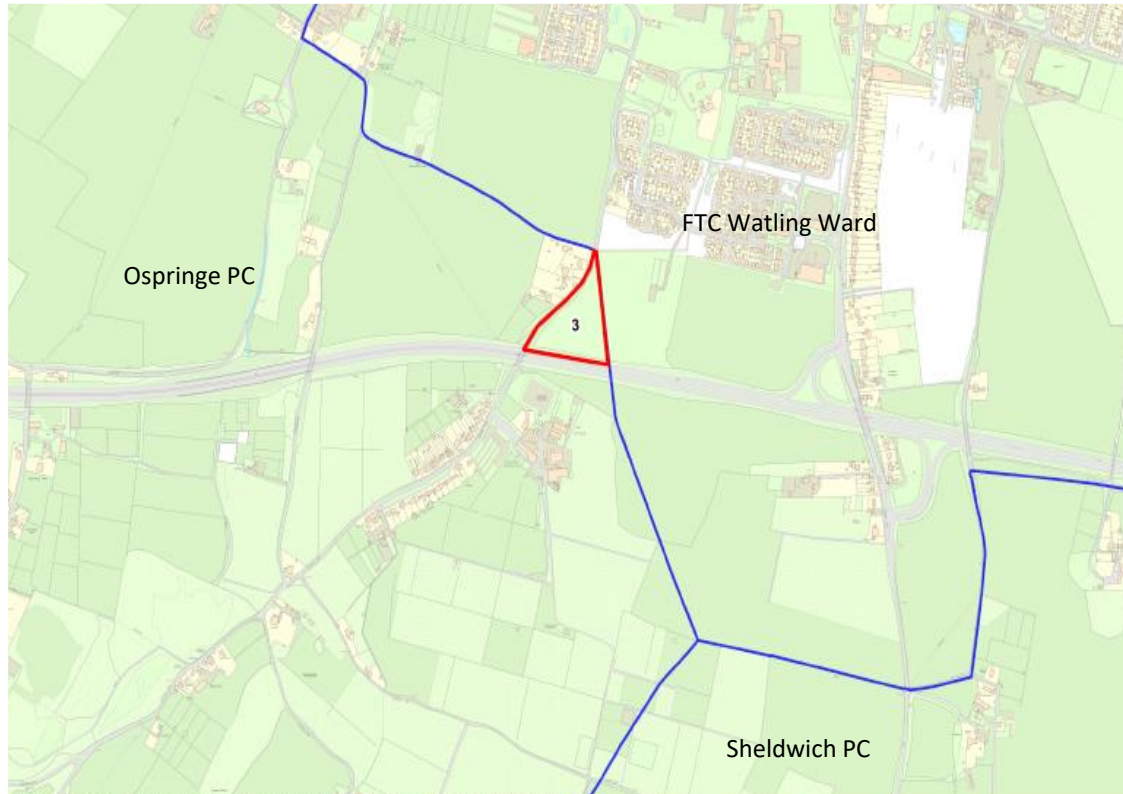
Faversham Maps

MAP 8

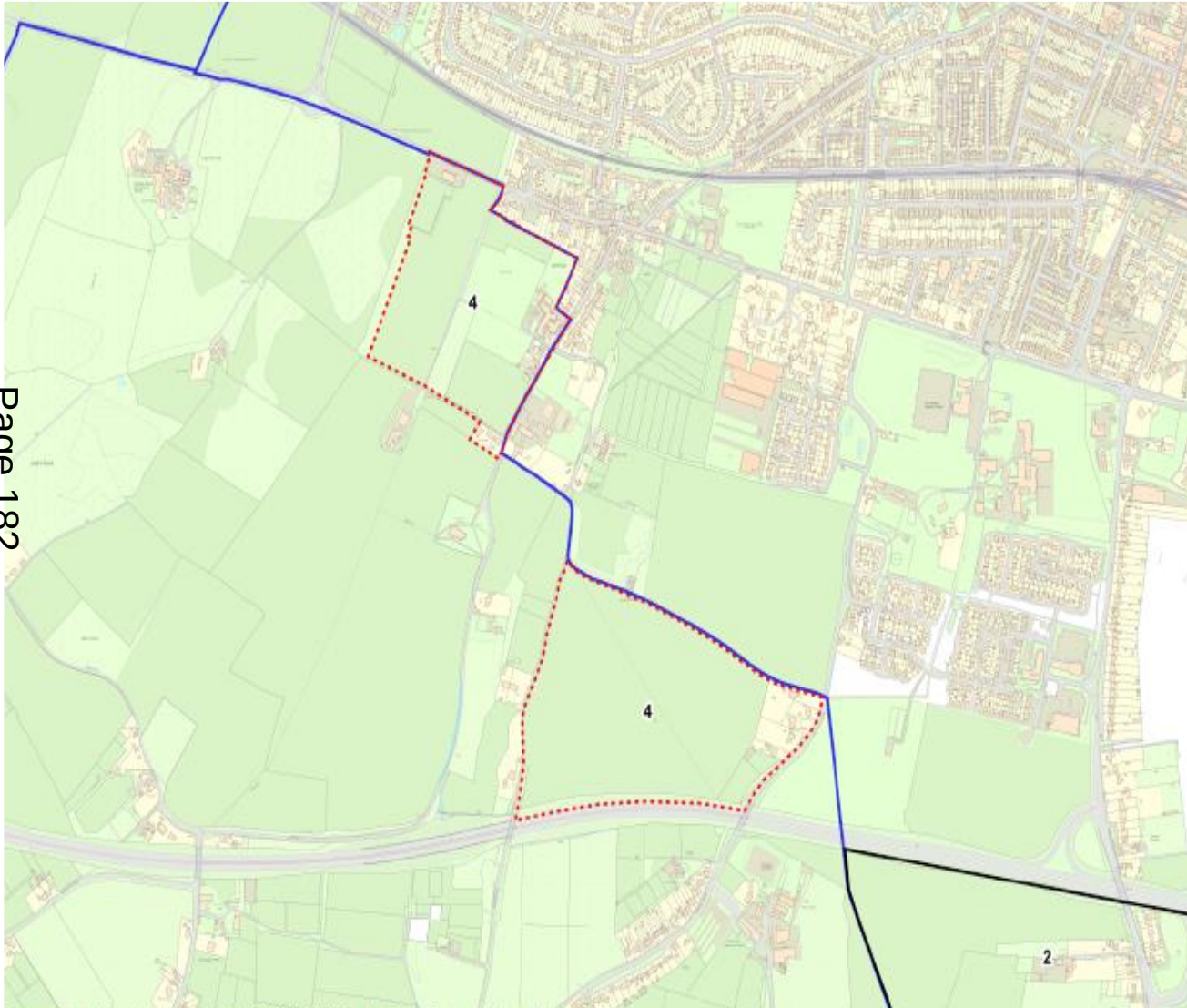
Watling Ward split



Blue line indicates ward split boundary

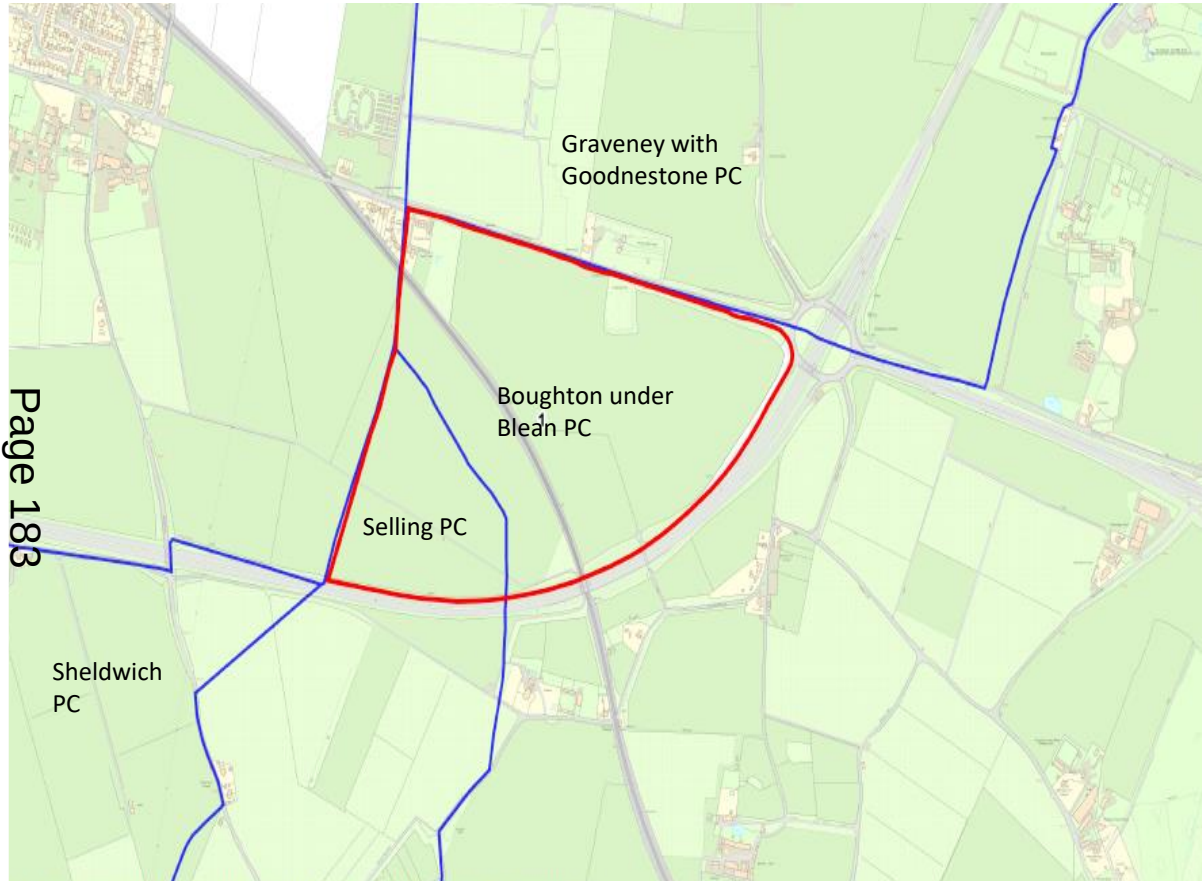


Land at Perry Court. Land is currently owned by Faversham TC in Ospringe PC. This would extend Watling Ward to move all of Perry Court within Faversham Town Council boundary.



Extension of Watling ward to encompass the remaining part of Ospringe Village - red dotted lines indicate boundary change proposal

MAP 11



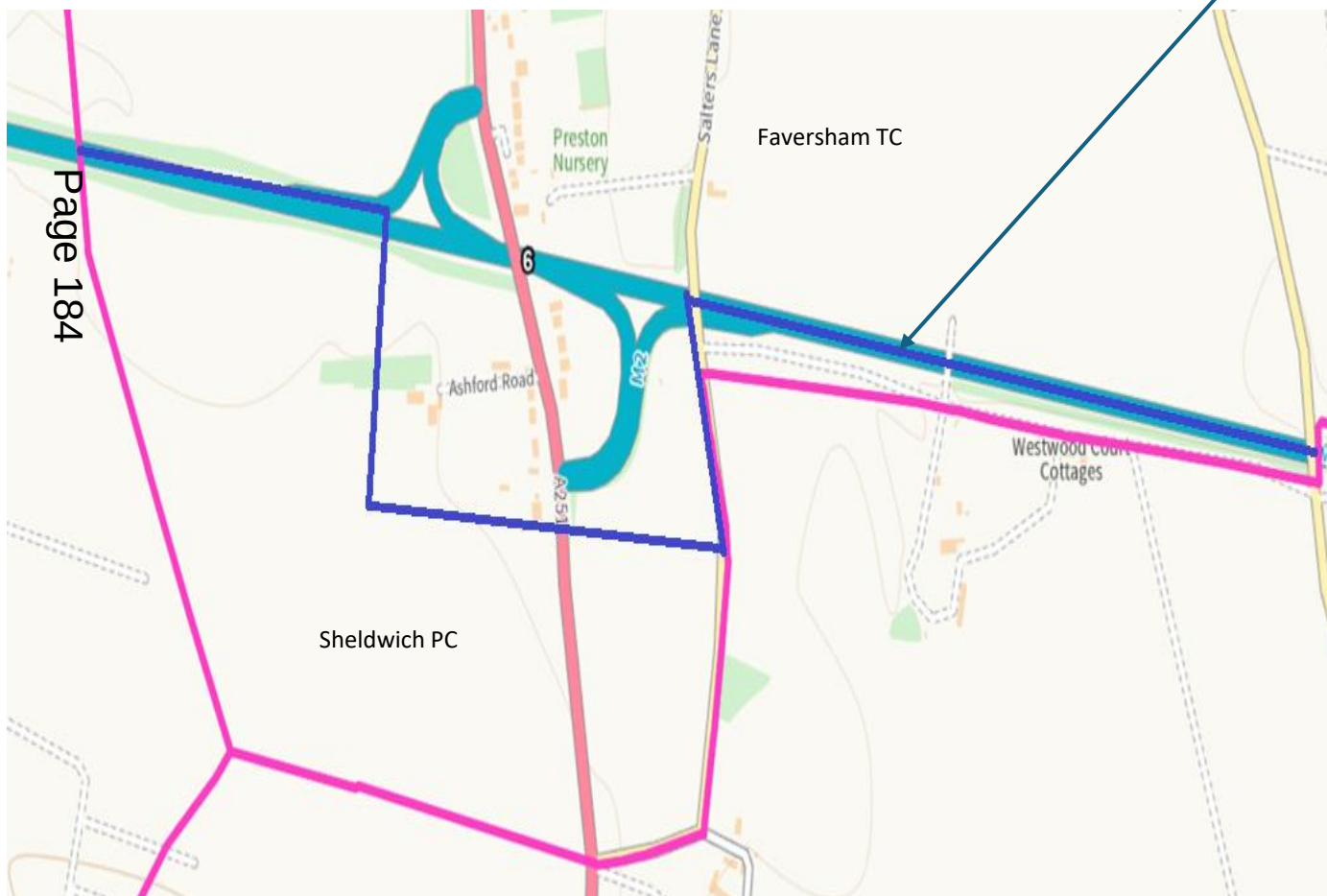
Extension of Watling ward to the M2 and A2

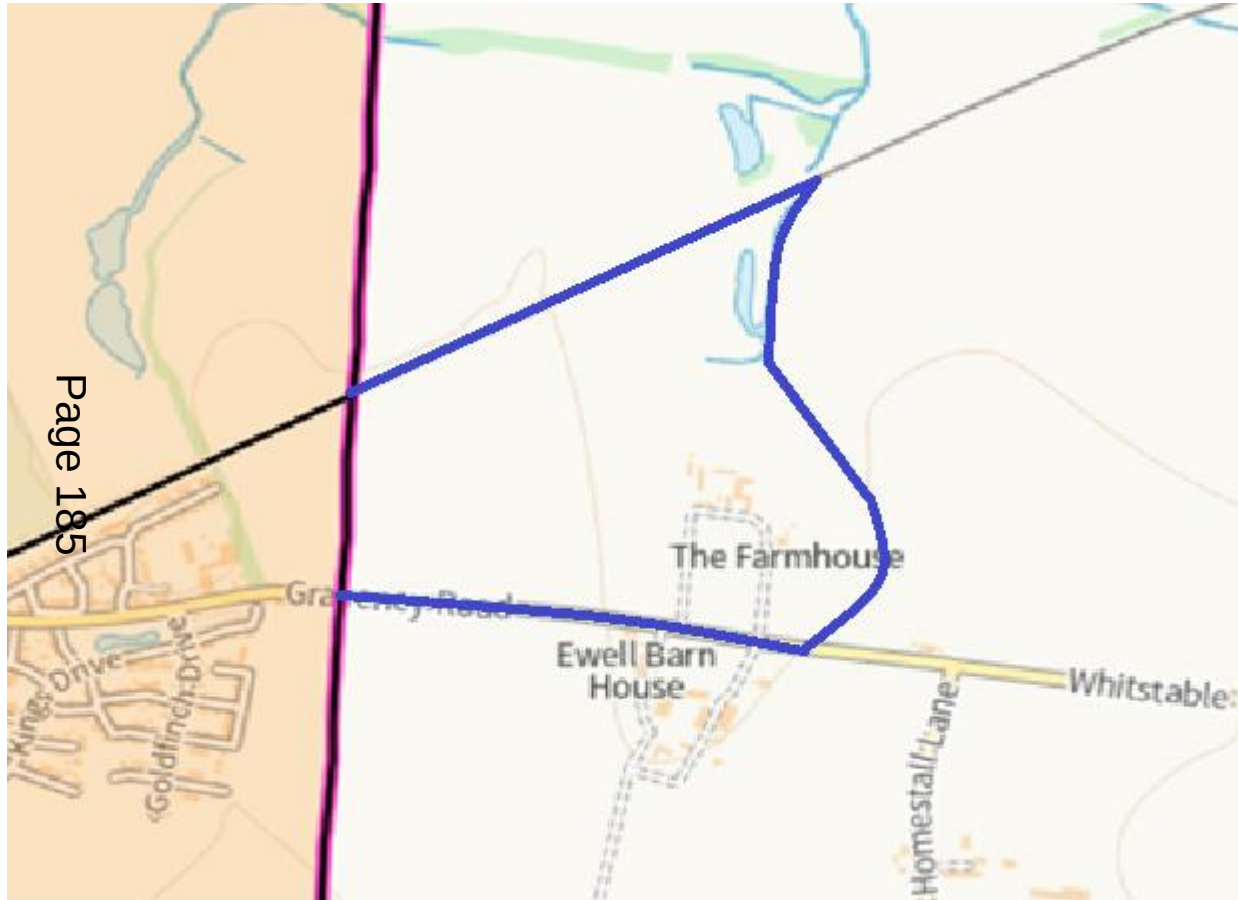
Move of land (red lines) to Faversham TC from Selling PC and Boughton under Blean PC

MAP 12

Transfer of land from Faversham Town Council to Sheldwich

Dark blue line indicates new FTC/Sheldwich boundary moving from
land to Sheldwich following along M2, with M2 junction
remaining in FTC boundary.

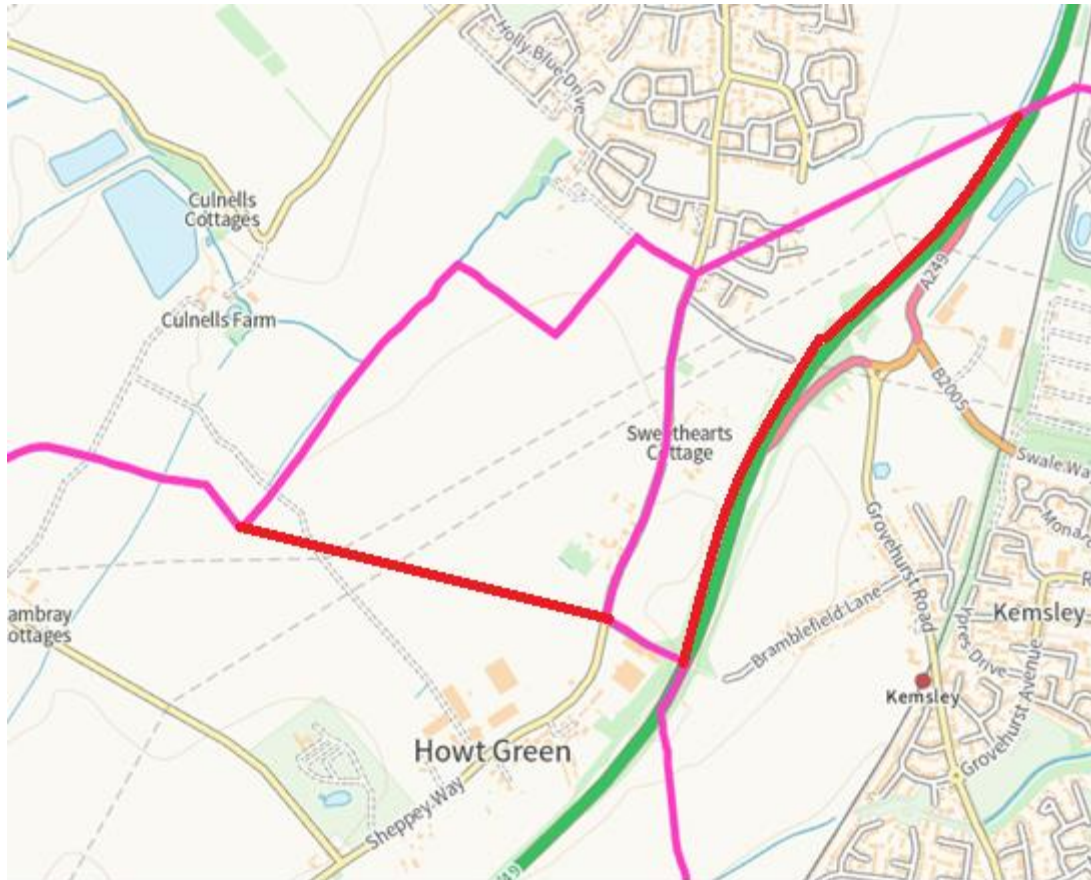




Extension of Watling Ward to include School Farm along Graveney Road following natural boundary lines (blue lines) encompassing land from Graveney with Goodnestone PC

Sittingbourne maps

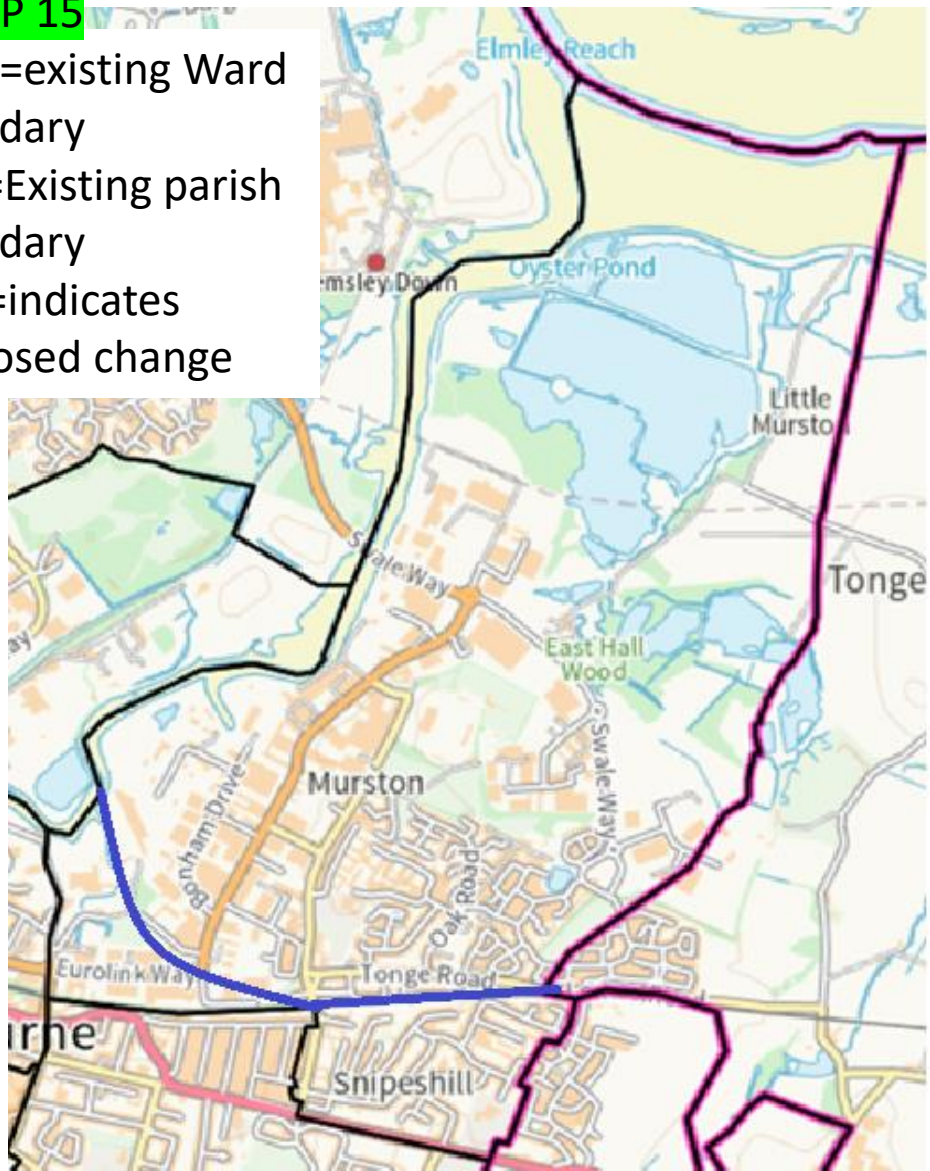
MAP 14



Iwade boundary change

MAP 15

Black=existing Ward
boundary
Pink=Existing parish
boundary
Blue=indicates
proposed change



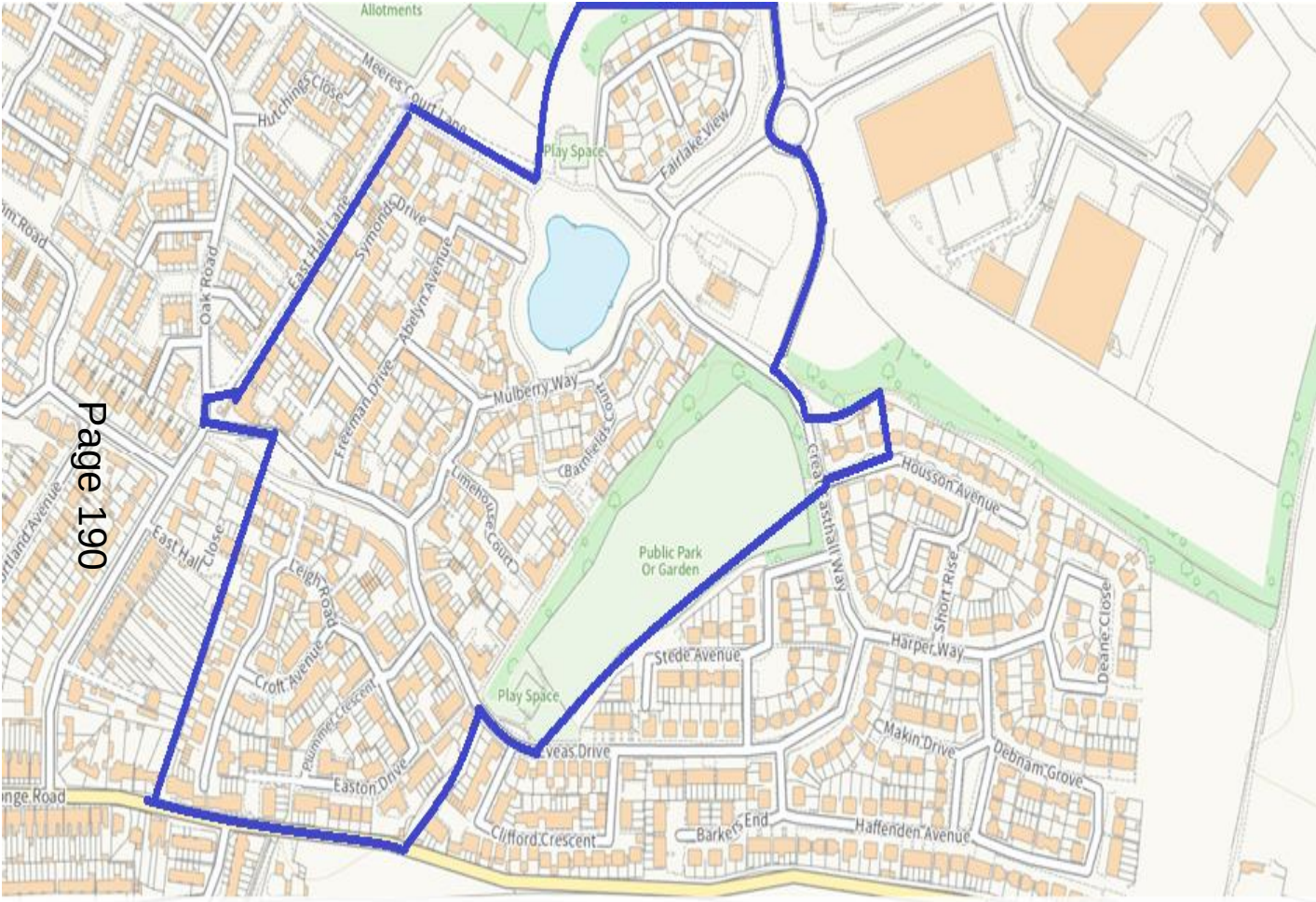
Murston



MAP 16



Great Easthall Parish Council boundary



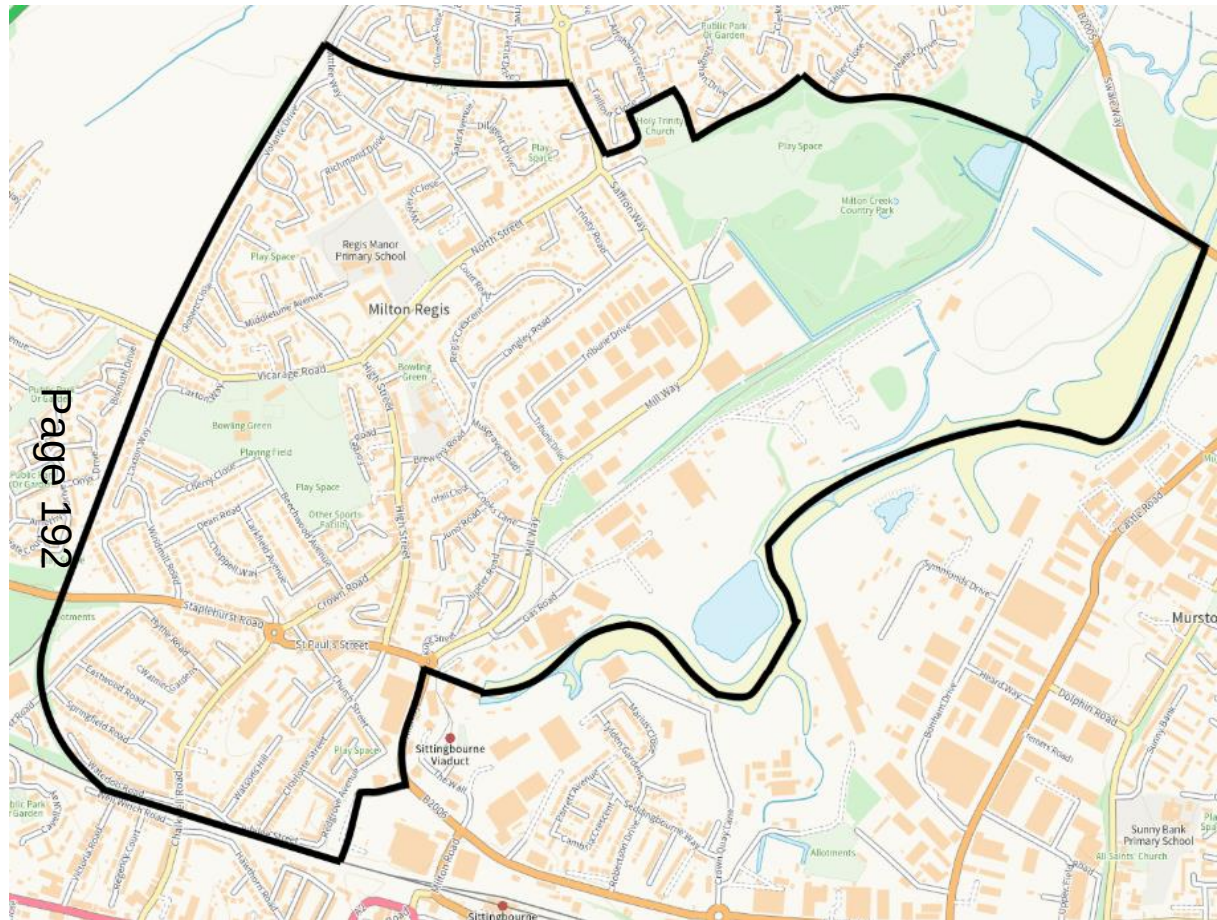
Great Easthall map
Area within the blue line
proposal to move within
Tonge PC boundary



A map of the study area. The town of Iwade is shown on the left. A blue line indicates the study site, which runs along the coast. The harbour is located to the right of the study site. The Clay Reach is shown on the far right. A green line labeled 'A2' is also visible.

A map of the Kemsley and Milton Regis area. A blue boundary outlines a large region. An orange square is located on Newman Drive, near the intersection with Attlee Way. Other labels include: Sweetheart's Cottage, Kemsley, Kemsley Down, Elmley Reach, Recreation Ground, Barge Way, Shoppey Way, Howt Green, Quinton Road, Milton Regis, Attlee Way, Newman Drive, Vale Way, Murston, East Ha Wood, and Swale. Roads B2005 and B2006 are also marked.

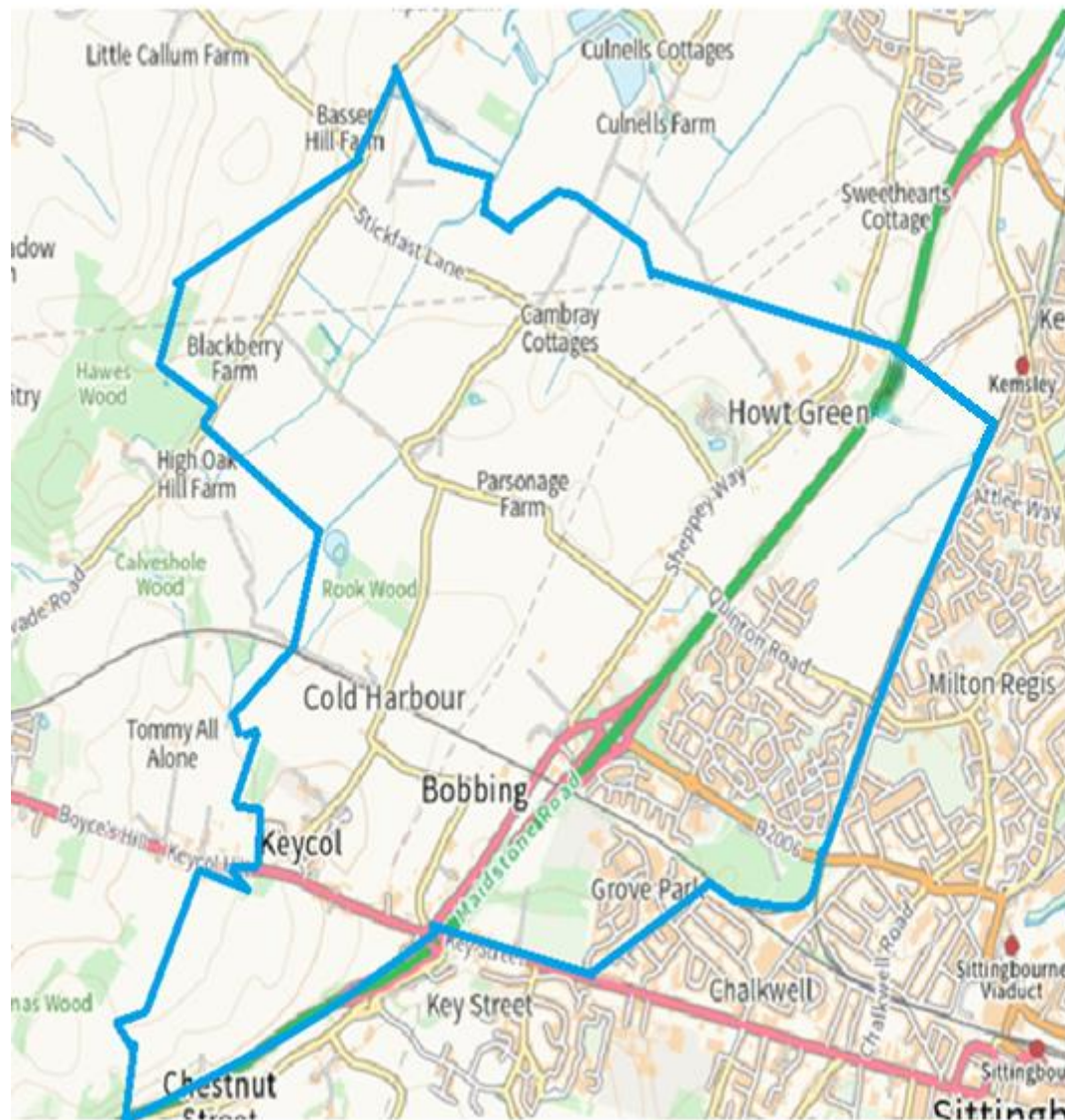
MAP 19



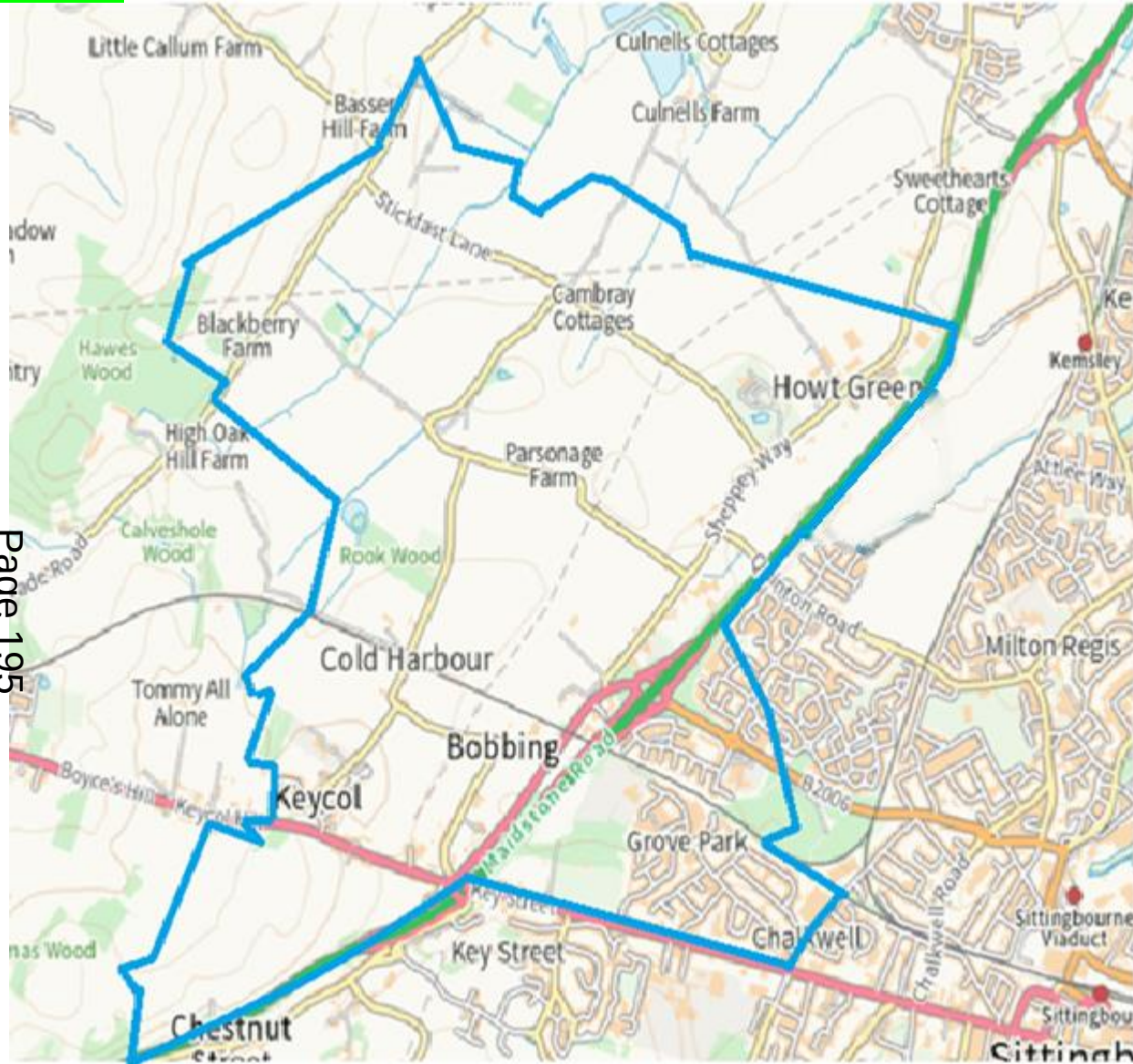
Proposed Milton Regis parish council boundary. The parish would encompass land South of the B2006 along to the roundabout on Mill Way and follow the creek on the existing ward boundary.



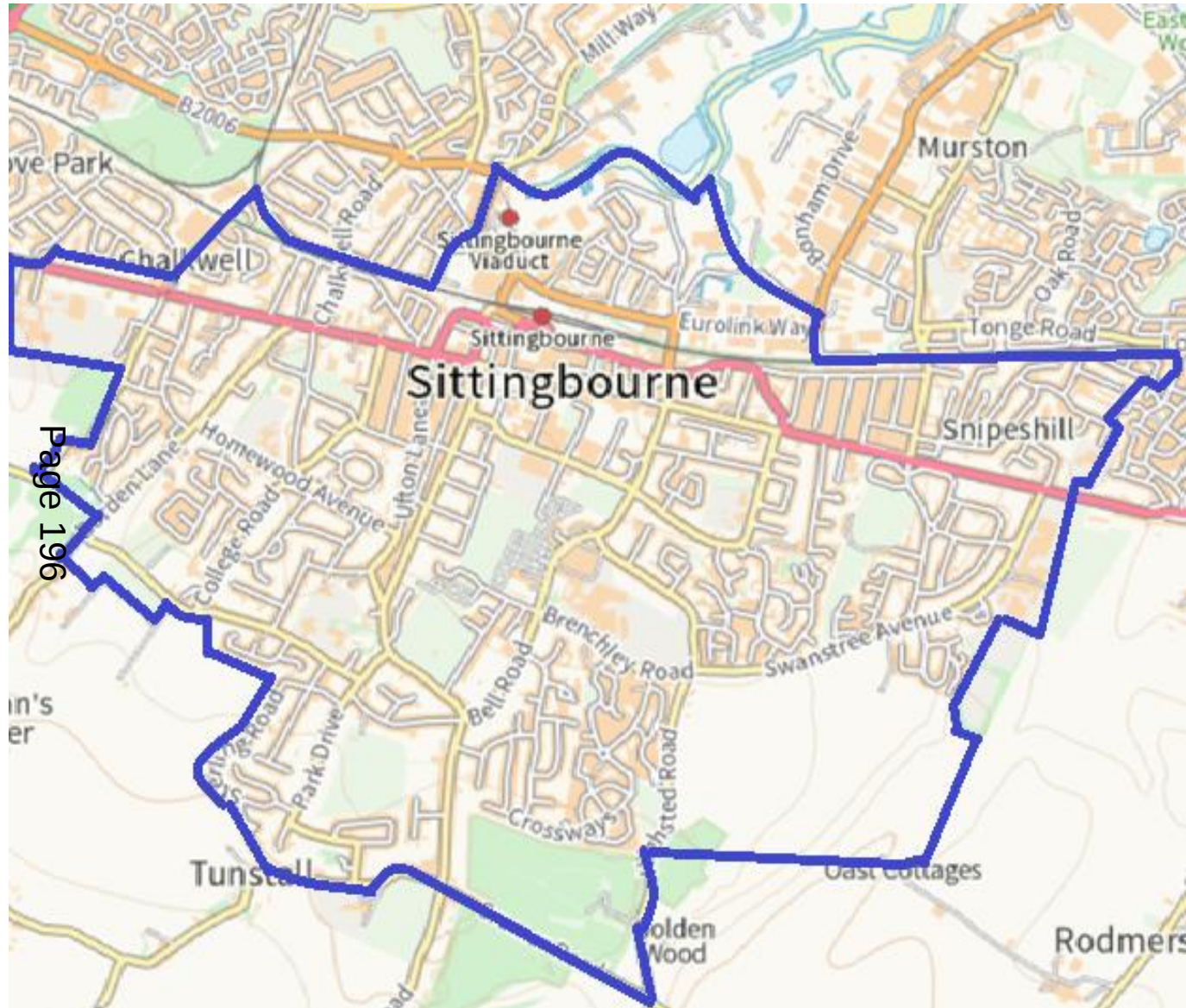
Proposed Meads Parish Council boundary



Proposed Bobbing Parish Council
boundary extending to encompass
The Meads

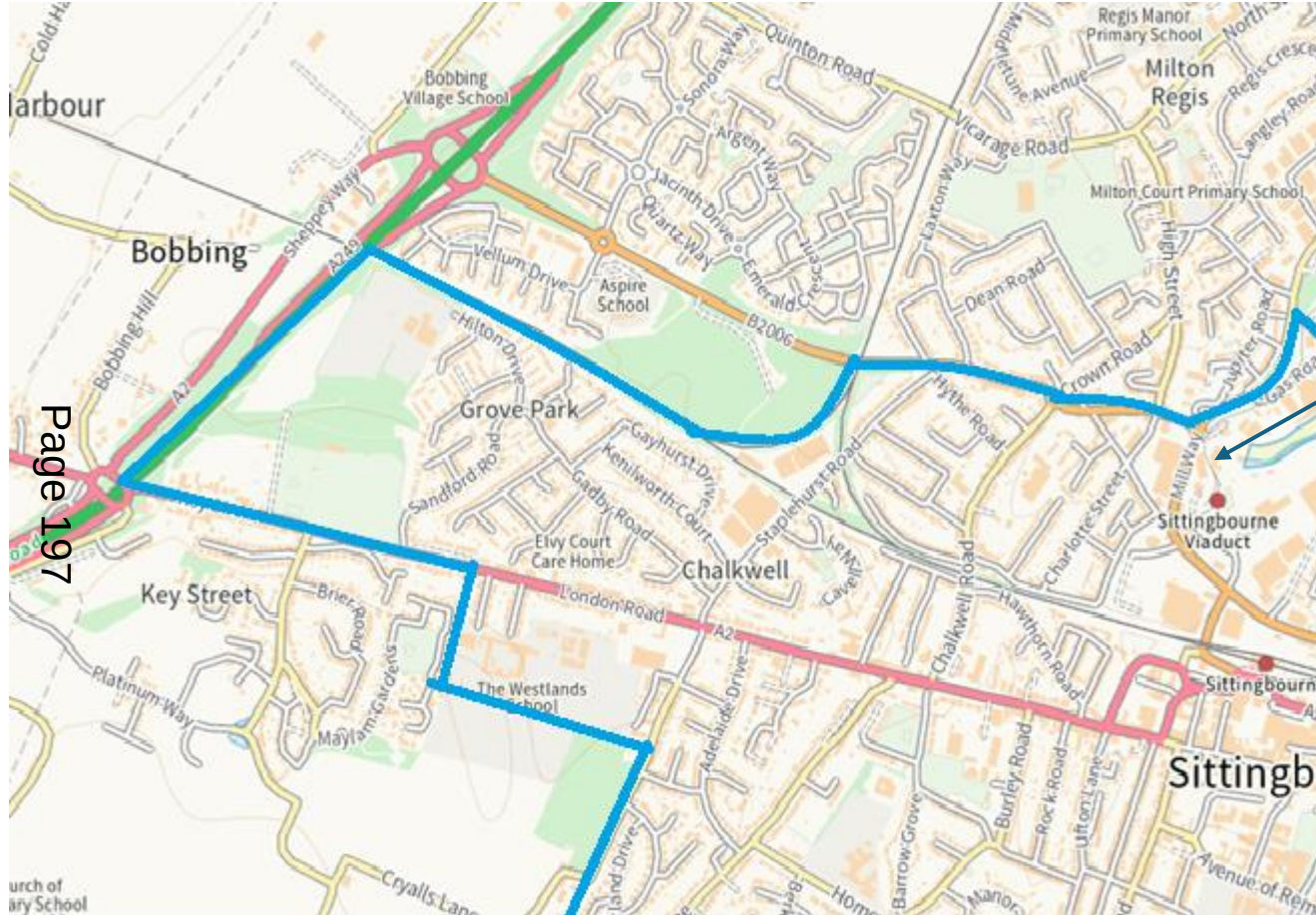


Proposed Bobbing Parish Council boundary extending to encompass Grove Park



Proposed Urban Sittingbourne Council boundary

MAP 24



Urban Sittingbourne Council including Grove Park



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Swale Borough Council

Terms of Reference

Community Governance Review 2025/2026

Version 2

The Terms of Reference have been amended since they were first published. Below is a summary of the amendments:

5. Areas under review

5.1 This section has been updated to include all the areas under review and provide further information on parish boundaries.

5.4 Provided details on all boundary changes under review at Stage 2

8. Indicative timetable

The timetable has been updated to extend 2nd Stage Consultation to 9-week period.

The remainder of the document is unchanged.

1. Introduction

1.1 A community governance review will be carried out by Swale Borough Council under the provisions of the Local Government and Public Involvement in Health Act 2007 ("the 2007 Act").

1.2 The review shall comply with the legislative requirements, have regard for the associated statutory guidance and will be conducted in accordance with these terms of reference.

2. What is a community governance review?

2.1 A community governance review provides the opportunity for Principal Councils (Swale Borough Council) to review and make changes to community governance within their areas, which reflect local identities and facilitate effective and convenient local government.

The Local Government and Public Involvement in Health Act 2007 sets out that a CGR can take place for the whole or part of the Borough and can consider one or more of the following:

- a. Creating, merging, altering or abolishing Parishes/Town Councils;
- b. The naming of Parishes and the style of new Parishes/Town Councils;
- c. The electoral arrangements for Parishes/Town Councils including: - the ordinary year of election; - the number of Councillors to be elected; and - the warding (if any) of the Parish/Town Councils;
- d. Grouping Parishes under a common Parish Council or degrouping Parishes.

2.2 The Council is required to ensure that community governance within the area under review will be:

- a. Reflective of the identities and interests of the community in that area; and

- b. Effective and convenient.

2.3 In doing so, the CGR is required to take into account:

- a) The impact of community governance arrangements on community cohesion; and
- b) The size, population and boundaries of a local community or Parish Council.

2.4 These requirements have been taken into account in defining the objectives and questions proposals will be assessed against.

3. What do Parish Councils do?

3.1 Parish Councils represent the most local form of government and can own land and assets, employ staff and provide services at a local level, this can include open space and recreation, cemeteries, grass cutting, street lighting etc. They can raise funds to meet the costs of administration and provision of services through setting a precept which forms part of council tax bills levied on council taxpayer's in the parish. Parish Councils can also provide a local voice for the community responding to consultations and raising concerns with the relevant organisations.

3.2 A Parish Council is made up of parish councillors elected by the local government electors in the parish with elections taking place every four years. Vacancies within the four-year term are filled by co-option or by election if 10 local government electors request it.

3.3 A Town Council, which is likely to be a relevant consideration in this review, has the same powers and role as a parish council, but in addition can opt to style its chairman as Mayor.

4. Who will undertake the review?

4.1 As the principal authority Swale Borough Council is responsible for undertaking any CGR within its electoral area. A politically balanced member steering group has been established and will be overseen by Policy and Resources Committee, supported by SBC officers from appropriate departments.

5. Areas under review

5.1 The review will consider the establishment of Town or Parish Councils for Sittingbourne in the following electoral wards Homewood, Roman, Murston, Kemsley, Milton Regis, Chalkwell, The Meads, Grove Park, Woodstock, with consideration of any existing local council arrangements in these areas. Boundaries for any newly established Councils will not always follow existing Ward boundaries, the parish will reflect local identity and connection to an area.

5.2 The review will also consider the establishment of Parish Council for Halfway in the electoral ward area Queenborough and Halfway or to merge Halfway with Queenborough Town Council.

5.3 The review will also consider name change for Warden Parish Council to Warden Bay Parish Council

5.4 The review will also consider boundary changes as approached by Parish Councils or residents including:

Iwade Parish Council-to amend the boundary to follow along the A249 and up into Iwade, land from Bobbing PC to Iwade PC.

Bobbing Parish Council-boundary changes dependant on establishing parish councils in Sittingbourne.

Sheerness Town Council- Lucas Close, to move boundary to include remaining properties in Lucas Close to within Queenborough Town Council. Change to STC boundary dependant on establishing a Halfway Parish Council or any other Governance arrangements.

Minster on Sea-boundary changes dependant on establishing a Halfway Parish Council or any other Governance arrangements.

Queenborough Town Council- boundary changes dependant on establishing a Halfway Parish Council or any other Governance arrangements.

Tonge Parish Council-extending Tonge PC boundary to include all of Great Easthall area.

Boughton under Blean and Selling Parish Council- to extend the boundary of Faversham Town Council's Watling Ward to cover land within these parishes.

Sheldwich Parish Council- to move land currently within Faversham Town Council boundary to be within Sheldwich PC.

Ospringle Parish Council-to extend Watling Ward to encompass whole of Perry Court (land currently owned by Faversham Town Council but outside of it's boundary)

Goodnestone with Graveney Parish Council- to extend Watling Ward to include School Farm on Graveney Road

5.5 It shall have particular regard for the need to secure that community governance within the area under review:

- reflects the identities and interests of the communities in that area; and
- is effective and convenient.

5.6 When carrying out the Community Governance Review, Swale Borough Council must also take into account other existing or potential community governance arrangements. A review does not mean there will be changes but will examine if there is a case for change.

5.7 Appendix A is a map of the borough including ward and parish boundaries for reference.

6. Assessment of proposals

6.1 Proposals will be assessed against the following objectives and questions: -

Objective 1

Support the Identities and Interests of Communities

- To recognise parishes as coming from the community, belonging to the community and requiring community support
- To listen and respond to the needs and concerns of communities
- To create fair boundaries that represent communities and avoid arbitrary differences between neighbours

Key Questions:

Does the community want a parish council and is it able to support one?

Does/would this parish represent a community or coherent communities?

Objective 2

Support Effective and Convenient Local Government

- To identify existing issues with parish boundaries and seek resolutions to them
- To minimise disruption to existing parishes through effective warding

Key Questions:

Is a parish council, or change to a parish boundary the most effective resolution to the community's needs?

Is this parish boundary practical and reasonable?

7. Consultation

7.1 The Council is required to consult the local government electors for the area under review and any other person or body who appears to have an interest in the Review and to take the representations that are received into account. The Council will also identify any other person who, or body that, it feels may have an interest in the Review and write to them inviting them to submit their views at all stages of the consultation.

7.2 Before making any recommendations or publishing final proposals, a full consultation process will form part of the Review to take full account of the views of local people and other stakeholders. The Council will comply with the statutory consultative requirements by:

- a) Consulting local government electors for the area under review;
- b) Consulting any other person or body (including a local authority) which appears to the Council to have an interest in the Review;
- c) Notifying and consulting Kent County Council; and
- d) Taking into account any representations received in connection with the Review.

7.3 The Council will publicise the Review by displaying a notice at the Council Offices and creating a dedicated page on the Council's website. The Council will also write to all potentially impacted Parish Councils or any other community or resident groups of which the Council is aware, Borough Councillors and the relevant County Councillors, and the MPs.

7.4 Information about each stage of the Review will be published on the Council's website. It will also be possible to view documents at: Swale Borough Council, Swale House, Sittingbourne, Kent ME10 3HT.

8. Indicative timetable

Event	Date
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Consideration of Terms of Reference by Policy and Resources Committee	5 th November
Approval of Terms of Reference by Council	10 th December
Terms of Reference published	17 th December
First consultation stage	18 th December-9th February 2026
Approval of draft recommendations by Policy and Resources Committee	11 th March
Approval of recommendations by full council	1 st April
Second consultation Stage-draft recommendations	7 th April-9 th June
Final recommendations considered by Policy and Resources Committee	July
Final recommendations approved by Council	July
If applicable Community Governance Orders made	September

9. Electorate Forecasts

9.1 When considering the electoral arrangements of the Parishes in the area the Council must consider any likely future changes in the number or distribution of electors within five years (2030 forecast).

9.2 The Review will use the latest electorate figures available at a parish level together with the estimated delivery of new dwellings within the five year period taken from the Council's most recent forecast.

10. Consequential Matters

10.1 When the required consultation has been undertaken, and the Review completed, the Council may make an Order to bring into effect any decision that it may make taking account of the role of the Local Government Boundary Commission for England. If the Council decides to take no action, then it will not be necessary to make an Order.

10.2 If an Order is made it may be necessary to cover certain consequential matters in that Order. These may include: a) The transfer and management or custody of any property; b) The setting of a precept (Council tax levy) for the new Parish Council; c) Provision with respect to the transfer of any functions, property, rights and d) Liabilities; e) Provision for the transfer of staff, compensation for loss of office, pensions and other staffing matters.

10.3 It may also be necessary as a consequence of this review, in cases where Ward boundaries need to change to match Parish boundaries, for the Council to submit a Requested Alteration(s) to the Local Government Boundary Commission for England in order to request a change. Further, where certain changes are required to parish wards it may be necessary to seek consent from the Local Government Boundary Commission for England.

10.4 The Council will also take into account the requirements of the Local Government Finance (New Parishes) Regulations 2008 when calculating the budget requirement of any new Parish Councils when setting the Council tax levy to be charged.

Following the review the Community Governance Review Steering Group shall make recommendations as to:

- whether or not to establish a new Town/Parish Council in the identified areas.
- The electoral arrangements of any new parish or town council – including the ordinary year of election, warding and number of councillors; the review shall invite and take account of submissions from all interested parties.

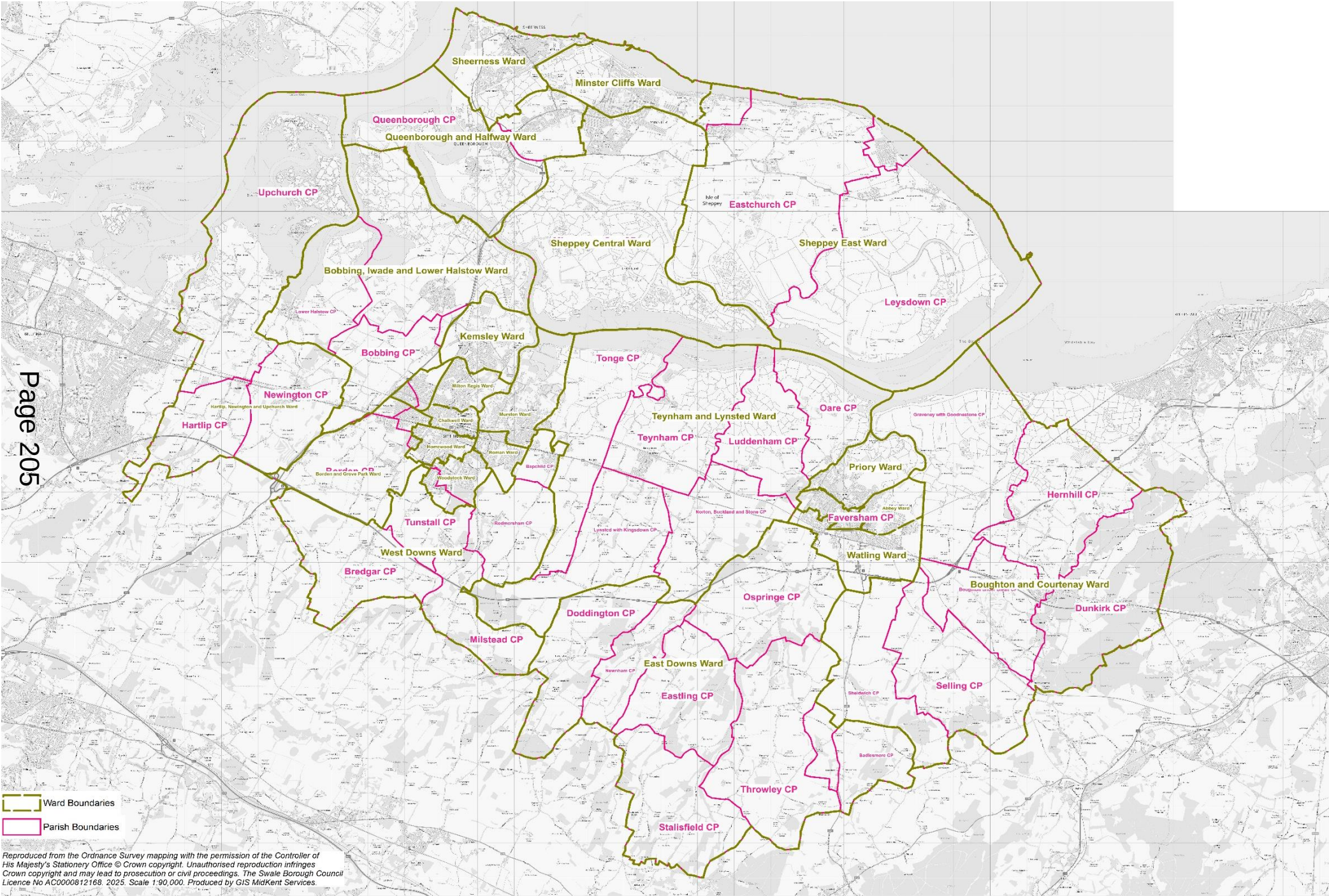
11. Representations

11.1 Swale Borough Council welcomes representations during the specified consultation stages as set out in the timetable from any person or body who may wish to comment or make proposals on any aspect of the matters included within the Review.

11.2 Representations may be made:

By post:

Swale Borough Council
Swale House
East Street
Sittingbourne
ME10 3HT



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Policy & Resources Committee Meeting	
Meeting Date	11 March 2026
Report Title	Corporate Plan 2023-2027 update report
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Philip Sutcliffe – Communications & Policy Manager
Lead Officer	Janet Dart – Policy & Engagement Officer
Classification	Open
Recommendation	1) Members of the Policy & Resources Committee are invited to note and discuss the Corporate Plan 2023-2027 update at Appendix I. 2) To agree that members and officers start work on a new Corporate Plan 2027-2028 in Autumn 2026 to provide continued clarity about the organisation's priorities and ensure coherent decision-making by members as well as help to inform the new unitary about what the local priorities are.

1 Purpose of Report and Executive Summary

- 1.1 The report at Appendix I provides an update on the progress of the objectives and actions in the Corporate Plan 2023-2027.
- 1.2 The update shows that good progress has been made on most of the actions. Out of 59 actions, 47 are rated as green, of those 9 are completed, 37 are ongoing or on track for completion and one the plan is completed and the delivery is ongoing. Twelve are rated as amber (changed and/or timeline revised, but on track for delivery), 0 are rated red (on hold, significantly behind schedule with a risk of non-delivery or not started). This shows that since an update report was presented in March 2025, 4 actions have moved from amber to green and 2 have moved from red to amber. One that was rated as red/amber has this year moved to amber.

2 Background, Context and Proposals

- 2.1 Following the May 2023 borough election, the administration developed a Corporate Plan which set out their vision and ambition for the borough for the period 2023-2027. The Corporate Plan was adopted by Council on 3 April 2024. This is a living document setting out the vision of the council and the strategic, corporate priorities.
- 2.2 It is good practice to review the Corporate Plan each year to monitor the progress on actions, noting which items are completed, on target for completion or are at risk on non-completion.

- 2.3 The Council's Corporate Plan establishes the political and managerial priorities on which the organisation will focus over a medium-term period. Without attempting to cover in any detail all of the objectives to be pursued by every department, it sets the tone for future resource allocation, establishing which activities and objectives are priorities.
- 2.4 In an era of constrained and diminishing resources, it is important to have a Plan that is linked to the Medium-Term Financial Plan (MTFP) which should inform the key decisions of the Council.
- 2.5 The Corporate Plan is also linked to the Annual Delivery Plan which is a 3-year service plan prioritising and setting the work programmes for each service. It also sets out statutory duties, areas for service improvement, key projects and procurements.
- 2.6 The plan is central to the strategic framework which links to departments' operational service plans and to individual officers' objectives. It establishes clear priorities while also providing a steer for all teams to link their work to the overall ambitions of the council.
- 2.7 Currently the timeline for Local Government Reorganisation, states that Vesting Day for the new Unitary Council is 1 April 2028, the current Corporate Plan covers the period 2023 to 2027. Until Vesting Day, Swale Borough Council services will continue to operate and it is important that a Corporate Plan is in place to ensure that the Council's resources continue to be allocated in a coherent, accountable and effective way. This will provide clarity about the organisation's priorities and ensure coherent decision-making by members as well as help to inform the new unitary about what the local priorities are. It is proposed that members and officers start work on developing a new Corporate Plan in Autumn 2026.

3 Recommendations

- 3.1 Members of the Policy & Resources Committee are invited to note and discuss the Corporate Plan 2023-2027 update at Appendix I.
- 3.2 To agree that members and officers start work on a new Corporate Plan 2027-2028 in Autumn 2026 to provide continued clarity about the organisation's priorities and ensure coherent decision-making by members as well as help to inform the new unitary about what the local priorities are.

4 Alternative Options Considered and Rejected

- 4.1 For recommendation 1, as this is largely a report for information, there are no alternative options proposed.
- 4.2 For recommendation 2, the alternative is not to start work on a new Corporate Plan for the period 2027-2028. This is not recommended as there is a legal requirement for councils to have a definite policy framework, but there is no

specific requirement for a corporate plan. However, the absence of a plan is likely to result in a lack of clarity about the organisation's priorities and less coherent decision-making by members.

5 Consultation Undertaken or Proposed

- 5.1 The Senior Management Team were consulted to obtain updates on each of the actions in the Corporate Plan 2023-2027.

6 Implications

Issue	Implications
Corporate Plan	The Corporate Plan 2023-2027 was adopted by Council on 3 April 2024. It is good practice to review the Corporate Plan each year to monitor the progress on actions, noting which items are completed, on target for completion or are at risk on non-completion.
Financial, Resource and Property	By carrying out an annual update of the Corporate Plan, any financial implications arising from identified delivery problems can be addressed at an early stage. The Corporate Plan complements the MTFP, in that it sets out in broad terms what the council aims to achieve given the resources established by the MTFP. It is anticipated that the activities required by the plan will generally be funded within the resourcing framework established in the MTFP.
Legal, Statutory and Procurement	The legal status of the Corporate Plan as a component of the statutory policy framework originates from the Local Government Act 2000 and regulations subsequently made under it. No specific procurement implications have been identified at this stage.
Crime and Disorder	The Plan at Appendix II includes some specific points of relevance to crime and disorder, particularly under priority 1 – Community.
Environment and Climate/Ecological Emergency	The Plan at Appendix II includes some specific points of relevance to the environment and to the climate and ecological emergencies, particularly under priority 3 - Environment.
Health and Wellbeing	The Plan at Appendix II includes some specific points of relevance to health and wellbeing, particularly under priority 4 – Health & Housing.
Safeguarding of Children, Young People and Vulnerable Adults	The Plan at Appendix II includes some specific points of relevance to safeguarding of children, young people and vulnerable adults, particularly under priority 1 – Community and priority 4 – Health & Housing.
Risk Management and Health and Safety	No specific implications have been identified at this stage.

Equality and Diversity	The Public Sector Equality Duty requires decision-makers to have due regard to the need to eliminate unlawful discrimination and advance equality of opportunity right throughout the decision-making process. An equality impact assessment was carried out when the Corporate Plan was developed. The Corporate Plan is in general at too high a level of abstraction for the aims of the Equality Duty to be relevant in any concrete way, although they are likely to be much more relevant to many of the pieces of work which will flow from it, which will all need to be subject to individual impact assessments. The impact of the Plan itself on the aims of the Equality Duty, without reference to these more detailed pieces of work, is considered to be low, and nothing requiring the mitigation of adverse impacts has been identified. It is believed that the Plan involves no unlawful discrimination.
Privacy and Data Protection	No specific implications have been identified at this stage.
Local Government Reorganisation	No specific implications have been identified at this stage as the current Corporate Plan covers the period 2023 to 2027. However, there may be actions that need to be carried out as part of the preparation for Local Government Reorganisation.

7 Appendices

- 7.1 The following documents are to be published with this report and form part of the report:

Appendix I – Corporate Plan 2023-2027 update report

Appendix II – [Corporate Plan 2023-2027](#)

8 Background Papers

None.

Corporate Plan update on actions – March 2026

RAG rating definitions:

Action on hold, significantly behind schedule with a risk of non-delivery or not started, or does not have funding.
Action changed and/or timeline revised, but on track for delivery. Further or additional funding may be needed which could cause some delay in delivery.
Action on track or completed.

Priority 1: Community - To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience.

Priority number	Corporate Plan actions	Actions update	RAG rating
1.1	Provide the evidence base for the Local Plan to ensure our built and outdoor sport and health facilities meet the demands of the current and future populations.	Built Facilities Strategy has been commissioned, developed and approved by the Community and Leisure Committee and Sport England. It is now being used by planners to justify developer contributions. The Playing Pitch Strategy is now completed and signed off by Sport England and Housing, Health and Community Committee. Focus is now on delivery of both strategies. Project complete.	Complete
1.2	Review the Leisure centre service in order to deliver a range of options for residents to improve their health and wellbeing.	Tender specification and documents completed. PSQ stage held which shortlisted companies interested in taking part in the tender. Four companies are now progressing through the tender and have submitted initial bids. A round of dialogue and negotiation is currently underway and will be followed by a final tender submission round between March and May 2026.	On track
1.3	Inspect and maintain the playgrounds across the borough and seek external contributions to enhance them wherever possible.	Playground development programme approved by Community and Leisure Committee. 2024/25 and	On track

		2025/26 playground improvements currently out to tender. Review of all playgrounds completed and report recently taken to Housing, Health and Community Committee. Outcome will be progressed depending on Member recommendations. Daily, quarterly and annual inspections continue as day-to-day business. Further work being undertaken on procuring improvements to play areas benefitting from Section 106 funding.	
1.4	Complete the Parking Policy review and implement the principles to ensure traffic flow across the borough.	Project completed. Policy approved by Members and uploaded to website. Principles being used for ongoing decisions. Civil Enforcement Contract and Cashless Parking option contract approved for extension.	Complete
1.5	Work in partnership with the local towns and parishes and voluntary sector on our community assets – e.g. playgrounds, sports pitches and pavilions, community halls.	Corporate process for asset transfers has been reviewed. Disposal and Asset Transfer policies now approved by committee. Expression of interest form created for town and parishes to complete and updated them via Parish Liaison Forum. More recently a new Voluntary and Community Sector Lettings Policy has been consulted upon. Have been working with interested community groups such as New Road Football Club around future asset transfers. Activity in the second half of 2025/26 has focused on potential interest from Parish and Town Councils in greenspaces, community assets and public toilets, with Committee approval supporting a	On track

		number of potential transfers. Negotiations continue in respect of these and other possible transfers. Committed funding from developer contributions to a project to install a new artificial playing pitch in Faversham supporting local school and community sports club.	
1.6	To support local groups and organisations in Swale through the delivery of the member grants programme and review the funding mechanism of a community lottery scheme.	Members grant scheme operated and closes at end of February. Swale Community Lottery successfully launched in March 2025. Work continues to raise the profile and promote the scheme across the borough.	Ongoing
1.7	Enable and empower the existing voluntary and community sector in Swale to develop, strengthen, grow, and improve sustainability for the future.	Extension of the original project continued throughout 2025 to continue to strengthening collaboration, provide guidance and resources, and enhance representation across Swales voluntary sector. The project will close at the end of March 2026 whereby Swale CVS will continue its work through their own programmes. A refreshed Voluntary and Community Sector Lettings Policy was agreed by Economy and Property Committee in January 2026, following public consultation. UK Shared Prosperity Funding has continued to be used to support the sector, including capacity grants	On track

		to SVA and CVS and over £120,000 of Community Infrastructure Grants.	
1.8	To consult with our residents on ways of devolving power and giving communities a greater say in what happens in their locale potentially through the establishment of new Parish, Town and Community Councils if there is community support to do it.	A Community Governance review commenced on 17 December 2025. There are a number of areas of the borough included within the review including, consulting residents on the establishment of a town or parish council for the currently unparished areas of the borough; and some amendments to existing.	On track
1.9	To ensure active and effective engagement mechanisms are in place so that all residents and communities have the opportunity to engage with the Council.	The Communications Strategy 2024-2027 was developed with members and adopted at Policy & Resources Committee on 16 October 2024. This document sets out the priorities and mechanisms for communicating and engaging with residents. In September 2025 at the Policy & Resources Committee, Members agreed the Public Consultation Policy Statement along with a public guidance document and member guide along with a toolkit for officers. Area Committees continue to take place and are proven to be an important engagement mechanism.	On track
1.10	To support the voluntary and community sector to co-ordinate an effective response to the cost-of-living crisis, including effective distribution of the Household Support Fund.	Cost of Living partnership group continues to meet and deliver a co-ordinated response for residents. The Household Support Fund has delivered direct support through VCSE organisations and will cease in its current format at the end of March to become the new Crisis and Resilience Fund.	On track
1.11	To work as part of the Community Safety Partnership to delivery priorities to address domestic abuse, crime, and disorder, ASB and support vulnerable people.	The Community Safety Partnership has delivered against the priorities set out in the 2024/25 2025/26 CSP plan. The strategic assessment is being prepared to review priorities for next year's plan.	Complete

		Delivery of a range of initiatives and use of the PCC grant have been achieved.	
1.12	To deliver the Safer Streets Programme in Sittingbourne and Sheerness town centres.	The Safer Streets programme has been delivered with successful outcomes in Sittingbourne and Sheerness Town Centres. This has included a wide range of initiatives including increased CCTV, Street Marshalls, Youth Provision, By-stander training and environmental works.	Complete
1.13	To deliver an effective public space CCTV service and town centre radio scheme, and to grow wider service delivery by the control centre.	The control centre continues to operate a high-quality service and has seen expansion through external contract with other councils. The town centre radio scheme continues to operate. Project is in place to extend the physical footprint of the control room in order to take on more external contracts.	On track
1.14	To engage with schools to inform young people about democracy and the work of the council.	Delivered an event in Democracy Week with a number of secondary schools, the Mayor, members and officers in November 2025.	Complete

Priority 2: Economy - Working with our businesses and community organisations to work towards a sustainable economy which delivers for local people

Priority number	Corporate Plan actions	Actions update	RAG rating
2.1	Use the Levelling-Up Fund as a catalyst for further regeneration on the Isle of Sheppey.	The new Makers Studios at Masters House were formally opened in January 2026. Sheppey College welcomed its first new student cohort to the building's extension that month. The Adventure Golf course was opened at Beachfields in July 2025 and has proved very popular. Internal works to extend and reconfigure the Healthy Living Centre progress. LUF investment has been supported by UKSPF funding, including capital works at the Neptune Terrace Building which has been successfully let. £20m Pride in Place funding was announced for Sheppey East in September 2025. Economy and Property Committee agreed in January 2025 not to dispose of the Old Library in Trinity Road, pending an exploration of external investment opportunities.	On track
2.2	Use the Sittingbourne Supplementary Planning Document as a model framework to support town centre regeneration.	Outside of the Levelling Up Fund, town centre regeneration has been delivered principally via UKSPF, through both revenue grants and capital works. This has included, for example, a commitment to refurbishing the Central Avenue toilets in Sittingbourne . The Pride in Place Impact Fund has awarded £1.5m across the borough for	On track

		2025/26 and 2026/27 and the Prosperity Funds Member Working Group has proposed a town centre focus for a significant part of this budget.	
2.3	Implement the Property Asset Strategy to support best use of our assets and look to increase our income.	A number of disposals and transfers have been considered by Economy and Property Committee in the last year including: • Land rear of Queenborough Guildhall • 34 High Street, Sittingbourne • Barton's Point Coastal Park • Oare Gunpowder Works Country Park • Sheerness Allotments (Medway Road and Richmond Street / Nursery Close) • Thistle Hill Community Centre and Playing Field Work continues to enact the Committee resolutions, and a pipeline of requested asset transfers to Parish and Town Councils is being progressed New lettings and rent reviews mean that there is projected growth in income generated from property assets.	On track
2.4	Deliver economic development through the UK Shared Prosperity Fund (UKSPF) and the Rural England Prosperity Fund (REPF) (currently programmed to March 2025).	Both programmes are on track to achieve full spend by the nationally extended deadline 30 September 2026. It is now known that this will be the last year of UKSPF funding. Funding allocations have been made to the Borough through the Pride in Place programme and Pride in Place Impact Fund,	On track

		Sample highlights of the current programme have included: • Investment in open spaces and in the Boroughs leisure facilities • Grant scheme to support Community Infrastructure • Grants to support local CVS organisations and community projects, recruiting and training volunteers and tackling loneliness • Grant to support work with young people not in education, employment or training. •	
2.5	Develop an Economic Development Strategy, building on the successes of the Economic Improvement Plan.	Work on the Economic Development Strategy has been paused pending an understanding of the input of national and regional government in delivering economic development, and in particular the future funding landscape (eg the introduction of central government funded schemes / devolved funding / the future of regional economic partnerships such as KMEP, Brand Kent, etc). The UKSPF, REPF and latterly the PIP and PIPIF funding guidance / indicators have provided suitable frameworks for interim investment.	On hold
2.6	Progress a Local Plan with local needs and capacity at its heart.	There has been significant work undertaken in 2025/26 to develop Swale's next Local Plan culminating in the launch of the Reg 18 consultation in January 2026, and the selection of a growth option and non-strategic site allocations by the Planning and Transportation Policy Working Group, also in January (to be recommended to Policy and Resources Committee in March).	On track

		Supportive work has included the adoption of: • A revised Local Development Scheme • A Protocol for Urgent Designation to the Local Heritage List • The refreshed Statement of Community Involvement. • Kent and Medway Local Nature Recovery Strategy. Evidence base work has been completed throughout the year, including the Whole Plan Viability Assessment and Important Countryside Gaps Review.	
2.7	Support skills development through advocacy and partnership working.	The Sheppey College extension – funded via Levelling Up Fund investment to provide junior, further and adult education across a range of subject – welcomed its first students in January 2026. We have used UKSPF to continue to support those Not in Employment, Education or Training (NEETs). We continue to provide space for providers in Swale House, where appropriate and sought to work with others looking for delivery space in the Borough. Separately, we have responded to KCC's Schools Commissioning Plan and lobbied regarding the changing needs of the Borough and the issue of local provision for local students.	On track

2.8	Develop the borough's second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets.	Swale's second Local Heritage List has been developed during the course of 2025, and a Protocol for Urgent Listing was approved by Policy and Resources Committee in June. Conservation Area reviews have been progressed for Graveney Church, Graveney Bridge, Goodnestone Graveney, Bexon, Newington Church, Newington High Street and Newington Manor. These are scheduled at Policy and Resources Committee across February and March 2026. Commencing consultation on the boundaries of an Area of Special Advertisement Control is being recommended to Policy and Resources Committee in February, following consideration by Planning and Transportation Policy Working Group.	On track
2.9	Support modal shift and partnership-based solutions to key issues countering sustainability and congestion.	We continue to advocate for modal shift investment and prioritisation for rail freight, including in consultation responses. We continue to work with Network Rail to promote investment opportunities for rail freight and for opportunities to combat congestion in central Sittingbourne	On track

Priority 3: Environment - To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead

Priority number	Corporate Plan actions	Actions update	RAG rating
3.1	Refresh the Climate and Ecological Emergency Action Plan and continue to be a leader in our work towards net zero.	Carbon footprint of the Council has been re-calculated. Steady progress being made against our emissions. New action plan approved in March 2025. Work underway on new actions. First annual report of the new plan taken through committee in January 2026. Member and officer steering group still well attended and monitoring progress.	Plan - complete Delivery - ongoing
3.2	Look at the feasibility of solar and renewable energy solutions for our estate, including council car parks.	A 294-panel solar array is to be installed on the roof of Swale House in Spring 2026, which will generate approximately 117,128 kWh, and offsetting 50% of the total electricity currently consumed by Swale House annually Work has been conducted to look at other suitable sites including leisure centres. The pay back period for Council car parks is considerably longer due to the need for steel framework to create the canopies. Opportunities still being monitored to see if the position changes.	On-track
3.3	Create an air quality policy that formalises what we can do to improve air quality for the benefit of our residents.	The Air Quality policy is now complete with updates made in 2024. Changes will be included in the Regulation 18 local plan consultation reflecting the recent updates to NPPF.	On-track

3.4	Form partnerships with key stakeholders to ensure we champion active travel opportunities.	Active Travel co-ordinator has had a successful year, attracting external funding to design/develop new schemes. Swale's Local Cycling and Walking Infrastructure Plan has been created and a successful public consultation has been completed. The Plan is due back at committee in March for adoption. Planning process encourages new active travel opportunities through the design and application process of new developments.	On-track
3.5	Review the grounds maintenance service to ensure we maximise biodiversity gains, particularly with grass cutting, whilst continuing to provide places for residents to enjoy their leisure time.	The Grounds maintenance contract has been reviewed and an extension to the contract was granted by Members, allowing the Council to adapt grass cutting regimes and apply savings to the annual contract cost. Officers are continuing to survey each of the sites across the Borough in order to review if maintenance regimes can be improved. Our country parks continue to develop and improve.	Complete
3.6	Ensure key policy documents such as the Local Plan and Open Spaces Strategy lever in improvements in the quantity and quality of open space to meet the needs of a growing population.	The existing Open Spaces and Play Strategy is used by planners to lever in developer contributions for existing open spaces or generating new ones. The strategy was placed on hold subject to the outcome of the Highsted planning enquiry. The initial stage of work has been completed and will be reconvened following publishing of the outcome. The completion of the Playing Pitch strategy mentioned above is already assisting us in pulling in developer contributions and recommendations	Delayed

		have been made as part of the Local Plan development to strengthen policy positions in these areas. The Council is working with Kent Wildlife Trust to create a pilot habitat bank at Queensdown Warren Nature Reserve, helping to restore the landscape, provide long term protection, and satisfy Biodiversity Net Gain (BNG) requirements where on-site offsetting is not feasible.	
3.7	Work with our partners and contractor to successfully deliver the new waste collection contract and undertake initiatives to deliver improved recycling participation.	The collection service has settled and now is delivering consistent service. The Council has trialled a number of new campaigns and projects on increasing food waste collection and can share that the food waste tonnages collected have increased by 30%, removing more food waste from recycling and refuse and therefore positively impacting our recycling rates.	On track
3.8	Promote the circular economy by raising awareness of how the materials residents put in their bins can be used for the benefit of the environment.	Residents to be informed of the government legislation changes and what this means for collections. A range of communications campaigns have been delivered across the year. Our resident e-newsletter has seen an increase in sign-ups with regular messaging going out about recycling and waste minimisation.	On track
3.9	Build on the benefits of an improved street cleansing service and work with residents to	The indicator remains Amber with the project still on-going to make the street cleansing service more	On track

	ensure they can take pride in their local community.	efficient. All litter bins have now been audited with a new asset inventory created and a programme of old bin replacements underway. QR codes have been created for ease of reporting by residents are being rolled out across the Borough in Q1 of 2026. We continue to trial new innovations with a new project looking at litter bin 'fill rates' to allow smarter scheduling.	
3.10	Make best use of our resources alongside other enforcement agencies to investigate the most disruptive environmental crimes across the borough, in order to deliver the best environmental outcomes for residents.	The team has had another successful year, running 10 multi-agency Operations to target waste criminals. We remain partners on a number of high-profile waste crime investigations. Fly-tipping cases have reduced by 10% from last year, with continued effort on targeting those that commit offences resulting in 37 formal/informal resolutions.	On track
3.11	Lobby for the best possible standards in marine and coastal environments, protecting our habitats and reducing the impacts of pollution.	Regular engagement with Southern Water and the Environment Agency. We pay close attention to monitoring of sea pollution and continue to push for improvements. Water quality has enabled the Council to apply for Blue Flags and Quality Seaside awards. 2026 water quality results were positive again with the ability to apply for Blue flags at two of our three beach resorts.	On track

Priority 4: Health & Housing - To aspire to be a borough where everyone has access to a decent home and improved health and wellbeing

Priority number	Corporate Plan actions	Actions update	RAG rating
4.1	Work with Breaking Barriers Innovation playbook programme, to develop a long-term programme to tackle health inequalities on the Isle of Sheppey.	Intervention designed for Sheppey work readiness pilot programme – awaiting agreement to proceed with funding from Kent Marmot Coastal Programme – Accelerator programme	Delayed
4.2	Actively play our role in the Health and Care Partnership to address health inequalities in the borough.	SBC has continued active engagement in the Swale Health and Care Partnership and working on a range of initiative and delivery strands.	On track
4.3	Ensure we address health inequalities in all our policies ensuring a blueprint for a healthy borough.	Health implications are considered as part of the decision-making process of all policies.	On track
4.4	Deliver the Housing, Homelessness and Rough Sleeping Strategy 2023 -2027, to meet and build on our statutory obligations to tackle homelessness and improve the standards of homes.	Good progress has been made against the delivery priorities of the Housing, Homelessness and Rough Sleeping Strategy 2023-27. Annual report is provided to Housing and Health Committee. Strategy will be revised in-line with new Government Strategy.	On track
4.5	Purchase accommodation to use as temporary accommodation to enable us to control costs and provide improved quality and more local provision.	Temporary Accommodation purchase programme Phase 1 has been completed. Evaluation of programme is being completed.	On track
4.6	Prepare for the introduction of the Renters Reform Bill 2023 and ensure we implement the requirements when it receives royal ascent.	The Renters Rights Act has now been enacted. Project team and implementation plan created. New Burdens funding received for 25/26. Team training has begun and 2 Apprentices recruited.	On track
4.7	Work in partnership to maximise the number and range of affordable homes in the borough.	Work continues with registered providers to engage them in providing land led and S.106 schemes in Swale. Despite excellent delivery over the past few years, there are challenges to viability and capacity	Ongoing

		and despite a strong s.106 pipeline RPs are not able to make the schemes work. Work is on-going to develop the Council's own scheme on Cockleshell Walk. Build contract procurement has taken place and funding bids submitted.	
4.8	Ensure we meet our safeguarding obligations to keep children and vulnerable adults safe.	Safeguarding processes well established in the Council. External audit assurance have taken place with both the adult and children's boards with good level of assurances.	Complete
4.9	Achieve Domestic Abuse Housing Accreditation, demonstrating our commitment to identifying abuse, preventing it and provide help to those affected.	We have been awarded Gold for the DAHA assessment – the first Council in Kent to have achieved this status.	Complete

Priority 5 - Running the Council - Working within our resources to proactively engage with communities and outside bodies to deliver in a transparent and efficient way

Priority	Theme	Corporate Plan actions	Actions update	RAG rating
5.1	Finance	Maintain fiscally sound and stable position.	Budget for 2026/27 was passed at full council on 18 February 2026. The fair funding review has delivered a neutral position for 2026/27 however reductions in homelessness and RSG from 2027/28 means that a savings plan is required to avoid unsustainable reliance on reserves.	At risk
		Maximising opportunities for external funding and income streams.	Teams are working to maximise grant opportunities and fees and charges set to maximise our income streams.	Ongoing
		Work towards maximising the rates of income on all commercial council properties.	The property team are reviewing where possible and issuing leases to optimise the council's position. New lettings and rent reviews over the past year have resulted in projected growth in income from commercial property assets, subject to retaining existing tenants.	Ongoing
		Maximising opportunities for external grant funding to deliver the Council's corporate objectives.	Grant funding is sought to deliver council schemes and maximised to support services where the criteria allows.	Ongoing
		Managing finances and having a sound culture of performance management robustly to ensure Value for Money.	Internal and external audit opinions have reported that we continue to deliver a sound culture of financial and performance management have a strong governance	Ongoing

			position and are delivering value for money services.	
		Ensuring value for money is embedded in culture, service quality and social values.	Internal and external audit opinions have reported that we continue to deliver a sound culture of financial and performance management have a strong governance position and are delivering value for money services.	Ongoing
		Investing in projects which deliver financial returns and/or contribute to our wider objectives around Net Zero.	Projects are assessed on their financial viability, member decisions and where possible we aim to contribute to the council's net zero objective.	Ongoing
5.2	Resources/ staff	Seek to make best use of assets and staff resources.	Ongoing process of review and assessment of staff and assets required to deliver our services. Workforce strategy approved by Policy & Resources Committee on 5 February 2025.	Ongoing
5.3	Partnership working	Effective partnership working. Reviewing contract and partnership arrangements to ensure the most appropriate and efficient means of delivering services to our diverse communities and customers.	Service contracts and delivery methods under constant review when procurement dictates or changes arise to allow a seek alternative approaches to efficient service arrangements.	Ongoing
5.4	Customer Services	Reviewing our customer service options to enable better outcomes for customers.	Customer Experience Strategy has been adopted. Delivery plan created.	On track
5.5	Equality, Diversity and Inclusion	Ensuring inclusivity and equality for all residents.	The Corporate Equality Strategy 2024-2028 was developed with Members and adopted at Policy & Resources Committee in July 2024.	Ongoing

		Actively promoting fairness, equality and diversity.	The equality objectives progress will be reported to Committee in 2026.	
5.6	Communication with residents	Improving communication with residents via all channels.	The Communications Strategy 2024-2027 was developed with members and adopted at Policy & Resources Committee on 16 October 2024. This document sets out the priorities and mechanisms for communicating and engaging with residents. There is continued growth in engagement and reach of council owned channels.	Complete
5.7	Services/ performance management	Provide services that meet the needs of residents. A sound culture of performance management.	Regular performance monitoring is reported to members with a review of indicators completed in line with the adoption of the new Corporate Plan.	Ongoing
5.8	Staff values, development and well-being	Create a culture that empowers and fosters an ambitious and motivated workforce. Welcoming fair and appropriate challenge. Instilling the values of integrity, dignity, respect and pride. Embedding well-being policy. Supporting and training for effective workforce development.	Wellbeing events and information are shared regularly with staff across the council. There is also a wellbeing week delivered annually promoting a number of health initiatives to improve staff wellbeing. A shared set of Values for Members and Officers was agreed in 2025. These were launched to Officers at the All Staff event in September. A series of Team Talks follow to embed the values and subsequent competency framework. Training plan is organised and delivered annually based on skill requirements from the	Ongoing

		Work collaboratively to alleviate difficulties with recruitment and retention.	organisation and development needs from staff. Managers and HR work together on recruitment and this can include advice from external recruitment agencies to address hard to fill roles.	
5.9	Members training, values and codes of conduct	Appropriate training and support to be provided to our councillors. Welcoming fair and appropriate challenge. Instilling the values of integrity, dignity, respect and pride. Working together to ensure that staff and elected members codes of conduct are met and adhered to.	The Member Development Working Group established a comprehensive training programme for the 2025/26 civic year, ensuring all Members have access to a wide range of training and briefing opportunities. Sessions have been delivered both in person and remotely to support flexible participation, and all training has been recorded so Members may revisit content or view sessions at a time that suits their schedules. This approach ensures that every Member has had the opportunity to fully engage with the programme and maintain their ongoing professional development. A shared set of values was agreed in 2025, launched to Officers in September at the All Staff event. The member/officer protocol has now been adopted by Council and following a process of minor amendment has been communicated to all members and staff.	Ongoing

5.10	Governance	Ensuring core governance around corporate and financial planning, workforce planning, managing assets and sound and ethical procurement. Maintaining effective governance that allows sound decision making.	Robust policies and procedures in place to support our financial management, procurement and governance position – evidenced by sound internal and external audit opinions. Any proposed changes to the Constitution go through the Constitution Working Group.	Ongoing
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Policy and Resources Committee Meeting	
Meeting Date	11 th March 2026
Report Title	Graveney & Goodneston Conservation Areas review
EMT Lead	Emma Wiggins - Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Jhilmil Kishore - Principal Heritage Officer
Classification	Open
Recommendations	1. To note the Character Appraisal and Management Strategy document (public consultation draft, as set out in Appendix II) for the review of Graveney Church, Graveney Bridge and Goodnestone Conservation Areas, and representations made by interested parties, as set out in Appendix I. 2. To note the officer's response to the representations received during the course of the public consultation, as set out in Appendix I 3. Adopt the Character Appraisal and Management Strategy subject to any minor editorial amendments and formatting.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to make the Policy & Resources Committee aware of updated appraisals to three conservation areas – Graveney Church, Graveney Bridge and Goodnestone. and to recommend that all three conservation areas be formally re-designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act, 1990. The proposals include a detailed character appraisal and associated management strategy in line with current good practice for the management of conservation areas. Officers recommend that the Policy & Resources Committee supports and agrees the changes to the review document set out in Appendix I and as reflected in Appendix II).

2 Background

- 2.1 Goodnestone Conservation Area, the oldest of the three, was first designated in March 1976, while Graveney Church and Graveney Bridge Conservation Areas were designated in November 1999. A brief character appraisal was compiled for all three Conservation Areas in 1999. There is a formal requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 for Conservation Areas to be reviewed from 'time to time'.
- 2.2 The Swale Heritage Strategy, adopted in March 2020, has resulted in a stronger commitment by the Council to ensure its conservation areas are reviewed more regularly and possible new conservation areas also given consideration. The review of the three Conservation Areas in Graveney & Goodnestone is part of the work programme of the second 3-year action plan forming part of the adopted Swale Heritage Strategy 2020 – 2032. As the existing level of officer resource did not allow for this review work to be carried out in-house, an external consultant (Conception Architects) was appointed to undertake the review.

- 2.3 The proposal is to re-designate and amend the boundaries of the three conservation areas and to equip them with a detailed character appraisal and a complementary management strategy which will assist with development management and heritage conservation purposes over the next decade or more. It is a matter for the Policy and Resources Committee to decide whether to formally adopt the Graveney Bridge, Graveney Church and Goodnestone Conservation Areas Character Appraisal and Management Strategy (as recommended and set out in Appendix II, following consultation feedback, or otherwise).
- 2.4 Part of the review process involved an assessment of whether the area should be extended or reduced in size. In this regard particular consideration was given to extending the conservation area. The changes proposed to the boundary are as follows:

Proposed boundary changes - Graveney Church The proposal is to extend the Conservation Area to cover the church parking area and part of the reinstated footpath so that the historic route and its setting can be properly protected. Bringing these spaces within the boundary would help ensure that future changes respect their historic character and contribution to local identity. The parking area entrance is also a recognised historic point in Graveney and Goodnestone, marked by a 2001 information board, strengthening the case for inclusion.

Proposed boundary change - Graveney Bridge The Conservation Area extension is proposed to include the parking area beside the Four Horseshoes Inn because it contributes to the historic character and streetscape. Historic maps show the plot was once part of an orchard, and although the orchard has gone, its openness, traditional boundaries, and informal surface still reflect its rural origins.

Proposed boundary change - Goodnestone It is proposed to extend the Conservation Area to encompass the orchards behind properties from Poplar Hall north to Goodnestone Lane. As the only remaining orchards locally, with mature trees and hedgerows defining the edge of the settlement, they reflect historic land use evident on the 1865 Ordnance Survey Map. Their contribution to the rural setting, especially as experienced from the footpath linking the church to Goodnestone Lane, supports their inclusion to better represent the area's historic significance.

- 2.5 Consideration was given, informed by public consultation responses, to extending the Conservation Area boundary to include part of Odin's Path and the footpath leading to the village hall. This reflected their recognised historic interest and the view that they might reasonably be treated as an exception to the general approach set out in Historic England's *Advice Note 1*. (*Historic England Advice Note 1 advises that conservation area designation is not generally intended as a means of protecting the wider landscape.*) A further potential extension was assessed to incorporate the wider landscape between the existing Conservation Area and Broom Street, including the full length of Odin's Path, the Grade II listed 15th-century Sparrow Court, and the non-designated heritage asset of the Old Vicarage, which has 16th-century origins.
- 2.6 While these assets possess historic associations and benefit from the open farmland that contributes to their setting, the wider area does not demonstrate a level of special architectural or historic interest sufficient to justify designation. Sparrow Court already benefits from statutory protection through its listed status, and national guidance advises against extending Conservation Areas solely to capture isolated heritage assets or extensive areas of open countryside.
- 2.7 Specific concerns were raised by Iceni Projects on behalf of Skylark Kent LLP and are presented in Appendix III. These are considered to apply an unduly narrow interpretation of

conservation area legislation and overlook the evidence-based methodology used in preparing the draft appraisals. The Council's assessments of character, setting, and significance are consistent with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic England guidance, and the proposed boundary extensions are proportionate, coherent, and defensible. The presence of modern features does not preclude inclusion where land contributes to the historic form, spatial structure, or setting of the area. The suggestion that ongoing planning appeals constrain the Council's statutory duties is unfounded, as outlined in the officer's response in Appendix I. The Conservation Area and Management Strategy Review document for Graveney & Goodnestone Conservation Areas are considered to remain robust, justified, and appropriate for progression to the next stage of the designation process.

3 Proposals

3.1 The recommendations are:

1. To note the Character Appraisal and Management Strategy document (public consultation draft, as set out in Appendix II) for the review of Graveney Church, Graveney Bridge and Goodnestone Conservation Areas, and representations made by interested parties, as set out in Appendix I.
2. To note the officer's response to the representations received during the course of the public consultation, as set out in Appendix I.
3. Adopt the Character Appraisal and Management Strategy subject to any minor editorial amendments and formatting.

4 Alternative Options Considered and Rejected

- 4.1 One option would be to not take this review work any further or suspend the work on this review until some point in the future. Whilst this option would not result in wasted officer time and loss of cost to the consultant, it could still lead to (a) the designation being challenged, (b) reputational damage to the Council and/or (c) development and associated infrastructure provision decisions being made for the locality without an appropriate understanding and appreciation of the special qualities of the three Conservation Areas in Graveney & Goodnestone. This is not recommended because it would risk the justifiable continuation of the designation and/or the appropriately sensitive and positive management of the Conservation Areas and their wider setting moving forward.
- 4.2 A second option would be to disregard some elements, or all of the feedback received, in terms of the proposed designation. However, whilst it is considered that the appraisal and management plan (to support the re-designation of the Conservation Area) is essentially sound, the feedback provided from the local community is valuable and to ignore any of this feedback without sound reasons would call the value of the consultation process into question and potentially deliver reputational damage to the Council.

5 Consultation Undertaken or Proposed

- 5.1 A 6-week public consultation exercise ran from Monday 1st September 2025 upto and including Friday 10th October 2025.

- 5.2 All those parties with property within or overlapping the current conservation area boundary were notified in writing of the review and were invited to comment on it, as were key relevant organisations including Kent County Council and Historic England.
- 5.3 Hard copies of the review document were made available at Faversham Library and were also available to view/download on-line via the Council's website for the duration of the public consultation period.
- 5.4 A total of 12 consultation responses have been received. 1 from Graveney & Goodnestone Parish Council, 1 from Icen Projects on behalf of Skylark Kent LLP, and 10 from the local residents. The officer response to this consultation feedback (as summarised) is attached as Appendix I.
- 5.5 Historic England and Kent County Council in its function as the Highway Authority were consulted on the Conservation Area designation but provided no feedback in this respect. No response was received either from the county's Ecology Team (which was also consulted). Highways and Ecology at Kent County Council are consulted because Conservation Area designation affects land use, access, and environmental protection. Their specialist data and statutory responsibilities ensure the designation is evidence-based, legally sound, and aligned with wider county strategies.

6 Implications

Issue	Implications
Corporate Plan	The proposed designation of Graveney Bridge, Graveney Church and Goodnestone Conservation Areas would support the Economy priority from the Corporate Plan: <i>'To develop the borough's second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets'</i> .
Financial, Resource and Property	Implementing some aspects of the proposed Management Plan may have financial and resource implications for the council, particularly if it is decided to proceed with an Article 4 Direction review. These financial impacts will be considered if / when these further reports are brought forward. Note: <i>Article 4 review is being considered within Action Plan 3 (2026-2028) of Heritage Strategy.</i>
Legal, Statutory and Procurement	The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on every local planning authority to <i>"determine which parts of their area are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance"</i> and, from time to time, to review the functioning existing conservation areas.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	One of the three dimensions of sustainable development is its environmental role: contributing to protecting and enhancing our natural, built and historic environment.

Health and Wellbeing	The health and wellbeing aspects of interaction with heritage assets and heritage related projects are referenced in the adopted Heritage Strategy which underpins this review work.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.
Local Government Reorganisation	No Impact on Local Government reorganisation, because Conservation Area re-designation comes under management of the area's heritage and is guided by best practices as set out by Historic England and the NPPF.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Public consultation – table of representations (in summary form), and the council's response to them.
- Appendix II: Public consultation version of the 2025 draft Graveney & Goodneston character appraisal and management plan document.
- Appendix III: Public Consultation response from Iceni Projects on behalf of Skylark Kent LLP.

8 Background Papers

A Heritage Strategy for Swale 2020-2032 Adopted March 2020

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APPENDIX I: TABLE OF REPRESENTATIONS, THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE ASSESSMENT DOCUMENT IN RELATION TO THEM – FOR GRAVENEY CHURCH, BRIDGE AND GOODNESTONE C.A.

Rep. No(s).	Representati on By	Summary of Representation	Officer Response	Recommendatio n
1	Graveney with Goodnestone Parish Council	Graveney with Goodnestone Parish Council welcome the publication of the comprehensive review of the three Conservation Areas which are included within our Parish. We are now submitting our comments on the proposals put forward in the consultation document. GOODNESTONE CONSERVATION AREA The Parish Council supports the proposed boundary adjustment to include the orchards behind the properties extending from Poplar Hall to Goodnestone Lane to help preserve and enhance the setting of these properties and the wider Conservation Area. The reference to the eligibility of a specified range of properties for inclusion within the Swale Local Heritage List also recognises the importance of these heritage assets and would help enhance the historic significance, character and setting of the Conservation Area. GRAVENEY BRIDGE CONSERVATION AREA The Parish Council supports the proposed boundary adjustment to include the parking area alongside the Four Horseshoes Inn which would assist in preserving and enhancing the setting of the Conservation Area. The reference to the eligibility of specified properties for inclusion within the Swale Local Heritage List also recognises the importance of these heritage assets and would help enhance the historic significance, character and setting of the Conservation Area. GRAVENEY CHURCH CONSERVATION AREA The Parish Council supports the proposed boundary adjustment to include the parking area for the Church and part of the reinstated footpath alongside the churchyard as these areas would help preserve and enhance the historic setting of the Church and wider Conservation Area. The reference to the eligibility of Graveney Court Cottage for inclusion within the Swale Local Heritage List also recognises the importance of this heritage asset	Noted & welcomed	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		and its proximity to the Church and would help enhance the historic significance, character and setting of the Conservation Area. The Parish Council fully endorses the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the Village Hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However , we feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street , to include the full length of Odin's Path , the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of The Old Vicarage, with its origins dating back to the 16th Century. We would submit that both Sparrow Court and The Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street. We would also submit that this Conservation Area could be further extended to include the section of farmland , pasture and playing fields linking the Church car park to Bridge House and running alongside the western boundary of Seasalter Road, primarily to preserve and enhance the setting and visual amenity of the surrounding heritage assets and to recognise the contribution which this historic landscape makes to the Graveney Church and Graveney Bridge Conservation Areas.	While these assets possess historic associations and benefit from the open farmland that contributes to their setting, the wider area does not demonstrate a level of special architectural or historic interest sufficient to justify designation. Sparrow Court already benefits from statutory protection through its listed status, and national guidance advises against extending Conservation Areas solely to capture isolated heritage assets or extensive areas of open countryside.	

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
2	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.	Noted and welcomed.	No Change to the appraisal document
3	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.		
4	Local Resident	I have reviewed the extensive Conservation Area Review and commend you on the detail and work which has gone into this. I have no views on the Graveney side of the document and agree with the proposed changes to the conservation areas, and improvements which could potentially be made. However, I am a little puzzled by the extension to the Goodnestone conservation area, the proposed extension of its boundary affect my families land, and solely my families land, and basically now follows the boundary of our smallholding. In principle we have no problem with this, however one of the key arguments in the conservation area extension is because the land is planted with orchard. This isn't entirely true, only about 50% of this land is plum, apple and pear orchard, the remainder is planted with Kentish Cobnut trees, and the remainder with a willow tree plantation. There is no guarantee as the landowner and farmer that the orchard use will remain, especially as a high percentage of the fruit trees need grubbing up due to their age and decreased production.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Is the conservation area saying that we have to keep orchards to preserve the heritage of the village. The stretch of land in question has been a mixture of orchard, pasture or agricultural land for over 100 years, and has changed many times over the years (we can provide photographic evidence of this), I don't see how the council can insist on the preservation of an orchard when we might want to plant and farm other crops, but then this completely goes against the arguments of the conservation area extension proposal. We would like to clarification on this point, and any restrictions on land use which may be imposed. Also, the extension of the conservation area now includes a 1970s Atcost concrete and asbestos barn, does this now mean that this building has to be preserved? We have been guardians of this stretch of land for over 60 years, we have never seeked to develop the land for anything other than farming, but feel that to include solely our land, and 100% (as the proposed conservation area boundary is our boundary) of it could be both unfair and restrictive to future commercial agricultural activities.		
5	Local Resident	I have reviewed the documentation for the 3 conservation areas in Graveney and Goodnestone and would like the following additions to be considered please for the Graveney Church CA. Include all land that faces the three heritage assets of Murton Barn, Murton's Farmhouse and Graveney Court Cottage. This is to protect the views and setting afforded to these properties. Include all land that faces Graveney Church to protect its setting. Include all land to the rear of the three heritage assets of Murton Barn, Murton's Farmhouse and Graveney Court Cottage to protect the views and setting afforded to these properties.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Include The Old Vicarage and Sparrows Court in the CA, to recognise and protect their heritage and setting.		
6	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street	Noted and welcomed.	No Change to the appraisal document
7	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.		
8	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
9	Local Resident	I would like to submit my support for your plans to expand the 3 conservation areas in the East of the Borough. Swale has seen so much disruption from housing expansion and highways improvements in recent years, often with the appearance that the importance of our natural spaces have been overlooked. May I suggest a Facebook poll or something similar to gauge people's opinions on the matter rather than relying on emails as I feel many will not take the time to write to you.	Noted and welcomed	No Change to the appraisal document
10	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However, I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage, with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
11	Local Resident	I agree the conservation areas should be extended and would go further to say that they should encompass the fields behind Graveney Church that lead to Broom Street and run alongside Sandbanks Lane. This would then help protect Sparrow Court https://historicengland.org.uk/listing/the-list/list-entry/1069143 a grade listed hall house and also The Vicarage, https://themarket.com/tools/propertyprices/the-old-vicarage-broom-street-graveney-faversham-me13-9ds (which should be considered for listing). These two properties are clearly visible from Graveney Church and visa versa and therefore, this ancient setting, which has existed since medieval times with Sparrow Court, should be preserved and protected.	Noted and welcomed.	No Change to the appraisal document
12	Iceni Projects – Planning Consultants	On behalf of Skylark Kent LLP, the 14-page response is attached as appendix III. Public Consultation response from Iceni Projects on behalf of Skylark Kent LLP in reference to Land at Sandbanks Lane and Seasalter Road, Graveney, ME13 9DU (Swale Reference: 23/504264/OUT) (PINS Reference: APP/V2255/W/25/3365131), (the appeal decision has been made and the application granted) Land West of Head Hill Road, Graveney, ME13 9DE (Swale Reference: 23/504263/OUT) (PINS Reference: APP/V2255/W/25/3367559) (dismissed impact on heritage assets)	Noted	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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Officer Response to Iceni Projects' Consultation Submission (on behalf of Skylark Kent LLP)

1. Statutory and Policy Context

The Iceni submission applies an unduly restrictive interpretation of the *Planning (Listed Buildings and Conservation Areas) Act 1990*. The statutory test for designation remains whether an area is of *special architectural or historic interest*, assessed in its entirety. The Act does not require that all land within a conservation area exhibit high architectural quality, nor does it preclude the inclusion of neutral or modern features where these form part of the area's historic structure, spatial character, or setting.

Historic England's *Advice Note 1* explicitly recognises the role of landscape, open space, historic routeways, and spatial relationships in contributing to special interest. The draft appraisals follow this guidance appropriately.

2. Relationship with Ongoing Planning Appeals

The suggestion that the Council should defer conservation area review pending the outcome of unrelated planning appeals is not supported by statute or case law. Conservation area designation is a strategic heritage function, independent of individual development proposals. Appeal decisions may inform future development management but do not constrain the Council's duty to identify and protect areas of special interest. The Council is therefore acting entirely within its powers in progressing the appraisals at this stage.

3. Accuracy and Methodology of the Appraisals

The Iceni critique selectively challenges descriptive elements while overlooking the structured methodology underpinning the appraisals. The documents:

- distinguish clearly between internal character, immediate setting, and wider landscape context
- draw on site survey, historic mapping, and established conservation practice
- identify views that contribute to significance, including glimpsed or filtered views, which are recognised in national guidance
- reflect the historic interdependence of settlement form, marshland, agricultural land, and routeways in both Graveney and Goodnestone

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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The claim that the appraisals “conflate” settlement and conservation area characteristics is not supported by the evidence. The documents appropriately describe how the conservation areas sit within, and derive significance from, their wider historic context.

4. Proposed Boundary Extensions

The Icení submission mischaracterises the purpose and justification of the proposed boundary extensions.

Graveney Church

The extension includes land that contributes to the legibility of the historic settlement pattern, the setting of the church, and key views. The presence of a modern car park does not preclude inclusion; conservation areas routinely encompass neutral or detracting elements where these form part of the historic spatial structure or contribute to understanding significance. Odin’s Path is a historic route whose surviving alignment is relevant to the area’s evolution.

Graveney Bridge

The extension captures the historic crossing point, associated land parcels, and the spatial relationship between bridge, watercourse, and settlement. Modern features do not negate the area’s historic interest. Archaeological potential is a legitimate consideration and is not dismissed by the Council.

The assertion that the extensions are “legally vulnerable” is speculative and unsupported by any substantive analysis of the statutory test.

5. Goodnestone Conservation Area Boundary

The Icení critique assumes that conservation area boundaries must follow parish boundaries or modern settlement edges. This is incorrect. The existing and proposed boundaries reflect the historic agricultural setting that shaped the village’s development and contribute to its special interest. The northern land parcels help explain the evolution, form, and rural character of the settlement. The boundary is therefore coherent and justified.

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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6. Development Management Considerations

The appraisals do not seek to restrict development. They emphasise the need for context-sensitive design, consistent with the National Planning Policy Framework. Identifying sensitive views, spaces, or settings is a normal and necessary part of conservation area management. The suggestion that the documents act as a “barrier to progress” is rhetorical rather than evidence-based.

7. Overall Position

The Iceni/Skylark submission presents a narrow and selective interpretation of heritage policy and overstates the legal risks associated with the Council’s approach. The draft appraisals:

- are proportionate, evidence-based, and aligned with national guidance
- provide a robust assessment of character, setting, and significance
- offer clear and defensible justification for the proposed boundary extensions
- support effective long-term management of the historic environment

There is no basis for concluding that the appraisals require fundamental revision or that the proposed extensions are unsound.

Graveney & Goodnestone Conservation Areas Character Appraisal & Management Strategy

Public Consultation Draft September 2025

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FOREWARD

Historic buildings and places add to the quality of people's lives and help to create a sense of place that we all identify with.

As a community and as a local authority, we have a responsibility to safeguard our historic assets for future generations and to make sure that they are not compromised by unsympathetic alterations or poor-quality developments. Conservation area designation and subsequent management is one way in which this can be achieved.

Conservation areas are not intended to halt progress or to prevent change. Rather, they give the local community and the Borough Council the means to positively manage change and to protect what is special about the area from being harmed or lost altogether.

Swale Borough is fortunate in having such a rich and varied mix of built and natural heritage. The Borough Council wants to see it used positively as a catalyst to sustainable, sensitive regeneration and development, and to creating places where people want to live, work, and make the most of their leisure time. To that end, we have reviewed three conservation areas in Graveney: Graveney Church, Graveney Bridge & Goodnestone. The results of that review are set out in this document, which the Borough Council is now seeking constructive feedback on.

This is one of a series of conservation area reviews which the Borough Council is committed to undertaking, following the adoption of the Swale Heritage Strategy 2020 – 2032.



Councillor Mike Baldock,
Cabinet Member for Planning and
Swale Borough Councillor and
Heritage Champion

Mike Baldock

1.0 INTRODUCTION

1.1 What is the purpose of conservation areas

A Conservation Area is defined as “an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”¹. It was first introduced in the Civic Amenities Act of 1967 to further the provision of the protection and improvement of buildings and character of a designated area.

It is the responsibility of individual local planning authorities to designate and review conservation areas from time to time using local criteria to determine and assess their special qualities and local distinctiveness².

The primary aim of conservation area designation is to protect the special character of an area and to actively manage change in a way that preserves and enhances its special character and historic interest. Conservation areas have a distinctive environment and unique character based on a range of features including its architecture, historic layout, or the use of local materials, style, or landscaping. In practice, conservation areas are typically designated based on a combination of these special characteristics. It is these distinctive qualities that should be preserved for future generations.

The designation of a conservation area offers protection in several ways:

- Local planning authorities have authority over most building demolitions.
- Local planning authorities exercise additional control over householder development.
- All trees within conservation areas are safeguarded.
- When reviewing planning applications, the local planning authority must give special consideration to the importance of preserving or enhancing the character and appearance of the conservation area and its surroundings.
- The Local Development Plan includes policies that actively promote development that preserves or enhances the character and appearance of conservation areas.

¹Section 69 (1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

²Section 69 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

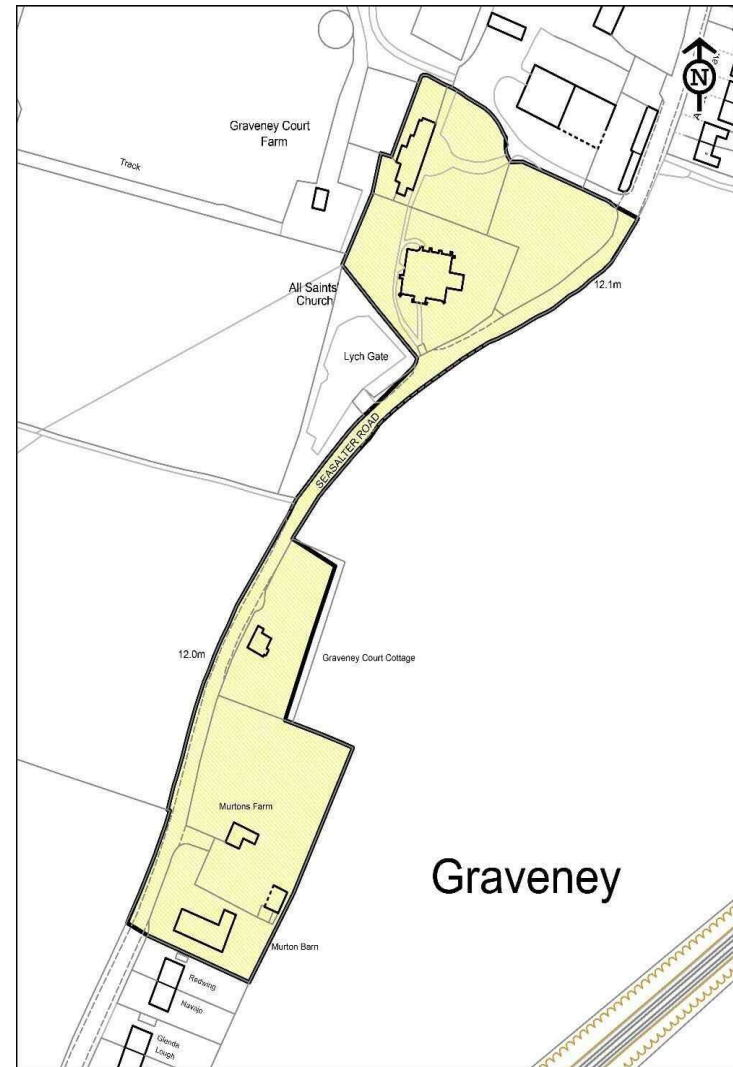
1.2 Graveney Church Conservation Area

Graveney Church was first designated as a conservation area on 24 November 1999 by Swale Borough Council. Graveney has a brief appraisal on the conservation area that was compiled in the same year as its designation.



View towards Church of All Saints and Graveney Court within the Graveney Church Conservation Area.

Map 1, shows the current extent of the conservation area as it was designated in 1999.



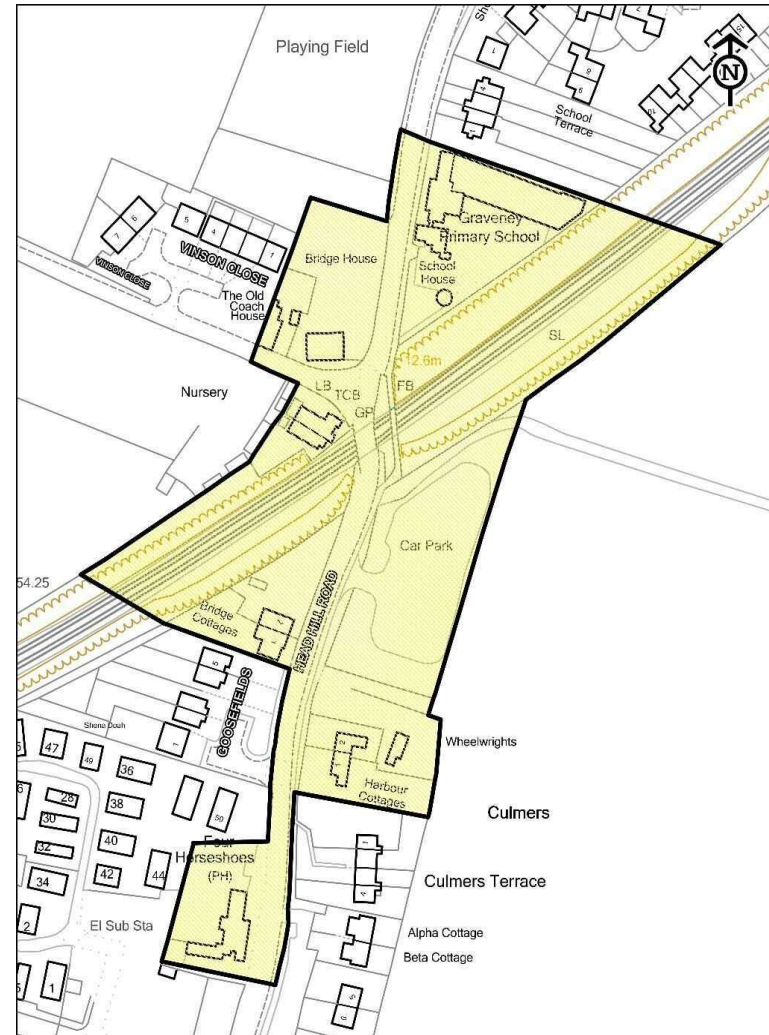
Map 1: Graveney Church Conservation Area

1.3 Graveney Bridge Conservation Area

Graveney Bridge was first designated as a conservation area on 24 November 1999 by the local planning authority of Swale Borough Council. Graveney has a brief appraisal on the conservation area that was compiled in the same year as its designation.



View towards Bridge House within the Graveney Bridge Conservation Area.



Map 2: Graveney Bridge Conservation Area

Map 2, shows the current extent of the conservation area as it was designated in 1999.

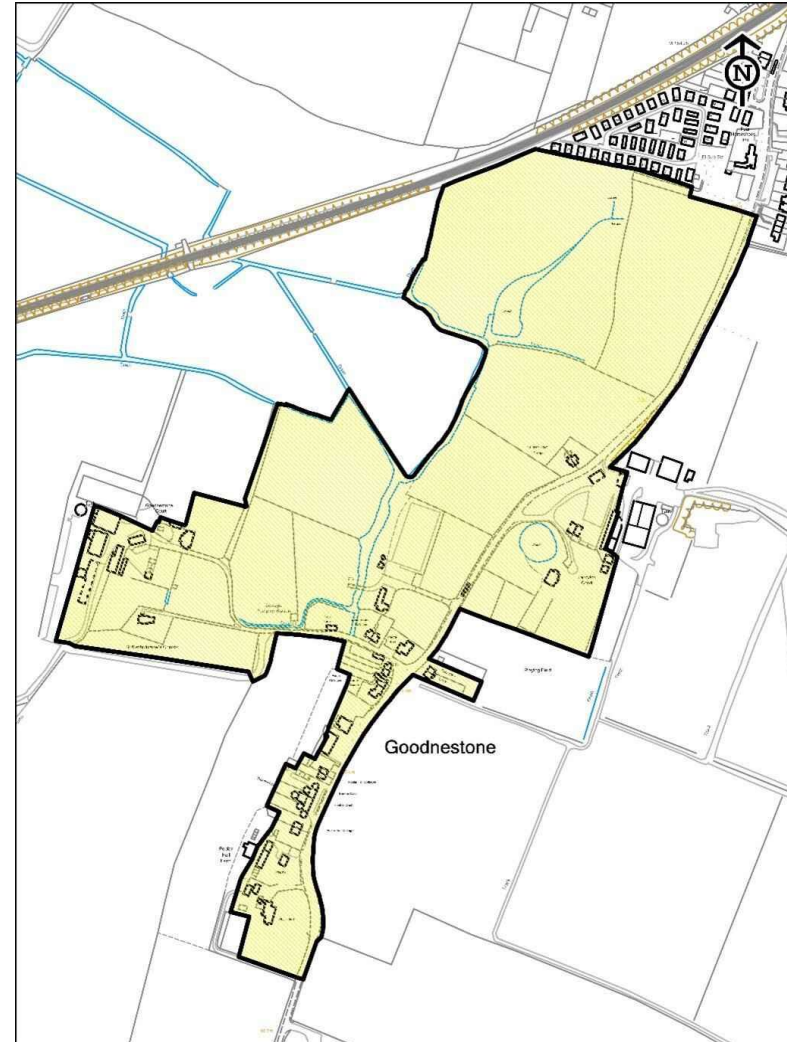
1.4 Goodnestone Conservation Area

Goodnestone was first designated as a conservation area on 9 March 1976 by the local planning authority of Swale Borough Council. Goodnestone has a brief appraisal on the conservation area that was compiled in 1999.



View towards the Church of St Bartholomew from Goodnestone Lane within the Goodnestone Conservation Area.

Map 3, shows the current extent of the conservation area as it was designated in 1976.



Map 3: Goodnestone Conservation Area

1.5 The Purpose and status of this Character Appraisal and Management strategy

The aim of these Conservation Area Character Appraisals and Management Strategies is to:

- Identify the significance of the heritage assets, meaning the value the conservation areas hold for current and future generations due to its archaeological, architectural, artistic, or historical importance.
- Raise public awareness and encourage involvement in preserving and enhancing the areas.
- Provide a framework for planning decisions to support positive change and regeneration.
- Review the boundaries of the conservation areas in line with Section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Highlight specific issues and features that detract from the character or appearance of the conservation areas, offering opportunities for enhancement and improvement through positive change.
- To ensure that the conservation areas are justified with such status due to its special architectural or historic interest, and that the concept of conservation is not being undermined by designating areas that lack exceptional interest in line with Chapter 16 of the National Planning Policy Framework.

A Conservation Area Character Appraisal is an evaluation and documentation of the unique architectural or historical features that define the character and appearance of a place. This appraisal offers an objective analysis aimed at identifying the distinctive qualities of the areas by outlining the elements that contribute to its special character. However, it is important to note that the appraisal is not exhaustive, and the omission of any specific building, feature, or space should not suggest that it is not of significance. In some cases, the full importance of a building, feature, or site may only become clear when it undergoes the more detailed evaluation required for individual planning applications.

A key aspect of reviewing the Graveney Church, Graveney Bridge and Goodnestone Conservation Areas is determining whether they continue to possess the architectural and historical significance that justifies their ongoing designation. This review also offers an opportunity to assess the effectiveness of the designations over the past 25 years and to consider whether the boundaries of the conservation areas should be adjusted, either by extending or reducing them.

The appraisal includes a management strategy for each area designed to help the Swale Borough Council and other stakeholders manage the conservation areas positively in the future. These strategies may include specific actions, design recommendations, and site-specific guidance, where relevant. It can also highlight potential threats to the areas' character, identify buildings at risk, and suggest measures such as Article 4 Directions or local heritage listing.

The appraisal can inform the development and assessment of policies within the Development Plan and serves as a material

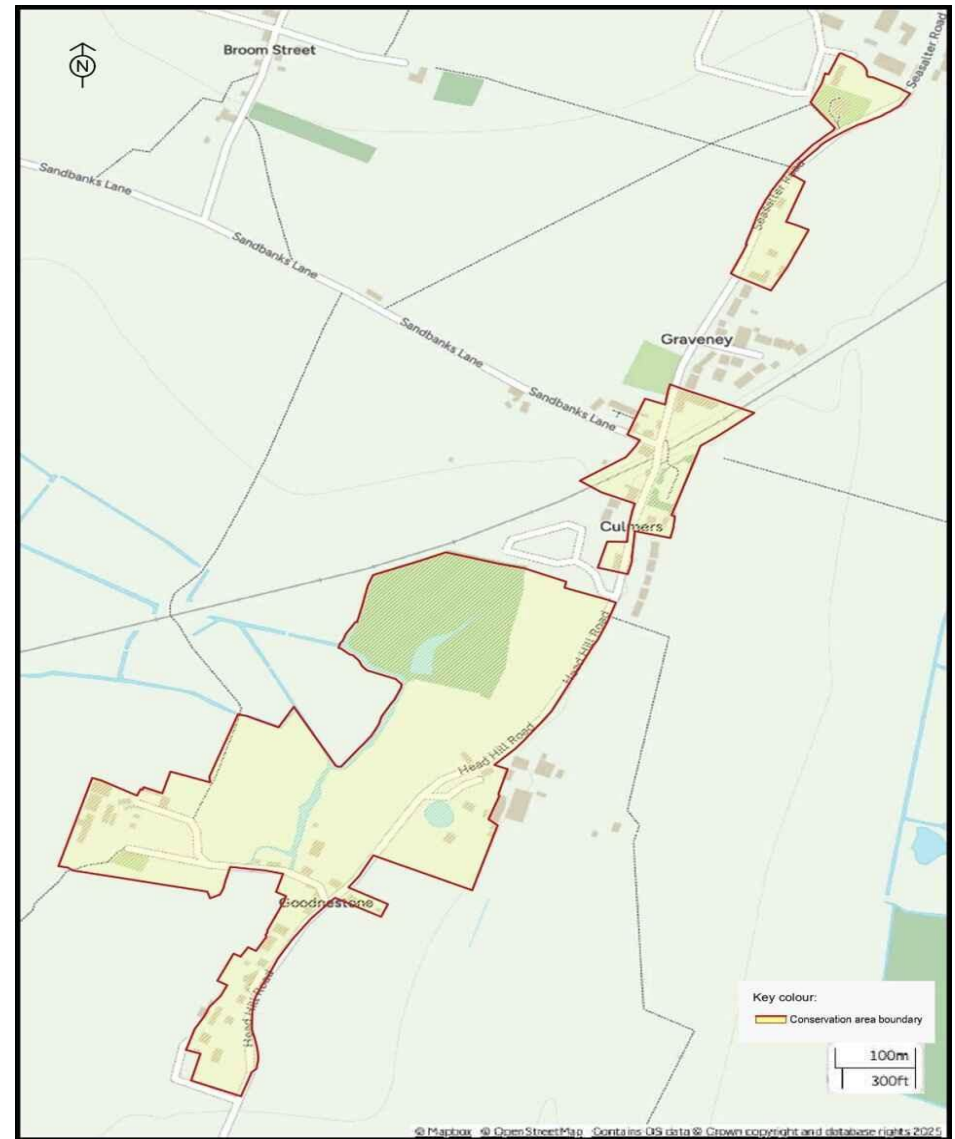
consideration in development management decisions made by the local planning authority and the Planning Inspectorate during planning appeals. Furthermore, it can raise awareness of the areas' special character, helping to guide local Parish Councils in preparing Neighbourhood Plans, Village Design Statements, and assisting individuals with design decisions.

This Conservation Area Character Appraisal has been prepared in consultation with local organisations, elected representatives, and council officials. It will undergo public consultation and is intended to be formally adopted for use in development management.

Conception Architects Studio would like to express gratitude to all those who contributed to the creation of this character appraisal.

Map 4, shows the designated conservation areas in relation to each other.

Map 4: Designated conservation areas



2.0 CHARACTER APPRAISAL

2.1 The history and development of Graveney Church

The name "Graveney" is believed to originate from the Old English words 'grafa,' meaning 'trench' or 'ditch,' and 'ēa,' meaning 'river,' together translating to 'ditch stream' or more commonly 'at the graven river.' This name was originally used to describe the stream at Graveney, which flowed through a broad ditch (sometimes called a trench or "graven ditch"). In the Domesday Book (1086), Graveney is recorded as "Gravenel."

The Domesday Book provides the following description of Graveney: "In Boughton Hundred, Richard also holds Graveney from the Archbishop. It is assessed at 1 sulung. The land has 1 plough in lordship. 8 villagers and 10 smallholders possess 2 ploughs. 5 slaves; meadow, 10 acres; 4 salt-houses valued at 4 shillings. The value before 1066 and after was 100 shillings; now it is £6; of this, the monks of Canterbury receive 20 shillings."

The first mention of the name Graveney dates back to 811 AD, recorded in several charters where King Coenwulf of Mercia granted land to Archbishop Wilfred of Canterbury. The most well-preserved Viking vessel found in England, the Graveney Boat, was discovered in 1970, just northeast of Graveney village, during maintenance work on the Hammond Drain. The boat has been dated to AD 927.

Over the centuries, the area has seen little change. Edward Hasted, writing in 1798, described it as follows:

"There is little thoroughfare here, and no village as such, with houses scattered throughout the area. Overall, though the area is somewhat unhealthy, it does not lack charm, being well-covered with trees, particularly elms, which thrive here in abundance. The roads are well-maintained, as are the poor, and the entire parish seems to flourish under the stewardship of the inhabitants of Graveney Court."

Graveney remained a marginal area through the 19th and 20th centuries. For example, in 1838, during the "Last Uprising of the Agricultural Labourers" at nearby Bossenden Woods, the rioters passed through Graveney but quickly moved on. There are no records of any residents of Graveney joining the rebellion. Additionally, the railway through Graveney opened in 1860, but no station was ever constructed.

Despite its proximity to France and being on the flight path of German bombers, Graveney experienced relatively little damage during World War II. However, it can claim to be the site of the only direct armed conflict between German and British soldiers on English soil. This occurred on September 27, 1940. A German Ju-88, engaged in a battle with two Spitfires, crashed into the marshes. Members of the 1st Battalion London Irish Rifles, who were at the nearby Sportsman, responded. As they approached the wreckage, the German crew opened fire, but the Rifles returned fire from two directions, causing the airmen to quickly surrender.

After the war, the 1953 Great Flood inundated the marshes, leading to improvements in the sea wall. Shortly thereafter, electricity was introduced to the village.

Graveney holds rich historical significance as a window into rural English life across centuries. The village church and neighbouring Graveney Court reflect a deeply rooted connection between land, labour, and legacy. Graveney Court, built circa. 1420 by Judge John Martyn, whose brass memorial remains in the church, symbolises the area's medieval prominence. Later owned by the Blaxland family, who employed much of the local population as agricultural workers, the estate shaped the community's way of life. The church, filled with tributes to these figures, stands as a lasting record of Graveney's legal, social, and agrarian past.

The churchyard is also home to the headstone of Thomas Barman, who died in 1758, and stands at approximately three feet tall and is distinguished by its curved, or “nowy,” head. Rich in symbolic detail, it features carved reliefs of skulls, spades, and lilies, iconic emblems of mortality and the fleeting nature of life. These motifs reflect the funerary art and spiritual sensibilities of the mid-18th century, when such imagery served both as a memento mori and a form of remembrance. Its historical and architectural significance lies not only in its craftsmanship but also in the way it encapsulates contemporary attitudes toward death. As a preserved monument, it contributes meaningfully to the character of the churchyard and offers valuable insight into the cultural and artistic expressions of the period.

The village is linear in nature and broadly laid out on a north/south axis with almost all existing buildings linking with the main road running through the village. The buildings are orientated to the front of the street. Houses and buildings are predominantly detached, spaced fairly widely apart and are set

back with varying distances from the street. The character of the village can be described as loosely knit due to the varying architectural and historical influence across the area, but it displays signs of significant value throughout.



A pen and ink picture of Graveney Church by Francis Grose 1757.

2.2 Topography, geology and landscape

Graveney is located on the eastern edge of the Borough of Swale, approximately six kilometres east of Faversham and a similar distance southwest of Whitstable. It sits at the edge of the Graveney marshes, which extend to the northwest, reaching as far as The Swale.

The settlement of Graveney is situated on slightly elevated ground, rising above the surrounding flat land. It has a clear linear layout, with development stretching along Seasalter Road for about 800 meters. The area is mostly agriculture, rich in orchard and arable land with previous hop productions that now exist mainly in Faversham to the West. There is also presence of some livestock grazing, such as sheep as mentioned by the Parish Council, and horse pastures across the area.

The solar farm referred to is the Cleve Hill Solar Park, situated to the northwest of the conservation area. Its large-scale infrastructure and industrial appearance introduce a prominent visual element that is at odds with the natural, undeveloped character traditionally associated with the Graveney marshes. This presence has significantly altered the visual experience of the landscape, diminishing the sense of remoteness and openness that once defined the marshland setting. The expansive, flat terrain that previously contributed to the area's wild and tranquil character is now visually interrupted by the solar farm's panels and associated structures. As a result, the setting of the conservation area; particularly in views extending from the church graveyard across the marshes; has been compromised, leading to a clear erosion of the marshland's historic and environmental qualities.

2.3 Buildings

The Graveney Church Conservation Area is an area made up of few buildings that are scattered, but several with both listed status and historical significance. The area embraces the parish church, a couple of farmsteads and a cottage style

building. There is a varying mix of building styles, dates, materials and types that combine to create a place of interest. Graveney Church and Graveney Court are the defining features of the conservation area. They mark the western edge of Graveney Village.

The church of All Saints, which dates back to the 12th century, is of particular interest. John Newman writes in Pevsner, *The Buildings of England*, and describes it as “a rarity in Kent, and indeed would be rare in any county except perhaps Norfolk; not only is it charmingly unrestored, but it also holds architectural value and features objects that are beautiful in their own right.” The building is modest in scale, constructed from flint and stone rubble with a peg-tiled roof. A later addition, the Lych Gate, stands by the roadside and provides entry to the small churchyard. To the east lies a small paddock, enclosed by low brick walls and a somewhat deteriorated estate railing along the road.



Church of All Saints.

Graveney Court.

Graveney Court lies immediately to the north of the church. Set back from the road and partially obscured by trees from certain viewpoints, the house stands at the edge of Graveney

Marshes. Dating from around 1420, it is a timber-framed structure finished with plaster and weatherboarding. To the north, the adjoining farmyard is now largely composed of modern buildings, though two older brick structures remain.

Murton's Farm is located a short distance south of the church, on the eastern side of Seasalter Road. Part of the detailed brick building dates back to the sixteenth century. Adjacent to it stands a larger, timber-framed barn from the seventeenth century, which has recently been converted into two residences. Due to significant refurbishment and adaptation, the barn now presents a fairly modern appearance.



Murton's Farm.

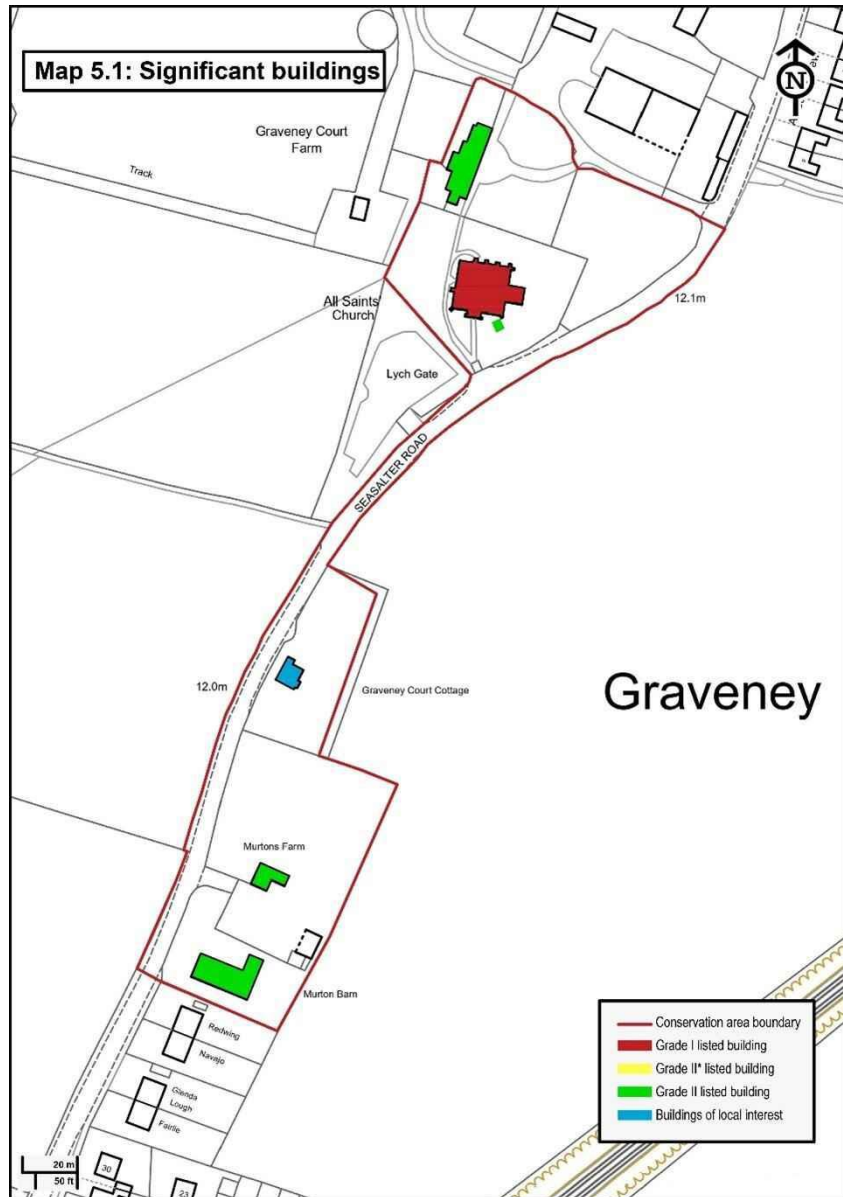
Barn South of Murton's Farm.

Located just north of Murton's farm and approximately the middle distance between the church and farm, sits a farm style house referred to as Graveney Court Cottage. The building shows architectural style and finishes similar to that of Graveney Court. Painted white, the building stands alone along Seasalter Road. Although not listed, the building does display local interest due to its close relevance with the surrounding historical architecture.



Graveney Court Cottage.

This small cluster of buildings has now merged with a formerly separate group of older structures located further south, near the junction of Seasalter Road and Sandbanks Lane. The once open space between these two groups has been filled in with residential development, most notably at Murton Place. There, an original small estate of Airey houses was redeveloped in the late 1980s at a higher density. The houses are noted to fit in with the local 'Kent' vernacular having weatherboard or tiled facades, brick quoins, half-hipped roofs and timber fences or brick walls.



2.4 Building Materials

Graveney Church's character is largely shaped by the diversity of its architectural styles, often reflected in the choice of building materials. These materials were typically selected based on their availability from local sources. Prior to the transport revolution of the mid-19th century, nearly all building materials were either sourced or produced locally. As a result, they serve as a genuine reflection of the area's natural resources and local identity. At the same time, these materials were used to convey architectural ambition and evolving tastes. Even those that were commonly used at the time contribute meaningfully to the area's character and sense of place.

Prior to the advent of widespread transport in the 19th century, builders relied heavily on materials that were locally sourced or easily obtained. Timber from surrounding woodlands was commonly used for the structural frames of medieval and early post-medieval buildings, often combined with wattle and daub or later infilled with plaster or brick. Flint, a plentiful local resource, was widely used in ecclesiastical buildings and boundary walls, frequently combined with stone rubble for strength and texture. Weatherboarding, both functional and decorative, became a defining feature of many cottages and barns, offering protection from the coastal climate. Brick was used for newer buildings and to over-clad older buildings to give them a more up-to-date appearance.

Kent peg tiles were traditionally the roofing material of choice, but slate began to be used in the early 19th century, especially after the arrival of the railway in Graveney in 1860. Thatch was

once common, particularly on farm buildings and cottages, though no examples remain within the conservation area today.

Timber Frame

The timber-framed buildings of the Graveney Church conservation area are a defining feature of its historic character, reflecting construction methods that date back to the medieval period. These frames were traditionally built using English oak, a durable and readily available hardwood sourced from the ancient woodlands of Kent. Oak was prized not only for its strength and longevity but also for its ability to be worked green (unseasoned), which made it ideal for complex jointing techniques like mortise and tenon. In much of the region, oak frames were often left exposed or infilled with wattle and mud or later with brick or stucco. The visible timber elements, such as braced posts, tie beams, and jettied upper floors supported by carved brackets, demonstrate both structural function and craftsmanship. Over time, majority of the timber frames were clad with weatherboarding for additional protection against the coastal climate, but the underlying oak structure remains a testament to the village's medieval building traditions.

Stone

The buildings of Graveney, including the Church of All Saints, featured Kentish ragstone and flint, materials that were readily available from the surrounding landscape. Kentish ragstone, a strong, grey limestone, was often quarried locally offering durability and resilience against the coastal climate. This stone was commonly used for the plinths, buttresses, and window frames in the church, as well as in decorative elements like the string course and battlements of the tower. Flint, another local material, was frequently mixed with stone rubble to form the

main walls of the Church of All Saints, creating the characteristic rough texture of the church's exterior. This combination of stone and flint not only ensured the building's longevity but also harmonised with the surrounding landscape. Flints were either laid as field flints in lesser buildings or knapped (that is split and dressed with a hammer) in order to reveal the dark shiny inner surface in finer examples.



Stonework to front of the Church of All Saints.

Brick

Traditional bricks used in the past were typically made from local clay, resulting in a distinctive range of colours and finishes that contributed to the region's architectural character. The bricks were often a warm, reddish-brown or orange hue, a

result of the natural clay found in the area, which was fired in local kilns. Over time, some bricks developed a weathered, slightly darker tone due to exposure to the elements, especially in coastal areas like Graveney. The finish of these bricks was generally smooth but could also be slightly rough-hewn, reflecting the methods of production before the industrial era. In some cases, flemish bond brickwork was used, especially in later periods, contributing to the aesthetic detailing of buildings. While most brick buildings were simple and utilitarian, others, particularly in the 17th century, could feature more decorative brickwork with elements such as headers and stretchers arranged in patterns to add texture and interest to facades.



Brickwork to front of Murton's Farm.

Kent Peg Tiles

The term “peg tile” refers to a traditional plain clay tile designed to hang from the top edge of a tiling lath using a peg. Historically, these tiles were secured with small wooden pegs, and later with aluminium ‘drops’ inserted into or passed through one of the two holes near the top of each tile. Made from local clays and fired using simple methods, these tiles were strong, lightweight, and came in warm terracotta shades of orange and red. Natural imperfections in the clay, along with the handcrafting process, gave each tile unique variations in colour and shape, resulting in a richness of texture that modern machine-made tiles cannot replicate.

Up until the 19th century, handmade clay peg tiles from local sources were the roofing material of choice across Kent. Their production continued well into the 20th century, and a small number of traditional manufacturers still exist today. These tiles remain a distinctive feature of architecture in Graveney. Kent peg tile roofs are especially noticeable on roofs, particularly those with steep pitches, typically exceeding 35 degrees. In addition to roofing, peg tiles are occasionally used for vertical cladding on exterior walls, often arranged with decorative banding to enhance visual interest.



Tiles on the roof of the converted barn at Murton's Farm.

Weatherboarding

Painted feather-edged weatherboarding is a traditional walling material commonly found on historic cottages, barns, and farm buildings. Typically made from timber, such as pine or larch, the boards are laid horizontally with overlapping edges to effectively shed water and protect the structure from the elements. In the Southeast of England, including Graveney, weatherboarding has long been used for both agricultural and domestic buildings, with finishes reflecting their function: farm buildings were often left untreated or coated in black tar, while domestic properties were more likely to be painted white or off-white, offering a lighter and more refined appearance. Over time, the boards naturally weather, developing a soft patina that adds to the rustic charm and character of the area's architecture.



Boarding to extension of Graveney Court.

2.5 Boundary fences, railings and walls

Boundary treatments are an important feature in defining the character of Graveney Church and its surrounding area. The use of railings, picket fences, walls, and hedges of varying types, materials, and ages plays a crucial role in demarcating boundaries and distinguishing between private and public spaces. These features not only serve a functional purpose but also contribute to the aesthetic and historical richness of the village.

The Graveney Church Conservation Area offers a diverse variety of timber-based fences and varying hedgerows. There is also evidence of brick and stone walls around the churchyard and Graveney Court, and similarly, steel related railings to the area to offer architectural quality and craftsmanship. The vast presence of natural elements also pays tribute to the age of the area and lack of interruption the area has had during its history.





Though not within the immediate church conservation area, an important archaeological find known as the Graveney Boat was discovered in 1970 in a nearby marshland. This well-preserved Anglo-Saxon vessel, dating to the 10th century, provides rare evidence of early medieval boat-building techniques and maritime trade in the region. It underscores the broader archaeological richness of the Graveney area, highlighting its historical role in coastal transport and commerce.

2.7 Trees

Trees make an important contribution to the character of the Graveney Church Conservation Area. They enhance key views within and beyond the village, often framing or providing a backdrop to historic buildings such as the Church of All Saints. Their presence adds to the visual amenity and rural atmosphere of the area, while also reinforcing the strong connection between the village and the surrounding countryside.

2.6 Archaeology

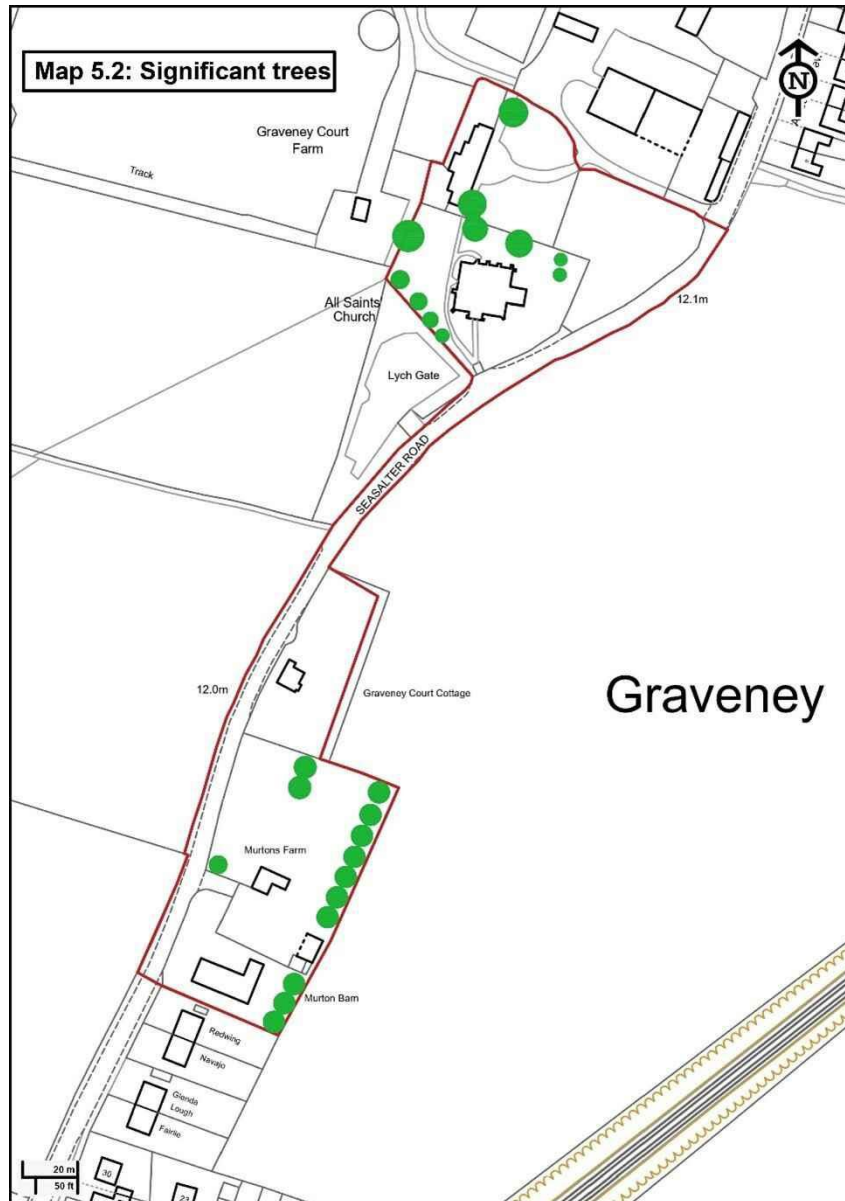
The Church of All Saints in Graveney, a Grade I listed building, is of high archaeological and architectural interest. Dating back to the 12th century, with substantial additions in the 14th and 15th centuries, the church displays a range of historic features including coursed flint and rubble walls, a north-west tower, Romanesque chancel arch, and crown post roof structures. These elements offer insight into the construction methods and religious architecture of medieval Kent. The churchyard, relatively undisturbed, likely contains medieval and post-medieval burials, making it a site of archaeological potential for understanding local burial customs and social hierarchies.



The conservation area is characterised by a variety of native and long-established tree species, including yew, beech, oak, ash, sycamore, field maple, holly, silver birch, and chestnut. These trees support local biodiversity and wildlife, particularly where they form part of hedgerows or boundary features. Their seasonal variation and natural forms contribute to the area's visual richness and ecological value.



Significant trees within the conservation area are plotted on the map marked 5.2.



2.8 The public realm and the highway

Seasalter Road is an important public space that runs through the centre of the Graveney Conservation Area. The road offers different experiences as you move up from Murton's Farm to the Church of All Saints.

The road is rural in character. There are few buildings that utilise the road, and for the most part, the road is narrow and bound by hedgerows and trees on either side. There is a denser congregation of hedgerows starting at Murton's Farm lining either side of the road, before opening up to arable land before reaching the church. As you move from Murton's Farm to the church the curvature of the road adds to the interest and character of the area. The transition to arable land allows changing views and captures vistas. The buildings are relatively concealed as you move up to the church, which is also relatively hidden by trees. However, it is this concealment that lends to the enjoyment of the approach towards the church.

Beyond Murton's Farm, the absence of a footway reinforces the road's rural character. The carriageway is narrow and also serves a bus route, which adds to its dynamic nature and requires attentiveness from all users. As one approaches the church, the character of the road shifts again, with a change in speed limit to 40mph introducing a more active pace. The road remains relatively flat throughout, enhancing long views across the landscape and revealing the area's distinctive topography and rural charm.

Although the road shows a general absence of street lighting, there are several highway signs and bollards along the road

which detract from the character of the area, particularly when approaching the church. Telegraph poles and overhead cables are more prolific along the eastern side of the road but cross to the western side near to the church. The presence of telegraph poles and overhead cables are present-day interventions that are notable detractors in views of the church.

For the most part the streetscape is well maintained as well as the small public footpath along Murton's Farm. The narrowness of the road and density of the hedgerows adds to the rural character of the area, but vehicle movement and other detractors undermine this experience.



View from Murton's Farm towards the church along Seasalter Road.



View towards Lych Gate from Seasalter Road.



View towards Murton's Farm from Seasalter Road.

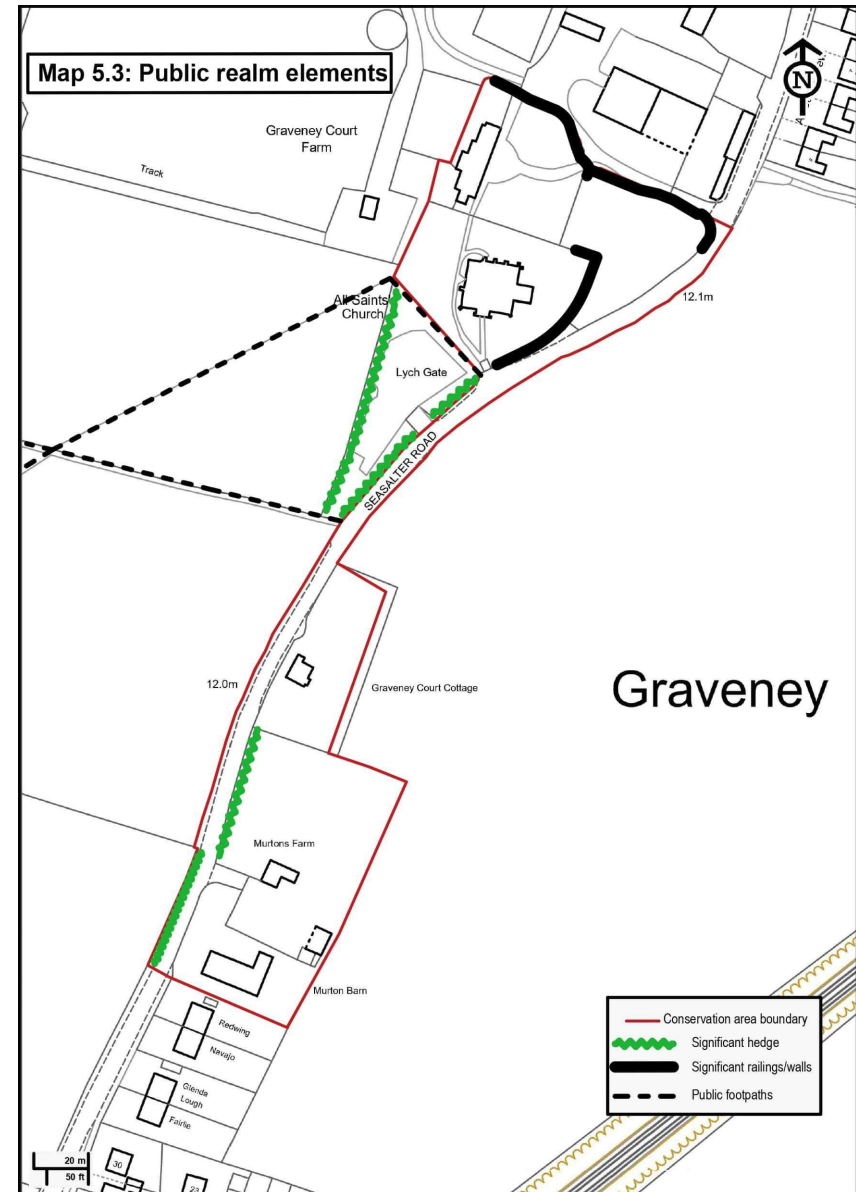


Footpath leading from corner of churchyard and the start of Odin's footpath.



The churchyard wall along Seasalter Road, and the wall along the Graveney Court boundary line.

Map 5.3 illustrates the public realm elements adding to the character of the Graveney Church Conservation Area.



2.9 Significant Views

Views play an important role in how the character and visual appeal of a place are perceived, enjoyed, and understood. Recognising key views helps to safeguard their contribution to the setting, while also supporting the careful planning and management of any development that may affect them.

Viewpoint 1: Views along and from the public highway

Seasalter Road offers views from both edges of the conservation boundary leading from either Murton's Farm or from the Church of All Saints. Both views offer different experiences, but both equally lending to the character of the area.

These views are deemed as important as they not only change with weather conditions but also change with the time of day.



Looking north from Seasalter Road.



Looking south from Seasalter Road.

Viewpoint 2: Views from the village to the surrounding countryside

Panoramic views across the surrounding countryside offer a visually rewarding experience, revealing the natural contours and character of the wider landscape. These views strengthen the historic relationship between the village and its rural setting. The contrast between the intimate, enclosed feel of the road and the expansive, open views beyond enhances the overall sense of place, making a meaningful contribution to the village's unique character.



Looking west from the northern end of Seasalter Road.



Looking south east from the northern end of Seasalter Road.



Looking north from the start of Odin's footpath.



Looking south west from the northern end of Seasalter Road.

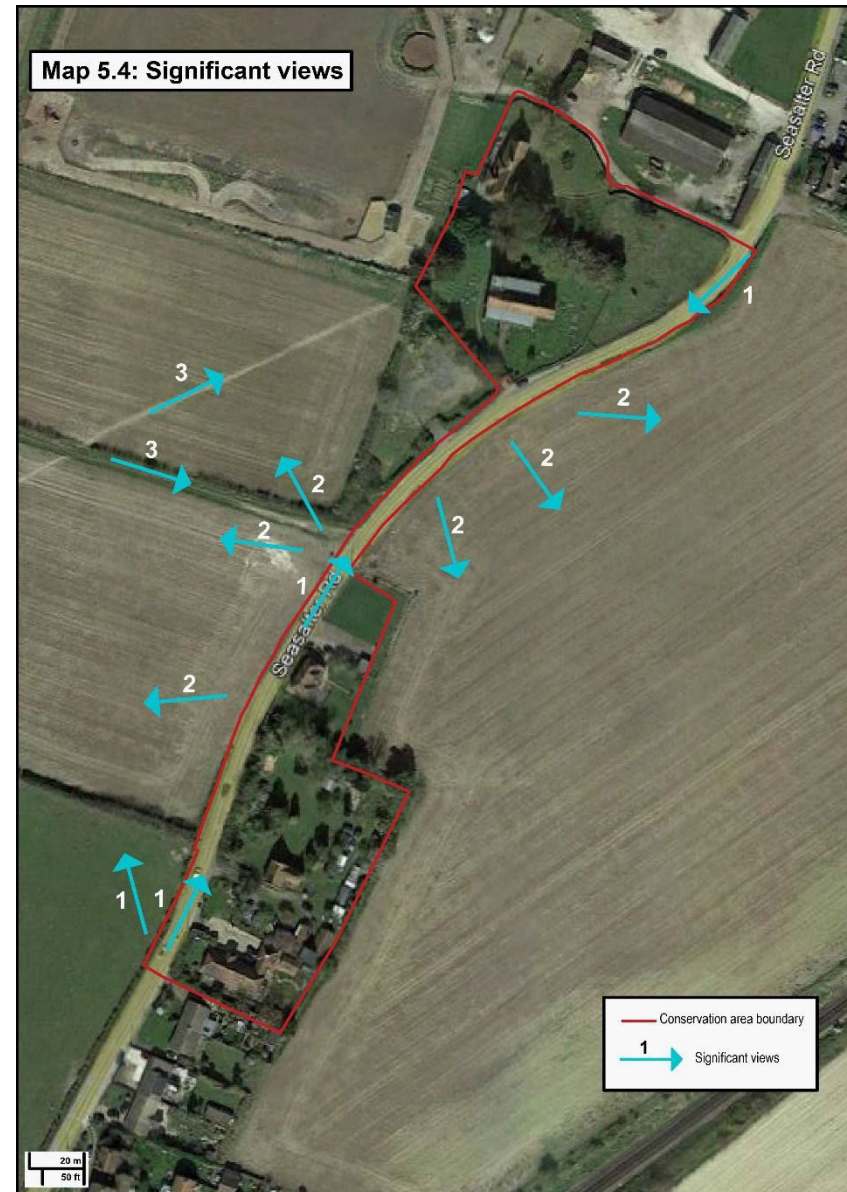
Viewpoint 3: Views from the public footpath towards the area

Views from the public footpath looking toward the area further emphasise the close connection between the settlement and its surrounding landscape. These outward and inward views reinforce the village's rural setting and highlight its historical integration with the natural environment.



View from the village hall looking towards the church.

The significant views are annotated on an aerial map labelled 5.4.



2.10 Setting

The setting of a conservation area often plays a key role in how its historic and visual significance is experienced. Surrounding areas, even when located outside the designated boundary, can make an important contribution to the character and overall sense of place, supporting the conservation area's heritage value and enhancing its context.

Graveney's agricultural landscape setting strongly reinforces the village's historic and functional relationship with its surrounding countryside. In particular, the open land to either side of Seasalter Road are especially important to the setting of the conservation area. These areas bring the rural landscape into the heart of the village, enhancing its countryside character and forming the backdrop to several designated heritage assets.

The Church of All Saints plays a pivotal role in the historic connection the designated area has both within Graveney and to the neighbouring areas. The historical setting of the church is deeply rooted in the rural and coastal landscape of north Kent. Positioned on slightly elevated ground at the edge of the Graveney marshes, the church has long served as a focal point for the surrounding agricultural community. Dating back to the 12th century, its location reflects both spiritual and practical considerations, overlooking the fertile fields and tidal wetlands that sustained local livelihoods. Historically isolated yet central to village life, the church is closely tied to a pattern of dispersed settlement, farmsteads, and ancient routes such as Odin's path that connects to Broom Street and that connects Graveney to the broader medieval landscape. Its proximity to the marshes

and the former Graveney Channel also hints at a time when waterborne trade and travel were key to the area's development. Today, the church remains a powerful symbol of continuity, anchoring the village in its historic setting.

Historic farmsteads like Graveney Court and Murton's Farm, reflects a dispersed rural settlement pattern typical of this part of Kent. The open fields, narrow lanes, and expansive marsh views all contribute to Graveney's distinct historic character, preserving a strong sense of its past as a working rural community closely tied to the land and sea.

3.0 CHARACTER APPRAISAL

3.1 The history and development of Graveney Bridge

The name "Graveney" is believed to originate from the Old English words 'grafa,' meaning 'trench' or 'ditch,' and 'ēa,' meaning 'river,' together translating to 'ditch stream' or more commonly 'at the graven river.' This name was originally used to describe the stream at Graveney, which flowed through a broad ditch (sometimes called a trench or "graven ditch"). In the Domesday Book (1086), Graveney is recorded as "Gravenel."

Notable to the history and development of the area is the influence of the historically referenced 'Culmers'. The Culmers is a small hamlet within the parish of Graveney with Goodnestone in Kent, England. Situated near the village of Graveney and the hamlet of Broom Street, the area is characterised by its rural setting and proximity to the Graveney Marshes. The name "Culmers" appears in historical records, including the 1842 Tithe Apportionment for Graveney, which lists various fields and properties associated with the name, such as "Culmers Field". These records indicate the area's longstanding agricultural significance. Today, Culmers remains a quiet locality, reflecting the traditional Kentish rural landscape.

Historically, the Culmers area has played a vital role in the development of Graveney, mirroring the village's growth and reflecting the broader rhythms of rural life in Kent. It stands as a testament to the enduring presence of local families over generations and illustrates the socio-economic evolution of

rural Kent—from tenant farming to land ownership and active participation in village governance.

The Culmer family, prominent landowners in the region, left a lasting legacy. Notably, they built 'York Gate' in Broadstairs as a defense against storm tides. In the 15th century, George Culmer constructed an arch over the dirt track leading to the fishing harbour, later reinforcing it with heavy wooden doors. Their influence extended beyond Graveney, playing a key role in shaping both Broadstairs and the surrounding areas through generations of stewardship and civic involvement.

Throughout its history, Graveney has maintained a distinct identity due to its physical isolation on the marshes and its proximity to larger centres like Faversham. As such, it has seen relatively limited development compared to more urbanised areas, which has helped preserve its historic fabric. However, in recent decades, the surrounding landscape has been subject to increasing pressure from large-scale infrastructure proposals such as the London Array wind farm, which provided the car park and footbridge to the Graveney Primary School as part of sustainable development. Recently; and of national significance; is the Cleve Hill Solar Park to the northwest of Graveney.

The arrival of the railway in Graveney in 1860 marked a significant turning point in the village's historical development. Situated on a predominantly north-south axis, Graveney is a linear settlement characterised by detached buildings facing both sides of a main road that runs through the village. These buildings are spaced moderately apart and set back at varying distances from the street, contributing to a loosely knit

character shaped by diverse architectural and historical influences. The railway, which runs directly through the heart of the village, physically bisects the settlement and has played a crucial role in shaping its spatial and social fabric.

The railway's construction introduced a clear physical division within the village, with the two sides connected by a bridge that spans over the tracks. This bridge serves as an important link, maintaining connectivity between both halves of Graveney despite the barrier created by the railway line. The presence of a nearby road junction connecting areas to the north and west further underscores the importance of the village as a local transport node, integrating road and rail access and ensuring ongoing connectivity within the region.

Economically, the arrival of the railway during the height of the Industrial Revolution connected Graveney to broader markets, facilitating the transport of local goods and enabling access to materials and products from outside the village. This increased accessibility likely contributed to modest commercial development, particularly around the station and bridge area, while the village's predominantly detached housing pattern suggests that large-scale urbanisation was limited, preserving much of its rural character. The railway's presence also encouraged demographic changes, bringing new residents and workers to the area and contributing to the variety of architectural styles seen today.

Historically, the railway's introduction transformed Graveney from a self-contained rural settlement into a more outward-looking community, connected economically and socially to larger towns and cities. It altered movement patterns within the

village, reshaped the road network to accommodate new transport demands, and influenced the settlement's development trajectory. The result is a village that embodies layers of historical change, where the railway stands not just as an infrastructure feature but as a symbol of Graveney's evolving identity through the centuries.



Historical image of the Post Office & Bridge House in Graveney, dated 1895.

3.2 Topography, geology and landscape

Graveney is located on the eastern edge of the Borough of Swale, approximately six kilometres east of Faversham and a similar distance southwest of Whitstable. It sits at the edge of the Graveney marshes, which extend to the northwest, reaching as far as The Swale.

The area features flat to gently undulating terrain, characteristic of the North Kent marshes. This landscape is interspersed with dykes and drainage channels, reflecting its historical use for grazing and salt production. The proximity to the Swale estuary adds to its ecological significance, providing habitats for various bird species and supporting traditional farming practices.

The underlying geology of the Graveney Bridge area comprises sedimentary rocks from the Jurassic period, including sandstones and mudstones. These formations have been shaped by historical sea-level changes and glacial activities, contributing to the area's current landscape. The soil composition varies, supporting a mix of agricultural activities.

Historically, the Graveney Bridge area has been utilized for mixed agriculture, including livestock grazing on the marshes and arable farming inland. The fertile soils have supported the cultivation of crops such as hops and cherries. The landscape's openness and the presence of isolated buildings suggest a history of rural settlement and land use.

3.3 Buildings

The Graveney Bridge Conservation Area is made up of varying types of buildings and houses with unique architectural features. Several buildings have listed status, with the most significant being the Four Horse Shoes Inn, the Bridge House and Post Office, although some distance apart, define the conservation area.

At the southern end of Seasalter Road, which connects to the bridge, is Graveney School. The school, along with the former head teacher's residence, is a charming Victorian red-brick

structure. Featuring steep slate roofs, Gothic-style windows, and finely crafted brickwork, it showcases the typical architectural elements of school buildings from that era. Completed in 1876, it embodies the classic features of a traditional village school and plays a vital role in shaping the character of the surrounding streetscape.



Graveney Primary School.

Bridge House and The Post Office, both of which pre-date the school, help to define the layout of the road junction. Bridge House is constructed from red stock brick and covered with a clay tile roof, while its former stables have been converted into a residence. The Post Office, also known as Graveney Bridge, is built from brick, now painted, and features a steeply pitched peg-tiled roof that stands out prominently. A single-storey, weatherboarded extension has been added to the front of the

original building to serve as the shop, which has since closed. This straightforward design blends seamlessly with the area's overall character and charm.



Bridge House & the Post Office, with the shop extension to the front.

The North Kent Coast railway line now acts as a physical boundary for these buildings. Seasalter Road takes a gentle dogleg as it crosses the line, a curve that subtly enhances the area's sense of place. The railway bridge itself is a robust and striking structure, though much of its yellow brick skewed arch is set within the cutting, making it less immediately visible from the street. In contrast, a modern steel footbridge has been added alongside; while functional, it lacks the character and refinement of the original bridge.



The North Kent Coast railway.

Bridge Cottages, located on Seasalter Road, are a pair of charming 17th-century cottages, now Grade II listed for their previous architectural and historical significance. Built from rendered brick with plain tiled roofs, the cottages are set on a plinth and feature two storeys, along with a single-storey, half-hipped extension to one side. Distinctive details include metal casement windows on the upper floor and a combination of wooden casements and half-glazed doors on the ground floor, all sheltered by flat hoods. The cottages have since been heavily refurbished and have lost the rendered brick finish over time.



Bridge Cottages (now Wheelrights and Harbour Cottages), Sealsalter Road.

The Bridge Cottages have also had name changes and are now referred to as the Harbour Cottages, being 1 and 2, and Wheelwrights being 3. Further to the south lies a stretch of fairly ordinary modern housing.



Housing further south of Harbour Cottages.

Opposite is the Four Horse Shoes Inn dating from about 1800, which effectively marks the southern limit of the conservation area. The building has significant historical references, having been noted of particular interest for the mathematical tiling on the front elevation. The building has since had multiple changes to its façade, for which it now has sections of red face brick with the mathematical tiling having been painted.



The Four Horse Shoes Inn.

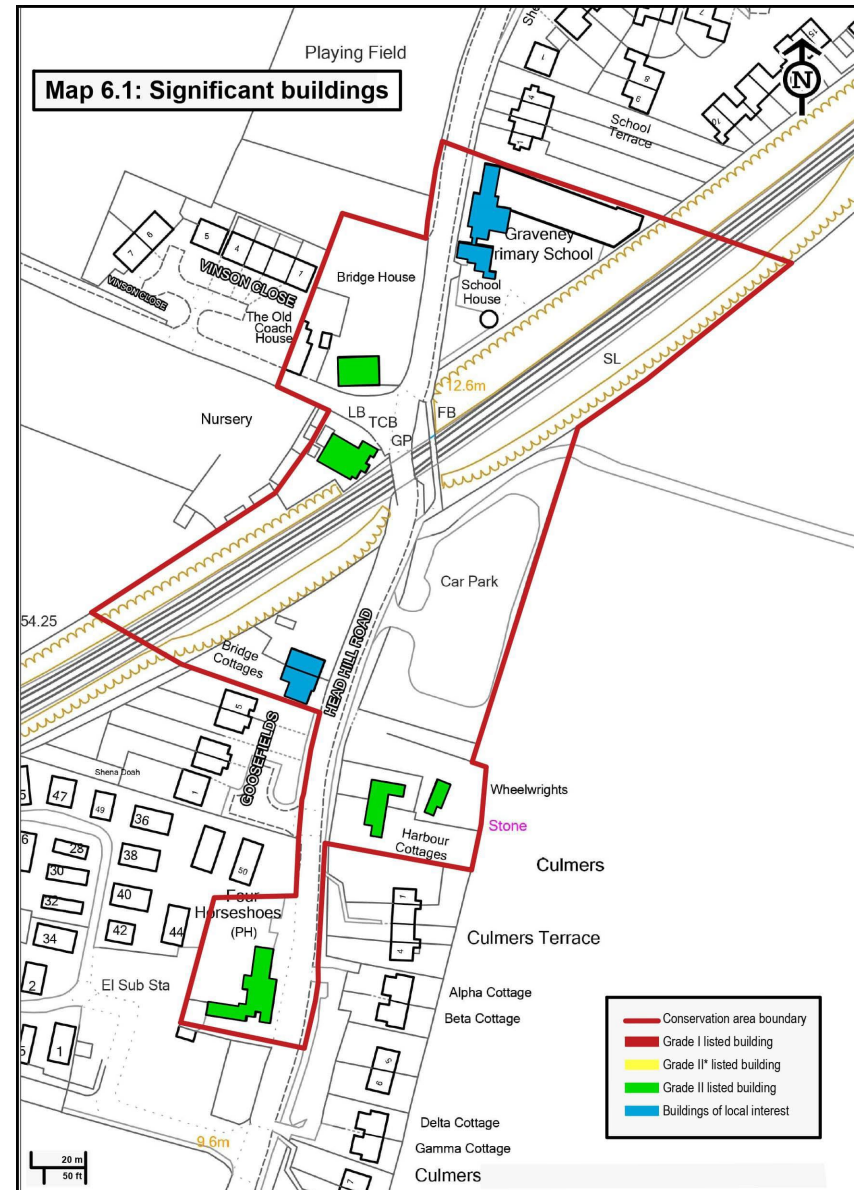
The land to the north of the Inn has been recently developed for housing, and the site to the rear is occupied by the Park Homes on the Four Horseshoes Park.



Park Homes behind the Inn.



Park Homes alongside the Inn.



3.4 Building Materials

The character of the Graveney Bridge Conservation Area is deeply rooted in the diversity of its architectural styles, a quality often expressed through the varied use of traditional building materials. These materials were largely selected based on their availability from local sources, particularly before the transport revolution of the mid-19th century, when nearly all construction relied on materials that could be sourced or produced nearby. This reliance on local resources not only reflects the area's natural geology and landscape but also forms a core part of its architectural identity. At the same time, the choice of materials reveals changing tastes and aspirations over time, with even commonplace materials contributing meaningfully to the area's distinctive character and sense of place.

Before the widespread development of transport networks, builders in Graveney Bridge relied on what was readily available in the local environment. Timber from surrounding woodlands was a primary material for the structural frames of medieval and early post-medieval buildings, often combined with traditional infill techniques such as wattle and daub, or later, brick and plaster. Flint, abundant in the local area, was frequently used in ecclesiastical structures and boundary walls, often paired with ragstone or other stone rubble to add both strength and textural interest. Weatherboarding became a characteristic feature of many domestic and agricultural buildings, serving both a practical and decorative function, particularly in response to the coastal climate. Brick was increasingly used from the 18th century onwards, both for new construction and as a way of updating older buildings with a more fashionable facade.

Roofing materials also reflect this evolution in building practices. Traditional Kent peg tiles dominate the roofscape of the conservation area, lending a warm and consistent visual appeal. However, following the arrival of the railway in nearby Graveney in 1860, slate became more accessible and began to appear on buildings from the mid-19th century onward. Thatch, once commonly used on cottages and farm buildings, has now disappeared from the area, although its historical presence still influences the vernacular character. Together, these materials illustrate the relationship between local resources, historical development, and the enduring architectural heritage of the Graveney Bridge Conservation Area.

Timber Frame

The timber-framed buildings of the Graveney Bridge Conservation Area are a defining element of its historic character, showcasing construction techniques that date back to the medieval period. These structures were traditionally built using English oak, a strong and durable hardwood sourced from the ancient woodlands of Kent. Oak was highly valued not only for its resilience but also for its ability to be worked while green (unseasoned), making it ideal for intricate jointing methods such as mortise and tenon. Across the region, oak frames were often left exposed or infilled with wattle and mud, and later with mortar or stucco as building practices evolved. The visible timber features, such as braced posts, tie beams, and jettied upper stories supported by carved brackets, highlight both the structural role and skilled craftsmanship involved. Over time, many of these timber frames were either clad with weatherboarding overtime, or as with the Four Horseshoes Inn, the frame was clad with mathematical tile

to provide additional protection from the coastal environment, yet the original oak framework remains a lasting testament to the area's medieval building heritage.

Mathematical Tile

Mathematical tiles are specially designed, flanged clay tiles that mimic the appearance of traditional brickwork when fixed to a wall. Once installed, their vertical surface closely resembles that of genuine bricks, making them difficult to distinguish at a glance. Popular in parts of the South East during the 18th and 19th centuries, these tiles were often used to give timber-framed buildings a more fashionable and modern brick-like facade.



Image by Herbert Crosoer 1905, showing what the mathematical tile of the Four Horseshoes prior to being painted would have looked like.

Brick

Traditional bricks used in the past were typically crafted from locally sourced clay, giving rise to a distinctive palette of colours and textures that helped define the architectural character of the region. These bricks often displayed warm reddish-brown or orange tones, a result of the natural clay found in the area and the firing techniques used in local kilns. Over time, exposure to the elements, particularly in coastal environments like Graveney, caused many of these bricks to develop a weathered, slightly darker appearance. The surface finish of historic bricks was usually smooth, though some retained a rougher texture due to pre-industrial production methods. In later periods, Flemish bond brickwork became more common, adding subtle visual interest through alternating headers and stretchers. While many brick buildings served simple, practical purposes, some, especially from the 17th century, incorporated decorative brickwork, using patterned arrangements to enhance façades with added depth and detail.

Although not within the conservation area but on the boundary, there is evidence of yellow stock brickwork being used. Yellow stock brickwork became increasingly common from the Regency period onward. The combination of yellow and red bricks was often used to create a polychromatic effect, a style closely associated with the High Victorian era and later embraced by the Arts and Crafts Movement.



Brickwork on Bridge House.



Brickwork on houses in area called 'Goosefields'.

Kent Peg Tiles

Kent peg tiles are traditional plain clay tiles designed to be hung from tiling laths using small pegs. Originally, these were

secured with wooden pegs, though later versions used metal, often aluminium, 'drops' inserted through one of two holes near the top of each tile. Made from local clay and fired using simple, time-honoured methods, these tiles were both durable and lightweight, typically featuring warm terracotta shades ranging from orange to red. Natural variations in the clay and the handcrafting process gave each tile subtle differences in colour and shape, resulting in a rich, textured finish that modern machine-made alternatives cannot replicate.

Up until the 19th century, handmade clay peg tiles from local sources were the standard roofing material throughout Kent, and their use continued well into the 20th century. Today, a handful of traditional manufacturers still produce them using historic techniques. In Graveney, Kent peg tiles remain a defining architectural feature, especially visible on the steeply pitched roofs, usually angled over 35 degrees. Beyond roofing, peg tiles are also used for vertical cladding on external walls, where they are often laid with decorative banding to add visual interest and texture.



Tiles on the Post Office and back of Bridge House.

Slate

Slate roofing was uncommon before the early 19th century. Its wider use emerged with the advent of rail transport, which made Welsh slate more readily available and affordable across the country, including in Kent. Unlike traditional clay peg tiles, which required steeply pitched roofs, slate allowed for shallower roof angles, typically between 30 and 35 degrees. This shift in pitch often provides a useful clue to the original roofing material used on a building. In some cases, existing buildings with steeper roofs were later re-roofed in slate, but more often, slate was introduced on newer structures designed specifically to accommodate its characteristics. As a material, slate offered a sleek, uniform appearance and excellent weather resistance, which contributed to its popularity in the 19th century and beyond.



Slate tiles at Graveney Primary School.

Weatherboarding

Feather-edged weatherboarding is a traditional cladding method widely seen on historic cottages, barns, and farm buildings throughout the Southeast of England, including Graveney. Typically made from timber such as pine, larch, or sometimes oak, the boards are installed horizontally with overlapping edges, allowing rainwater to run off efficiently and providing essential protection from the elements. This practical and visually distinctive technique has been used for centuries, especially in rural and coastal settings where exposure to harsh weather is a concern.

In Graveney, weatherboarding is a characteristic feature of both domestic and agricultural architecture. Farm buildings were often left untreated or finished with black tar to enhance durability and blend with the working landscape. By contrast, cottages and other dwellings were more likely to be painted in lighter tones, such as white, cream, or pale grey, lending a softer, more refined appearance. Over time, the timber naturally weathers, developing a silvery-grey patina and subtle texture that enrich the building's historic character.



Boarding to the Bridge Cottages and closed Post Office Shop.

Modern Building Materials

In recent decades, mass-produced materials such as concrete roof tiles, machine-made bricks, and uPVC windows have been introduced in Graveney Bridge. However, these modern additions often fail to complement or enhance the historic character of the village, contrasting with the traditional materials and craftsmanship that define the area's architectural heritage.



View of the concrete roof tiles used on the Bridge Cottages.

3.5 Boundary fences, railings and walls

Boundary treatments are a key element in shaping the character of Graveney Bridge and its surrounding landscape. The presence of railings, picket fences, walls, and hedges, crafted from a variety of materials and reflecting different

periods, plays a vital role in defining boundaries and distinguishing private spaces from public areas. Beyond their practical use, these features add to the visual appeal and historical depth of the village.

The Graveney Bridge Conservation Area is home to varying styles of fences and railings, hedges and brick walls. The more traditional white picket fence is also present, enhancing the historical value and aesthetic nature of the area which may have started to disappear with the industrial era.





3.6 Archaeology

While the Graveney Bridge Conservation Area is primarily known for its historic buildings and rural charm, the surrounding landscape has also provided significant archaeological insights. The nearby Graveney Marshes, in particular, have been the site of key discoveries, including the famous Graveney Boat. This well-preserved, clinker-built vessel dates back to the late 9th century, around 895 AD, as determined through dendrochronology. Excavated in 1970, the boat was found alongside a range of artifacts, such as Roman tile fragments and 10th- to 11th-century Continental pottery sherds. These finds suggest the area's longstanding maritime activity and its connections to wider European trade routes during the early medieval period.

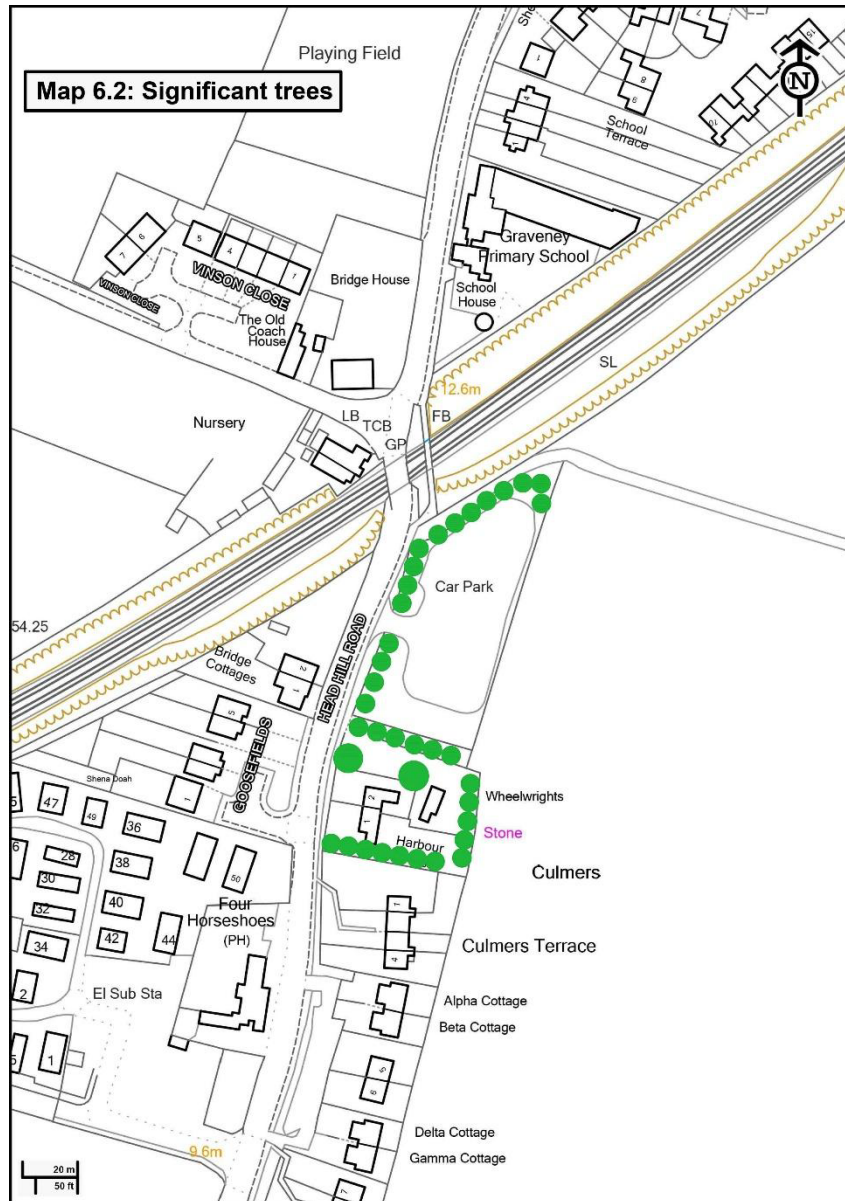
Beyond the boat, the wider region has revealed numerous archaeological features, ranging from the Neolithic to the Anglo-Saxon periods. These discoveries highlight the area's continuous occupation and underscore its strategic significance throughout history, from early human settlements to its role in maritime trade and communication.

3.7 Trees

Trees make an important contribution to the character of the Graveney Bridge Conservation Area. They enhance key views within and beyond the village, often framing or providing a backdrop to historic buildings. Their presence adds to the visual amenity and rural atmosphere of the area, while also reinforcing the strong connection between the village and the surrounding countryside.



The conservation area is characterised by a variety of native and long-established tree species, including yew, beech, oak, ash, sycamore, field maple, holly, silver birch, and chestnut. These trees support local biodiversity and wildlife, particularly where they form part of hedgerows or boundary features. Their seasonal variation and natural forms contribute to the area's visual richness and ecological value.



3.8 The public realm and the highway

At the junction in Graveney, Kent; where Head Hill Road, Sandbanks Lane, Seasalter Road, and the bridge crossing intersect; observers encounter the primary area where the conservation area's historic and physical characteristics are most evident. The layout of the roads and the presence of the bridge reflect the traditional infrastructure of the locality and contribute to the area's historical significance.

This junction provides a clear example of the conservation area's preserved road patterns, architectural features, and surrounding landscape. These elements together demonstrate the area's rural heritage and justify its protected status. The combination of these factors creates a distinct environment that highlights the importance of maintaining the conservation area's original character.



View from Head Hill Road looking towards the bridge.

The road starting from The Four Horseshoes Inn leading up to the juncture over the bridge is active throughout the day and somewhat during the evening. The road itself is rather flat with a gentle winding motion as you move along it, changing views and vistas as one passes through the village.

As the road approaches the bridge crossing, it gently narrows, creating a subtle sense of transition and focus. This narrowing emphasizes the significance of the bridge as a key crossing point. After the bridge, the road broadens again as it opens out into the junction with Seasalter Road and Sandbanks Lane, reinforcing the sense of movement and connection between different parts of the village.

The road slightly narrows as it approaches the bridge crossing and widens once again as it forms the junction to Seasalter Road and Sandbanks Lane.



Junction at Head Hill Road, Sandbanks Lane and Seasalter.

Footways are a consistent feature throughout most of the village and are generously wide, contributing to a pedestrian-friendly environment. The footpaths along Head Hill Road are particularly important as they provide direct access to a pedestrian bridge over the railway line. This bridge connects to a footway that runs past the school and continues up to Murton's Place, integrating different parts of the village and encouraging safe, convenient pedestrian movement. Together,

these elements of road width variation, vegetation density, and thoughtfully planned pedestrian routes help define the character of the area by balancing accessibility with the preservation of natural and built features.



There is little street lighting which contributes positively to the rural character of the village. There are a few street lights before and over the bridge crossing at either end, but do not detract from the overall significance of the area. There is a prolific number of telegraph poles and overhead cables that run along Head Hill Road up to and over the bridge, which continue up Sandbanks Lane and Seasalter Road. These do somewhat detract from the area, particularly when looking towards the bridge from Head Hill Road.

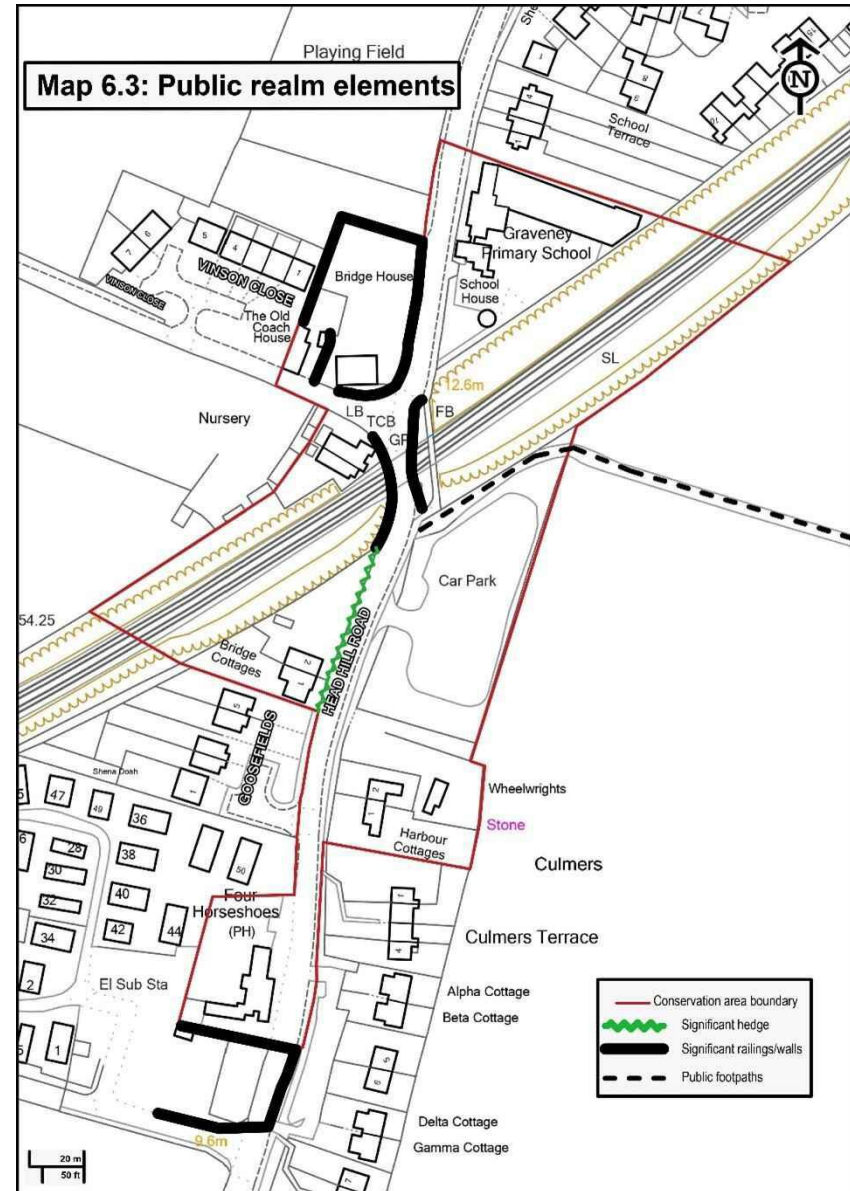


The road through the village also serves as a bus route. The more traditional style of bus stops adds significantly to the character of the area, and act as a key element along the route through the village, showing that the area still holds traditional and historic significance.



Footpath access provides physical and visual links between the settlement and the surrounding landscape, contributing to its overall connectivity with the wider rural area. These routes help define the village's relationship with its landscape setting. Even where footpaths fall outside the conservation area, their connection to the main carriageway contributes to the integration of the built environment with the natural surroundings and supports the character of the settlement.

Map 6.3 illustrates the public realm elements adding to the character of the Graveney Bridge Conservation Area.



3.9 Significant Views

Views play an important role in how the character and visual appeal of a place are perceived, enjoyed, and understood. Recognising key views helps to safeguard their contribution to the setting, while also supporting the careful planning and management of any development that may affect them.

Viewpoint 1: Views along and from the public highway

Head Hill Road, Seasalter Road, and Sandbanks Lane offer views from the edges of the conservation boundaries, revealing both the enclosed road edges and the more open areas of the village. This view contributes to the significance of the conservation area by illustrating key aspects of its historic and architectural character. The presence of traditional red brick cottages, steeply pitched roofs, and prominent chimneys reflects the established vernacular style and supports an understanding of the area's historical development.

The view also provides a clear visual connection to the surrounding rural landscape. The openness at the end of the street allows for an appreciation of how the built environment relates to its wider setting and highlights the transition from village to countryside.

The consistency of built form, scale, and materials within the view contributes to the overall coherence of the streetscape. These characteristics support the aesthetic value of the area and are representative of its established character.

In addition, the spatial progression from a more enclosed village street to open views beyond enhances understanding of

the area's historical layout and development pattern. This view is therefore relevant to both the appreciation and management of the conservation area's special interest.



Looking north from Head Hill Road.



Looking south from Head Hill Road.



Looking south from Seasalter Road.



Looking west from Sandbanks Lane.



Looking east from Sandbanks Lane.

Viewpoint 2: Views from the village to the surrounding countryside

Panoramic views across the surrounding countryside offer a visually rewarding experience, revealing the natural contours and character of the wider landscape. These views strengthen the historic relationship between the village and its rural setting. The contrast between the intimate, enclosed feel of the road and the expansive, open views beyond enhances the overall sense of place, making a meaningful contribution to the village's unique character.



Looking south west from Head Hill Road.



Looking east from the footpath before the bridge.



Looking south west from the bridge over the railway.

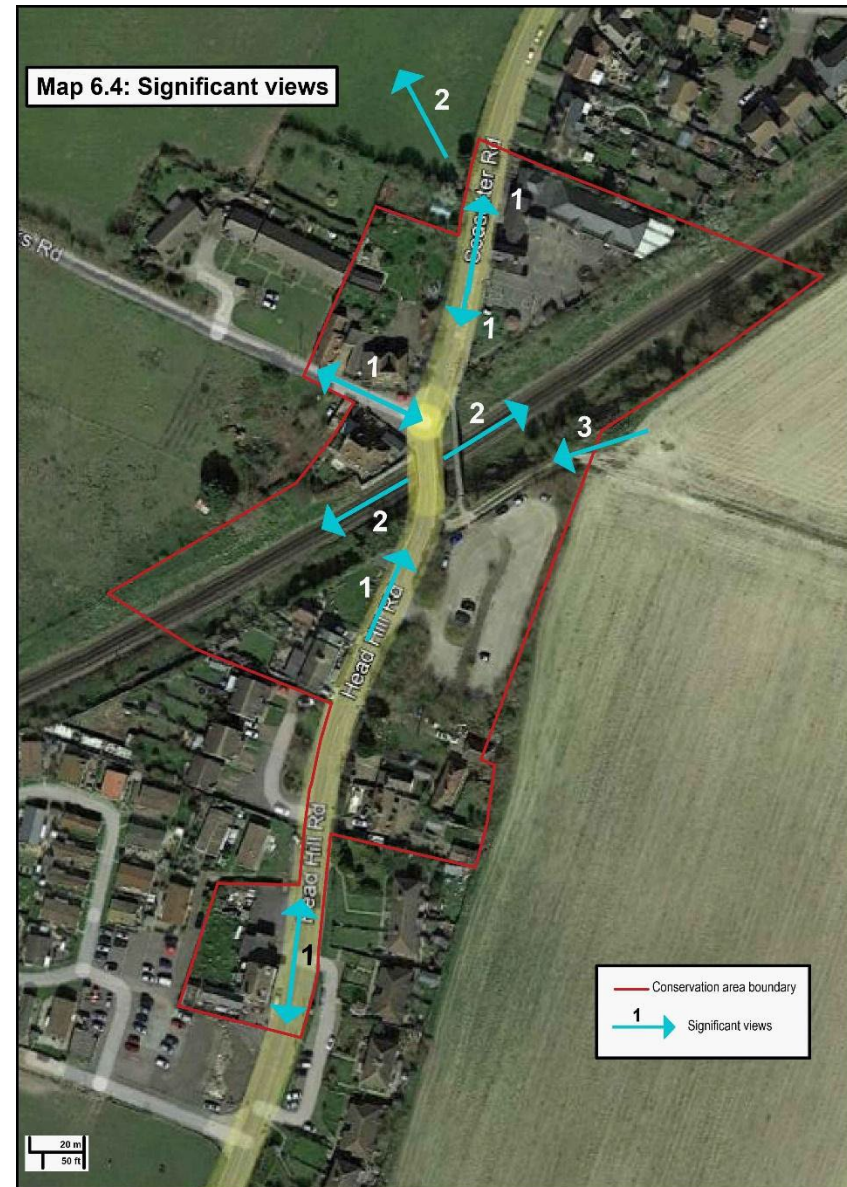
Viewpoint 3: Views from the public footpath towards the area

Views from the public footpath looking toward the area further emphasise the close connection between the settlement and its surrounding landscape. These outward and inward views reinforce the village's rural setting and highlight its historical integration with the natural environment.



View from the footpath towards the bridge crossing.

The significant views are annotated on an aerial map labelled 6.4.



3.10 Setting

The setting of a conservation area often plays a key role in how its historic and visual significance is experienced. Surrounding areas, even when located outside the designated boundary, can make an important contribution to the character and overall sense of place, supporting the conservation area's heritage value and enhancing its context.

The Graveney Bridge Conservation Area in Graveney, Kent, is a rural environment characterised by its preservation of historic features typical of a marshland village. Bounded by Head Hill Road and Sandbanks Lane, the area consists of open countryside, historic residences, and a landscape that has experienced minimal alteration over time. The narrow lanes pass through fields and hedgerows, linking buildings that reflect Graveney's agricultural and social history.

Several historic buildings form the backbone of the conservation area's character. Among them is Bridge House, an architecturally significant Grade II listed property. With its elegant Georgian proportions and distinctive brickwork, Bridge House stands out as a landmark within the village, offering a refined contrast to the more vernacular cottages nearby while still fitting harmoniously within the rural context.

Close to the bridge itself, the Bridge Cottages (as referred to on the ordnance survey maps) form a modest but historically rich grouping of period homes. Their simple, functional design, traditional materials, and grouped arrangement evoke the working-class history of the village. Nearby, the former village Post Office, though now converted to residential use, retains

key architectural features that reflect its central role in Graveney's community life.

Also central to the area's identity is The Four Horseshoes Inn, a long-standing public house that has served as a social hub for the village. Its timber-framed structure, low-pitched roof, and traditional detailing make it a focal point both visually and socially within the conservation area. The Culmers, a Grade II listed group of buildings and now known as the Wheelwrights and Harbour Cottages, contributes further to the area's traditional village layout, with its well-proportioned form and historic fabric.

Together, these buildings, each with their own architectural and historical value, sit within a wider setting of marshland and open space, particularly towards the Graveney Marshes and the South Swale, an area of significant ecological interest. The interplay of built and natural elements, along with the intimate scale of the lanes and houses, gives the Graveney Bridge Conservation Area a distinct sense of place. It stands today as a living patchwork of Kentish heritage, rural tradition, and community continuity.

4.0 CHARACTER APPRAISAL

4.1 The history and development of Goodnestone

Goodnestone is a village nestled in the Swale district of Kent, England, boasts a rich tapestry of history and development. Not to be confused with the other Goodnestone which is easier to locate between Canterbury and Sandwich. Originally documented in 1242 as "Godwineston," the name signifies "the farm or settlement of Godwin," reflecting its Saxon heritage. By 1961, the village had a modest population of 58, and in 1983, it was incorporated into the civil parish of Graveney with Goodnestone.

The area dates back to prehistoric times, with evidence of a hand axe being found in the area upon higher ground, possibly as a vantage point to overlook a hunting or watering area.

There is no mention of Goodnestone in the 1086 Domesday Book. In 1798, Edward Hasted described Goodnestone as the following: "It is a very small parish, lying on the north side of the high London Road, at the 48th milestone, about half a mile's distance from it. The village and church are situated in the middle of the parish, which does not extend more than half a mile from them each way. It lies low in a flat and open country, and from its nearness and exposure to the marshes, very unhealthy, the lands in it are exceeding rich and fertile, like those in the same tract in Faversham and Preston described before, the fields are very level, large, and but little encumbered with trees or hedge-rows, what trees there are elm, and there is no woodland."

Similar to Graveney, Goodnestone remained a marginal area throughout the 19th and 20th centuries, meaning it held a peripheral or less significant role socially, economically, and politically compared to more central or prosperous regions. This marginality can be seen in several ways. For instance, during the "Last Uprising of the Agricultural Labourers" in 1838 at nearby Bossenden Woods; a notable event marked by rural unrest and rebellion against poor working conditions; the rioters passed through both Graveney and Goodnestone but did not find support or active participation from the local populations.

The absence of any recorded involvement by residents suggests that these villages were somewhat isolated or disconnected from the wider social upheavals affecting the surrounding agricultural communities. This lack of engagement highlights the area's marginal status: it was on the outskirts of political activism and social change, possibly due to limited population, economic stagnation, or a more conservative, stable community less inclined to join rebellions. Thus, despite being geographically close to sites of significant unrest, Graveney and Goodnestone remained peripheral, both in influence and involvement, reinforcing their characterisation as marginal areas during this period.

Of importance to Goodnestone's history is the presence of the Stone family. Their legacy is most prominently marked by a Grade II listed chest tomb situated approximately five metres south of St Bartholomew's Church in Goodnestone. The Stone family chest tomb showcases high-quality 19th-century craftsmanship with detailed carvings, including fluting, geometric motifs, and rose decorations. Its well-preserved

condition and stylistic similarities to other regional monuments highlight a shared local tradition in memorial design. The earliest inscription commemorates George Stone, who passed away in 1810.

Further details about the Stone family are preserved in burial records. George Stone, born in 1801, was the eldest son of John Wingfield Stone (1777–1822) and Sarah Stone (1779–1847). He died on April 7, 1840, at the age of 39, and is interred in St Bartholomew's Churchyard. His siblings included Thomas James Stone (1803–1823) and Edward Stone (1808–1858).

Beyond its artistic value, the tomb holds historical significance as a marker of a prominent local family and contributes to the heritage and character of the Church of St Bartholomew's churchyard.

The village broadly follows a north/south axis, and the majority of the houses and buildings are connected to Head Hill Road which runs through the village. The conservation area includes surrounding low-lying fields, woodland to the north, agricultural land, and drainage ditches. It extends from Goodnestone Lane to the Four Horseshoes Park, with a frontage to Head Hill Road.

The majority of the houses and buildings lie within the southern part of the conservation area. Due to the pattern of development, the locality has a relatively open and spacious feel with gaps and planting between dwellings.

The Oast House Complex stands as the sole remaining structure from what was once a flourishing hop-growing industry in the region. This historic complex, consisting of

traditional kilns and drying facilities, offers valuable insight into the agricultural heritage and processing methods used in hop cultivation. Its preservation highlights the significance of hop farming to the local economy and culture during its peak, making the complex a rare and important landmark in the area's rural landscape.

There are also a combination of historic farmsteads, the railway line along its northern boundary, and the adjacent Culmers ancient woodland. The farmsteads represent the area's agricultural heritage through traditional building styles and land use. The railway line reflects the region's industrial development and influences local settlement patterns. The Culmers ancient woodland provides important natural habitat and contributes to the area's ecological value.

The character of Goodnestone, is defined by its charming rural atmosphere, rich historical layers, and a sense of timelessness that has been carefully preserved through its designation as a conservation area. Tucked into the gently undulating North Kent countryside, the village retains the feel of a small, self-contained historic settlement, where agricultural traditions and community life have shaped its physical form and identity over centuries.



Historical image of the Forge Cottages in Goodnestone dated 1910.

4.2 Topography, geology and landscape

The Goodnestone Conservation Area is situated approximately 1.5 miles east of Faversham in Kent. It lies within the civil parish of Graveney with Goodnestone. The area is characterised by its low-lying, flat terrain, which is part of the expansive North Kent marshlands. The landscape is predominantly open and agricultural, with large, level fields that are sparsely populated with trees, primarily elm, and minimal hedgerows. The proximity to marshes contributes to the area's rich and fertile soils, making it highly suitable for agriculture.

Geologically, the region is underlain by a complex sequence of sedimentary formations. The foundational layer consists of Upper Chalk, which is overlain by the Thanet Beds, a fine sandy formation. Above this lies the Woolwich and Old-haven Beds, comprising sands and pebble-rich layers. The surface is predominantly covered by London Clay, a stiff, bluish-grey clay that. Additionally, the area features drift deposits such as alluvium and brickearth, particularly in the marshes and river valleys.

The landscape is characterised by its flat, open terrain, with wide agricultural fields stretching across the area. Scattered woodlands and hedgerows contribute positively to the rural feel and offer pockets of views across the countryside. Only one orchard remains, a quiet reminder of the area's agricultural past.

4.3 Buildings

The Goodnestone Conservation Area includes three statutorily listed buildings: Bartholomew's Church (Grade I), the Stone family chest tomb (grade II) and Goodnestone Court (Grade II*), It also comprises a range of houses, cottages and historic features such as the former Oast Houses; known as the Barons Oast, Hobbits Oast and Thornfield Oast; which were are considered to be of local interest. There are also several buildings and structures that form part of the Poplar Hall farmstead, Landgon Manor farmstead, and Goodnestone Court farmstead; to the east, west and south; that add to the character of Goodnestone. The most significant buildings lie to the west and include St Bartholomew's Church and Goodnestone Court.

Buildings fronting Head Hill Road include Poplar Hall. Built during the twentieth century, it is a substantial, brick-built house set back from the road in a mature garden and nicely marks the southern edge of the village. It is an example of the architecture dating between 1930 - 1950. The house shows small elements of the Arts and Crafts Movement, but it cannot be said to be a direct influence on these styles of homes which in the most part often featured timber-framed structures with infilled panels, steeply pitched roofs, and large chimneys.



Poplar Hall.

Poplar Hall Cottages.

Poplar Hall Cottages, just north of Poplar Hall, exhibit one of the only examples of the exposed timber frame construction in the conservation area. These houses also display architectural characteristics of the Arts and Crafts movement that influenced the design of homes during the mid-19th to early 20th century. Also characterised by traditional brickwork, pitched tiled roofs, and timber detailing, the homes retain their rural charm with gabled roofs, brick chimneys, and small front and rear gardens.

Alongside the cottages is an Oast House complex made up of the former Oast Houses known as Barons Oast, Hobbits Oast

and Thornfield Oast, now converted into dwellings. The converted Oast comprises five prominent roundels linked to a central two storey store. This traditional Kentish building, with its warm red brick and white painted weatherboarded loading bays, plays a key role in defining the character of the street scene in Goodnestone. The conversion has respected the overall building form, but unfavourable features include roof lights in the roundels, plastic windows, and tall evergreens along the front boundary. There is also no evidentiary building consent that notes the approval of the use of the plastic windows.



Oast House complex.

More Poplar Hall Cottages stand immediately to the north of the Oast House complex. They are semi-detached period homes

dating from 1869 are characterised by traditional brickwork and pitched tiled roofs. The homes retain their rural charm with gabled roofs, brick chimneys, and small front and rear gardens. More so, the cottages display intricate brick detailing around the gables, lintels, and first floor stringcourse. Above the heads of the first-floor gable windows is polychrome brickwork triangular stone features that contain the initials RJ. Original windows survive in one cottage.



Poplar Cottages north of the Oast House complex.

At the corner of Goodnestone Lane and Head Hill Road there are a small group of semi-detached houses referred to as the Forge house and 1, 2, 3, 4 and 5 Forge Cottages. These houses express an architectural style in line with that of a traditional farmhouse design. Although of varying finishes, the houses embody the traditional design of gable ends, pitched tiled roofs and brick chimneys on either ends of the gable. The

houses also have red brick facades, common to the area, with the exception of the plaster rendered facade.



Forge Cottages 1, 2, 3 and 4.

To the west of Goodnestone Lane is Goodnestone Court, a timber-framed building from the 15th century. Some of the lower parts of the structure have been rebuilt or reinforced with painted brick. On the left end, you can see exposed wooden beams close together, a typical detail from medieval timber buildings. The roof is plain tiled and hipped with gablets, and there are multiple brick chimneys positioned at the rear left, rear centre, and end right of the structure. The house is two storeys high and was likely originally constructed with a continuous jetty, as indicated by the jettied gables on both ends. The left gable features a Perpendicular-style traceried window with three lights and six over, accompanied by a moulded bargeboard; a combination that, according to the listing on *British Listed Buildings* (Listing Entry No. 101107863), suggests this section may have originally served as a chapel. The façade includes three wooden casement windows on the first floor and two on the ground floor, along with two canted bay windows. A half-glazed door with a flat hood is centrally

located on the right side of the front elevation. The large space between the church and the house is filled with an array of farm buildings, some brick built, which are set in and around a bowl-shaped hollow.



Goodnestone Court.

St Bartholomew church is set apart from the rest of Goodnestone to the west, located just south of Goodnestone Court, and is approached along a narrow lane. This diminutive building dates from the early 12th century, possibly earlier, and still retains most of its Norman character. Built of flint and stone rubble and set in a small churchyard it is a good example of a simple, Norman country church. The building, redundant since

1984, is now cared for by the Churches Conservation Trust.



St Bartholomew Church.



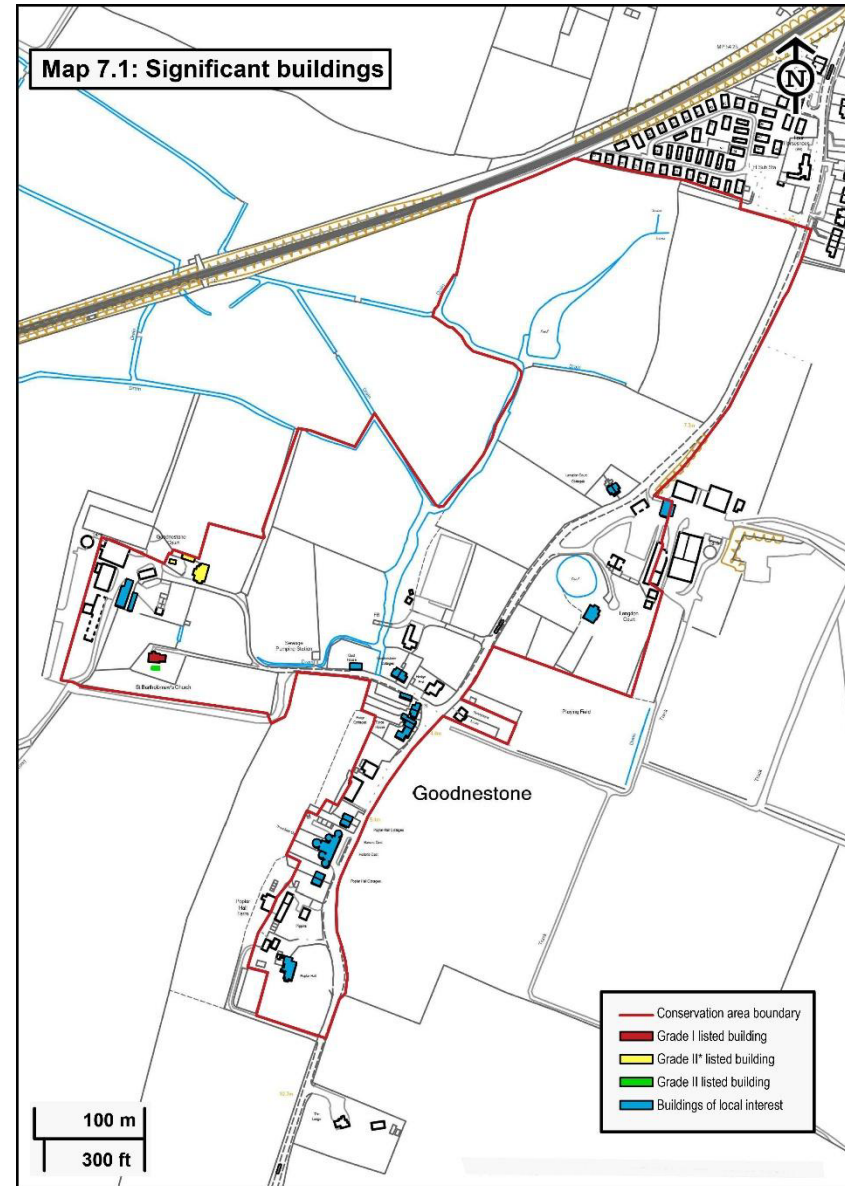
Langdon cottages, situated just north of Langdon Court, are a late 19th to early 20th-century English cottage-style house, constructed primarily from yellow London stock bricks with red brick detailing. It features a steeply pitched clay tile roof with two gabled dormer windows and a central brick chimney stack with terracotta pots. The windows are traditional, white-painted

timber sash types, with arched brick lintels on the ground floor. A modest white timber-panelled front door sits beneath a recessed brick archway. The structure's symmetrical façade and mature, weathered finishes give it a classic, rural character typical of its period.



Langdon Court.

Langdon Court is a sizable brick residence situated just north of the main cluster of buildings in Goodnestone. Set back from the road and mostly concealed by mature trees surrounding it, the house remains largely out of sight to the public realm. Adjacent to it is a group of farm buildings, operated as a separate commercial enterprise. While the complex appears to consist primarily of modern structures, several traditional farm buildings are also present within the group.



4.4 Building Materials

The character of the Goodnestone Conservation Area is firmly rooted in the rich diversity of its architectural styles, a feature often expressed through the varied application of traditional building materials. These materials were primarily chosen based on their local availability, especially before the transport revolution of the mid-19th century, when most construction relied on resources that could be sourced or manufactured nearby. This dependence on local materials not only mirrors the area's natural geology and landscape but also shapes a fundamental aspect of its architectural identity. At the same time, the evolving selection of materials reflects shifting tastes and social aspirations, with even modest elements playing a vital role in defining the area's distinctive character and sense of place.

Prior to the expansion of transport infrastructure, builders in Goodnestone worked with what was readily accessible in the surrounding environment. Timber from local woodlands served as a primary material for the structural frames of medieval and early post-medieval buildings, often combined with traditional infill methods such as wattle and daub, later replaced by brick and plaster. Flint, naturally abundant in the area, was commonly used in ecclesiastical buildings and boundary walls, frequently paired with ragstone or other rubble stone to enhance both durability and visual texture. Weatherboarding became a hallmark of many residential and agricultural structures, offering both practical protection and aesthetic charm, particularly well-suited to the coastal climate. From the 18th century onward, brick became increasingly popular, used

both in new construction and to modernise older buildings with more fashionable exteriors.

Roofing materials similarly illustrate the evolution of local building practices. Traditional Kent peg tiles dominate the rooflines of the conservation area, contributing to a warm and cohesive visual character. However, after the railway reached nearby Graveney in 1860, slate became more widely available and began appearing on buildings from the mid-19th century. Thatch, once a common roofing material for cottages and farmhouses, has since vanished from the area, though its legacy continues to influence the vernacular aesthetic. Collectively, these materials tell the story of Goodnestone's relationship with its natural environment, its historical development, and its enduring architectural heritage.

Stone

During medieval times, the buildings of Goodnestone, including the Church of St Bartholomew, were constructed using Kentish ragstone and flint, materials that were readily sourced from the surrounding landscape. Kentish ragstone, a durable grey limestone, was often quarried locally and prized for its strength and ability to withstand the coastal climate. It was commonly used for plinths, buttresses, and window surrounds in the church, as well as for decorative features such as the string course and battlements of the tower.

Flint, another abundant local material, was frequently combined with rubble stone to form the main walls of the Church of St Bartholomew, giving the exterior its distinctive rough texture. This blend of flint and stone not only contributed to the building's durability but also helped it blend naturally into the

surrounding landscape. In more modest structures, flints were often used in their raw, field-picked form, while in higher-quality buildings, they were knapped, split and shaped with a hammer, to reveal the dark, glossy interior surface, adding visual refinement to the masonry.



Stonework to entrance of St. Bartholomew's Church.

Timber Frame

The timber-framed buildings of the Goodnestone conservation area are a distinctive feature of its historic character, showcasing construction methods that date back to the medieval period. These frames were traditionally crafted from English oak, a strong and readily available hardwood sourced from the ancient woodlands of Kent. Oak was valued not only for its durability and longevity but also for its ability to be worked

while still green (unseasoned), making it ideal for intricate jointing techniques such as mortise and tenon. In much of the region, oak frames were either left exposed or infilled with wattle and mud, and later with masonry or stucco. The visible timber components, such as braced posts, tie beams, and jettied upper floors supported by carved brackets, highlight both structural purpose and craftsmanship. Over time, most of the timber frames were covered with weatherboarding to provide extra protection from the coastal climate, yet the underlying oak structure remains a testament to the village's medieval building traditions.



Timber frame visible on Goodnestone Court.

Brick

Historically, bricks were typically made from locally sourced clay, which resulted in a unique range of colours and textures that contributed to the region's architectural identity. These bricks often featured warm shades of reddish-brown or orange, influenced by the natural clay and the firing methods of local kilns. Over time, especially in coastal areas like Graveney, exposure to the elements caused many of these bricks to develop a weathered, darker appearance. Most historic bricks had a smooth finish, although some retained a rougher texture due to earlier, pre-industrial manufacturing techniques. In later periods, Flemish bond brickwork gained popularity, creating visual interest with alternating headers and stretchers. While many brick buildings were primarily functional, some from the 17th century showcased decorative brickwork, with patterned designs adding depth and detail to their façades. There are buildings within the conservation area where yellow stock brickwork can also be found. This style became more prevalent starting in the Regency period. The mix of yellow and red bricks was often used to create a polychromatic effect, a characteristic style of the High Victorian era that was later embraced by the Arts and Crafts Movement.



Brickwork of Oast House and Goodnestone Cottages.

Kent Peg Tiles

The term “peg tile” refers to a traditional clay tile designed to hang from the top edge of a tiling lath with the use of a peg. Historically, these tiles were fixed with small wooden pegs, and later with aluminum ‘drops’ inserted into or threaded through one of the two holes near the top of each tile. Made from locally sourced clay and fired using simple techniques, these tiles were strong, lightweight, and typically found in warm terracotta shades of orange and red. The natural imperfections in the clay, along with the handmade production process, gave each tile unique variations in color and shape, creating a textured richness that modern machine-made tiles cannot replicate.

Until the 19th century, handmade clay peg tiles sourced locally were the roofing material of choice throughout Kent. Their production continued well into the 20th century, and a few traditional manufacturers still exist today. These tiles are a distinctive feature of Graveney’s architecture, particularly on its roofs. Kent peg tile roofs are especially recognisable for their steep pitch, often exceeding 35 degrees. In addition to roofing, peg tiles are occasionally used for vertical cladding on exterior walls, often arranged with decorative banding to add visual interest.



Tiles on roof of Poplar Hall Cottage.

Weatherboarding

Painted feather-edged weatherboarding is a traditional walling material commonly found on historic cottages, barns, and farm buildings. Typically made from timber, such as pine or larch, the boards are laid horizontally with overlapping edges to effectively shed water and protect the structure from the elements. In the Southeast of England, including Goodnestone, weatherboarding has long been used for both agricultural and domestic buildings, with finishes reflecting their function: farm buildings were often left untreated or coated in black tar, while domestic properties were more likely to be painted white or off-white, offering a lighter and more refined appearance. Over time, the boards naturally weather, developing a soft patina that adds to the rustic charm and character of the area's architecture.



Boarding to a garage on Goodnestone Lane.

Modern Building Materials

In recent decades, mass-produced materials such as concrete roof tiles, machine-made bricks, and uPVC windows have been introduced in Goodnestone. However, these modern additions often fail to complement or enhance the historic character of the village, contrasting with the traditional materials and craftsmanship that define the area's architectural heritage.



Image of UPVC windows on front of the Oast House complex.

4.5 Boundary fences, railings and walls

Boundary treatments play a significant role in shaping the character of Goodnestone and its surrounding landscape. Elements such as railings, picket fences, and walls crafted from diverse materials and reflecting various historical periods, and hedges are essential in defining boundaries and separating

private properties from public spaces. In addition to their functional purpose, these features contribute to the village's visual charm and historical richness.

The Goodnestone Conservation Area features a range of boundary styles, including fences, railings, hedges, and brick walls. Traditional white picket fences can also be found, adding to the area's historic charm and aesthetic value, features that might have diminished with the rise of the industrial age.



4.6 Archaeology

The Goodnestone Conservation Area reveals subtle but important traces of human activity dating back to prehistoric

times. While the archaeological record is not as densely layered as in some other regions of Kent, the finds that have emerged offer key insights into early settlement and tool use. One of the most notable prehistoric artifacts discovered in the area is a pebble hammer, a tool typical of the Neolithic or early Bronze Age periods. This object, found within the parish, reflects early utilitarian activity, likely related to basic tasks such as food preparation, hide working, or toolmaking. Pebble hammers were typically made from water-worn stones and selected for their durability and ease of grip. Their presence in the landscape can indicate transient encampments or longer-term habitation.

The context of this find suggests that the area was visited or inhabited by early communities who may have relied on the nearby marshland, woodland, and access to water for their subsistence. Though no substantial prehistoric structures have yet been unearthed in the conservation area itself, isolated tools like the pebble hammer imply a continuity of land use and a familiarity with the natural landscape by early peoples.

In the wider region around Goodnestone, other prehistoric sites help build a broader picture of human presence. The nearby Graveney Marshes, for instance, have yielded Mesolithic and Neolithic artifacts, suggesting that the wider Faversham area was a corridor of movement and resource exploitation for early populations.

Together, these prehistoric elements, though sparse, contribute to the layered history of Goodnestone and place it within a wider network of prehistoric activity that spans across Kent.

4.7 Trees

Trees play a vital role in shaping the character of the Goodnestone Conservation Area. They enrich important views both within the village and in the surrounding landscape, often framing or complementing historic buildings. Their presence enhances the area's visual appeal and contributes to its rural charm, while also emphasising the close relationship between the village and the countryside around it.



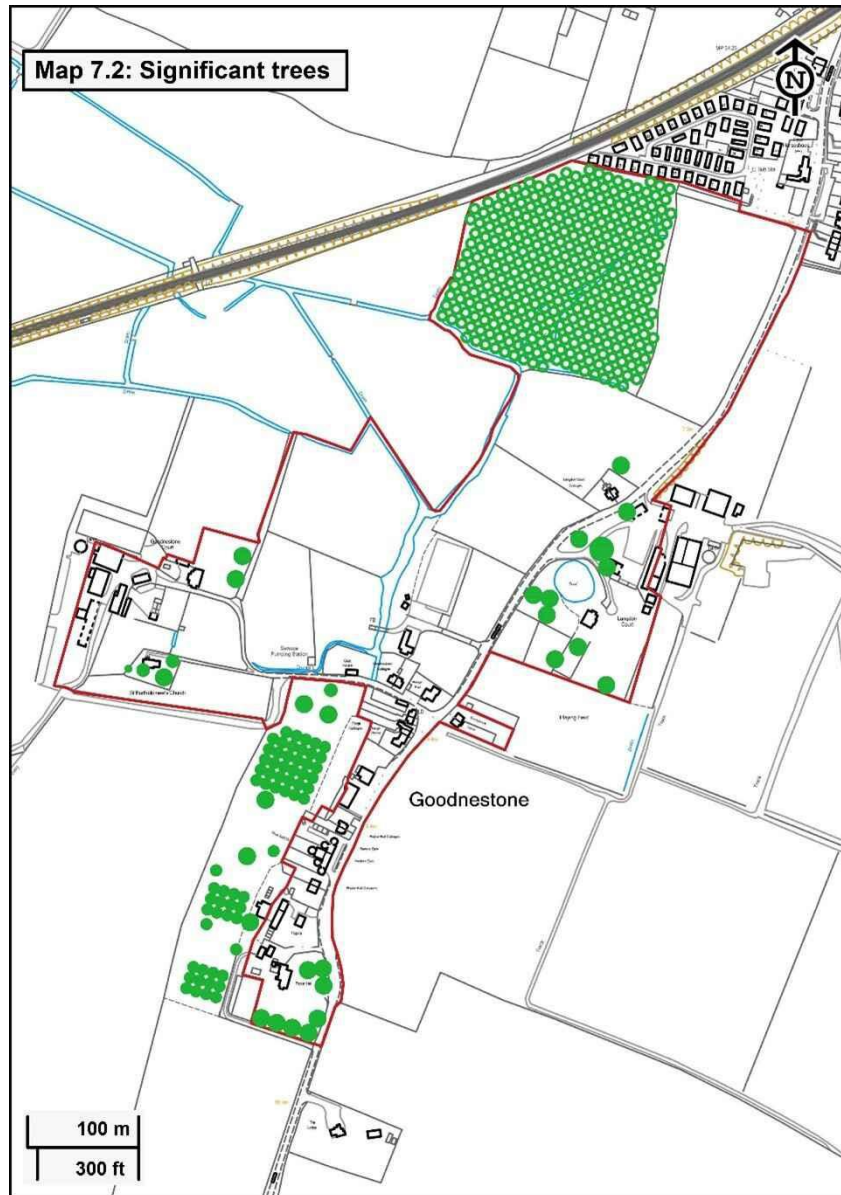
The conservation area is characterised by a variety of native and long-established tree species, including yew, beech, oak, ash, sycamore, field maple, holly, silver birch, and chestnut. These trees support local biodiversity and wildlife, particularly where they form part of hedgerows or boundary features. Their seasonal variation and natural forms contribute to the area's visual richness and ecological value.



Trees at Langdon Court Farm above and the Culmers wood below.



Significant trees within the conservation area are plotted on the map marked 7.2.



4.8 The public realm and the highway

Goodnestone Lane, Head Hill Road, and the central parts of the Goodnestone Conservation Area are key public spaces that shape how both residents and visitors experience and appreciate the village's distinctive rural character.



View from Head Hill Road towards the Oast House complex.

The overall atmosphere of Goodnestone is peaceful and informal, with a loose and organic layout that reflects its agricultural past. Goodnestone Lane, which meanders gently through the heart of the settlement, retains a strong rural identity. There is little in the way of formal pavements or kerbs,

and the buildings, many of which are historic, sit close to the lane in an unregimented fashion. In some sections, such as near the junction with Head Hill Road, the space feels enclosed by cottages and mature hedgerows, enhancing a sense of intimacy. Elsewhere, the village opens up into more spacious and tranquil areas, such as near the small village green or the graveyard of the local church, which offer places for quiet reflection and connection to nature.



View from Head Hill Road towards Langdon Court.

As one travels along Goodnestone Lane or turns onto Head Hill Road, subtle shifts in the road's alignment and elevation create a dynamic sequence of views and perspectives. Historic

buildings, farmsteads, and key landmarks such as the church are gradually revealed, making for a visually engaging journey through the village. The presence of native trees along the lane edges helps blur the line between settlement and countryside, reinforcing the sense that the rural landscape is ever-present and just a step away.



Looking south from Head Hill Road near Goodnestone Lane.

Footpaths exist in some areas but are typically narrow and informal, which contributes to the traditional village atmosphere. The lack of modern street lighting and an overall scarcity of road signage help preserve this rural character and minimise visual clutter. However, telegraph poles and overhead wires, particularly those that intrude into key views such as sightlines to the Oast House complex and Goodnestone Court, are a more intrusive feature and detract slightly from the otherwise harmonious scene.

Despite this, public spaces throughout Goodnestone are generally well cared for and free from excessive signage or modern interventions. Their simple, uncluttered appearance supports the village's enduring rural charm and sense of place.

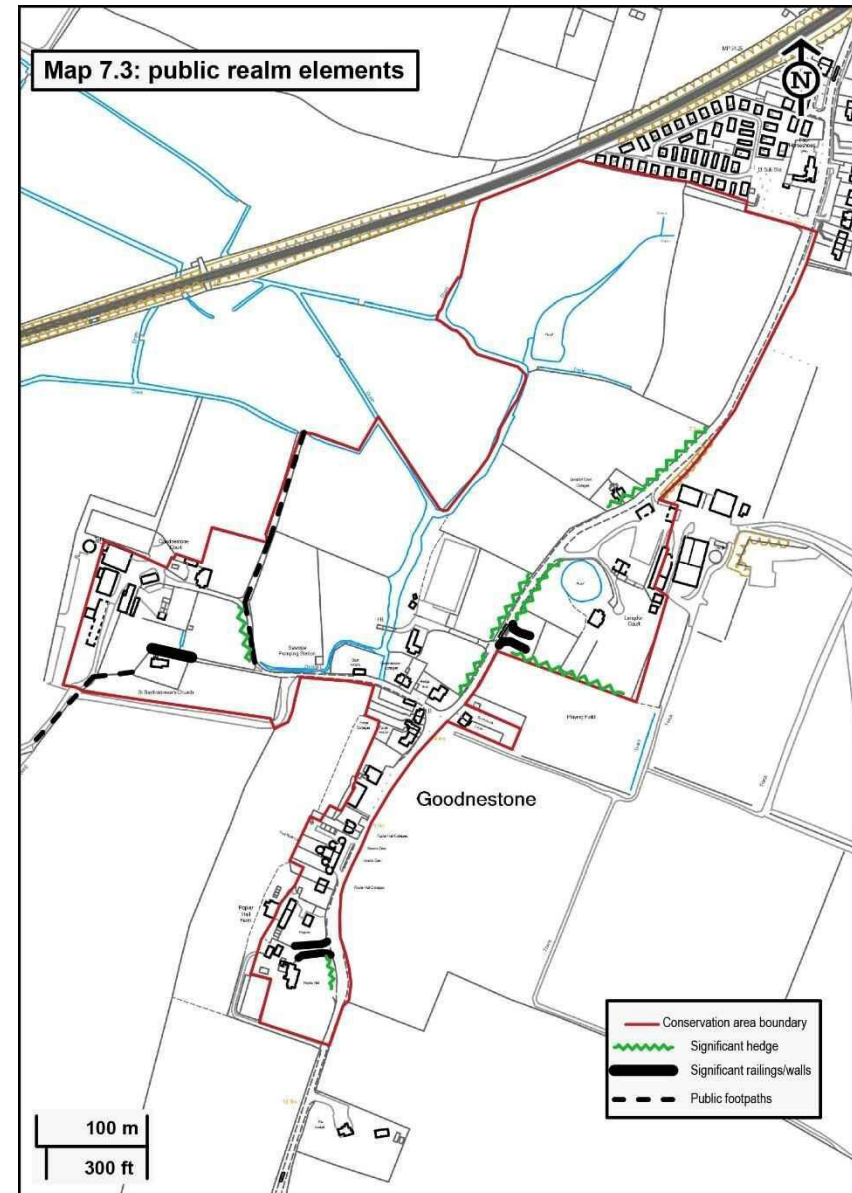


Corner of Head Hill Road Junction with Goodnestone Lane.



View from Goodnestone Lane towards Goodnestone Court.

Map 7.3 illustrates the public realm elements adding to the character of the Goodnestone Conservation Area.



4.9 Significant Views

Views play an important role in how the character and appearance of a place are perceived, enjoyed, and understood. Recognising key views helps to safeguard their contribution to the setting, while also supporting the careful planning and management of any development that may affect them.

Viewpoint 1: Views along and from the public highway

The views experienced along the public road corridors contribute significantly to the understanding of the conservation area's character and setting. Head Hill Road and Goodnestone Lane offer views from the edges of the conservation boundaries. These views provide a varied experience, encompassing both the enclosed, vegetated road edges and the more open aspects of the village.

The road corridors reveal how the built form transitions into the surrounding rural landscape and help to define the edge of the settlement. They allow for visual connections between the historic core and its agricultural context, reinforcing the area's development pattern and spatial structure.

As publicly accessible viewpoints, these roads play an important role in shaping how the conservation area is experienced and understood. The views contribute to the area's overall visual character and support its historic and aesthetic significance.



Looking south from Head Hill Road towards Faversham.



Looking north from the southern end of Head Hill Road.



Looking north from Head Hill Road towards Graveney.



Looking south from Head Hill Road towards Langdon Court.

Viewpoint 2: Views from the village to the surrounding countryside

Panoramic views across the surrounding countryside offer a visually rewarding experience, revealing the natural contours and character of the wider landscape. These views strengthen the historic relationship between the village and its rural setting. The contrast between the intimate, enclosed feel of the road and the expansive, open views beyond enhances the overall sense of place, making a meaningful contribution to the village's unique character.



Looking south west from Graveney.



Looking north west from Langdon Court, on Head Hill Road.



Looking east from Head Hill Road, near Goodnestone Lane.



Looking north from Goodnestone Lane.



Looking north from the footpath connecting to Goodnestone Lane.



Looking north and north east from the footpath connecting to Goodnestone Lane.

Viewpoint 3: Views from the public footpath towards the area

Views from the public footpath looking toward the area further emphasise the close connection between the settlement and its surrounding landscape. These outward and inward views reinforce the village's rural setting and highlight its historical integration with the natural environment.



View from the footpath at the west end of the churchyard looking south.



View towards St Bartholomew Church from footpath.



View towards Poplar Hall and the orchard field from footpath.



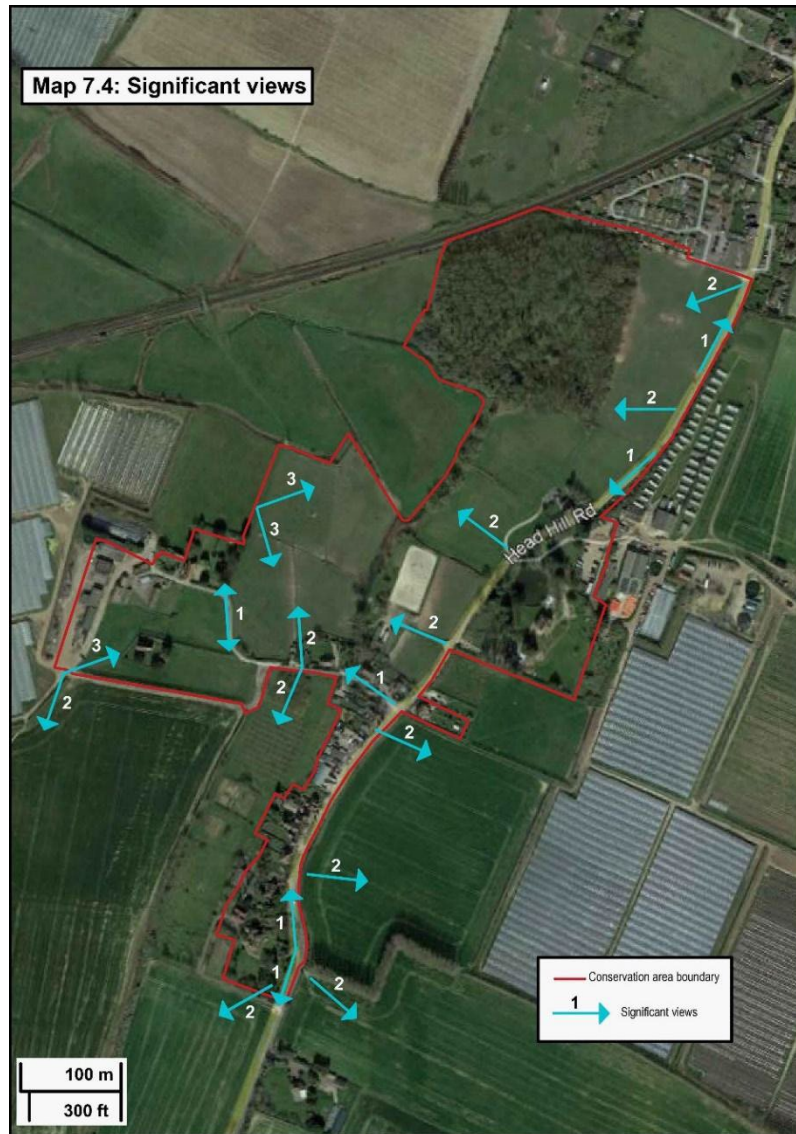
View towards Goodnestone Farm from footpath.



View towards St Bartholomew Church from footpath.



View towards Oast House complex over orchard field from footpath connecting to Goodnestone Lane.



The significant views are annotated on an aerial map labelled 6.4.

4.10 Setting

The setting of a conservation area is often crucial to how its historical and visual importance is perceived. Areas beyond the designated boundaries can still significantly influence its character and sense of place, helping to reinforce the heritage value and enrich the broader context of the conservation area.

The Goodnestone Conservation Area is a well-preserved rural enclave that beautifully reflects the timeless character and historical richness of this small countryside village in Kent. Surrounded by tranquil roads such as Goodnestone Lane, the area offers a rural landscape where the natural beauty of the countryside is on full display. Much like Head Hill Road, Goodnestone Lane winds through expansive open fields, bordered by hedgerows and dotted with charming farm steads which enhance the village's rural character.

The homes along Goodnestone Lane encompass a range of property types, from cottages to larger detached houses, many set within spacious gardens that contribute to the area's open and rural character. The village retains its traditional architectural features and layout, reflecting its historic and conservation area status. Surrounding landscapes and preserved green spaces enhance the overall character of the conservation area. Nearby Faversham provides access to local amenities, supporting the rural community.

The Conservation Area is rich in historical landmarks that add depth to its character. St Bartholomew's Church, a Grade I

listed building, is one of the most significant features of the area, with its striking medieval architecture and centuries-old stonework. The church serves as a central landmark, grounding the village in its spiritual and historical roots. Its presence stands in harmonious contrast to the surrounding cottages and farmsteads, contributing to the area's distinctive rural aesthetic.

Poplar Hall, which defines the southern entrance of the conservation area, plays a key role in shaping the village's historical and architectural identity. The elegant building, with its period features, blends seamlessly into the village's visual landscape. Its well-maintained structure and surrounding grounds evoke the village's agricultural past and offer a sense of continuity with Goodnestone's long-standing heritage.

Goodnestone Lane, Head Hill Road, and the surrounding Conservation Area encompass a rural landscape typical of Kent, characterised by natural features, historic structures, and a calm, undisturbed environment. The area displays a blend of traditional architectural elements and preserved open spaces that reflect its historical and environmental significance.

5.0 SUMMARY AND CONCLUSION

5.1 Graveney Church & Graveney Bridge Conservation Areas

Graveney is a place with a strong and distinctive identity, shaped by its long history, architectural heritage, and close connection to the surrounding marshland and agricultural landscape. The Graveney Church and Graveney Bridge Conservation Areas, both located along Seasalter Road and extending into Sandbanks Lane and Head Hill Road, represent some of the most historically and visually significant parts of the village. Having identified this special character, the area was formally designated as a conservation area in 1999 to ensure the preservation and enhancement of its unique qualities.

The Graveney Church Conservation Area centres around the Grade I listed Church of All Saints, a building of exceptional historic and architectural importance, with Norman origins and medieval additions. Surrounded by a historic churchyard and framed by a group of listed and traditional buildings, the church forms the heart of the village's historic core and reflects Graveney's strong ecclesiastical heritage.

To the south, the Graveney Bridge Conservation Area continues along Seasalter Road and into Sandbanks Lane and Head Hill Road, capturing a more linear, open rural character. This area reflects Graveney's agricultural history and historical relationship with the nearby marshes and coastline. It includes a variety of historic buildings, many dating from the 18th and 19th centuries, built in traditional materials such as stone, timber frame, brick, flint, painted weatherboarding, and Kent

peg tiles. These buildings are interspersed with fields, hedgerows and mature gardens, reinforcing the area's strong visual and historical connection to the surrounding landscape. Together, the two conservation areas encapsulate the historical evolution of Graveney, from its medieval ecclesiastical roots to its development as a rural and agricultural settlement. The shared frontage along Seasalter Road links the two areas, creating a cohesive and attractive historic streetscape with far-reaching views across the marshes and open countryside. The overall sense of place is further enhanced by the survival of traditional building forms, locally distinctive materials, and the limited intrusion of inappropriate modern development.

The 1999 designation of the Graveney Church and Graveney Bridge Conservation Areas recognised the need to protect these important characteristics. Since then, the designation has provided a framework for managing change in a way that respects the village's unique heritage. While the area has evolved over time, development has generally been sympathetic and in keeping with the scale, materials and setting of the village, helping to preserve the special architectural and historic interest for which it was designated.

Key positive characteristics of Graveney Church

The special character of the Graveney Church Conservation Area may be summarised as follows:

- The area around Graveney Church is a historic rural settlement centred around the 12th-century Church of All Saints, with medieval origins as a manorial farming

community shaped by its coastal location and surrounding marshlands.

- The area has a strong visual identity centred around the church which also acts as a visual focus within the conservation area.
- The strong relationship between the village and surrounding landscape, experienced through views and vistas to and from the village and through the public footpath network, particularly around the church.
- The lack of concrete highway kerbs and mature hedgerows to the main road provide the area with a feel of countryside, supported by the open landscape surrounding the area.
- Trees significantly contribute to the character of the area and add to the rural charm.
- The architectural contribution being made by several listed buildings and one, Graveney Court Cottage, considered to be of local interest.
- Boundary walls, fences and hedgerows make a significant contribution to the special character of the area.
- The diverse combination of traditional architectural styles, forms, and local building materials reflects the history and development of the village.

Every conservation area has both positive and negative characteristics and features. Identifying the negative aspects helps those responsible for managing change to prioritise positive improvements and enhancements.

Key negative characteristics of Graveney Church

- The number of highway signs and bollards detracts from rural and historic character of the area.
- The presence of telegraph poles and overhead cables, some of which are visually intrusive.
- A significant building is showing signs of poor maintenance.

As part of the review process, an assessment was carried out to determine whether the existing conservation area boundaries are appropriately defined, and to consider whether the area should be extended or reduced in size.

In this regard, consideration was given to extend the conservation area and include the parking next to the church as well as a small area of open land to the west and south of the church. This area is shown in Appendix 1, map 8.1 on page 95. The parking, which is directly tied to the church, has become part of the visual impact the church has on the area, as well as lending to the landscape character of the area. The area of open land to the west and south of the church provide vistas across the area and to towards the church. They are also enclosed by footpaths with historical interest, namely Odin's Path which is an ancient route that links the church to Broom Street to the west and another historic footpath linking to Sandbanks Lane to the south west. This path was lost when there was an orchard on this area of land but has since been reinstated after the land was returned to arable use. Both have historical significance in the development of Graveney.

It is therefore recommended that the boundary be extended and revised to include the proposed areas and increase the spatial and visual continuity that the church provides to the conservation area.

Key positive characteristics of Graveney Bridge

The special character of the Graveney Bridge Conservation Area may be summarised as follows:

- The settlement around Graveney Bridge on Head Hill Road and Seasalter Road is characterised by a scattering of historic homes amidst more modern features such as the Kent Railway line that runs through the middle of the conservation area.
- There is a strong visual identity centred around the bridge and junction between Head Hill Road, Seasalter Road and Sandbanks Road.
- The Bridge House, Post Office and Graveney Primary School provide a visual focus to the village contributing to its life and vitality.
- The area benefits architecturally from a number of listed buildings, with other buildings and structures considered to be of local interest.
- A varied blend of traditional building styles, forms, and locally sourced materials reflects the village's historical growth and evolving identity.
- Boundary walls, fences, and railings play a notable role in defining the unique character of the area.
- The village maintains a close connection with the surrounding landscape, evident in the expansive views both into and out of the village.

- The healthy number of hedgerows, varying in both size and height, also enhance the visual appeal of the landscape, whilst providing ecological corridors for the area.
- Buildings and public spaces are generally well maintained and remain in good condition, contributing positively to the overall appearance of the area.

Every conservation area has both positive and negative characteristics and features. Identifying the negative aspects helps those responsible for managing change to prioritise positive improvements and enhancements.

Key negative characteristics of Graveney Bridge

- The number of highway signs and bollards detracts from rural and historic character of the area.
- The presence of numerous telegraph poles and overhead cables, some of which detract from the visual quality of the area.
- The widespread use of concrete highway kerbs, though some definition needed on this lane which is a bus route and sometimes used as a shortcut to Whitstable, can appear out of keeping with the village's historic and rural character.
- The occasional introduction of mass-produced, non-local building materials, such as uPVC windows, can undermine the village's traditional character and reduce its overall distinctiveness.

As part of the review process, an assessment was carried out to determine whether the existing conservation area

boundaries are appropriately defined, and to consider whether the area should be extended or reduced in size.

In this regard, consideration was given to extend the conservation area and include the parking next to the Four Horse Shoes Inn. The parking edge embodies a traditional oak post and fence with a hedgerow growing along the streetscape. Having historical and archaeological reference to Roman cinerary urns which were found in the parking area, although the exact location is not known and is not directly tied to the Four Horse Shoes Inn, the parking is important to both the street scene and setting of the listed building and is therefore recommended to be included in the conservation area. The playing field across the school, being on elevated ground, contributes to the scenic characteristic of the conservation area. Views to the open land and orchard fields to the west provide a rural and countryside feel. The hedgerow along Seasalter Road, both significant in height and density, add to the character of the narrow road and create vistas as you move north and south on Seasalter Road.

It is therefore recommended that the boundary be extended and revised to include the proposed areas and increase the visual continuity of the conservation area.

5.2 Goodnestone Conservation Area

The Goodnestone Conservation Area encompasses a picturesque rural landscape characterised by its historic buildings and tranquil setting along Head Hill Road and Goodnestone Lane. The area is defined by its low-lying fields and woodlands to the north, with the village centre situated at the junction of Head Hill Road and Goodnestone Lane.

At the heart of the conservation area is St. Bartholomew's Church, a Grade I listed Norman church dating back to around 1100. St. Bartholomew's Church holds significant historical and cultural value within the Goodnestone Conservation Area. As a prominent landmark, it has been central to the village's religious and social life for centuries. The church has served as a place of worship and community gathering, providing a sense of continuity and identity for local residents over generations.

Next to the church is Goodnestone Court, a Grade II* listed building that adds to the area's architectural heritage. The conservation area also includes traditional Oast Houses, cottages and examples of early 20th century architectural style such as Poplar Hall and Poplar Cottages as well as farm buildings, which contribute to the village's rural character.

The landscape surrounding the conservation area is largely agricultural, featuring a mix of arable land, woodlands, and pastureland. The area is well connected by a network of public footpaths which provide scenic views of the surrounding countryside. The natural environment is managed with an emphasis on biodiversity and sustainability, maintaining the rural character of the area.

The 1999 designation of the Goodnestone Conservation Area recognised the need to protect these important characteristics. Since then, the designation has provided a framework for managing change in a way that respects the village's unique heritage. While the area has evolved over time, development has generally been sympathetic and in keeping with the scale, materials, and setting of the village, helping to preserve the special architectural and historic interest for which it was designated.

Key positive characteristics of Goodnestone

The special character of the Goodnestone Conservation Area may be summarised as follows:

- Goodnestone is a small rural settlement that evolved from a medieval manorial farming community, with its origins deeply rooted in the agricultural history of the region.
- The area has strong visual identities centred around the church and farmstead to the west, as well as the Oast Houses to the south. There is also a visually strong identity at the junction of Head Hill Road with Goodnestone Lane and the Forge Cottages.
- St Bartholomew Church and Goodnestone Court provide a visual focus to the south, with Langdon Court to the north contributing to its life and vitality. The new orchard off Goodnestone Lane and healthy number of hedges also add significance to the life and character of the area.

- The village's architectural character is enhanced by a number of listed buildings, along with many buildings considered to be of local interest.
- The varied mix of traditional building styles, forms, and locally sourced materials reflects the village's historical evolution and tells the story of its development over time.
- Trees play an important role in shaping the character of the village, reinforcing its rural setting and enhancing the overall sense of place.
- Boundary walls, fences, and railings contribute noticeably to the unique character of the area, helping to define its historic and rural identity.
- The village maintains a strong connection with the surrounding landscape, which is experienced through a series of open views and vistas both into and out of the settlement, as well as through a network of public footpaths that link the village to its rural surroundings.
- Farmsteads in the conservation area contribute positively by preserving the area's agricultural heritage, identifying traditional architecture, and maintaining the rural character of the landscape.

Every conservation area has both positive and negative characteristics and features. Identifying the negative aspects helps those responsible for managing change to prioritise positive improvements and enhancements.

Key negative characteristics of Goodnestone

- The presence of numerous telegraph poles and overhead cables, some of which detract from the visual quality of the area.

- The occasional introduction of mass-produced, non-local building materials, such as uPVC windows, can undermine the village's traditional character and reduce its overall distinctiveness.
- A small number of buildings currently used for, what appears to be a fencing company and logistics/mechanic repair company, detract from the character and quality of the conservation area significantly. There is an excess storage of vehicles and materials that neglect the use of the land and block the view of the orchard from Head Hill Road, which is significant where these buildings stand.

As part of the review process, an assessment was carried out to determine whether the existing conservation area boundaries are appropriately defined, and to consider whether the area should be extended or reduced in size. In this regard, consideration was given to extend the conservation area and include the orchard behind the significant buildings of Poplar Hall and the Oast Houses as you enter Goodnestone. This orchard is, whilst young, the only orchard within the area and reminiscent of a major industry in Goodnestone up to the 1950's.

Consideration is given to extending the conservation area to include part of the open field alongside Culmers Wood and grazing fields. This field offers views across the conservation area and surrounding landscape, enhancing its visual and scenic character. It is recommended that the boundary be revised to include these areas, improving visual continuity and landscape heritage.

6.0 GRAVENEY CHURCH CONSERVATION AREA MANAGEMENT STRATEGY

The designation of a Conservation Area does not represent an end in itself but rather serves as a formal recognition of the area's special architectural and historic interest. This status enables the implementation of appropriate measures to ensure that the distinctive character and heritage of the area are preserved and, where possible, enhanced for the benefit of present and future generations.

Conservation should not be misconstrued as an attempt to halt progress or prevent change. The Graveney Church Conservation Area forms part of a dynamic and evolving community. Responsible change is not only inevitable, but necessary to meet the evolving needs of the area and to support its long-term vitality and sustainability.

The objective of conservation in this context is to positively manage change, ensuring that developments are undertaken in a manner that respects the historical and architectural significance of the area, while allowing the community to thrive and adapt. By carefully guiding transformation, the qualities and features that are cherished today can be safeguarded and passed on in good condition to future generations.

This management strategy has been developed to foster active engagement in the ongoing stewardship of the Graveney Church Conservation Area. It provides a structured framework for collaboration among a range of stakeholders, including

Swale Borough Council, the Parish Council, local amenity and heritage groups, Kent County Council, Kent Highways, individual property owners, and local businesses. Through collective effort and shared responsibility, the aim is to ensure that the character and integrity of the Graveney Church Conservation Area are maintained and celebrated over time.

6.1 Statutes and policies

Upon the designation of a conservation area, a range of statutes, planning policies, and regulatory frameworks come into effect to determine which types of development require planning permission, as well as to guide the procedures followed by the local planning authority in both plan-making and decision-taking. The specific statutes and policies relevant to designated conservation areas are detailed in Appendix 4.

These instruments collectively establish the formal framework for managing change within such areas. Of particular importance is the statutory duty placed upon the local planning authority to give special consideration to the desirability of preserving or enhancing the character or appearance of the conservation area in the execution of all its planning functions.

The Swale Borough Local Plan seeks to ensure that the significance of the Graveney Church Conservation Area is both sustained and enhanced through a range of strategic objectives, including:

- The preservation or enhancement of the area's special character and appearance.

- The preservation or enhancement of the setting of the conservation area, as well as other designated heritage assets.
- The safeguarding and enhanced understanding of archaeological significance.
- The protection and enhancement of landmarks and key views or vistas, both within and beyond the conservation area.
- The safeguarding of buildings of local interest that contribute positively to the area's overall significance.
- The protection of spaces that are deemed significant to the character of the area.
- The safeguarding of important trees that contribute to the area's historic and visual value.
- The promotion of high-quality design in new development that responds appropriately to its context and reflects the distinct character of the conservation area.
- The continued sensitive management of the public realm.
- The requirement that all new development demonstrates a positive response to the Conservation Area Character Appraisal.

6.2 Published Guidance

A substantial body of published guidance exists to support the positive management of change within conservation areas. Swale Borough Council has adopted a number of Supplementary Planning Documents (SPDs), which are listed in Appendix 4. In addition, Historic England has produced a

comprehensive suite of guidance and advisory notes, referenced in the bibliography at Appendix 5.

6.3 Householder alterations

Where householder alterations requiring planning permission are proposed, the Council will generally seek to ensure that such changes contribute positively to the special character and appearance of the conservation area. The reinstatement of lost architectural features, such as sash windows, panelled doors, or original roof coverings, as well as the use of traditional boundary treatments, will be actively encouraged by the Council. Where appropriate, such reinstatements may be requested as part of planning applications for extensions and/or alterations.

It should be noted, however, that certain householder alterations to unlisted buildings within conservation areas may still be carried out without the need for planning permission.

With no householder alterations having been discovered, it is suggested that Swale Borough Council not consider the use of an Article 4 Direction for the Conservation Area.

6.4 Swale local heritage list

Derived from Swale Borough Council's adopted Heritage Strategy 2020–2032, the Council is in the process of compiling a *Local Heritage List* to identify heritage assets that, while not formally designated, contribute significantly to the local historic environment.

The purpose of the Local Heritage List is to:

- Enhance public awareness of the borough's local heritage assets and their contribution to local character and distinctiveness;
- Inform developers, property owners, council officers, and elected members about buildings within the borough that are considered worthy of preservation and protection;
- Offer guidance and specialist advice to property owners to support the conservation of the character and setting of relevant buildings, structures, sites, and landscapes;
- Assist the Council in evaluating development proposals and making informed decisions on planning applications; and
- Provide a more comprehensive and accurate record of the borough's local historic environment.

The inclusion of a building or site on the Local Heritage List will be treated as a material consideration in the determination of any planning application affecting that asset.

It should be noted that buildings already protected by virtue of being within the curtilage of a listed building are excluded from the Local Heritage List.

The following buildings in the Graveney Church Conservation Area would be eligible for inclusion within the Swale Local Heritage List, and are listed as follows:

- Graveney Court Cottage

These buildings are also indicated on map 5.1 on page 14.

6.5 Public realm

The public realm (that is, areas located between buildings which are open to public access and contribute to public enjoyment) makes a positive contribution to the special character of the Graveney Church Conservation Area. The highway (being Seasalter Road), public footpaths, the open fields to the west and east of the highway, and the churchyard all fall within the public realm.

In rural conservation areas, it is particularly important to exercise caution regarding conventional highway 'improvements,' as these may not align with or respect the distinctive character of the locality. The inappropriate application of standard elements, such as concrete highway kerbs, street lighting, generic road signage, and traffic calming measures, can often undermine and detract from the unique qualities that define rural village conservation areas.



The preservation of soft verges, without the introduction of concrete kerbs, as well as existing roadside banks and hedgerows, is essential to the future sensitive management of sections of Seasalter Road. Equally important is the restrained use of highway signage and road markings. Where the installation of signs, markings, street furniture, salt bins, refuse bins, or utility boxes is considered necessary, such elements should be carefully designed and sited with sensitivity, and ideally in consultation with the local community.

The Kent County Council has developed and published a new Highways Asset Management Plan (HAMP) to identify a clear investment strategy and associated action plan for the future. Inclusive of this Plan is a Forward Works Programme that covers a five-year period between 2021 and 2025. They have since revised a new five-year Forward Works Programme to cover 2025 – 2029. Highway maintenance, improvements and alterations should be carried out in accordance with the HAMP.

Additionally, reference should be made to *Streets for All* (Historic England, 2018) and *Highway Works and Heritage Assets: The Kent Protocol for Highway Works in Relation to Designated Heritage Assets* (Kent County Council and Kent Conservation Officers Group, 2011). Both offer guidance on best practices for highway and public realm works in historic environments.

Early engagement with all relevant stakeholders, including Swale Borough Council's Conservation and Design Team and Graveney with Goodnestone Parish Council, will be essential to ensuring that any proposed future changes meet appropriate heritage and design standards.

Seasalter Road has several overhead cables and telegraph poles. Opportunities to investigate removal, where possible, in order to remove redundant cables, if any, and reduce the number of poles by the potential of underground services, should be taken.

The Parish Council, Swale Borough Council and Kent County Council will seek to ensure that the public realm continues to be sensitively managed.

Opportunities for enhancement within the public realm:

- An audit of public signage, including highway signage, should be undertaken to assess whether all existing signs and road markings are necessary, appropriately designed, and suitably located.
- An audit of overhead supply lines and utility poles should be conducted in collaboration with the statutory undertakers to determine the potential for removing overhead cables or poles, or for relocating services underground.

6.6 Trees and planting

Trees and hedgerows are essential to the unique character of Graveney, providing significant benefits to local wildlife habitats and supporting biodiversity. It is crucial to promote the preservation and proactive management of these natural features, while also exploring opportunities for new planting when suitable. Any new planting efforts should aim to enhance the rural character of Graveney, typically using native species. However, other species that have become well-established in the Kentish countryside may also be appropriate in certain cases.



It's important to note that all trees within the conservation area are legally protected. Therefore, a written notice must be submitted to the Borough Council at least six weeks before any tree work is carried out within these designated areas.

Trees and Planting: Opportunities for Enhancement

- A comprehensive audit of trees and hedgerows could be conducted to assess opportunities for improved management, potential for additional protection through tree preservation orders, or the possibility of further planting initiatives. This would include and be more

specific to the churchyard and Graveney Court, as well as Murton's Farm.

- In some cases, proactive management may involve the removal of certain trees to preserve, restore, or reveal important views and vistas, ensuring that the natural landscape is optimised for both aesthetic and environmental value. This proactive management would include the churchyard, Graveney Court and Murton's Farm in which the trees appear to require work and maintenance.

6.7 New development opportunities

The potential for new development within the Graveney Church Conservation Area is limited. Any development proposals that arise will be assessed in accordance with both local and national planning policies, which emphasise the utmost importance of conserving designated heritage assets.

Development that impacts the setting of the conservation area or other heritage assets may also alter their cultural and historical significance. The local planning authority is legally obligated to give special consideration to safeguarding the setting of the conservation area, as well as the setting of any listed buildings, during the planning and decision-making process.

6.8 Heritage at risk

There are currently no designated heritage assets within the Graveney Church Conservation Area on Historic England's Heritage at Risk Register or on Swale Borough Council's Heritage at Risk Register.

This appraisal has identified one building which appears to be in poor condition, showing signs of poor structural integrity:

- Murton's Farm
- Small barn at the back of Murton's Farm



These buildings may qualify for inclusion in the Swale Heritage at Risk Register. In such cases, the Council will notify the respective owners and, when appropriate, collaborate with them and other relevant stakeholders to explore opportunities for mitigating the risk and ensuring the long-term preservation of the asset.

7.0 GRAVENEY BRIDGE CONSERVATION AREA MANAGEMENT STRATEGY

The designation of a Conservation Area does not represent an end in itself but rather serves as a formal recognition of the area's special architectural and historic interest. This status enables the implementation of appropriate measures to ensure that the distinctive character and heritage of the area are preserved and, where possible, enhanced for the benefit of present and future generations.

Conservation should not be misconstrued as an attempt to halt progress or prevent change. The Graveney Bridge Conservation Area forms part of a dynamic and evolving community. Responsible change is not only inevitable, but necessary to meet the evolving needs of the area and to support its long-term vitality and sustainability.

The objective of conservation in this context is to positively manage change, ensuring that developments are undertaken in a manner that respects the historical and architectural significance of the area, while allowing the community to thrive and adapt. By carefully guiding transformation, the qualities and features that are cherished today can be safeguarded and passed on in good condition to future generations.

This management strategy has been developed to foster active engagement in the ongoing stewardship of the Graveney Bridge Conservation Area. It provides a structured framework for collaboration among a range of stakeholders, including Swale Borough Council, the Parish Council, local amenity and heritage groups, Kent County Council, Kent Highways,

individual property owners, and local businesses. Through collective effort and shared responsibility, the aim is to ensure that the character and integrity of the Graveney Bridge Conservation Area are maintained and celebrated over time.

7.1 Statutes and policies

Upon the designation of a conservation area, a range of statutes, planning policies, and regulatory frameworks come into effect to determine which types of development require planning permission, as well as to guide the procedures followed by the local planning authority in both plan-making and decision-taking. The specific statutes and policies relevant to designated conservation areas are detailed in Appendix 4.

These instruments collectively establish the formal framework for managing change within such areas. Of particular importance is the statutory duty placed upon the local planning authority to give special consideration to the desirability of preserving or enhancing the character or appearance of the conservation area in the execution of all its planning functions.

The Swale Borough Local Plan seeks to ensure that the significance of the Graveney Bridge Conservation Area is both sustained and enhanced through a range of strategic objectives, including:

- The preservation or enhancement of the area's special character and appearance.
- The preservation or enhancement of the setting of the conservation area, as well as other designated heritage assets.

- The safeguarding and enhanced understanding of archaeological significance.
- The protection and enhancement of landmarks and key views or vistas, both within and beyond the conservation area.
- The safeguarding of buildings of local interest that contribute positively to the area's overall significance.
- The protection of spaces that are deemed significant to the character of the area.
- The safeguarding of important trees that contribute to the area's historic and visual value.
- The promotion of high-quality design in new development that responds appropriately to its context and reflects the distinct character of the conservation area.
- The continued sensitive management of the public realm.
- The requirement that all new development demonstrates a positive response to the Conservation Area Character Appraisal.

7.2 Published Guidance

A substantial body of published guidance exists to support the positive management of change within conservation areas. Swale Borough Council has adopted a number of Supplementary Planning Documents (SPDs), which are listed in Appendix 4. In addition, Historic England has produced a comprehensive suite of guidance and advisory notes, referenced in the bibliography at Appendix 5.

7.3 Householder alterations

Where householder alterations requiring planning permission are proposed, the Council will generally seek to ensure that such changes contribute positively to the special character and appearance of the conservation area. The reinstatement of lost architectural features, such as sash windows, panelled doors, or original roof coverings, as well as the use of traditional boundary treatments, will be actively encouraged by the Council. Where appropriate, such reinstatements may be requested as part of planning applications for extensions and/or alterations.

It should be noted, however, that certain householder alterations to unlisted buildings within conservation areas may still be carried out without the need for planning permission.

With no householder alterations having been discovered, it is suggested that Swale Borough Council not consider the use of an Article 4 Direction for the Conservation Area.

7.4 Swale local heritage list

Derived from Swale Borough Council's adopted Heritage Strategy 2020–2032, the Council is in the process of compiling a *Local Heritage List* to identify heritage assets that, while not formally designated, contribute significantly to the local historic environment.

The purpose of the Local Heritage List is to:

- Enhance public awareness of the borough's local heritage assets and their contribution to local character and distinctiveness;

- Inform developers, property owners, council officers, and elected members about buildings within the borough that are considered worthy of preservation and protection;
- Offer guidance and specialist advice to property owners to support the conservation of the character and setting of relevant buildings, structures, sites, and landscapes;
- Assist the Council in evaluating development proposals and making informed decisions on planning applications; and
- Provide a more comprehensive and accurate record of the borough's local historic environment.

The inclusion of a building or site on the Local Heritage List will be treated as a material consideration in the determination of any planning application affecting that asset.

It should be noted that buildings already protected by virtue of being within the curtilage of a listed building are excluded from the Local Heritage List.

The following buildings in the Graveney Bridge Conservation Area would be eligible for inclusion within the Swale Local Heritage List, and are listed as follows:

- Graveney Primary School & School House (excluding the 2003 extension)
- Bridge Cottages

These buildings are also indicated on map 6.1 on page 32.

7.5 Public realm

The public realm (that is, areas located between buildings which are open to public access and contribute to public enjoyment) makes a positive contribution to the special character of the Graveney Bridge Conservation Area. The highway (being Seasalter Road, Head Hill Road and Sandbanks Lane), public footpaths, the bridge crossing over the railway, and the car park, for which the landscaping has been carefully selected, all fall within the public realm.

In rural conservation areas, it is particularly important to exercise caution regarding conventional highway 'improvements,' as these may not align with or respect the distinctive character of the locality. The inappropriate application of standard elements, such as concrete kerbs, street lighting, generic road signage, and traffic calming measures, can often undermine and detract from the unique qualities that define rural village conservation areas.



The preservation of soft verges, without the introduction of concrete kerbs, as well as existing roadside banks and hedgerows, is essential to the future sensitive management of sections of Seasalter Road and Head Hill Road. Equally important is the restrained use of highway signage and road markings. Where the installation of signs, markings, street furniture, salt bins, refuse bins, or utility boxes is considered necessary, such elements should be carefully designed and sited with sensitivity, and ideally in consultation with the local community.

The Kent County Council has developed and published a new Highways Asset Management Plan (HAMP) to identify a clear investment strategy and associated action plan for the future. Inclusive of this Plan is a Forward Works Programme that covers a five-year period between 2021 and 2025. They have since revised a new five-year Forward Works Programme to cover 2025 – 2029. Highway maintenance, improvements and alterations should be carried out in accordance with the HAMP.

Additionally, reference should be made to *Streets for All* (Historic England, 2018) and *Highway Works and Heritage Assets: The Kent Protocol for Highway Works in Relation to Designated Heritage Assets* (Kent County Council and Kent Conservation Officers Group, 2011). Both offer guidance on best practices for highway and public realm works in historic environments.

Early engagement with all relevant stakeholders, including Swale Borough Council's Conservation and Design Team and Graveney with Goodnestone Parish Council, will be essential

to ensuring that any proposed future changes meet appropriate heritage and design standards.

Seasalter Road and Head Hill Road have several overhead cables and telegraph poles. Opportunities to investigate removal, where possible, in order to remove redundant cables, if any, and reduce the number of poles by the potential of underground services, should be taken.

The Parish Council, Swale Borough Council and Kent County Council will seek to ensure that the public realm continues to be sensitively managed.

Opportunities for enhancement within the public realm:

- An audit of public signage, including highway signage, should be undertaken to assess whether all existing signs and road markings are necessary, appropriately designed, and suitably located.
- An audit of overhead supply lines and utility poles should be conducted in collaboration with the statutory undertakers to determine the potential for removing overhead cables or poles, or for relocating services underground.

7.6 Trees and planting

Trees and hedgerows are essential to the unique character of Graveney, providing significant benefits to local wildlife habitats and supporting biodiversity. It is crucial to promote the preservation and proactive management of these natural features, while also exploring opportunities for new planting

when suitable. Any new planting efforts should aim to enhance the rural character of Graveney, typically using native species. However, other species that have become well-established in the Kentish countryside may also be appropriate in certain cases.



Trees just north of the entrance into Wheelwrights.

It's important to note that all trees within the conservation area are legally protected. Therefore, a written notice must be submitted to the Borough Council at least six weeks before any tree work is carried out within these designated areas.

Trees and Planting: Opportunities for Enhancement

- A comprehensive audit of trees and hedgerows could be conducted to assess opportunities for improved management, potential for additional protection through tree preservation orders, or the possibility of further planting initiatives.
- In some cases, proactive management may involve the removal of certain trees to preserve, restore, or reveal important views and vistas, ensuring that the natural landscape is optimised for both aesthetic and environmental value.

7.7 New development opportunities

The potential for new development within the Graveney Bridge Conservation Area is limited. Any development proposals that arise will be assessed in accordance with both local and national planning policies, which emphasise the utmost importance of conserving designated heritage assets.

Development that impacts the setting of the conservation area or other heritage assets may also alter their cultural and historical significance. The local planning authority is legally obligated to give special consideration to safeguarding the setting of the conservation area, as well as the setting of any listed buildings, during the planning and decision-making process.

7.8 Heritage at risk

There are currently no designated heritage assets within the Graveney Church Conservation Area on Historic England's Heritage at Risk Register or on Swale Borough Council's Heritage at Risk Register.

This appraisal has identified no heritage assets that require addition to Historic England's or Swale Borough Council's Heritage at Risk Register.

8.0 GOODNESTONE CONSERVATION AREA MANAGEMENT STRATEGY

The designation of a Conservation Area does not represent an end in itself but rather serves as a formal recognition of the area's special architectural and historic interest. This status enables the implementation of appropriate measures to ensure that the distinctive character and heritage of the area are preserved and, where possible, enhanced for the benefit of present and future generations.

Conservation should not be misconstrued as an attempt to halt progress or prevent change. The Goodnestone Conservation Area forms part of a dynamic and evolving community. Responsible change is not only inevitable, but necessary to meet the evolving needs of the area and to support its long-term vitality and sustainability.

The objective of conservation in this context is to positively manage change, ensuring that developments are undertaken in a manner that respects the historical and architectural significance of the area, while allowing the community to thrive and adapt. By carefully guiding transformation, the qualities and features that are cherished today can be safeguarded and passed on in good condition to future generations.

This management strategy has been developed to foster active engagement in the ongoing stewardship of the Goodnestone Conservation Area. It provides a structured framework for collaboration among a range of stakeholders, including Swale Borough Council, the Parish Council, local amenity and heritage groups, Kent County Council, Kent Highways,

individual property owners, and local businesses. Through collective effort and shared responsibility, the aim is to ensure that the character and integrity of the Goodnestone Conservation Area are maintained and celebrated over time.

8.1 Statutes and policies

Upon the designation of a conservation area, a range of statutes, planning policies, and regulatory frameworks come into effect to determine which types of development require planning permission, as well as to guide the procedures followed by the local planning authority in both plan-making and decision-taking. The specific statutes and policies relevant to designated conservation areas are detailed in Appendix 4.

These instruments collectively establish the formal framework for managing change within such areas. Of particular importance is the statutory duty placed upon the local planning authority to give special consideration to the desirability of preserving or enhancing the character or appearance of the conservation area in the execution of all its planning functions.

The Swale Borough Local Plan seeks to ensure that the significance of the Goodnestone Conservation Area is both sustained and enhanced through a range of strategic objectives, including:

- The preservation or enhancement of the area's special character and appearance.
- The preservation or enhancement of the setting of the conservation area, as well as other designated heritage assets.

- The safeguarding and enhanced understanding of archaeological significance.
- The protection and enhancement of landmarks and key views or vistas, both within and beyond the conservation area.
- The safeguarding of buildings considered to be of local interest that contribute positively to the area's overall significance.
- The protection of spaces that are deemed significant to the character of the area.
- The safeguarding of important trees that contribute to the area's historic and visual value.
- The promotion of high-quality design in new development that responds appropriately to its context and reflects the distinct character of the conservation area.
- The continued sensitive management of the public realm.
- The requirement that all new development demonstrates a positive response to the Conservation Area Character Appraisal.

8.2 Published Guidance

A substantial body of published guidance exists to support the positive management of change within conservation areas. Swale Borough Council has adopted a number of Supplementary Planning Documents (SPDs), which are listed in Appendix 4. In addition, Historic England has produced a comprehensive suite of guidance and advisory notes, referenced in the bibliography at Appendix 5.

8.3 Householder alterations

Where householder alterations requiring planning permission are proposed, the Council will generally seek to ensure that such changes contribute positively to the special character and appearance of the conservation area. The reinstatement of lost architectural features, such as sash windows, panelled doors, or original roof coverings, as well as the use of traditional boundary treatments, will be actively encouraged by the Council. Where appropriate, such reinstatements may be requested as part of planning applications for extensions and/or alterations.

It should be noted, however, that certain householder alterations to unlisted buildings within conservation areas may still be carried out without the need for planning permission. The Conservation Area Character Appraisal has identified householder alterations that have involved the removal of historic features. It should also be noted, however, that the cumulative impact of inappropriate or unsympathetic alterations to traditional properties can significantly diminish their heritage significance and adversely affect the overall character and appearance of the conservation area. These alterations could erode the character of the Goodnestone Conservation Area should they become utilised in the future.

Swale Borough Council may consider the use of an Article 4 Direction in order to ensure that future alterations are positively managed through the planning system. The householder alterations that could be brought under control of an Article 4 Direction at Graveney Church Conservation Area include:

- Replacement windows and doors.
- Changes to roof coverings.
- Alterations to or demolition of fences, railings and boundary walls.
- Adding a front porch.
- Replacing a front garden with a hard surface.
- Installing roof lights on the roof slope.

8.4 Swale local heritage list

Derived from Swale Borough Council's adopted Heritage Strategy 2020–2032, the Council is in the process of compiling a *Local Heritage List* to identify heritage assets that, while not formally designated, contribute significantly to the local historic environment.

The purpose of the Local Heritage List is to:

- Enhance public awareness of the borough's local heritage assets and their contribution to local character and distinctiveness;
- Inform developers, property owners, council officers, and elected members about buildings within the borough that are considered worthy of preservation and protection;
- Offer guidance and specialist advice to property owners to support the conservation of the character and setting of relevant buildings, structures, sites, and landscapes;
- Assist the Council in evaluating development proposals and making informed decisions on planning applications; and
- Provide a more comprehensive and accurate record of the borough's local historic environment.

The inclusion of a building or site on the Local Heritage List will be treated as a material consideration in the determination of any planning application affecting that asset.

It should be noted that buildings already protected by virtue of being within the curtilage of a listed building are excluded from the Local Heritage List.

It should be noted that buildings already protected by virtue of being within the curtilage of a listed building are excluded from the Local Heritage List.

The following buildings/Structures in the Goodnestone Conservation Area would be eligible for inclusion within the Swale Local Heritage List, and are listed as follows:

- Poplar Hall
- Poplar Hall Cottages to north and south of Oast House complex
- Hobbits Oast
- Barons Oast
- Forge House
- 1 – 5 Forge Cottages
- Goodnestone Cottages
- Oast House complex
- Langdon Court
- Langdon Court Cottages
- Langdon Farm barn
- Goodnestone Farm (traditional) barns

These buildings are also indicated on map 7.1 on page 53.



Langdon Farm barn.



Goodnestone Farm barns.

8.5 Public realm

The public realm (that is, areas located between buildings which are open to public access and contribute to public enjoyment) makes a positive contribution to the special character of the Goodnestone Conservation Area. The highway (being Head Hill Road and Goodnestone Lane), Head Hill Road from Poplar Hall to Langdon Courth and north to Graveney, Goodnestone Lane to St. Bartholomew's Church and Goodnestone Court and the public footpaths, all fall within the public realm.

In rural conservation areas, it is particularly important to exercise caution regarding conventional highway 'improvements,' as these may not align with or respect the distinctive character of the locality. The inappropriate application of standard elements, such as concrete kerbs, street lighting, generic road signage, and traffic calming measures, can often undermine and detract from the unique qualities that define rural village conservation areas.



The preservation of soft verges, without the introduction of concrete kerbs, as well as existing roadside banks and hedgerows, is essential to the future sensitive management of sections of Goodnestone Lane and Head Hill Road. Equally important is the restrained use of highway signage and road markings. Where the installation of signs, markings, street furniture, salt bins, refuse bins, or utility boxes is considered necessary, such elements should be carefully designed and sited with sensitivity, and ideally in consultation with the local community.

The Kent County Council has developed and published a new Highways Asset Management Plan (HAMP) to identify a clear investment strategy and associated action plan for the future. Inclusive of this Plan is a Forward Works Programme that covers a five-year period between 2021 and 2025. They have since revised a new five-year Forward Works Programme to cover 2025 – 2029. Highway maintenance, improvements and alterations should be carried out in accordance with the HAMP. Additionally, reference should be made to *Streets for All* (Historic England, 2018) and *Highway Works and Heritage Assets: The Kent Protocol for Highway Works in Relation to Designated Heritage Assets* (Kent County Council and Kent Conservation Officers Group, 2011). Both offer guidance on best practices for highway and public realm works in historic environments.

Early engagement with all relevant stakeholders, including Swale Borough Council's Conservation and Design Team and Graveney with Goodnestone Parish Council, will be essential to ensuring that any proposed future changes meet appropriate heritage and design standards.

Head Hill Road has several overhead cables and telegraph poles. Opportunities to investigate removal, where possible, in order to remove redundant cables, if any, and reduce the number of poles by the potential of underground services, should be taken.

Head Hill Road has a section of stored unsightly vehicles that is deterring from the character of the Conservation Area. Opportunities to investigate removal and reuse of the area, where possible, should be taken.

The Parish Council, Swale Borough Council and Kent County Council will seek to ensure that the public realm continues to be sensitively managed.

Opportunities for enhancement within the public realm:

- An audit of public signage, including highway signage, should be undertaken to assess whether all existing signs and road markings are necessary, appropriately designed, and suitably located.
- An audit of overhead supply lines and utility poles should be conducted in collaboration with the statutory undertakers to determine the potential for removing overhead cables or poles, or for relocating services underground.
- An audit of the use of open public space to ensure suitability and provide a better sense of place.
- An audit of the roadways to identify blind spots and dangerous zones along the winding road.

- The feasibility of adding footways where there are roadside hedges to increase pedestrian safety along Head Hill Road.
- Protection and upkeep of the Graveney and Goodnestone sign to ensure preservation of an important feature to the area.



Graveney & Goodnestone sign on Head Hill Road.

8.6 Trees and planting

Trees and hedgerows are essential to the unique character of Goodnestone, providing significant benefits to local wildlife habitats and supporting biodiversity. It is crucial to promote the preservation and proactive management of these natural features, while also exploring opportunities for new planting

when suitable. Any new planting efforts should aim to enhance the rural character of Goodnestone, typically using native species. However, other species that have become well-established in the Kentish countryside may also be appropriate in certain cases.



Trees on the east and west sides of Head Hill Road next to Poplar Hall.

It's important to note that all trees within the conservation area are legally protected. Therefore, a written notice must be submitted to the Borough Council at least six weeks before any tree work is carried out within these designated areas.

Trees and Planting: Opportunities for Enhancement

- A comprehensive audit of trees and hedgerows could be conducted to assess opportunities for improved management, potential for additional protection through

tree preservation orders, or the possibility of further planting initiatives.

- In some cases, proactive management may involve the removal of certain trees to preserve, restore, or reveal important views and vistas, ensuring that the natural landscape is optimised for both aesthetic and environmental value.

This appraisal has identified no heritage assets that require addition to Historic England's or Swale Borough Council's Heritage at Risk Register.

8.7 New development opportunities

The potential for new development within the Goodnestone Conservation Area is limited. Any development proposals that arise will be assessed in accordance with both local and national planning policies, which emphasise the utmost importance of conserving designated heritage assets.

Development that impacts the setting of the conservation area or other heritage assets may also alter their cultural and historical significance. The local planning authority is legally obligated to give special consideration to safeguarding the setting of the conservation area, as well as the setting of any listed buildings, during the planning and decision-making process.

8.8 Heritage at risk

There are currently no designated heritage assets within the Goodnestone Conservation Area on Historic England's Heritage at Risk Register or on Swale Borough Council's Heritage at Risk Register.

APPENDIX 1

Proposed Amendments to the Graveney and Goodnestone Conservation Area Boundaries

As part of the review of the Graveney and Goodnestone Conservation Areas, consideration has been given to whether the existing boundaries accurately reflect the area's special architectural or historic interest.

For the most part, the current boundaries are deemed appropriate, as the area continues to exhibit architectural or historic qualities that make it desirable to preserve or enhance its character or appearance. However, three amendments are being proposed, as outlined below:

Proposed boundary adjustment 1 (part of Graveney Church)

It is proposed to enlarge the current Conservation Area to include the parking area for the church and part of the reinstated footpath along the churchyard.

These areas contribute significantly to the historical, aesthetic, and landscape interest of the locality. The parking area adjacent to the church grounds is enclosed by hedgerows and the churchyard wall, marking an important transitional space that leads to a historic footpath beginning at the northwest corner of the parking area.

Of particular importance is the footpath along the south side of the parking area, known as Odin's Path, which historically connects the church to Broom Street to the west. This route not

only serves as a tangible link between key village landmarks but also connects with the reinstated diagonal footpath across the field toward Sandbanks Lane, a path that had been lost due to the presence of an orchard but has now been restored.

Old Ordnance Survey maps from 1890 and 1921 show that the current parking area once formed part of an orchard, with no formal boundary hedge as exists today. These historical maps also indicate that the adjoining field extended uninterrupted up to the line of the historic footpath, underscoring the long-established nature of the pedestrian route that linked the church with Sandbanks Lane. Similarly, Odin's Path is shown as an historic route providing direct pedestrian access from the church to Broom Street, reinforcing its role in the village's traditional circulation pattern.

According to *Practice Guide 3 (58)*, such historic routes are crucial as they physically demonstrate the longstanding relationship between the village and its surrounding landscape. Including these footpaths within the Conservation Area acknowledges their role in illustrating how the community historically interacted with and moved through the local environment, reinforcing the cultural and historic significance of the setting.

It is acknowledged that Odin's Path does not constitute built form, and that *Historic England Advice Note 1* advises that conservation area designation is not generally intended as a means of protecting the wider landscape. However, in this instance, the inclusion of Odin's Path is warranted due to its direct and visible contribution to the character and appearance of the village. The path is not merely a landscape feature but

forms part of a historic movement network that reflects long-established patterns of access between the church, village streets, and open land. It visually and physically links distinct parts of the settlement and helps articulate the form and evolution of the village in its landscape setting.

By including the route and its immediate setting within the Conservation Area boundary, the special historic interest of this space; shaped by human use and reinforced by its enduring visual presence; can be managed appropriately through the planning process. This approach ensures that any future changes respect the route's contribution to local distinctiveness and preserve the integrity of the setting.

The entrance to the parking area also marks an important point in the history of Graveney and Goodnestone, as highlighted on a historical board established in 2001, further underscoring the value of this location.

Therefore, it is recommended that the Conservation Area be extended to encompass the parking area alongside the church, as well as a portion of the adjacent field, incorporating Odin's Path and the footpath toward the village hall. This extension will ensure the protection and recognition of these historically significant routes that illustrate the deep connection between the village and its landscape, while appropriately managing key contributors to the area's character and historic legibility.

The proposed conservation area boundary changes are shown on Map 8.1.



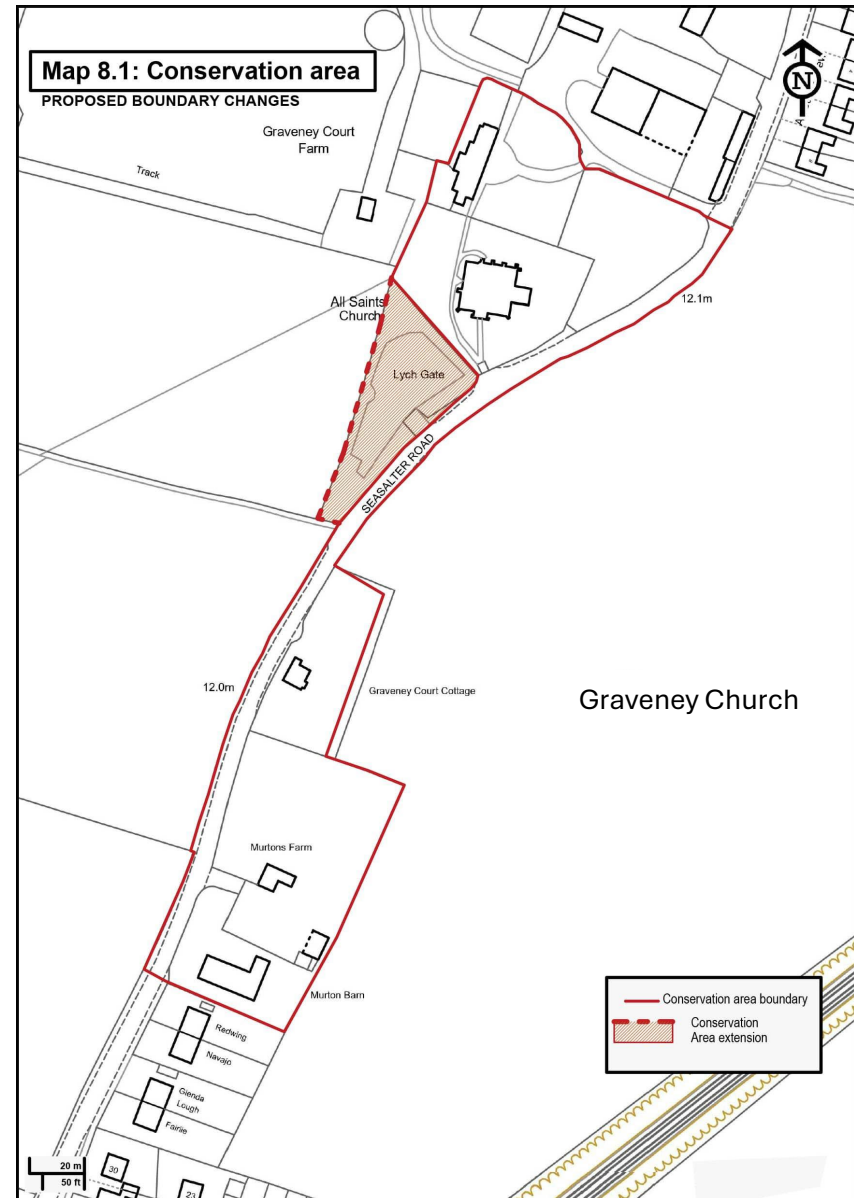
View from the churchyard into the parking area.



View from the footpath towards the church, connecting to Odin's path alongside the church parking area.



View from the start of Odin's path towards Broom Street.
View of the historical board at the entrance to the car park.



Proposed boundary adjustment 2 (part of Graveney Bridge)

It is proposed that the Conservation Area be extended to include the parking area adjacent to the Four Horse Shoes Inn, due to its contribution to the historic character, setting, and streetscape of the area.

The parking area is enclosed by a traditional post and rail timber fence, complemented by a growing native hedgerow, which adds to the rural character and visual cohesion of the area. While hedgerows are not usually subject to planning control, certain types are protected under the Hedgerows Regulations 1997, particularly where they are over 30 years old or adjacent to agricultural or equine land.

The site also holds archaeological significance, having produced Roman cinerary urns during previous excavations. This underlines its historical depth and aligns with Historic England's emphasis on archaeological potential as a key factor in assessing conservation area value.

Importantly, the parking area contributes to the setting of the Grade II listed Four Horse Shoes Inn, providing an open foreground that enhances views of the building from Head Hill Road. This supports Historic England's guidance that open spaces adjacent to heritage assets can contribute significantly to their setting and the character of the wider conservation area.

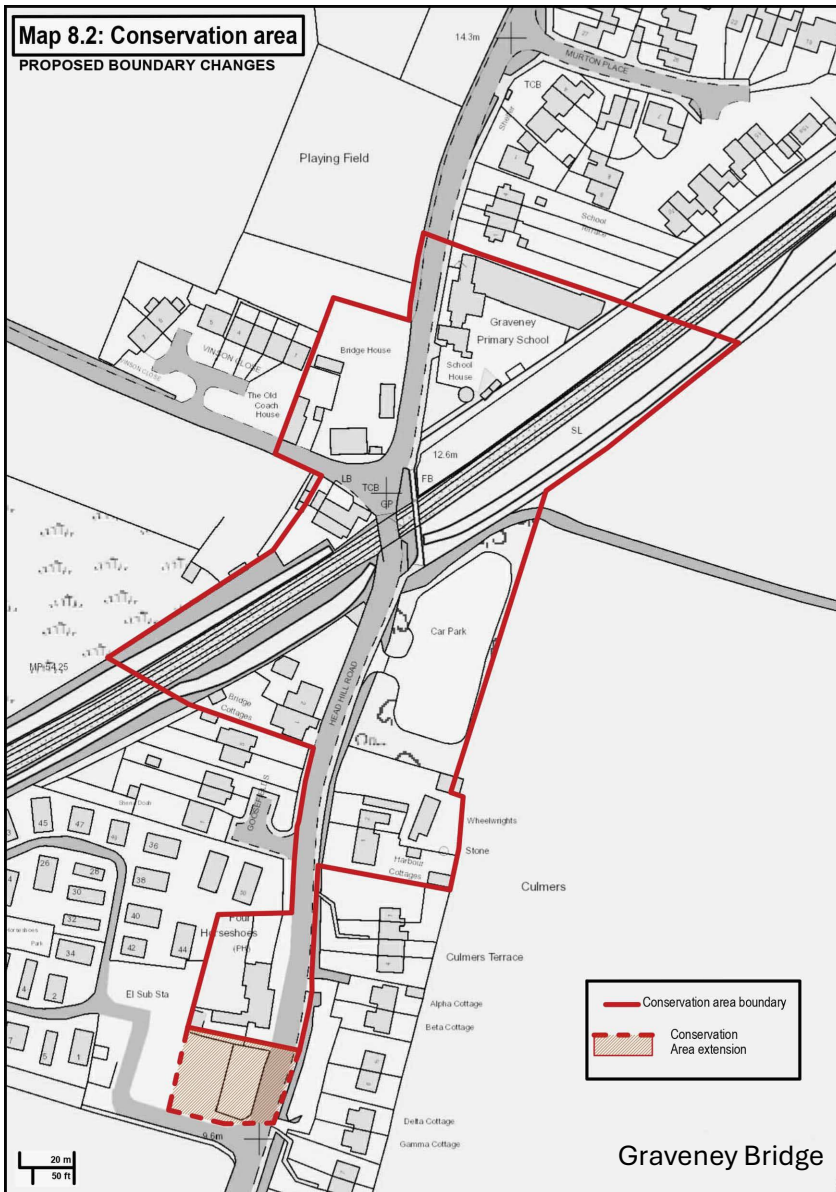
Historic mapping shows the area was formerly part of an orchard, reflecting its past agrarian use. Though the orchard is no longer present, the plot's openness, traditional boundaries,

and informal surfacing help preserve the site's historic rural character.



View towards the parking area alongside the Four Horse Shoes Inn.

It is recommended that the conservation area be extended to include the parking area alongside the Four Horse Shoes Inn. The proposed conservation area boundary changes are shown on Map 8.2.



Proposed boundary adjustment 3 (part of Goodnestone)

It is proposed to increase the Conservation Area to include the orchards behind the properties from Poplar Hall north to Goodnestone Lane.

The area comprises orchards; currently the only identified orchards in the vicinity; along with mature trees and hedgerows that define boundaries between the built environment and adjacent agricultural land. The orchards reflect historic land use, evidenced on the 1865 Ordnance Survey Map (published 1877) and likely dating to an earlier period. This landscape forms an important part of the historic rural setting and contributes significantly to the character and appearance of the area, particularly visible from the footpath linking the church to Goodnestone Lane.



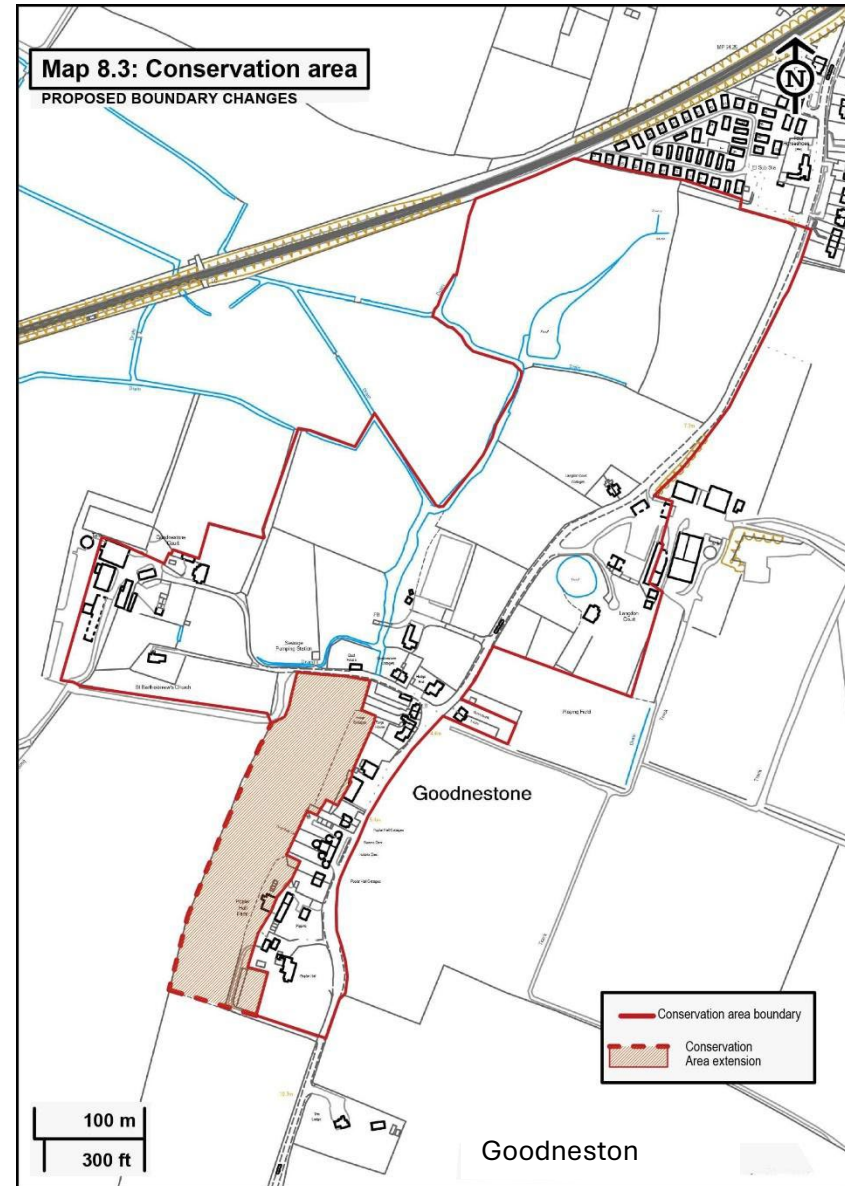
View from public footpath across orchard.

Historic England's 2019 guidance states that Conservation Areas should be designated where an area's special architectural or historic character is clear and worth preserving or enhancing. The orchards and their landscape reflect historic agricultural practices and contribute to local distinctiveness through their layout and setting. The guidance also emphasises the importance of preserving the area's context and views, which the proposed extension supports by maintaining key views and reinforcing the link between the historic settlement and surrounding countryside.

Historic England also stresses that "historic landscape features such as orchards, hedgerows, and field boundaries" are integral to the "historic character of an area," and their survival supports the legibility of past land use and settlement patterns.

By including the orchards behind the properties along Head Hill Road, the Conservation Area boundary will better reflect the area's historic environment, supporting its designation as an area of special interest.

The proposed conservation area boundary changes are shown on Map 8.3.



APPENDIX 2

Map Regression (Graveney & Goodnestone)



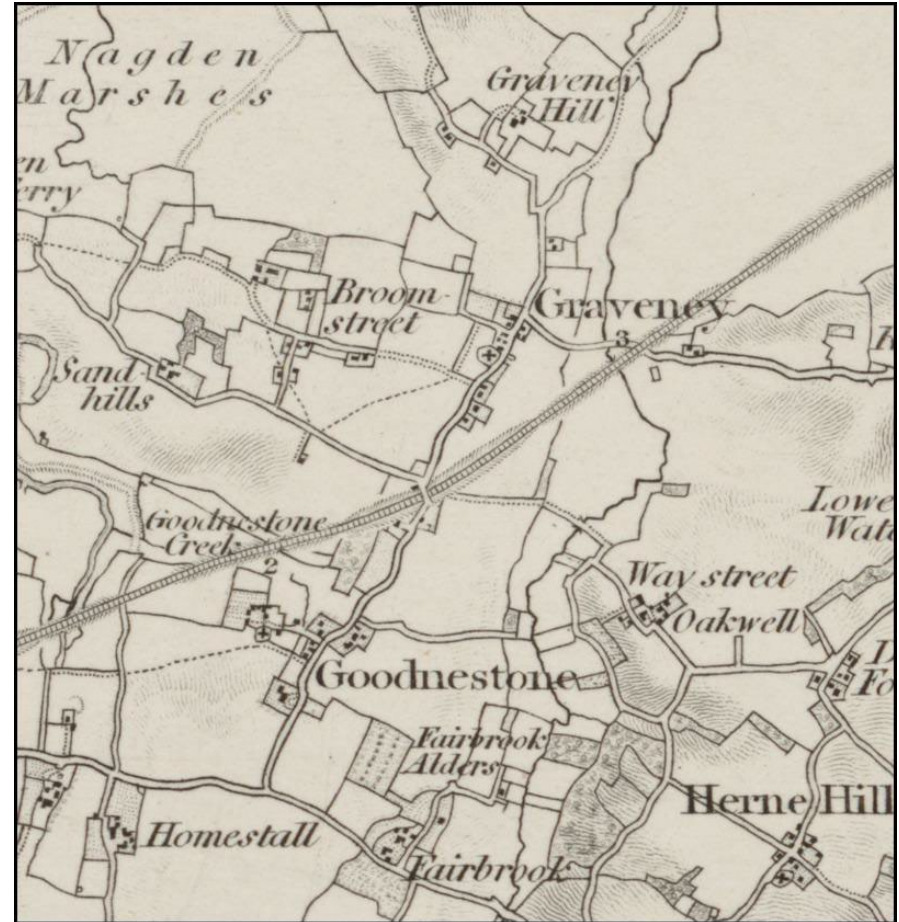
Saxton's Map of Kent 1575.



National Library of Scotland Ordnance Survey Extract.
Surveyed 1788 – 1798, published 1801.



National Library of Scotland Ordnance Survey Extract. Map of the Surveyed Area in 1799, published 1861.



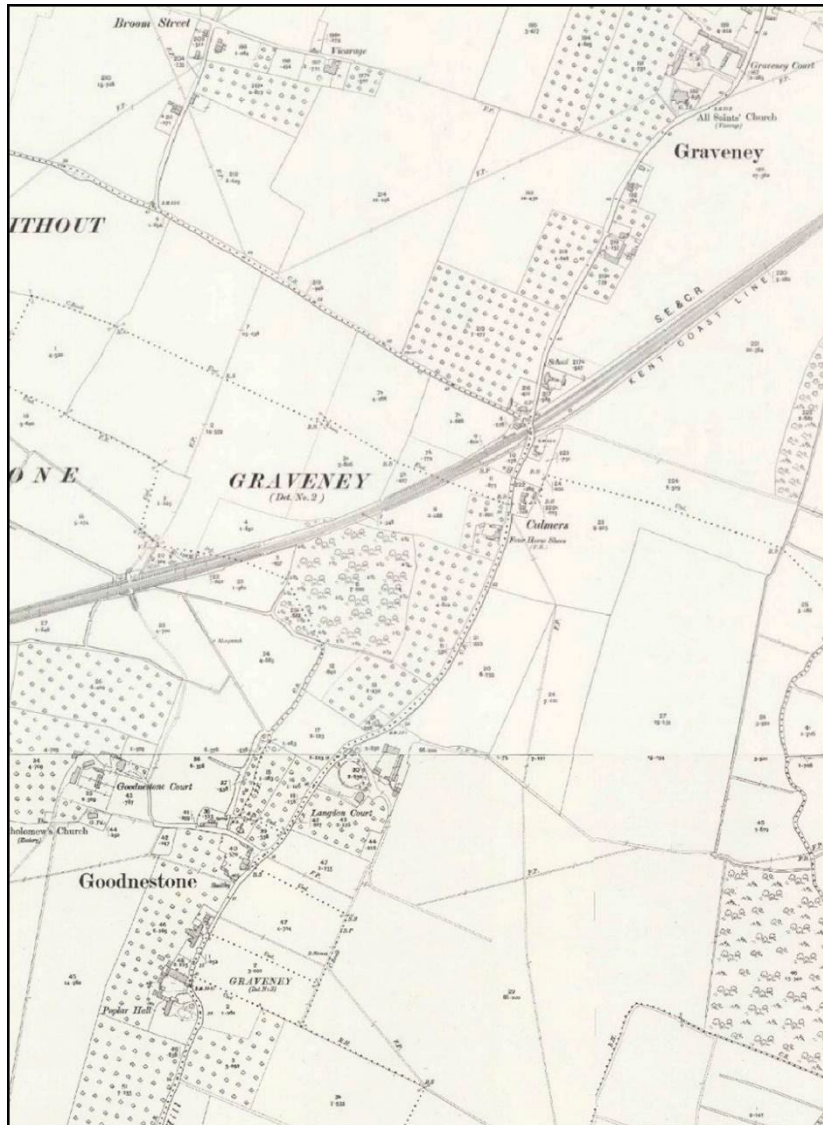
National Library of Scotland Ordnance Survey Extract. The same map as before of the Surveyed Area in 1799, published 1863 to illustrate the Kent railway line running through the parish.



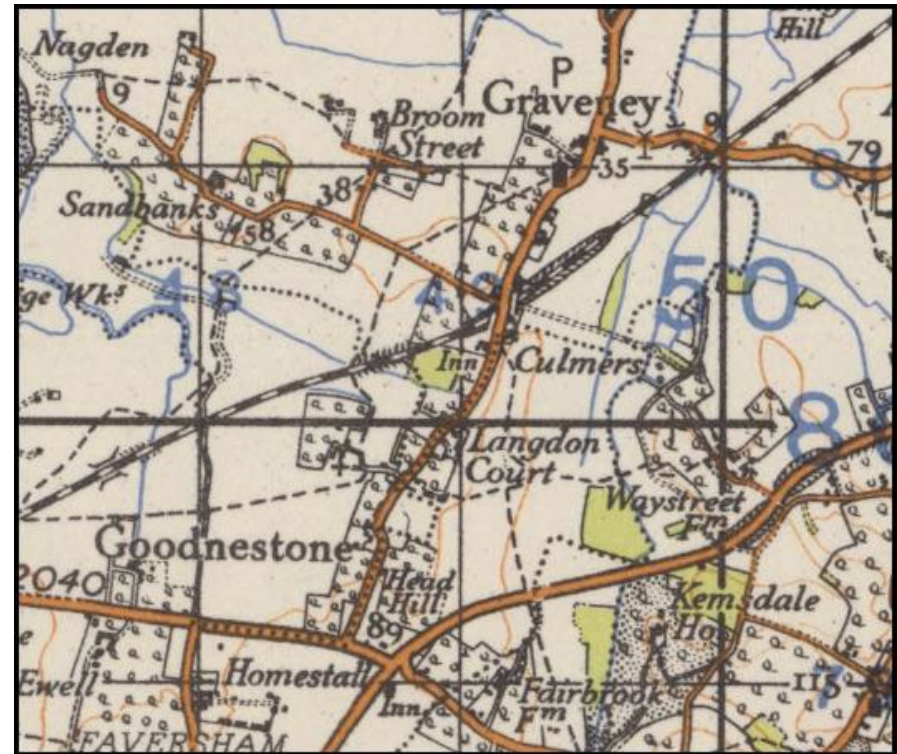
National Library of Scotland Ordnance Survey Extract.
Surveyed 1865, published 1877.



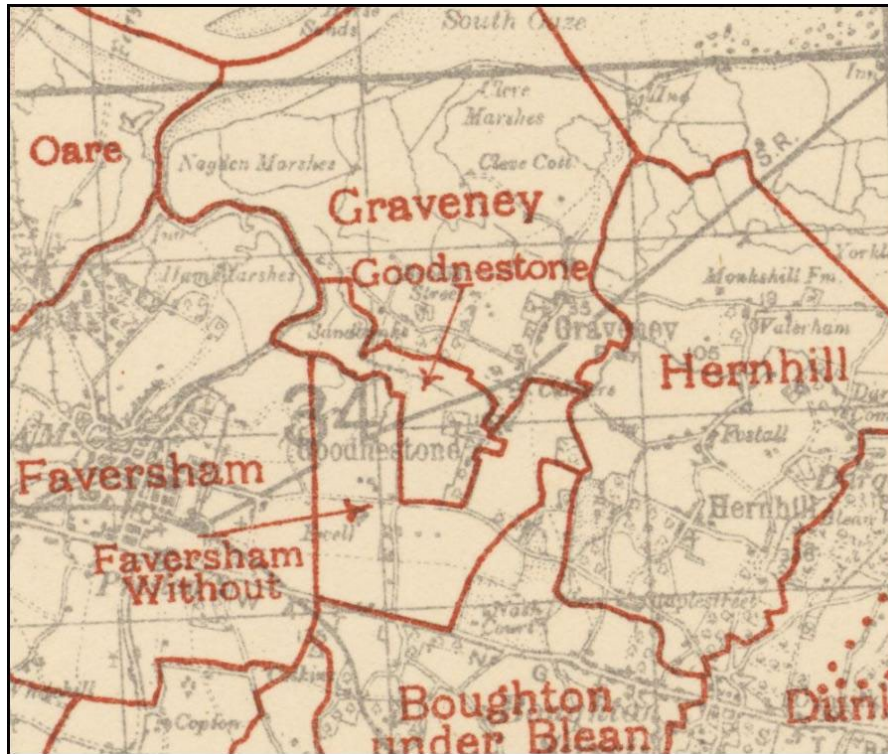
National Library of Scotland Ordnance Survey Extract.
Published 1898.



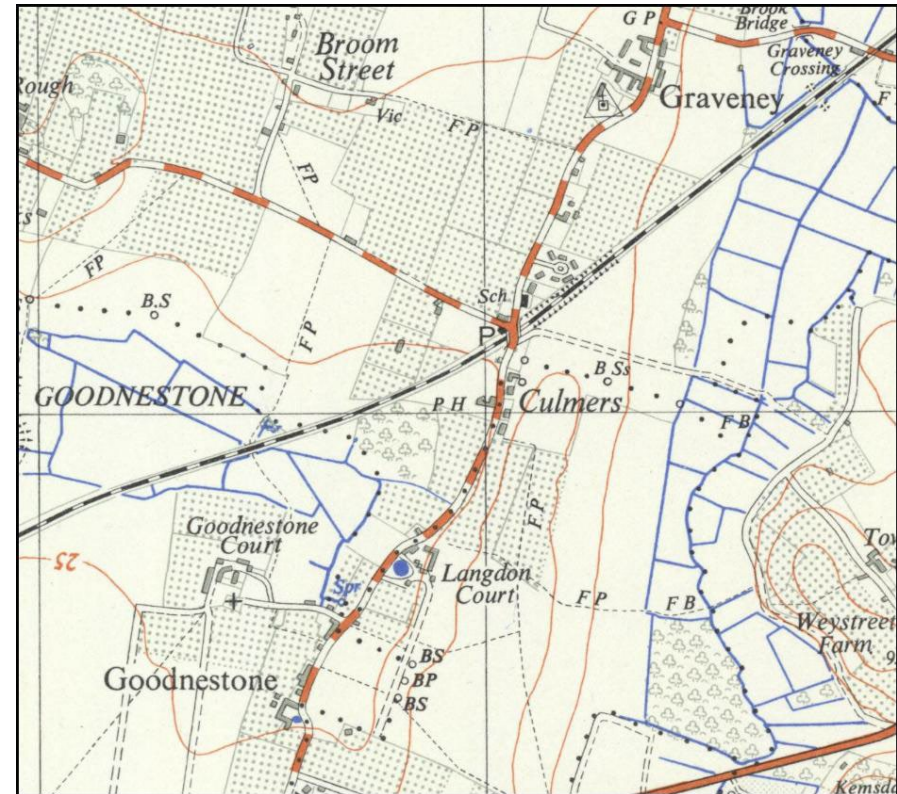
National Library of Scotland Ordnance Survey Extract.
Published 1907.



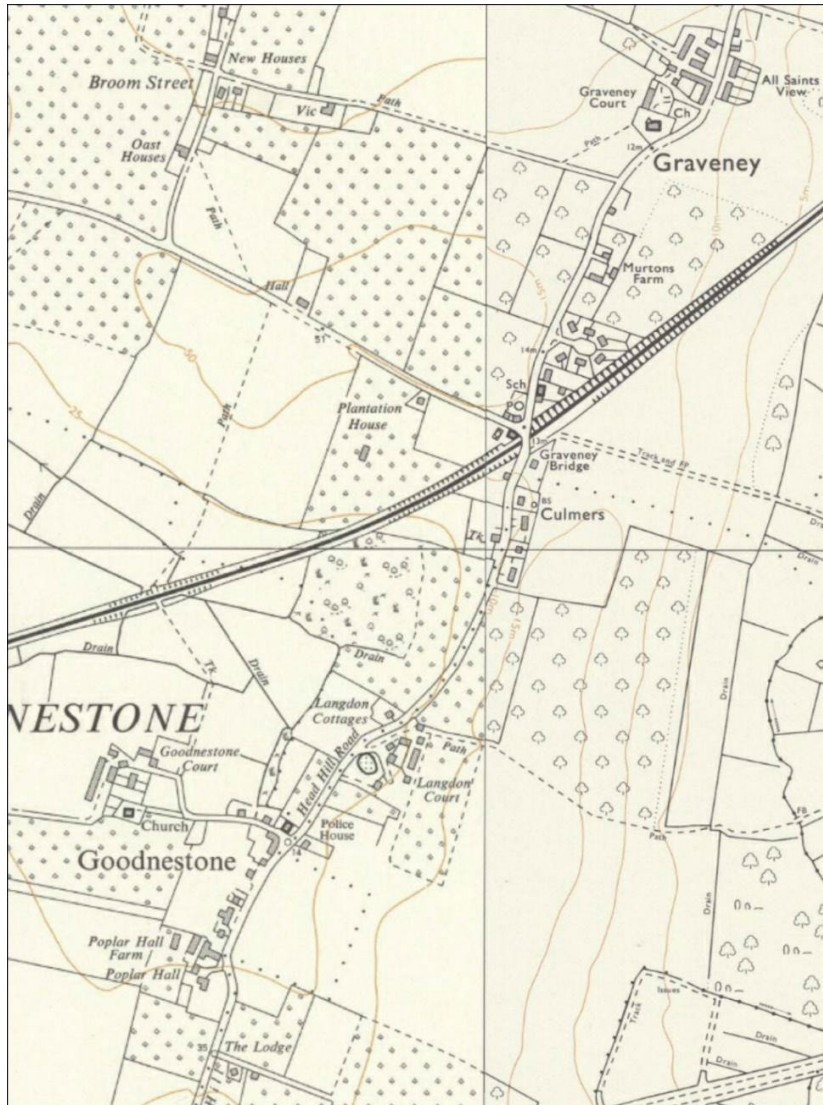
National Library of Scotland Ordnance Survey Extract.
Illustration of main roadways and railways through Graveney
and Goodnestone. Published 1943.



National Library of Scotland Ordnance Survey Extract. Illustration of the administrative boundaries of Kent. Published in 1944.



National Library of Scotland Ordnance Survey Extract. Published 1958.



National Library of Scotland Ordnance Survey Extract.
Published 1973.

APPENDIX 3

Extracts from the National Heritage List for England (the Statutory List of Buildings of Special Architectural or Historic Interest)

GRAVENEY COURT, SEASALTER ROAD Grade II



House. Circa 1420 and C18. Timber framed, plastered and weather boarded with painted brick extension. Plain tiled roof. Two storeys on plinth with jetty on brackets to centre, and roof hipped to left, with moulded barge boarded: gable to centre and stacks to centre right and end right. Five wooden casements on first floor, 4 on ground floor, the right end 2 on each floor in C18 extension. Central door with moulded panels and sidelights. Built c.1420 by John Martyn, Judge of the Court of Common Pleas, buried in the adjacent Graveney Church (see Hasted, VII, p.64).

CHURCH OF ALL SAINTS, SEASALTER ROAD Grade I



3/113 Church of All Saints 24.1.67 I Parish Church. C12 and C14 with some C15 fenestration. Little restored, but downpipes dated 1870. Coursed rubble and flint with plain tiled roof. Chancel, nave with aisles, north-western tower and south porch. Tower with string course and battlements, lancets in four stages and quarto foil at the top. Circular north-eastern stair-turret. Roll moulded and hollow chamfered west doorway. South aisle with offset diagonal buttresses and parapet. C14 Decorated tracery, of cusped paired lights with quatrefoils over, and 3 light aisle east window with cusped and foiled tracery and segmental hood. South porch extended in brick and pebble dashed, with moulded and chamfered south doorway. Chancel with cusped C14 lancets to south, restored C13 lancets to north, and 3 light C15 Perpendicular east window within the larger blocked jambs and drip mould of C14 east window. North aisle with 5 buttresses. Perpendicular 2 light windows, and simple chamfered north doorway. Interior: C14 nave arcades; 3 bays to the north with the tower as end bay, and 4 bays to south. Octagonal piers on seat-plinths with moulded capitals,

those to south richer; hollow chamfered and wave-moulded south arcade, double chamfered north arcade. Roof of 5 crown posts, with moulded collar beams and side purlins, and solid spandrels to raised tie beams. Lean-to aisle roofs. Romanesque chancel arch on imposts, the piers cut away and corbelled. Interior jambs and drip mould of C14 east window survive around C15 insertion, the respond carried down to floor level. Braced truss and tie beam roof-with embattled wall plate. Fittings: chancel; cinquefoil headed piscina, double and single sedilia, the larger to east with colonnettes with moulded octagonal bases and capitals, the smaller with cinque foiled head. Four centred arch and embattled label over both. Two C15 benches with poppy- heads, one with 6 pierced and cusped panels, the other with 3 pierced panels. Screen: early C16, 5 bays with attached shafts with Tudor flower motif on base with traceried panels and shields. Embattled transom running into tracery pattern, Central frieze with decorative motifs showing Renaissance influence. C19 embattled top beam. Nave: pulpit, late C17 on C19 base, taken from Faversham parish church. Pentagonal with enriched bolection moulded panels with festoons over and ribboned festoons along arises of each panel. Moulded cornice, and 3 semi-circular steps to rear. Box pews, extended into south aisle and incorporating late medieval benches with poppy heads and hollow chamfered end moulding. South aisle: cusped piscina with ogee head and animal head finial. Tomb recess with segmental arch, embattled cornice and attached shafts, with tomb chest and brass, 24" of Richard de Feversham, d.1381, C15 font, hollow octagonal bowl with decorated panels. C13 parish chest, wooden, with incised trefoil-headed arcade, and cross-hatched decorated iron flanges on lid. North aisle: cusped ogee headed piscina; recess cut out of north-east

corner. Some medieval floor tiles. Brasses: mutilated examples in south aisle. Joan de Feversham and son, d.1360, 14" half figures. Judge John Martyn, d.1436. 56" figures of Justice of Common Pleas and his wife under double canopy. He holds an inscribed heart; she has a lap dog at her feet. Glass: C14 fragments in north aisle east window, C15 fragments in chancel south-west window (See B.O.E. Kent II 1983 337-8).

HEADSTONE TO THOMAS BARMAN, CHURCHYARD OF ALL SAINTS, SEASALTER ROAD Grade II



Headstone. Thomas Barman, died 1758. Stone. Three feet in height with snowy head, with relief of 2 skulls with emblems of death, spades and lilies.

MURTON'S FARMHOUSE, SEASALTER ROAD Grade II



Farmhouse. C16 and C18. Painted brick and plain tiled roof. Two storeys on plinth with plat band and roof with parapet gables and stacks to left and to right. Two metal casements on each floor and central boarded door in brick porch with parapet and four centred arched doorways. Rear wing: timber framed, and tile hung with continuous jetty.

BARN 30 METRES SOUTH OF MURTON'S FARMHOUSE, SEASALTER ROAD Grade II

Barn. C17. Timber framed on flint and brick base and weather boarded with corrugated iron roof. Hipped roof with tiled hipped mid-stray. Interior: 4 bays with aisles and passing shores to arcade posts. Queen strut roof.



BRIDGE HOUSE, SANDBANKS LANE Grade II

House. C18. Red brick and plain tiled roof. Two storeys and attic with discontinuous plat band and corbelled eaves to steeply hipped roof with central stack and 2 hipped dormers. Two wooden casements on first floor and 2 canted bay windows with margin light sashes on ground floor. Central boarded door with segment headed surround. Single storey red brick extension to left.



POST OFFICE, SANDBANKS LANE Grade II



House. C18. Painted brick and plain tiled roof. Two storeys on plinth with discontinuous plat band and brick dogtooth cornice. Roof hipped to left with 2 hipped dormers and stacks to left and projecting at end right. Two wooden casements on first floor and 2 canted hipped bays on ground floor. Central panelled door in segmental headed surround.

BRIDGE COTTAGES, 1 AND 2, SEASALTER ROAD Grade II
(now known as 1 & 2 Harbour cottages)



Cottage pair. C17. Rendered brick and plain tiled roof. Two storeys on plinth with single storey and half-hipped extension to left. Stacks to left and at end right. Three metal casements on first floor and 2 on ground floor with wooden casement to left and half glazed doors to centre and to left with flat hoods. Included for group value with No. 3.

BRIDGE COTTAGE, 3, SEASALTER ROAD Grade II
(now known as Wheelwrights)

House, C17. Pebble dashed with plain tiled roof. Two storeys and roof hipped to right, half-hipped to left with stack to centre left. Two wooden casements on each floor with boarded central door in gabled porch. Single storey extension to right.

FOUR HORSE SHOES INN, SEASALTER ROAD Grade II



Public House. Circa 1800. Timber framed and clad with mathematical tiles; the side elevations plastered. Plain tiled roof. Two storeys and attic on plinth with parapet to half hipped roof with 2 flat roofed dormers and 2 stacks projecting at end left and 1 projecting at end right. Regular fenestration of 2 tripartite glazing bar sashes and central glazing bar sashes on first floor, and 2 tripartite glazing bar sashes with gauged heads on ground floor. Central half-glazed door with pilaster surround. Trap door to cellars to left. Single storey C20 red brick extensions to left and right.

CHURCH OF ST BARTHOLOMEW, GOODNESTONE LANE

Grade I



Parish Church. C12, north porch 1837. Restored 1876 (£400). Flint and plain tiled roof. Chancel, nave with wooden bell turret, north porch. Fine 3 light C15 west window. Lancets in nave and chancel north and south, otherwise C15 Perpendicular windows. Interior: nave with roof of 2 crown posts. C14 chancel arch chamfered into responds. Chancel with braced rafter roof. Fittings: combined piscina/sedile in chancel and piscina in nave. Rood stair in nave. Tomb recess on chancel north wall, cusped segmental arch and panel with encircled quatrefoils. Glass: in east window, and possibly west window by Thomas Willement (dated 1844). (See B.O.E. Kent II, 1983, 334).

CHEST TOMB TO THE STONE FAMILY, ABOUT 5 METRES SOUTH OF CHURCH OF ST BARTHOLOMEW, GOODNESTONE LANE

Grade II



Tomb chest. Early C19, earliest inscription to George Stone, died 1810. Side panels with horizontal fluting, lozenge and trapezium panels. Fluted corner pilasters with guilloche enrichment, moulded and fluted heads with rose decorations. Later C19 slab on top. Similar motifs occur in other local churchyards.

GOODNESTONE COURT, GOODNESTONE LANE Grade II*



House. C15. Timber framed and plastered and underbuilt with painted brick with exposed bressummer. Exposed close studding in gable to left. Plain tiled roof. Two storeys on plinth probably originally with continuous jetty. Jettied gable to left, end jettied gable to right. Hipped roof with gablets and stacks to rear left, rear centre and end right. Three wooden casements on first floor, 2 on ground floor with 2 canted bay windows. Left gable has Perpendicular traceried window of 3 lights with 6 over with moulded barge- board. Possibly originally a chapel. Half glazed door with flat hood to centre right. (See B.O.E. Kent II, 1983, 334).

APPENDIX 4

Legislation, National Policy & Local Policy

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66 General duty as respects listed buildings in exercise of planning functions:

- (1) In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 69 Designation of conservation areas:

- (1) Every local planning authority - (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and (b) shall designate those areas as conservation areas.
- (2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly.

- (3) The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

- (4) The designation of any area as a conservation area shall be a local land charge.

Section 71 Formulation and publication of proposals for preservation and enhancement of conservation areas.

- (1) It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.
- (2) Proposals under this section shall be submitted for consideration to a public meeting in the area to which they relate.
- (3) The local planning authority shall have regard to any views concerning the proposals expressed by persons attending the meeting.

Section 72 General duty as respects conservation areas in exercise of planning functions:

- (1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue

of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (NPPF) Section 16

The NPPF sets out the government's planning policies and how they should be applied. It provides the national framework for conserving and enhancing the historic environment, including conservation areas.

National Planning Practice Guidance (NPPG)

The NPPG sets out government's guidance on how the act and national planning policy should be applied.

Adopted Local Plan - Bearing Fruits 2031: The Swale Borough Local Plan (2017)

Relevant objectives and policies within the local plan include:

Policy ST 1 Delivering sustainable development in Swale.

To deliver sustainable development in Swale, all development proposals will, as appropriate: ... 8. Achieve good design through reflecting the best of an area's defining characteristics; 9. Promote healthy communities through: ... maintaining the individual character, integrity, identities and settings of settlements; 12. Conserve and enhance the historic environment by applying national and local planning policy through the identification, assessment and integration of development with the importance, form and character of heritage assets (including historic landscape).

Policy CP 4 Requiring good design.

All development proposals will be of a high-quality design that is appropriate to its surroundings. Development proposals will, as appropriate: ... 2. Enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and strengthening sense of place; 5. Retain and enhance features which contribute to local character and distinctiveness; 8. Be appropriate to the context in respect of materials, scale, height and massing; 9. Make best use of texture, colour, pattern, and durability of materials; 10. Use densities determined by the context and the defining characteristics of the area; 11. Ensure the long-term maintenance and management of buildings, spaces, features and social infrastructure.

Policy CP 8 Conserving and enhancing the historic environment.

To support the Borough's heritage assets, the Council will prepare a Heritage Strategy. Development will sustain and enhance the significance of designated and non-designated heritage assets to sustain the historic environment whilst creating for all areas a sense of place and special identity. Development proposals will, as appropriate: ... 1. According with national planning policy in respect of heritage matters, together with any heritage strategy adopted by the Council; 2. Sustain and enhance the significance of Swale's designated and non-designated heritage assets and their settings in a manner appropriate to their significance and, where appropriate, in accordance with Policies DM 32-DM 36; 3. Respond to the integrity, form and character of settlements and historic landscapes; 4. Bring heritage assets into sensitive and sustainable use within allocations, neighbourhood plans,

regeneration areas and town centres, especially for assets identified as being at risk on national or local registers; 5. Respond positively to the conservation area appraisals and management strategies prepared by the Council; 6. Respect the integrity of heritage assets, whilst meeting the challenges of a low carbon future; and 7. Promote the enjoyment of heritage assets through education, accessibility, interpretation and improved access.

Policy DM 24 Conserving and enhancing valued landscapes. The value, character, amenity and tranquillity of the Borough's landscapes will be protected, enhanced and, where appropriate, managed.

Part C. For all landscapes: ... 1. The scale, layout, build and landscape design of development will be informed by landscape and visual impact assessment having regard to the Council's Urban Extension Landscape Capacity Study and Landscape Character and Biodiversity Appraisal SPD, including, as appropriate, their guidelines, and the key characteristics, sensitivity, condition and capacity of character area(s)/landscapes, taking opportunities to enhance the landscape where possible, including the removal of visually intrusive features.

Policy DM 32 Development involving listed buildings. Development proposals, including any change of use, affecting a listed building, and/ or its setting, will be permitted provided that:

1. The building's special architectural or historic interest, and its setting and any features of special architectural or historic interest which it possesses are preserved, paying special attention to the: a. design, including

scale, materials, situation and detailing; b. appropriateness of the proposed use of the building; and c. desirability of removing unsightly or negative features or restoring or reinstating historic features.

2. The total or part demolition of a listed building is wholly exceptional, and will only be permitted provided convincing evidence has been submitted showing that: a. All reasonable efforts have been made to sustain existing uses or viable new uses and have failed; b. Preservation in charitable or community ownership is not possible or suitable; and c. The cost of maintaining and repairing the building outweighs its importance and the value derived from its continued use.

3. If as a last resort, the Borough Council is prepared to consider the grant of a listed building consent for demolition, it may, in appropriate circumstances, consider whether the building could be re-erected elsewhere to an appropriate location. When re-location is not possible and demolition is permitted, arrangements will be required to allow access to the building prior to demolition to make a record of it and to allow for the salvaging of materials and features.

Policy DM 33 Development affecting a conservation area.

Development (including changes of use and the demolition of unlisted buildings or other structures) within, affecting the setting of, or views into and out of a conservation area, will preserve or enhance all features that contribute positively to the area's special character or appearance. The Borough Council expects development proposals to:

1. Respond positively to its conservation area appraisals where these have been prepared;

2. Retain the layout, form of streets, spaces, means of enclosure and buildings, and pay special attention to the use of detail and materials, surfaces, landform, vegetation and land use;
3. Remove features that detract from the character of the area and reinstate those that would enhance it; and
4. Retain unlisted buildings or other structures that make, or could make, a positive contribution to the character or appearance of the area.

Policy DM 34 Scheduled Monuments and archaeological sites.

1. Development will not be permitted which would adversely affect a Scheduled Monument, and/or its setting, as shown on the Proposals Map, or subsequently designated, or any other monument or archaeological site demonstrated as being of equivalent significance to scheduled monuments. Development that may affect the significance of a non-designated heritage asset of less than national significance will require a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.
2. Whether they are currently known, or discovered during the Plan period, there will be a preference to preserve important archaeological sites in-situ and to protect their settings. Development that does not achieve acceptable mitigation of adverse archaeological effects will not be permitted.
3. Where development is permitted and preservation in-situ is not justified, the applicant will be required to ensure that provision will be made for archaeological excavation and recording, in advance of and/or during

development, including the necessary post-excavation study and assessment along with the appropriate deposition of any artefacts in an archaeological archive or museum to be approved by the Borough Council.

Swale Borough Council Key Supplementary Planning Guidance

- Swale Borough Council Planning and Development Guidelines No 2: Listed Buildings – A Guide for Owners and Occupiers.
- Swale Borough Council No 3: The Conservation of Traditional Farm Buildings.
- Swale Borough Council Planning and Development Guidelines No 8: Conservation Areas.

Swale Borough Council Heritage Strategy 2020-2032

The Council has created a borough-wide heritage strategy to guide the protection and management of Swale's historic environment in a positive, sustainable, and well-informed manner. This strategy has been developed in collaboration with key stakeholders and interested parties. A central part of the strategy is to outline the Council's overall vision and priorities. The aim is for these to align as closely as possible with those of local communities and amenity societies, ensuring broad support for the strategy. The strategy includes an initial three-year action plan, which presents a range of proposals focused on the sustainable and proactive management of various aspects of the borough's historic environment. Priority is given to areas already experiencing or at risk of harmful change, as well as those under significant development pressure that could

undermine their unique character. Wherever possible, the planned actions will be carried out in partnership with local amenity groups and community volunteers.



A Heritage Strategy for Swale

2020 – 2032

Adopted

March 2020



APPENDIX 5

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Historic England Publications

Historic England Good Practice Advice Notes (GPAs) provide advice on good practice and how national policy and guidance should be applied.

GPA1: *The Historic Environment in Local Plan Making* (March 2015)

GPA2 - *Managing Significance in Decision-Taking in the Historic Environment* (March 2015)

GPA3 – *The Setting of Heritage Assets* (December 2017)

Historic England Advice Notes (HEANs) include detailed, practical advice on how to implement national planning policy and guidance.

HEAN 1: *Conservation Areas: Designation, Appraisal and Management* (Feb 2019)

HEAN 2: *Making Changes to Heritage Assets* (February 2016)

HEAN 7(2nd Edition): *Local Heritage Listing: Identifying and Conserving Local Heritage* (January 2021)

HEAN 9: *The Adaptive Reuse of Traditional Farm Buildings* (October 2017)

HEAN 10: *Listed Buildings and Curtilage* (February 2018)

HEAN 12: *Statements of Heritage Significance* (October 2019)

HEAN 16: *Listed Building Consent* (June 2021)

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www.Swale.gov.uk

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10th October 2025

LH/23-H102
BY EMAIL

GRAVENEY AND GOODNESTONE CONSERVATION AREA REVIEW: CONSULTATION RESPONSE BY ICENI PROJECTS, ON BEHALF OF SKYLARK KENT LLP

a. Introduction

This Consultation Response has been produced to respond to the draft Graveney & Goodnestone Conservation Area Character Appraisal, which includes proposed extensions, which has been drafted for Swale District Council in relation to the Graveney Church, Graveney Bridge, and Goodnestone Conservation Areas. Skylark Kent LLP have a particularly strong interest in this area, being currently engaged in an appeal against Swale District Council's decision to refuse permission for the development of two sites which are directly related to these Conservation Areas. These are:

- Land at Sandbanks Lane and Seasalter Road, Graveney, ME13 9DU (Swale Reference: 23/504264/OUT) (PINS Reference: APP/V2255/W/25/3365131), hereafter also "Site A"
- Land West of Head Hill Road, Graveney, ME13 9DE (Swale Reference: 23/504263/OUT) (PINS Reference: APP/V2255/W/25/3367559, hereafter also "Site B"

At Figure 1 of this note, a map is included showing the locations of the two sites in relation to the Conservation Areas. Site A sits to the north of the Graveney Bridge Conservation Area, and south and west of the Graveney Church Conservation Area, while Site B sits within the Goodnestone Conservation Area.

The structure of this response is as follows:

- Legislative Framework, policy and guidance, as far as is relevant to this Consultation process, and our response;
- The Appeal, and its relevance to the Appraisal;
- Detailed comments on the Appraisal;
- Response to the proposed Extensions;
- Summary and Conclusions

The author of this document is Laurie Handcock, Director of the Heritage and Townscape team at Iceni Projects. I am a full member of the IHBC and the Chartered Institute for Archaeologists. My team and I have experience of producing Conservation Area Appraisals, and a strong knowledge of Historic England's guidance, as enshrined within Historic England's Advice *Note 1: Conservation Area Appraisal, Designation and Management* (2nd edition, published February 2019).

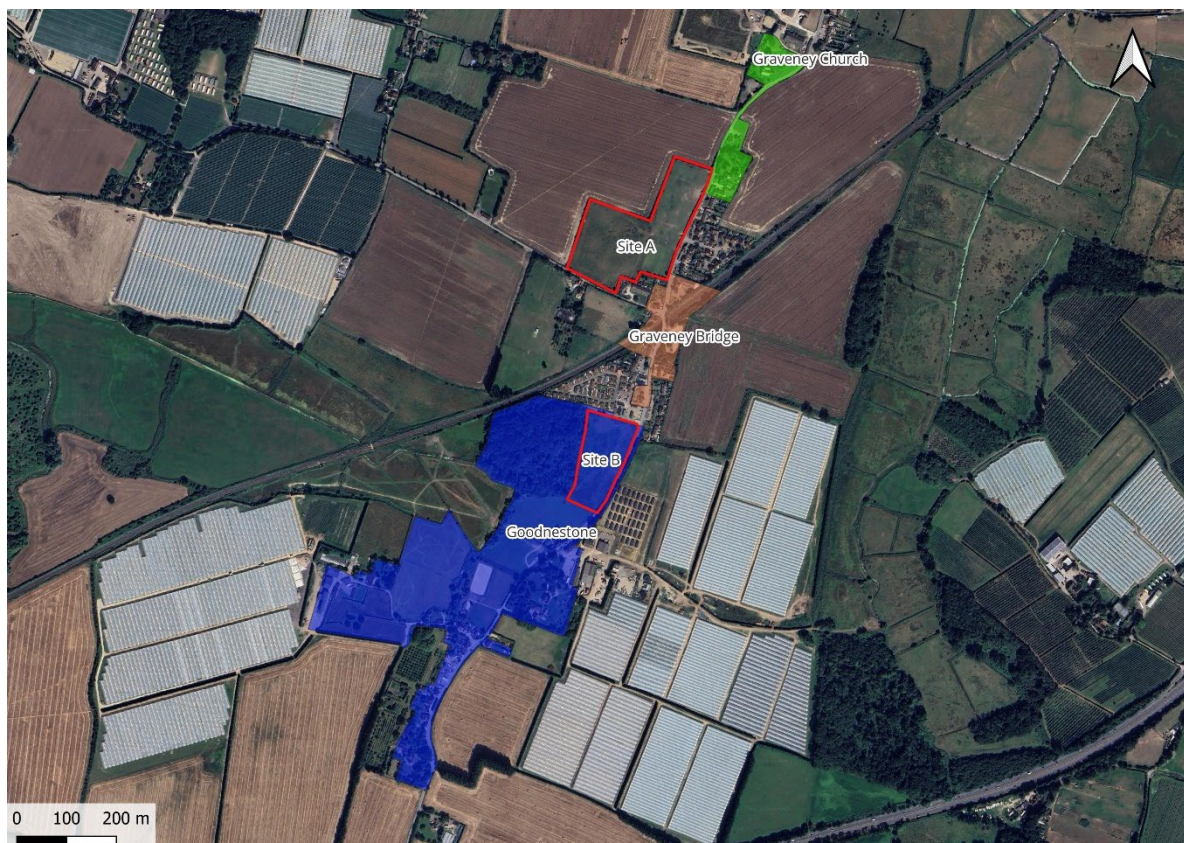


Figure 1: Map of the Sites currently being considered by the Planning Inspectorate, in relation to the three Conservation Areas.

b. Legislative and Guidance Context

Legislation

Sections 69 to 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 delineate the responsibilities of local planning authorities concerning conservation areas. Section 69 requires Local planning authorities to identify and designate areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, keep such designations under review, and may be directed by the Secretary of State to designate additional areas. Section 70 provides supplementary provisions for the designation of conservation areas, particularly emphasising procedures within Greater London, including consultation requirements and the necessity for publication of designations. Section 71 mandates that local planning authorities periodically formulate and publish proposals aimed at the preservation and enhancement of conservation areas, ensuring public participation through consultations. Section 72 imposes a general duty on planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Case Law

Case Law is relevant here insofar as it relates to the way in which the LPA are obligated to respond to consultation responses.

I would like to draw the Council's attention to the decision in *Future High Street Living (Staines) Ltd v Spelthorne Borough Council* [2023] EWHC 688 (Admin). This was a case that related to a proposal to extend the Staines Conservation Area in order to draw in a building for which there were demolition proposals, a former Debenhams store. It is of most relevance here, however, because the Claimant's case was ultimately successful, and the decision to extend the Conservation Area quashed, because

their consultation response had not been properly considered prior to the adoption of the Conservation Area; and because their Consultation Response had also not properly been reported to Committee, during the formal adoption period. The Council's approach was, in essence, that these Consultation Responses had been reviewed, but that they "did not alter" the views they already held on designation (para. 79). They had, it was argued, therefore failed to have full regard to the Consultation process, treating it with lip service, as a process to be gone through prior to proceeding with the finalisation of the Conservation Area in its original intended form. This approach on the part of the Council was found to be wrong in law, with Lane J finding that the Council needed to, and did not, provide a 'legally satisfactory response' to the failure to have regard to the Claimant's representations to the Consultation process (para. 84) and did not report the representations to members correctly.

A similar and related case is that of *Trillium (Prime) Property GP Ltd v London Borough of Tower Hamlets* [2011] EWHC 146 (Admin), in which the High Court examined the legality of Tower Hamlets Council's swift designation of the Limehouse Cut Conservation Area following a notice of intent to demolish. Trillium challenged the rapid designation of the conservation area and the lack of consultation. Consequently, the court quashed the conservation area designation, emphasising the need for transparency and proper consultation throughout the conservation area designation process. Notably for this case, it emphasised that "*the requirements for designation are not just that the area possess the special interest defined by s69; the area of special interest must be one the character or appearance of which it is desirable to preserve or enhance*" (para.9).

It is clear that in undertaking this Consultation, Swale District Council are obligated not only to have undertaken a Consultation process, but to treat it as a weighty and important part of that process. Consultation Responses need to be considered carefully, and responded to cogently and robustly, if concerns are not to be addressed. A failure to do so would, as case law has shown, potentially leave the adoption of the Appraisal and any boundary extensions as being open to challenge.

Historic England Guidance

Historic England's *Advice Note 1: Conservation Area Appraisal, Designation and Management* (2nd edition, published February 2019), provides comprehensive guidance for local planning authorities on identifying, designating, and managing conservation areas. It emphasises the importance of thorough appraisals to understand and articulate the special architectural and historic interest of an area. The guidance advocates for active community and stakeholder engagement in the appraisal process and recommends the development of management plans to ensure the ongoing preservation and enhancement of a conservation area's character.

A key principle outlined in Advice Note 1, aligning with the NPPF paragraph 204, cautions local authorities "to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest" (Para. 15, Page 7). This holistic approach discourages the inclusion of areas that do not enhance the overall character, ensuring that conservation area boundaries are drawn tightly and meaningfully. When considering boundary extensions, the guidance advises that such changes should be made when the additional areas demonstrably share the architectural or historic qualities that justify conservation status.

This is further supported by the PPG: "*local planning authorities need to ensure that the area has sufficient special architectural or historic interest to justify its designation as a conservation area.*" [Paragraph: 024 Reference ID: 18a-024-20190723]. Conservation Area designation and extension is not to be taken lightly; it is a process enshrined in legislation, which requires a proper commitment to process, and detailed and careful consideration of any potential extensions or amendments to a designation.

c. The Appeals, and their relevance to the Conservation Area Appraisal

As noted above, we are currently awaiting the decision of the Inspector in relation to two Appeals, one for land north of Bridge House and west of Seasalter Road, and another west of Head Hill Road, within the northern part of the Goodnestone Conservation Area. Decisions are expected in early December 2025. The appeals turn in part on matters of heritage impact, with both refusals incorporating a Reason for Refusal related to harm to Conservation Areas (The Appeal for Site A to the Graveney Church and Graveney Bridge CAs, and the Appeal for Site B to the Goodnestone and Graveney Bridge Conservation Areas).

These decisions, when issued, will therefore incorporate judgements, on behalf of the Secretary of State, on matters of heritage significance, including the character and appearance of the Conservation Areas, and the contribution made by their setting. Certain issues, such as the 'conflation' between Conservation Areas and settlement clusters which we discuss in detail below, were specifically considered at the hearings, and may be incorporated within the decisions. There is a significant body of case law which confirms that Appeal Decisions are material considerations in decision-making, most notably within *DLA Delivery Ltd v Baroness Cumberlege of Newick* [2018] EWCA Civ 1305 (which includes, at paragraph 29, a run-down of some of the most relevant supporting cases). The Courts' approach has been throughout that as a result of the consistency principle, previous appeal decisions are material and must be taken into consideration. There will inevitably be differences in the facts of each case, and these go to the weight that can be given to previous appeal decisions. Decision-makers are also able to reach their own conclusions, where matters of judgement are under consideration. Ultimately, however, a decision made by an Inspector on behalf of the Secretary of State will be material where related planning decisions are being made in the future, and any decision-maker will need to clearly demonstrate why they are seeking to depart from that decision.

Accordingly, it is clear that these appeal decisions will be material to future planning decisions in and around the three Conservation Areas. In the interests of clarity and consistency of decision making, we would urge the local authority, during their consideration of Consultation Responses, to also seek to take into consideration these Appeal Decisions, such that future inconsistency does not become 'baked in' to decision-making in the vicinity.

d. Comments on the Conservation Area Appraisal

We have reviewed the Conservation Area Appraisal and Management Plan in detail, and as a whole, are broadly content with the structure and general approach of the document. It is seeking to be a detailed consideration of the significance, character and appearance of the Conservation Area, and to take into consideration the sorts of issues which serve to contribute towards this significance, character and appearance. The appraisal is clearly sub-headed, and uses mapping and other visual figures to illustrate its key points, which aids in its legibility.

We nonetheless have some significant concerns about the document's content, which affect its usability and robustness. I deal with these in detail, on a Section-by-Section basis, below before summarising our core concerns with the Appraisal as a whole.

Character Appraisals

Graveney Bridge Conservation Area

Our comments on the Character Appraisal for this Conservation Area are as follows:

Sections 2.2 and 2.3:

We are of the view that the approach shown by the Appraisal to setting presents an incorrect consideration of the setting and are of the view that these sections require revision. The focus of our concern is a failure to have regard to the built, as well as landscape setting of the Conservation Area. There is a reference to built form to the south Murton Farm's Barn, but there is a particular focus on

landscape. Landscape considerations are clearly very relevant to this Conservation, but there is a clear underplaying of the nature of the Conservation Area as part of a longer chain of development.

Given that this is tightly-drawn Conservation Area, focused on a handful of buildings, it is necessary to have regard to this fact in relation to the wider character of the built environment in the vicinity. This is not an isolated cluster of built form with no relationship with later development, but this text reads as though this is the case. In reality, it is appreciated 'on the ground' as part of a wider cluster of buildings that runs north from the Graveney Bridge cluster, up Seasalter Road, and beyond, to the north. Indeed, my experience of Graveney as a whole is that one never truly leaves the influence of settlement, from the Four Horsehoes Public House to Brickfield House, a distance of just over 1km. The only small break in continuous development along the road appears within the Conservation Area, between Graveney Church Cottage and the Church. This section should be revised, to properly assess the land outside the Conservation Area as a mixture of built and landscape elements, and to consider their contribution towards significance, character and appearance.

2.8 (The Public Realm and Highway):

The document's necessary focus on the Conservation Area alone, a very small area that falls within, as we have outlined above, a much longer and more varied stretch of Graveney more broadly, can lead to some potentially misleading descriptions and analysis, which in view would benefit from better contextualisation. As an example, it is said that,

The road is rural in character. There are few buildings that utilise the road, and for the most part, the road is narrow and bound by hedgerows and trees on either side. (page 20, second paragraph).

This is a broadly an accurate description of the Conservation Area. It would help future analyses, however, if it was recognised that this sits within the context of the road itself being a relatively busy thoroughfare, where to the south and north, built form with varied expression sits alongside the roadway, and the 'rural' nature of the road ebbs and flows. It is also important to note that this 'rural character' changes along the road's length as there are dramatic (from a character perspective) changes in openness and enclosure. The section between Graveney Church Cottage and the Church, and that to the south, opposite Murton's Farm, for example, are dramatically different in character, because the more enclosed land to the west of the road further south is replaced further north by contrasting openness, with views across the marshes off the ridge to east and west. Similarly, it is said that,

The road remains relatively flat throughout, enhancing long views across the landscape and revealing the area's distinctive topography and rural charm.

The flatness of the road is a consistent feature, but 'long views' and appreciations of the topography are not available consistently throughout the Conservation Area.

Map 5.3:

This is a minor point, but there is inconsistent marking of 'significant hedges', this should be amended to aid legibility (the site southwest of Murton's Farm does not have the 'zig-zag' green line noted in the key).

2.9 (Significant Views):

We note that the following is said:

These views are deemed as important as they not only change with weather conditions but also change with the time of day.

Clarity is required over this comment; this is true of any view that can be obtained outside. It is unclear why this is a particularly key consideration here, or what it means for the management of the Conservation Area.

Viewpoint 1 (Views from the public highway): There is, in our view, a need to have regard to how these are shown on mapping, and how they can be obtained. Even in winter (as shown on the photographs), when entering the Conservation Area from the south, the size and depth of the hedgerow on the lefthand side is such that views are focused north into the Conservation Area. By contrast, the views entering the Conservation Area from the north, are expansive. It is therefore unclear why figure 5.4 shows a single focused view at the north entrance, and a more expansive view at the south entrance to the CA (see figure 2, below). This mapping is not an accurate reflection of experiences of the Conservation Area, and seeks to protect views which are already heavily constrained by development.

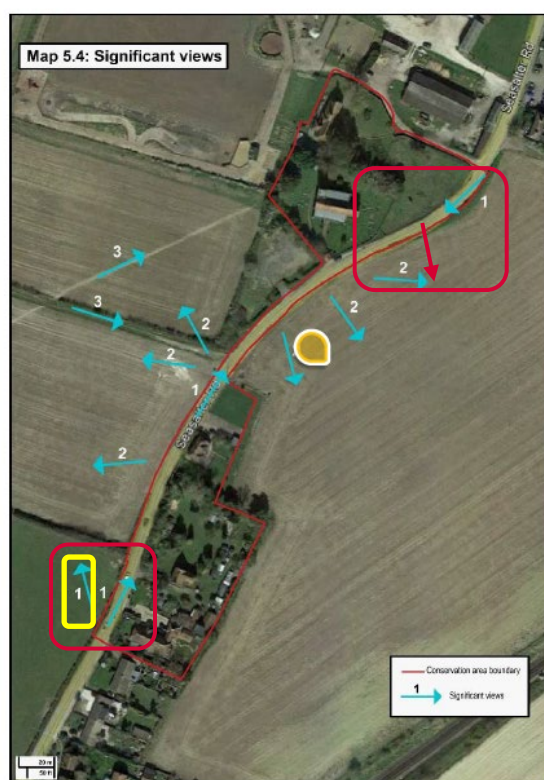


Figure 2: Highlighted form of Map 5.4 within the Appraisal. The arrow outlined in yellow is, in our view, unjustified, or at odds with one's experience of the Area, while an additional arrow is required, in our view at the northern edge of the Area, marked here in red.

2.10 (Setting): We have no particular issues with how the setting of the Conservation Area is described or framed, but some tightening of the text is probably required to assist users in its practical application. As elsewhere within the document, there is, because of the very small size and focused nature of this Conservation Area, a tendency to conflate, throughout, between the Conservation Area and Graveney more widely, or the Conservation Area and the built environment immediately surrounding it. Throughout this section, we would suggest that thought is given to ensuring that the Conservation Area alone, and the contribution of its setting to it is considered. As an example, there is significant focus on the landscape around the Conservation Area, but reference should also be made to the built environment to the south and north, forming, as it does, part of the Area's setting. These elements create, by contrast with the Area itself, a core part of its setting, the creation of 'edges' to the Conservation Area by being in contrast to the small historic cluster on which the Area focuses.

The Church is described as being a 'focal point' for the local community, and spiritually and administratively this is obviously correct, but some clarification is probably required here regarding the role of the Church as a *physical* focal point. While situated on a ridge, the Church is relatively low-slung as a building (as is actually relatively common for Kentish Churches of this age), and its visual prominence is therefore not as significant as the text currently suggests. It has prominence in views along the footpath between the Church and the village hall to the southwest, undoubtedly acting as a

focal point in this direction, and within its more immediate vicinity, but it quickly becomes well concealed.

Graveney Bridge Conservation Area

Sections 3.1-3.4:

As with the Graveney Church Conservation Area, the Graveney Bridge Conservation Area is an unusually defined Conservation Area, small in scale overall, and drawn with the intention of incorporating individual historic buildings (as well as a better-defined cluster around the railway bridge), and excluding later, less historic and more intrusive features and buildings. The nature of the designation (which is of a form that would be unlikely to be repeated today) means that the Appraisal needs to be clear, throughout, about how the area is defined, what is 'in' and what is 'out'.

This is an important practical point, because the application of Conservation Area legislation and policy (for example, the practical application of Section 72 of the 1990 Planning (Listed Buildings and Conservation Areas) Act) is determined by whether an application relates to "any buildings or other land in a conservation area" (Section 72(1), my emphasis). The settings of Conservation Areas are not protected by statute, but it is important that they are clearly defined, given that they attract 'great weight' in the planning process (NPPF paragraphs 212-213). There is no room for conflation between the Conservation Area itself and its setting. Unfortunately, this is not the case for the current draft of the Appraisal, and the descriptions of the Area wash over the entire grouping of Graveney Bridge, within and without the Conservation Area, indiscriminately. In the 'Buildings' section, for example, reference is made to 'fairly ordinary modern housing' south of Bridge Cottages, and Park Homes around the Four Horsehoes PH, without referencing the fact that these buildings sit outside the Area. This is far from a pedantic point. Because they have been drawn out of the Area, because it is an area drawn through inclusion of historic buildings, and the exclusion of non-historic or intrusive ones, these buildings, by definition, form its immediate setting, and the contribution, therefore, that this setting makes to significance. Clarity is required on this throughout this section and, as will be seen, beyond.

3.4 (Materials):

On page 35, reference is made, reference is made to the extremely ordinary, mass-produced houses of Goosefields, to the use of stock brick, with red brick soldier courses. These buildings, despite clearly being an intrusive and acontextual addition to Graveney, rightly excluded from the setting, are described with references to everything to the Regency Period and the use of polychromatic brickwork in the Victorian period. Indeed, more time is spent describing these buildings than the brickwork of the Conservation Area itself; given that this is a predominantly brick-built Conservation Area, this text needs revision, being unhelpful to readers, and giving apparent weight to plainly harmful aspects of setting.

3.8 (The Public Realm and Highway):

In our view, it is necessary to be specific about the role of landscape in views from the public realm, and in the setting of the Conservation Area more widely. It is implied that this is a common experience, but is in reality limited largely to the views up and down the railway, with the Area otherwise being experienced as a relatively insular space. This is reflected in figure 6.4; there is one other view, beyond those along the railway which is identified as providing a connection between the Conservation Area and the open countryside, and even here, we would suggest that this should be excluded, for the reasons set out below.

3.9 (Significant Views):

In relation to Viewpoint 1, particularly from the south of the area, there is, again, a need to have regard to the very specific nature of the Conservation Area, and a need to avoid conflation between the Conservation Area and the wider settlement of Graveney Bridge. The photograph below at Figure 3 illustrates the point; those features (built and natural) which are within the Conservation Area are here indicated in red. As can be seen, while this view is ostensibly one towards the Conservation Area, or

into it, it is one in which the Conservation Area is difficult to discern from the wider built environment. In addition, there are significant intrusive features within this view, not least the Park Homes which form a hard and unrelieved edge to the settlement at this point. We would suggest that this view be excluded or moved further north to a position where one is better able to appreciate the Conservation Area itself.



Figure 3: View north from the Goodnestone Conservation Area towards the Graveney Bridge Conservation Area. Features within the Graveney Bridge Conservation Area within this view are highlighted in red.

Additionally, the text refers to the 'clear visual connection' to the wider landscape at the northern and southern ends of the Conservation Area. There is some opening up at the northern and southern ends of the Conservation Area, but again some greater clarity is required within the text. These townscapes remain enclosed, with built form being the focal point of views to the north in particular. The curving nature of the road, and the height of the hedgerow to the west (which sits on land raised above the road) encloses the view for the viewer.

Reference is made within Viewpoint 2 to a view opposite Graveney Primary School, looking northwest. This view is a contained one, into the school playing field and paddock. In order to attain it, one has to actively cross the road, onto a very short stretch of pavement, and climb steps to a gate marked 'No Trespassing'. It cannot be attained from the road. The appraisal identifies this view as 'important' but does not have regard as to whether or not it is one that is important to viewers, or is attained as part of a natural movement through the area.

Additionally, this view is also wholly inconsistent with the description of Viewpoint 2 within the text. It is not 'panoramic' and does not 'reveal the natural contours and character of the surrounding landscape'. It is primarily a view of a village feature, a playing field associated with the school. The nature of the contours here obscures, rather than reveals the wider landscape, as the rising land forms a horizon line at the edge of the playing field. In our view this view should be omitted accordingly. As a whole, beyond the long views along the Railway Line, it is our view that the experienced connection between the Conservation Area and the wider landscape is overemphasised, with much of the Area's setting being made up of built form, as a result of the way in which it is drawn.

3.10 (Setting):

The Appraisal falls further into error through conflation within this section. As a whole, it is hard to follow, as the text spends much of its time describing buildings and features within the Conservation Area rather than its setting, and does not clearly define what the setting of the Conservation Area is.

The following paragraphs appear to constitute a description of the Area's setting as perceived by the Appraisal's authors:

The Graveney Bridge Conservation Area in Graveney, Kent, is a rural environment characterised by its preservation of historic features typical of a marshland village. Bounded by Head Hill Road and Sandbanks Lane, the area consists of open countryside, historic residences, and a landscape that has experienced minimal alteration over time. The narrow lanes pass through fields and hedgerows, linking buildings that reflect Graveney's agricultural and social history...

Together, these buildings, each with their own architectural and historical value, sit within a wider setting of marshland and open space, particularly towards the Graveney Marshes and the South Swale, an area of significant ecological interest. The interplay of built and natural elements, along with the intimate scale of the lanes and houses, gives the Graveney Bridge Conservation Area a distinct sense of place. It stands today as a living patchwork of Kentish heritage, rural tradition, and community continuity.

This description of setting is misleading and inaccurate, given the reality of a Conservation Area whose setting is very substantially formed of built development. The Conservation Area has a built boundary to the north (School Terrace and Murton Place); very significantly to the west (Vinson Close, north of Sandbanks Road; Goosefields, and Four Horseshoes Park Homes); and to the south (further Park Homes and Culmers Terrace). Given that the Conservation Area follows the railway line, much of its remaining boundary to the open countryside is inaccessible (north of Bridge Cottages, and east of the Primary School).

The Conservation Area Appraisal's approach to setting should be clear and well-defined. It should talk clearly and exclusively about the Area's setting, and the contribution it makes to character. It should be clear that the setting consists of a mixture of built development and open countryside, and the ability to appreciate that setting, kinetically, and in views into and out of the Conservation Area, should be properly and accurately outlined. In our view, this Section of the Appraisal requires considerable revision.

Goodnestone Conservation Area

4.8 and 4.9 (The Public Realm and Highway/Significant Views):

It would be helpful to have regard within the description of the Public Realm to the fact that one's experience becomes heavily influenced, in the northern part of the Conservation Area, by the presence of Graveney Bridge. Here, there are open views towards Park Homes and later built form, with scattered, more historic built features. The openness of the land, and the rather functional field boundaries in this vicinity, lead to a reduced sense of quality and coherence, when compared to the well-defined (yet evolving) experience within the village of Goodnestone further south.

When considering views, this issue arises again, with a suggestion throughout that Viewpoint 1, for example, allows an appreciation of "how the built form [of the Goodnestone Conservation Area] transitions into the surrounding rural landscape", with "visual connections between the historic core and its agricultural context". Again, there's a need to have regard to the fact that (in contrast to the Conservation Areas to the north), this is a Conservation Area that draws in significant areas of landscape as well as built form and has, by contrast, some elements of its setting which are built, notably to the north. More nuance is required within Section 4.9 to have regard to this point; the description of Viewpoint 1 at present is not reflective of all of the views identified, and it is not the case that this is a Conservation Area with a well-defined boundary and a wholly rural setting.

In terms of Viewpoint 2, care again is required when describing the interaction between built form and landscape in these views, having regard to the changing nature of the landscape, and the flow of the Conservation Area over this landscape. Of the views identified, not all are 'panoramic' (for example that at the northern end of the Area south of the Four Horseshoes, or that looking south from Goodnestone Lane), and the changing nature of the landscape in terms of its openness needs to be

taken into consideration. The viewpoints listed under Viewpoint 2 require revision, with the two highlighted above requiring exclusion on the basis of their present description (see figure 4).



Figure 4: Significant Views map for the Goodnestone Conservation Area: the views proposed for omission are circled in red.

4.10 (Setting):

There is, again, significant conflation of setting and internal Conservation Area character here. Much of this section refers to areas within the Conservation Area. Three paragraphs focus on Goodnestone Lane, a road set at the heart of the Conservation Area, and there are descriptions of the visual role of the Church within the Conservation Area and of Poplar Hall and other internal features. I am not clear from reading this that the authors have a clear understanding of what constitutes the setting of a Conservation Area. This section requires re-writing in order to be an accurate description of its setting and its role in significance, character and appearance.

Summary and Conclusion: In our view, this section requires revision in light of our detailed comments above. There is a need for this summary to reflect the unusual form of the Graveney Church and Bridge Conservation Areas, and to have regard, as a result, to their appearance within a wider run of built development, as two specific ‘wrap around’ Areas, focused on historic buildings that read within a wider settlement. These points should be recognised within their Key Characteristics, and a clear distinction drawn between the Areas themselves and their settings, which incorporate a mixture of built and landscape features. The Key Characteristics boxes still show a tendency towards conflation between settlement and Conservation Area. A similar issue arises in relation to the Goodnestone Conservation Area, where landscape is referred to, but there is a need for greater clarification as to whether the contribution arises from within or without the Area.

The connection between the Graveney Bridge Conservation Area and the surrounding landscape is, in our view, overstated, given the rather insular experience one obtains on the ground within the Conservation Area.

Management Strategy Sections

“Conservation should not be misconstrued as an attempt to halt progress or prevent change” but the ‘New Development Opportunities’ elements suggest that there are ‘limited’ opportunities for new development within all three Conservation Areas, and an identification that,

Development that impacts the setting of the conservation area or other heritage assets may also alter their cultural and historical significance. The local planning authority is legally obligated to give special consideration to safeguarding the setting of the conservation area, as well as the setting of any listed buildings, during the planning and decision-making process.

This approach is taken to all three Conservation Areas. Clearly, given the peculiar nature of the Conservation Areas, it is difficult to identify areas for redevelopment; Graveney Church and Graveney Bridge in particular are so small and specifically drawn that there is simply no space for additional development. However, it does little to suggest that the document should not be viewed as 'halting progress or preventing change' when the practical reality of the document is that it serves to severely restrict any growth within the settlements of Graveney and Goodnestone. It is not the Appraisal's role, of course, to identify redevelopment opportunities, and sites that might come forward in the future. However a series of appraisals that look to identify almost every possible view available out of these Areas as being important, and the wording that is used in this section, makes it difficult not to read this document as a rearguard action against potential future development.

Summary

Overall, we are of the view that the Appraisal requires revision if it is to be a document of accuracy, robustness and clarity. It is particularly necessary to draw a clear distinction between setting and internal character and appearance, and to have careful consideration to the way that views and setting are described and considered as part of the Conservation Areas' character, appearance and significance.

e. Proposed Conservation Area Boundaries

Two extensions are proposed to conservation areas within this document, one to the Graveney Church Conservation Area, and one to the Graveney Bridge Conservation Area. As a preamble to our comments, I would reiterate the case law and guidance points made above. Extensions to Conservation Areas have to be carefully considered, and enacted only if there is confidence that they genuinely support the 'special' interest' of the Conservation Area. Indeed, as per the judgement in *Trillium*,

"the requirements for designation are not just that the area possess the special interest defined by s69; the area of special interest must be one the character or appearance of which it is desirable to preserve or enhance"

This requirement applies to the area alone proposed for extension; it is not enough to view extensions as comfortably absorbed into the wider special interest of the Area. In our view, as we will show, the proposed extensions plainly fall considerably short of the requirement of 'special interest...which is it is desirable to preserve and enhance', and any proposal to extension could be subject to legal challenge.

Graveney Church Conservation Area

The proposed extension to the Graveney Church Conservation Area is proposed to incorporate a car park, and part of a *reinstated* footpath. The justification for this inclusion appears to be as follows:

- It is enclosed by walls and hedges, and is therefore a 'transitory' space from the Church;
- It incorporates a footpath, 'Odin's Path' which follows the same line as a historic route and connects to other satellite elements of the settlement;
- The entrance to the site is important, as it has an interpretation board.

There are a number of problems with these proposed justifications. The site is a car park, and in visual terms, has a largely neutral visual contribution to make, being an open space with a gravelled surface, a simple hedged boundary, and a metal 5 bar gate. There is nothing *special* about its appearance. It is additionally unclear why being a 'transitory' space, if this is indeed the case, is a factor that allows it to meet the high bar of special interest. It is a functional car park additional to the Church. It provides a means of people parking and moving to the Church, but it is inconceivable that given the strength of statute, this factor could be material in a decision to extend the Conservation Area. Its current form is also an entirely modern creation; as the Appraisal itself notes, until 1921, the area had no hedges, and was previously orchard.

Additionally, it is my view that the weight given to Odin's Path is hugely overplayed. As proposed, the extension incorporates 40 metres of a very long path that passes into the countryside. The majority of that path, and the diagonal path to the southwest would not be within the Conservation Area; designating this small patch of land applies a designation to a vanishingly small portion of the Conservation Area, and does not create a new connection, *given that the start of the path is already at the Area's edge*. In reference to historic routes, reference is made to Good Practice Guide 3 (*The Setting of Heritage Assets*), but the reference is unclear, and it is particularly unclear why this, a document regarding setting, provides justification for the extension of the Conservation Area *itself*.

Overall, the Council need to carefully consider any extension, and clear and robust justification is required for any extension, to ensure that they are of special interest. A modern car park, with ordinary landscape features (a hedge and gate), and a small fragment of a reinstated footpath, plainly cannot meet the stringent requirements for special interest. Were the Council to proceed with adoption, there is no question that the extension would be vulnerable to legal challenge.

Graveney Bridge Conservation Area

The area proposed for extension here is a rough car park to the south of the Four Horsehoes Public House, bounded by a rustic wooden fence installed in the last couple of years, and containing two Park Homes. The justification provided for the extension is as follows:

- Potential archaeological significance, relating to an earlier excavation purported to have taken place on the site;
- The site's contribution to the setting of the Four Horseshoes PH (on the basis that Historic England recognise that 'open spaces' can contribute positively to Conservation Areas;
- The site used to be an orchard, and some boundaries are the same today as was the case then.

Given the high bar for designation, and the quality of the proposed extension as viewed today, it is barely credible that this extension has been proposed. The site is visually of a very poor quality, with Park Home development within the boundary of a form that clearly detracts from the setting of the Four Horsehoes and the wider conversation, and no features, in landscape and boundary terms, of any great age or particular quality. Open spaces of course can contribute to Conservation Areas, but they *must have special interest in their own right* if they are to be proposed for addition to a Conservation Area. Historic England's guidance, and its reference to open spaces within Conservation Areas, clearly did not have rough car parks in mind.

This extension would be extremely vulnerable to legal challenge and would plainly fall significantly short of the high bar for designation. The justification for addition deliberately overlooks the reality of the current condition, and makes no mention of the Park Homes within this area. The extension should not be pursued.

Goodnestone Conservation Area

We have no comments to make on the proposed extension to this Conservation Area. Given its significant age, however, we are somewhat surprised that no efforts have been made to reduce the scale of the Conservation Area, or to rationalise its coverage. The Goodnestone Conservation Area is a peculiar one, because it appears to have little regard to the historic and present form of Goodnestone as a settlement. It is made clear in 4.1 that the settlement focused, today and historically, to the south of the Area as designated, where the 'village' itself is clustered, with the Manor and Church to the west. We have identified through the Tithe Map (see figure 5 below) that the Parish did not extend to the north to cover the northern parts of the Conservation Area; these instead fell within the Parish of Graveney. Indeed, given that there is no built form within the northern part of the Area, and the historic connection between this Area, and the well-defined village to the south, these areas' claim to "special architectural and historic interest" as part of a coherent Conservation Area is very limited, and in our view devalue the Conservation Area as a whole.



Figure 5: Overlay of the Tithe Map of 1840 with the Boundary of the Conservation Area (north to right)

In our view, it would be valuable to do a further assessment of this area to assess whether it would make the Area more robust and coherent to reduce its extent, or to reassess the robustness of its current boundaries and landscape inclusion.

f. Summary of our Position

We would suggest that there is a real need for the Conservation Area Appraisal to be reassessed, and for amendments to be made to the text, and to the proposed extensions. There is a real sense throughout the document that there is a longing to return to a rural past that no longer exists, this is understandable but is important that the character of the Conservation Area today is properly understood and characterised. References to 'rural charm' stand alongside descriptions of the busyness of Seasalter Road, and a general overlooking of the modern development that exists within the context of the three Areas. It is simply the case that the Conservation Areas have to be understood as forming part of a busy and well-developed landscape, and not the rural idyll that the text currently implies.

We would strongly request that the Council look to revise the document on the basis of the comments above, and ensure that it is a robust, accurate and legible document, clear on the extent of the Areas, and the contribution made by their settings. We would also strongly recommend that the extensions to the Graveney Church and Graveney Bridge Conservation Areas are not pursued. The justification provided for these area's inclusions does not stand up to scrutiny, and would plainly devalue the Conservation Areas, and put the Appraisal at risk of legal challenge.